



**Further Responses to the Government's
Consultation on the Crossrail Bill
Environmental Statement**



Further Responses to the Government's Consultation on the Crossrail Bill Environmental Statement

Presented to Parliament by the
Secretary of State for Transport
by Command of Her Majesty
November 2007

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CONTENTS

Introduction	4
Summary of Responses	8
Appendix A: Responses to Additional Provisions 1–4 and Supplementary Environmental Statements 1–4	10
Appendix B: Responses to the Crossrail Environmental Statement Consultation	13

INTRODUCTION

At Third Reading of the Crossrail Bill, the House of Commons will be asked to approve the Bill and, in so doing, give their approval to the building of Crossrail. Under the Environmental Impact Assessment (EIA) Directive¹, decision-making bodies are required to consider the environmental effects of projects when deciding whether or not they should be allowed to proceed. Article 1(5) of the EIA Directive requires that the objectives of the Directive, including that of supplying information, are achieved through the legislative process². In the case of Crossrail, Parliament itself is acting as the decision-making body. Therefore, the Government has made documents³ available to enable Members to consider environmental issues before deciding whether or not to approve the passing of the Bill at Third Reading. Members should consider the relevant documents, including the various volumes of the Environmental Statement, as part of the decision making process. The Government will also arrange for additional time to be allocated for Third Reading to facilitate debate of environmental issues.

The EIA Directive requires (among other things) that:

- a. the public concerned must be consulted and have an opportunity to express its opinions before “development consent” for Crossrail is given; and
- b. the results of information gathered from the relevant authorities and the public must be taken into consideration in the “relevant development consent procedure”.

To that end, the Government invited comments on the Environmental Statement (‘ES’)⁴. Representations received before 10 June 2005 were presented to Parliament in July 2005, prior to the Second Reading of the Bill⁵. This document presents the further representations received by the Department for Transport after 10 June 2005, but before 8 August 2007. A complete list of all the responses covered by this paper is at Appendix A. ***Both documents should be read to obtain an overall picture of the responses received.***

¹ Directive 85/337/EEC as amended by Directive 97/11/EC and, as from 25 June 2005, by Directive 2003/35/EC.

² This is explained further in Chapter 1 of the Main ES and the Introduction to the Government Overview of the Case for Crossrail and Its Environmental Impacts published in November 2007 (Cm 7250).

³ See the Government Overview of the Case for Crossrail and Its Environmental Impacts published in November 2007 (Cm 7250) for an overview of the documentation available.

⁴ In this document, the term ‘Environmental Statement’ or ‘ES’ is used to refer to all the documents listed in the table on the following page unless the context otherwise requires together with the ‘Main ES’. The term ‘Main ES’ is used to refer specifically to the Environmental Statement as originally produced (together with an addendum and its non-technical summary) when the Bill was introduced in February 2005.

⁵ See Command Paper 6603.

This document provides a guide to the main issues raised in the further representations and it is intended to inform debate at Third Reading. It therefore contains a summary of the main themes covered by the relevant responses. It is not intended to provide a detailed analysis of the further representations made (which are reproduced in full in Appendix B). Nor does it seek to respond to the views expressed by those commenting on the ES. However, the Government has produced a separate Command Paper entitled ‘Government Overview of the Case for Crossrail and Its Environmental Impacts’ (Command Paper Number 7250) which explains why the Government considers the Crossrail project worthy of its support, notwithstanding those adverse environmental impacts that will arise as a consequence. That paper also summarises the work done to assess, control and mitigate the environmental impacts of Crossrail and some of the main changes made to the project since the publication of the Main ES. Readers of this document should note that some of the changes to the project have reduced or even eliminated certain of the impacts mentioned in the letters in Appendix B. However, Command Paper 7250 provides no more than an overview of the case for Crossrail and of the environmental impacts of the project. As stated above, Members should consult the documents listed in the table below (in the Section entitled ‘Environmental Statement’), as well as the Main ES, to obtain a fuller picture.

Environmental Statement

A full EIA of the Crossrail project was carried out and a comprehensive ES (referred to throughout as the Main ES) published in February 2005 to accompany the Crossrail Bill. The Main ES runs to nine volumes, together with an Addendum, with many supporting specialist reports. There is also a Non-Technical Summary (NTS), of just over 55 pages, which sets out in non-technical language the main findings of the Main ES.

Since that time, there have been four sets of Amendments of Provisions (‘APs’) to the Crossrail Bill, each of which was accompanied by a supplementary ES (referred to as an ‘APES’). There have also been changes to the project which, although not themselves requiring changes to the Bill powers, altered the significant environmental impacts and thus led to the publication of a Supplementary Environmental Statement (‘SES’). Details of the official title of each document and the date deposited in the Private Bill Office in each House of Parliament is given in the table below. Each SES and APES was accompanied by a NTS deposited on the same date.

Document	Date Deposited	Deadline for comments
Supplementary Environmental Statement (SES1) and accompanying NTS	26 May 2005	8 July 2005
Supplementary Environmental Statement 2 (SES2) and accompanying NTS	18 January 2006	2 March 2006
Amendment of Provisions Environmental Statement (APES 1) and accompanying NTS	18 January 2006	2 March 2006
Amendment of Provisions Environmental Statement 2 (APES 2) and accompanying NTS	9 May 2006	21 June 2006
Amendment of Provisions Environmental Statement 3 (APES 3) and accompanying NTS	7 November 2006	20 December 2006
Supplementary Environmental Statement 3 (SES3) and accompanying NTS	7 November 2006	20 December 2006
An SES3 errata	25 January 2007	9 March 2007
Supplementary Environmental Statement 4 (SES4) and accompanying NTS	16 May 2007	27 June 2007
Amendment of Provisions Environmental Statement 4 (APES 4) and accompanying NTS	16 May 2007	27 June 2007

Copies of these documents, together with supporting specialist reports are available from Cross London Rail Links' (CLRL) website at <http://billdocuments.crossrail.co.uk/>.

Further ES Consultation

Command Paper 6603 (Responses to the Government's Consultation on the Crossrail Bill Environmental Statement) set out in detail the steps taken to publicise the Main ES prior to the publication of that Command Paper in July 2005.

Following the production of each APES and SES, the Government issued notices alerting interested parties to the opportunity to comment on the ES for the relevant Additional Provision or SES. These notices were published in the London Gazette, The Times and the

Standard and in various local papers throughout the entire route (in the case of AP4 and SES4 which dealt with more specific proposals in the Isle of Dogs and Woolwich which did not have route wide effects a more limited circulation was necessary). This information was also available from the Department for Transport and Crossrail websites.

The Department for Transport accepted further comments on the ES as a whole until 8 August 2007 (a date set to allow sufficient time for the preparation of this report, and for it to be considered by Parliament, prior to Third Reading).

In addition to this formal consultation exercise, issues relating to the ES have been raised before the Select Committee on the Crossrail Bill as part of the petitioning process - see the Select Committee's Special Report for further information⁶. Moreover, there have been exchanges of correspondence which, though not formal consultation responses and therefore not covered by this document, raised matters relating to the environmental assessment process for the Crossrail Bill. Representative examples of such correspondence have been included in Command Paper 7250 .

⁶ The First Special Report of the Crossrail Bill Committee, Session 2006-07, on the **Crossrail Bill**, HC 235-I, published on **Tuesday 23 October 2007 - see Chapter 10 in particular.**

SUMMARY OF RESPONSES

The Department for Transport received a further 52 representations between 10 June 2005 and 8 August 2007.

The responses cover a range of issues, some generic to the project, such as the route chosen, others relating to specific locations, such as the siting of shafts. Many of those who commented on the ES also petitioned the Select Committee considering the Crossrail Bill and a number of the issues raised in these responses were also raised before the Committee itself.

The following is a list of significant issues raised in response to the consultation exercise. It is provided to guide the reader to those issues that appear, from the comments received, to be of most concern to those affected by the project. The reader can find the detailed comments in the actual responses themselves, which are set out in Appendix B.

<u>Issues</u>	<u>Description of comments</u>
Alternatives	A large number of responses seek variations to the Crossrail proposals, ranging from very site specific alternatives (such as alternatives to the proposed Hanbury Street shaft) through to entirely different routes, and express the view that these alternatives have not been adequately assessed. Alternatives raised include non-geographic variations on the Bill proposals, such as the use of double-decker trains. A number of responses question the case for a station at Whitechapel.
Compliance with EIA Directive	Concerns relating to the adequacy of the information provided, including the coverage of alternatives, and the consultation process.
Impacts related to traffic and transport	Concerns relating to the likely impacts of additional Crossrail construction traffic and the impact of road closures and loss of car parking spaces. Concerns about potential impacts on pedestrian access routes.
Noise, pollution and quality of life impacts	Concern about the impacts and that these have not been sufficiently assessed.
Ecological impacts	Concerns about potential impacts on navigation channels and water resources. Concerns about impacts on recreational grounds and wildlife.
Heritage and archaeological impacts	Concerns in relation to the alteration or demolition of certain properties with heritage value.
Construction working hours	Respondents seeking different working hours to those assumed for the purpose of environmental assessment.
Human rights	Arguments that the Crossrail Bill and the Hybrid Bill process do not comply with the Human Rights Act 1998.
Interfaces with other projects	Concerns about the relationship between the Crossrail project and other proposals.
Business disruption and job losses	Concerns about impacts on businesses that will have to relocate and job losses.
Compensation	Respondents seeking additional compensation.
Impacts on passengers and freight/rail services	Concerns about impacts on other railway services.
PRM access	Requests for additional measures for Persons of Reduced Mobility (PRM).

Appendix A:
Responses to Additional Provisions 1–4 and Supplementary
Environmental Statements 1–4

	Date of letter
1. Keith Knaggs - Plasmor Ltd	03/06/2005
2. Superlink	07/06/2005
3. JS Parker	08/06/2005
4. Open Spaces Society	12/06/2005
5. RESPECT - The Unity Coalition of Tower Hamlets	13/06/2005
6. The Spitalfields Society	14/06/2005
7. The Spitalfields Society	14/06/2005
8. Spitalfields Community Association	16/06/2005
9. London Borough of Havering	01/07/2005
10. Royal Borough of Kensington and Chelsea	06/07/2005
11. The Environment Agency	06/07/2005
12. Friends of Mike End Park	07/07/2005
13. London Borough of Newham	07/07/2005
14. The Stationery Cupboard	08/07/2005
15. English Welsh and Scottish Railway Ltd (EWS)	08/07/2005
16. Khoodeelaar - Muhammad Haque	08/07/2005
17. Bircham Dyson Bell - Tarmac	08/07/2005
18. Barbara Smith - Crossrail Action Group	08/07/2005
19. The Spitalfields Society	08/07/2005
20. London Borough of Islington	08/07/2005
21. Paddington Residents Active Concern on Transport (PRACT)	10/07/2005
22. City of Westminster	14/07/2005
23. John Hartley	19/01/2006
24. R Dennis	19/01/2006
25. L Lean	21/01/2006
26. The Countryside Agency	13/02/2006
27. S Derek	21/02/2006
28. J Lloyd-Davies	01/03/2006
29. S Walton-SE Bayswater Residents Assn	01/03/2006
30. Paddington Residents Active Concern on Transport (PRACT)	01/03/2006
31. Port of London Authority (POLA)	01/03/2006
32. City of Westminster	02/03/2006
33. Risk Reward Ltd	09/11/2006
34. Father Alexander Sharbrooke	11/11/2006
35. London Borough of Redbridge	11/12/2006
36. The Ramblers Association	18/12/2006
37. London Borough of Camden	18/12/2006
38. The Environment Agency	18/12/2006
39. Sharpe Prichard - Targetfollow	19/12/2006

40. Spitalfields Small Business Association	19/12/2006
41. Woodseer and Hanbury Residents Association	20/12/2006
42. The Spitalfields Society	20/12/2006
43. The Spitalfields Community Association	20/12/2006
44. Royal Borough of Windsor and Maidenhead	02/01/2007
45. South Buckinghamshire District Council	15/01/2007
46. The Environment Agency	25/06/2007
47. Bircham Dyson Bell - London and South Eastern Railway Ltd	27/06/2007
48. Sharpe Prichard - Wood Wharf (General Partner) Ltd	27/06/2007
49. Natural England	27/06/2007
50. London Borough of Tower Hamlets	11/07/2007
51. South West Transport Action Group (SAWTAG)	no date
52. A Wood - Crossrail Action Group	no date

Appendix B:
Responses to the Crossrail Environmental Statement Consultation

Crossrail - Plasmor Ltd - comments on supplementary environmental statement

From: "Keith Knaggs" <Keith.Knaggs@plasmor.co.uk>
To: <crossrail@dft.gsi.gov.uk>
Date: 03/06/2005 17:56
Subject: Plasmor Ltd - comments on supplementary environmental statement

For Attention of Tim Neate, Consultation Manager, Dept for Transport, Major Projects Division 3

These comments relate to Bow Midland Yard West (pages 7-31 to 34) and are made by a director of Plasmor Ltd, a tenant in that rail depot.

1. Loss of this depot whether permanent or for any period longer than a few months would mean a renegotiation of our train service contract which in principle lapses if we lose one of our two depots. For both commercial and operational reasons there can be no guarantee that such a negotiation will be successful - which means that 175000 tonnes a year of concrete products moved by rail are at risk. Unless road transport can substitute, which would be a significant environmental "own goal", 20% of the business of a group employing 350 people would be at risk.

2. Past enquiries have shown how little suitable rail freight depot space is available in the London area. Access to the Blackwall tunnel is critical to this business which supplies a lot of South London and North Kent. The statement in paragraph 7.1.4 that concrete products are for "local distribution to work sites in the East End of London is inaccurate; our catchment area is wider than that. This specific geographical need makes it unlikely that Plasmor will be able to relocate its business from Bow. Job losses across the group would be 20-25 people.

Because Plasmor is the only user significant user of rail freight in its sector, replacement by another supplier will involve a switch from rail to road somewhere in the supply chain. Also, because our production units are in the North, unlike the relevant competition, there will be a small transfer of employment from North to South.

This highlights the fact that loss of rail freight facilities in London discriminates against business located well away from London for whom road transport may not be a feasible alternative.

3. Paragraph 7.1.8 says there is a possibility that relocation would involve materials transported by rail transferring to road but that "it is considered unlikely to occur". No justification for that statement is offered and in our case it is very likely indeed. Paragraph 7.1.10 adds that identification of another rail-linked site is outside the scope of the assessment. The only possible comment is "how convenient". It is simply not possible to assess environmental and employment impacts without considering precisely that issue.

4. It is understandable that Crossrail are unaware of the interrelationship between this depot and other Plasmor activities. It is disappointing that no consideration has been given to the possibility of wider consequences arising from disruption to one element of an integrated supply chain. This brief summary demonstrates that this is a serious matter for us and that the impact assessment relating to Bow Midland West is greatly understated.

Keith Knaggs
Plasmor Ltd
Knottingley
West Yorkshire

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SUPERlink

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7 June 2005

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Great Minster House 76 Marsham Street, London SW1P 4DR

Bob Kiley, Commissioner
Transport for London
Windsor House, Victoria Street, London SW1

CROSSRAIL ENVIRONMENTAL STATEMENT – REVIEW OF SUPERLINK

Dear Sirs,

This is a supplement to our formal response to the Crossrail Environmental Statement (ES). It responds to your report “SuperCrossrail and Superlink Update Report” which was placed on your website 26 May 2005. It should be read in conjunction with our response of 17 May 2005, and our FOI letter of 3 May 2005. This letter sets out our general comments. Our detailed response to the text of the report is attached.

We continue to hold the view expressed in our comments of 17 May, specifically that CLRL has not systematically evaluated alternatives to the standard normally applied for this sort of the project or as required by legislation and good practice. The ES does not comply with the EIA Directive requirement to “present the options that have been considered and the reasons for the choice, taking account of environmental factors.” While the CLRL ES indicates that various alternatives were considered, the work was not done systematically or to a professional standard that would normally be expected for a project of this magnitude. The “SuperCrossrail and Superlink Update Report” is no different. There is no sensitivity analysis, no environmental impacts analysis, and no operational modelling of the alternatives. Many statements are made with respect to these disciplines but there is no substantiation.

The report does not appear to comply with the principles of NATA. Schemes are to be assessed according to five criteria: economy, safety, accessibility, integration and environment. The report does not make objective comparisons between Superlink and Crossrail under any of these criteria, nor does it identify any fatal flaws in Superlink. It



therefore gives no basis to reject Superlink as an alternative. Although CLRL specifically told us that the report was being prepared consistent with NATA, this is not the case.

CLRL says it has been advised by “a number of leading experts” who have identified potential operational difficulties in the Superlink scheme, but we are not told who they are. The view of an unidentified expert, unsupported by any analysis, is worthless. Many of their criticisms apply equally to CLRL’s own Crossrail scheme, and even more severely to the Thameslink 2000 scheme, currently being promoted by Network Rail with Government support. A balance must be struck between reliability and commercial viability. We (and our own in house “leading experts”¹) are satisfied that Superlink can operate to a high level of reliability. However, we are *not* satisfied that Crossrail enables operation of the assumed additional West Anglia services, which are crucial to their business plan.

We provided DfT with a strategy for phasing implementation of Superlink. This is a form of sensitivity analysis, and shows that, even if only 12 or 20 trains per hour (tph) operate through the central section, the financial and economic case is far more attractive than for the CLRL Bill scheme with 20 or 24 tph. We have also prepared an evaluation of the Crossrail business case, if, as we believe, it is not possible to run the additional West Anglia services. This pushes the cost/benefit ratio below the Treasury hurdle rate, and the scheme is no longer value-for-money even in the broadest economic terms. Superlink is clearly superior to the Crossrail bill scheme if capacity through the central tunnel is constrained. CLRL should have done this type of sensitivity analysis itself.

Statements are made suggesting that Superlink is not compatible with regional planning policy. This is not consistent with the view expressed to us by regional planning officers and other stakeholders. In the view of one noted industry expert, “The environmental criticism of Superlink is superficial and perverse. If major improvements to the rail network are not achieved to serve East of England and the South East it will require much more emphasis on car travel, with the necessity to increase road capacity by highway construction. The environmental costs of these losses need to be balanced against the much more considerable savings in environmental quality resulting from a system of transport which has much less impact on the environment than its alternative.”²

The review of Superlink traffic forecasts by CLRL also displays a lack of understanding of the Superlink business plan, which was provided to you in July 2004. Did the authors of the report have full access to the Superlink model? It is unfortunate that you did not allow the people preparing the report to discuss the methodology with us, as this could have avoided misunderstandings that substantially undermine the validity of their work.

There are also some serious technical errors; for example the authors of the report have understated the current rail market on the Northampton and Cambridge routes by about half. For some reason they used census data on trip patterns which is known to be highly unreliable, rather than more reliable rail industry CAPRI data. They have incorrectly applied the rail industry forecasting method, PDFH. They have also suggested that the traffic growth forecasts are not credible, yet they are consistent with CLRL’s own forecasts for traffic growth with the Crossrail scheme. Using their approach, the Crossrail scheme would certainly not be worthwhile either!

¹ Chris Stokes, former Deputy Director Network Southeast and John Prideaux CBE, former Managing Director InterCity.

² Drummond Robson, former Chair, Royal Town Planning Institute London Branch.



SUPERlink

From analysis of the capital cost breakdown provided by CLRL, it is clear that their figures for many segments, including the new lines from Canary Wharf into Essex and from Heathrow to Woking, are consistent with our own estimates. However CLRL has included additional works, which are not required, plus large additional contingencies for which no justification is provided. For example, they seem to have allowed for four-tracking of the Staines-Reading line (they have refused to give us an explanatory narrative for this). In fact, we are simply proposing to restore services to a frequency that was operated in the recent past, so no work should be required.

We also want to make clear that Superlink Limited was formed to promote ways to make the Crossrail scheme viable. We do not see ourselves as “competing promoters”, at this time. Although we have acquired the intellectual property rights associated with the SuperCrossrail scheme, the Superlink scheme is substantially improved and different in key ways. We think the existing hybrid bill can be made compatible with the Superlink proposals, without re-starting the whole process. However, the longer changes are delayed, the more it will cost in the long run.

In conclusion, the CLRL Review of Superlink supports our view that CLRL has not used the environment assessment and NATA processes to consider reasonable alternatives, but only to justify an early decision to build the current scheme with as few changes as possible.

Yours Sincerely

John Prideaux
Chairman



Detailed Response from Superlink on the CLRL Report “SuperCrossrail and Superlink Update Report” published 26 May 2005

General Notes:

This note follows the same order as the CLRL report, and for ease of reference all CLRL text and tables are reproduced in *Sans serif (Arial)* font. Responses by Superlink are presented in *Serif (Times)* font.

These follow the same order as the CLRL “SuperCrossrail and Superlink Update Report”.

1	INTRODUCTION	4
2	SUPERCROSSRAIL	6
	CENTRAL LONDON ALIGNMENT	8
	Engineering Design	8
	Environmental Impacts	9
	Transport Impacts.....	9
	SUPERCROSSRAIL BRANCHES	11
	Engineering Design	11
	Environmental Impacts	11
	Operational Feasibility	12
	Impact on Planning Policy	12
	Construction Cost.....	13
	Conclusions	14
3	SUPER LINK AND DIFFERENCES WITH SUPERCROSSRAIL	14
	SUPERLINK – OPERATIONAL ANALYSIS	16
	Background	16
	Train Service Operation	17
	Rolling Stock Design	21
	Operations Conclusion	22
	SUPERLINK AND PLANNING POLICY	22
	Background	22
	The Superlink Planning Context	23
	Sustainable Communities Plan Growth Areas.....	24
	Other Policy Areas in Regional Guidance.....	26
	Planning Policy Conclusion	28
	SUPERLINK – PATRONAGE AND REVENUE FORECASTS	28
	Background	28
	Superlink Forecasts	28
	Summary of Superlink Forecasting Methodology	30
	Alternative Revenue Forecasts and Sensitivity Testing	31
	Patronage and Revenue Conclusion	33
	SUPERLINK – CONSTRUCTION COSTS.....	34
	SUPERLINK - CONCLUSIONS	35

Detailed comments follow:

1 INTRODUCTION

1.1 In 2002 a whole-route alternative to the Crossrail project, called SuperCrossRail, was proposed by GB Railways. In December 2004 a variant of this scheme, known as Superlink, was put forward by Superlink Ltd.



In fact, the SuperCrossrail scheme was first proposed to the sSRA in January 2000, in response to an invitation from the sSRA to suggest ways to relieve congestion at Liverpool Street, Paddington and Waterloo. The CLRL report actually refers in the bibliography to a proposal from GB Railways dated 2001.

*1.2 As part of the development of the Crossrail project, Cross London Rail Links Limited (CLRL) considered a wide range of options. This process is outlined in Chapter 6 of the Crossrail Environmental Statement, published in February 2005 (CLRL, 2005). All the options considered by CLRL were appraised in a manner consistent with the Government's New Approach to Appraisal (NATA). **The purpose of NATA is to provide a consistent framework for comparing different transport options for solving the same problem and, in so doing, to inform decisions about the selection of the appropriate option.** [emphasis added]*

CLRL acknowledges “The purpose of NATA is to provide a consistent framework for comparing different transport options for solving the same problem and, in so doing, to inform decisions about the selection of the appropriate option.”

However CLRL’s report does not actually do this. The report identifies potential weaknesses in the SuperCrossrail and Superlink scheme without ever acknowledging that many of the same criticisms apply to the Crossrail Bill Scheme, potentially to a greater degree. Many subjective comparisons are implied but not substantiated. There are no objective quantified comparisons.

1.3 The use of a NATA-consistent approach to appraising options meant that the performance of each option was assessed against five broad criteria – Economy, Safety, Accessibility, Integration and Environment. Due to the type of transport project under consideration with Crossrail – namely a high frequency metro service within a densely populated conurbation – particular interest was taken in a number of specific criteria:

- *The operational feasibility of the options - considered under the “Economy” objective within the “reliability” sub-objective.*
- *The ease of construction, including identifying serious risks to securing scheme consent – considered under the various “Environmental” sub-objectives.*

1.4 All options considered by CLRL initially underwent a thorough high-level appraisal, in order to identify those that were most promising and merited more detailed development. In the case of the SuperCrossRail and Superlink proposals, CLRL carried out an extensive range of studies to supplement the information provided to CLRL by GB Railways and Superlink Ltd. These included establishing outline engineering feasibility, assessing the main environmental impacts of the proposal and estimating construction costs.

1.5 In the case of SuperCrossRail, analysis of the potential environmental impacts of the scheme showed that, in the central area, there would be major issues surrounding the feasibility of construction and that, in the outer areas, it was likely that there would be significant difficulties in obtaining consent for major works in the Green Belt. CLRL also considered that there would be major operational difficulties associated with the scheme.

1.6 In the case of Superlink, the review led CLRL to conclude that the proposal would have similar difficulties to those associated with the earlier SuperCrossRail scheme. The number of proposed routes, multiple starting points and long distances that trains would have to travel, would be operationally incompatible with the requirement to provide a reliable, high frequency service through central London. In addition, there are many environmental and consent risks associated with the scheme.

1.7 Given these problems, CLRL concluded that neither SuperCrossRail nor Superlink represented potential solutions and they were not appraised further.



1.8 This report provides additional information on both of these proposals and the reasons for their rejection, over and above that set out in section 6.3 of Chapter 6 of the Crossrail Environmental Statement.

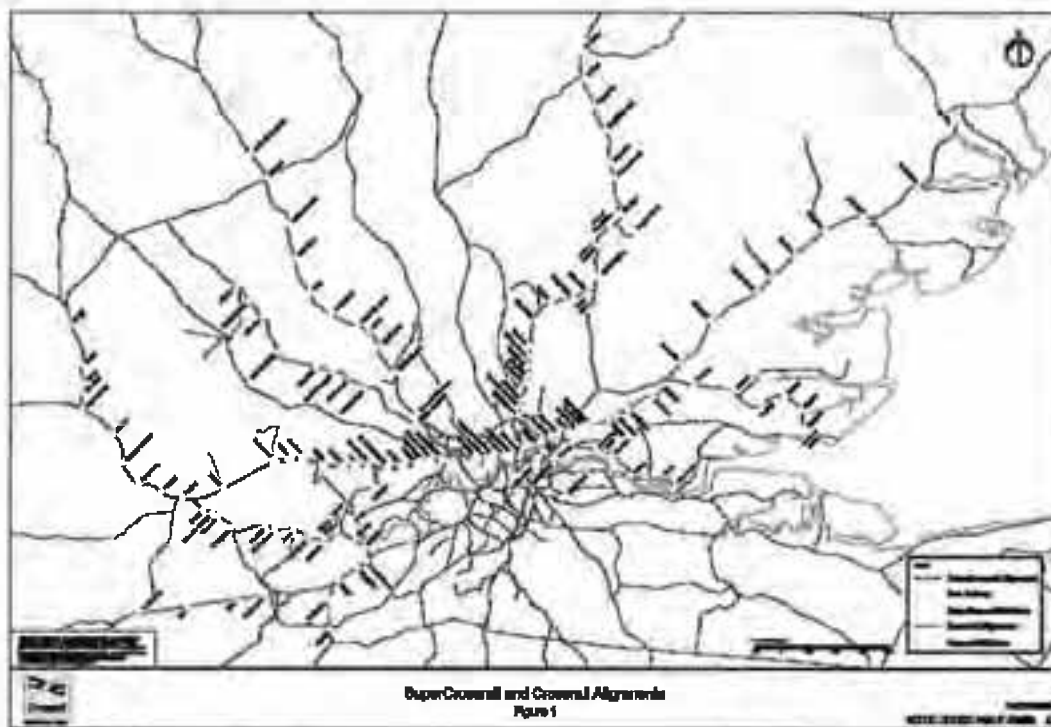
Each of the above points is addressed below, in response to the detailed paragraphs from the CLRL report.

2 SUPERCROSSRAIL

Superlink is based in part on SuperCrossrail but has major differences. SuperCrossrail was an early concept while Superlink is the result of more thorough, systematic review of alternatives both east and west of London. Superlink supercedes SuperCrossrail, and presentation of SuperCrossrail as if it were still being proposed is unnecessary and perhaps misleading. However, many of CLRL's criticisms of SuperCrossrail are also implicitly or explicitly directed at Superlink as well. For the record, we respond to the criticisms of SuperCrossrail as well as those of Superlink.

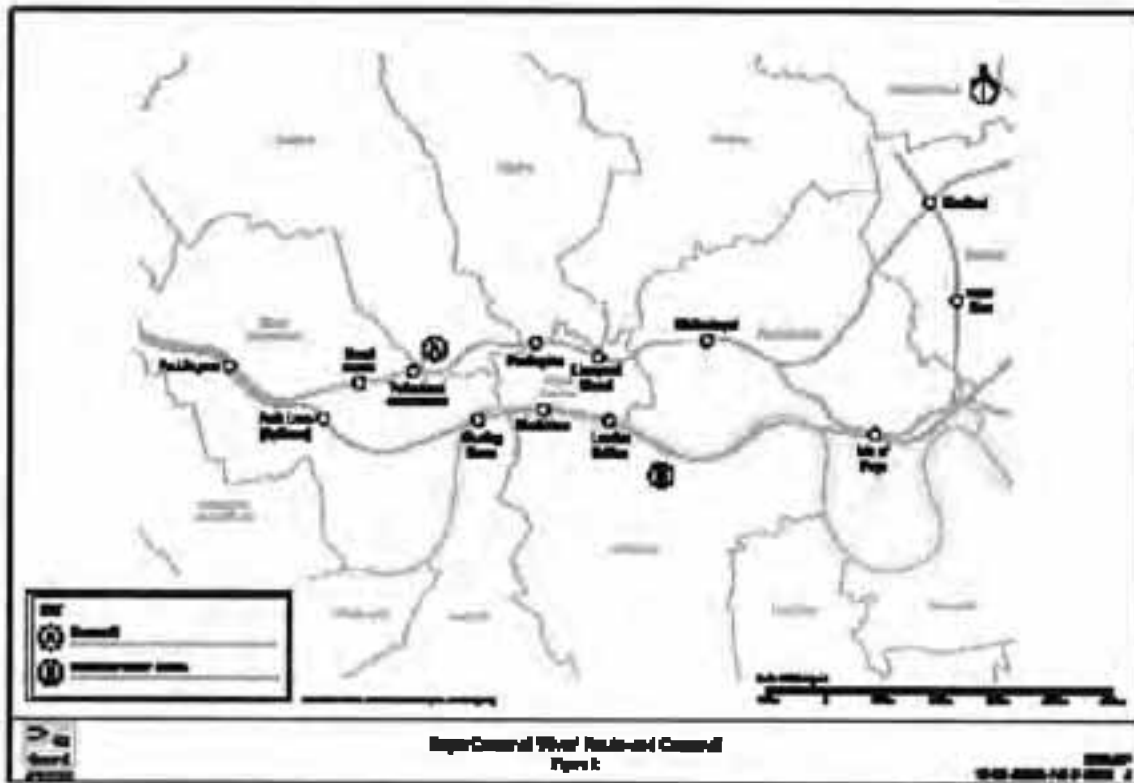
2.1 The SuperCrossRail proposal was made by GB Railways in a document dated 11th February 2002 (GB Railways, 2002). It is an ambitious scheme that combines services from a range of long distance commuting destinations with metro-style services predominantly serving the Greater London area. The scheme envisages fast services operating from Basingstoke, Guildford, Oxford, Milton Keynes, Cambridge, Ipswich, Stansted and Southend Victoria, while metro services would run from Aylesbury, Slough, Harlow and Tilbury. The routes proposed are shown in Figure 1. Although many of these routes would use existing surface railways, substantial new cross-country railway construction would be required around Heathrow Airport and to the east and north-east of London.

In fact, the SuperCrossrail scheme was first proposed to the sSRA in January 2000, in response to an invitation from the sSRA to suggest ways to relieve congestion at Liverpool Street, Paddington and Waterloo.





2.2 Within central London, SuperCrossRail would also use a new west-east tunnel similar in design to Crossrail but on a more southerly alignment via the River Thames, with stations serving the north and south banks of the river at Charing Cross, Blackfriars and London Bridge. This alignment, which is shown in Figure 2, would also serve the Isle of Dogs.



As discussed with Keith Berryman, it was always understood that the route through central London was an alternative to the safeguarded route, and that the choice of central London route was in principle independent of the SuperCrossrail proposals for a regional network.

2.3 Since the proposal document offered little in the way of design definition, CLRL carried out design work to a level sufficient to allow a high-level assessment of the proposed scheme to take place. The assessment focused on the proposal's engineering feasibility, construction methodology and outline environmental impacts, as well as considering construction costs and risks.

2.4 Additional work was also carried out by CLRL to identify the planning impacts of the project and, in particular, the risk attached to acquiring large amounts of land in the Green Belt to construct the new stretches of surface railway. Work was also undertaken to assess the operability of the SuperCrossRail proposal and its likely contribution to securing relief to overcrowded sections of the Underground network in central London.

CLRL has provided no evidence that any serious work or analysis was done to identify planning impacts, risks of using land in the Green Belt, or operability of the scheme. Figure 1 indicates that most of the new line would be either in existing motorway corridors, or through brownfield land, and that there would be no major impacts on existing settlements, or identified SSSIs or AONBs. Compared with CTRL, impacts on the built and natural environment appear likely to be modest.



CENTRAL LONDON ALIGNMENT

Engineering Design

2.5 The design development of the central London section of SuperCrossRail identified a number of issues:

- [1] Stations under the river could be constructed either by tunnelling or by digging down through the river bed using cofferdams.
- [2] Use of bored tunnel construction method for stations would increase construction costs, lengthen the construction programme and require larger worksites and permanent land-take on the banks of the Thames. Station tunnels would be created by enlarging the running tunnels made by tunnel boring machines. This would be a risky operation given the difficult ground conditions under the Thames.
- [3] Cofferdam station construction on the River Thames would provide better worksite access and space for ticket halls but would have significant environmental impacts and, given the likely scale of environmental objections that might result, would be problematic.
- [4] Riverside locations for station entrances and ventilation structures would be difficult to identify. Although locating sites for such activities is problematic within the whole of central London, there would be particular problems on the sides of the River Thames in central London where high demand for property has resulted in there being few vacant sites or areas available for redevelopment. This problem would be greatest if the bored tunnel construction method was adopted because ticket halls would need to be sited near the embankments.
- [5] Passenger routes from street to the platforms would be very long because of the depth of the alignment under the River Thames (around 35 metres at Blackfriars) and the length of the passageways under the Thames from the north and south sides. Access for emergency services would be similarly elongated.

All of these points are correct, in the abstract, but most of the points also apply to the scheme being proposed by CLRL in the current bill. CLRL should be comparing SuperCrossrail/Superlink impacts with those of the proposed scheme. This has not been done.

Addressing each bullet point in detail (numbering has been added for reference purposes):

[1] Agreed – this is a statement of fact. Stations under the river can be constructed using either open cut or bored tunnel methods. The open cut option is not feasible for the safeguarded scheme.

[2] A subjective comparison is implied, but it is not clear whether CLRL is stating that bored tunnel methods would be more expensive than open cut, or whether it would be more expensive than the Bill scheme which also uses bored tunnel methods. The Crossrail Bill scheme requires station tunnels to be enlarged in central London, potentially affecting hundreds of buildings with subsidence or collapse. The experience building Heathrow Express shows that tunnelling is never entirely risk free in this sort of location.

[3] Agreed. In discussions in 2002, Crossrail engineers suggested open cut (cofferdam) construction would be appropriate for part of the Blackfriars station. Other stations would be bored tunnel.

[4] Locations for riverside vent shafts and station entrances were identified by CLRL architects in 2002, and plans were prepared. In fact, CLRL has had difficulty identifying suitable sites for shafts and station entrances for the Crossrail Bill scheme. While some locations were safeguarded in 1992, none are without problems. Construction sites will



occupy many of central London's few open spaces, including Hanover Square and Finsbury Circus. Other locations such as the worksite in Spitalfields were not in the safeguarded scheme and will have major impacts. Station entrances will discharge passengers onto some of London's most overcrowded pavements. There is already severe overcrowding of street pavements around Bond Street, Farringdon, and Moorgate. Crossrail is likely to make this worse. One advantage of the river alignment is that it can connect into riverside walkways, which generally have spare capacity. Again, a subjective comparison is implied but not made explicitly with the bill scheme.

[5] Again a subjective comparison is implied but not actually made. CLRL has done no analysis of how walking distances would compare with those of the Crossrail scheme, and whether this is critical. Some of Crossrail's proposed stations will also be very deep, 30m from street level to platform at Tottenham Court Road and Farringdon, 32m at Bond Street, and 37m at Liverpool Street. There would also be some very long interchange subways.

Environmental Impacts

2.6 Analysis of the engineering feasibility of SuperCrossRail indicated that there would be significant difficulties with construction of stations in the central area. Cofferdams would be problematic because of environmental impact on the River Thames. The Environment Agency considered that, because each cofferdam would act as a partial dam, the hydraulics of the river would be altered and the likelihood of flooding upstream increased.

2.7 The bored tunnel method of constructing the central area stations would need larger riverside work-sites to be identified, as the cofferdams would be not be available to serve as these. There would also be much greater permanent land take on the sides of the Thames as the station ticket halls would have to be sited there rather than within the cofferdam structures.

Riverside work sites need be no larger than are required for the Crossrail Bill scheme. Materials could be removed by barge or by road, whereas the Bill scheme requires worksites in Mayfair, Soho, and the City that can only use road access.

Permanent land take need be no more than will be required for the Crossrail Bill Scheme.

Transport Impacts

2.8 A major objective of the Crossrail project is to reduce crowding on the London Underground network (CLRL, 2005 sections 1.1.5-1.1.6). Crossrail would achieve this objective by providing an attractive alternative means to the Underground of reaching a wide swathe of central London between Paddington and Liverpool Street. This would result in crowding relief to sections of a range of London Underground lines including the Bakerloo, Central, Jubilee, Piccadilly and Circle/Metropolitan lines.

2.9 GB Railways claim that SuperCrossRail would also provide relief to the Underground network, particularly the Victoria, Central and Bakerloo lines. However, examination of the SuperCrossRail proposal suggests that it would have a much lower impact on crowding relief on Underground lines, particularly those serving the West End. This is because the SuperCrossRail proposal contains only one definite station within this area and this would be located on its periphery, on the River Thames near Embankment station. The SuperCrossRail plans also show a further optional station on the edge of Hyde Park, close to Park Lane. However, this is also poorly located for access to most parts of the West End.



CLRL has provided no evidence to suggest that the River Alignment is not an equally effective, and possibly more effective approach at relieving congestion. They have not used the models that they have available to do this. Congestion can be relieved either by directly duplicating a line, or by opening a new route that will attract many passengers. The Jubilee Line Extension effectively relieved the Central Line from Stratford, as many passengers from Essex to the West End, South Bank and Westminster use it instead. While the Bakerloo, Central and Victoria Lines are congested through the West End, many passengers on these lines are not travelling to the West End but must currently travel through it. The proposed river alignment can relieve congestion on these lines by diverting through passengers away from and around the West End, rather than through it. While the Crossrail bill scheme proposes to essentially duplicate the Central Line between Paddington and Liverpool Street, the River Alignment would provide an alternate route, serving a different although overlapping corridor.

Arguably, the pavements in the heart of the West End, especially at junctions around Bond Street and Tottenham Court Road, are already so crowded that it is undesirable to encourage more pedestrians to travel into these areas. CLRL does not appear to have done any analysis of this.

2.10 The promoters of SuperCrossRail argue that their proposal would achieve crowding relief on the London Underground network because passengers would be able to walk from the stations to their final destinations within central London. However, although the southern parts of the City of London would be within walking distance of the Blackfriars and London Bridge stations, the distance from the Charing Cross SuperCrossRail station to areas such as Holborn, Tottenham Court Road and Soho would exceed 1km. This is considerably further than most commuters are willing to walk on a daily basis.

Again a subjective comparison is implied without any comparative data. Many central London destinations (including TfL and CLRL headquarters, and the City Hall) would be more than 1km from the stations in the Crossrail bill scheme. There is no analysis as to whether the stations on the river alignment would, on balance, be within walking distance of more or less central London workplaces than the Bill scheme.

2.11 Consequently there is a strong possibility that SuperCrossRail passengers would seek to interchange onto the Underground to reach their final destinations in central London. Analysis of potential interchange points between the Underground and SuperCrossRail suggested that the only realistic locations would be Embankment and London Bridge. However, at both these stations, the Northern line is forecast to be operating well above its Planning Guideline Capacity by 2016. As SuperCrossRail would provide no relief to the Bank branch, and only minimal relief to the Charing Cross branch, it is likely that this would exacerbate levels of overcrowding on what are already some of the most congested sections of the Underground.

It is not a strong possibility but a certainty that some SuperCrossrail passengers would interchange on to the Underground and the same is true of the Crossrail bill scheme. However, there is no basis to conclude that this problem would be more severe with SuperCrossrail, indeed as it follows a somewhat different alignment, there is an *a priori* case for arguing that less interchange would be required.



CLRL's own data shows that many Crossrail passengers are expected to interchange at Tottenham Court Road, one of London's most severely congested stations, and connect on to and worsen congestion on the Northern Line.

CLRL complains that the river route would not relieve congestion on the Northern Line, yet it is not clear whether the Crossrail Bill scheme would either. Superlink would provide material relief to the Northern Line by diverting passengers who would otherwise travel by National Rail services to Waterloo and Euston, who could instead travel directly to their destination.

It should be noted that the CLRL comments with respect to congestion relief are directed at SuperCrossrail. CLRL's review of Superlink (see later) does not contain any criticism on Superlink on the grounds of congestion relief. Superlink has demonstrated how its scheme is likely to be more effective at relieving congestion than the Crossrail bill scheme.

SUPERCROSSRAIL BRANCHES

Engineering Design

2.12 Analysis of the outer areas also identified a number of significant issues:

- An additional 7km of tunnelling would be required compared to the Crossrail proposal with consequentially increased costs and risks.*
- Additional property and farmland would be required, adding to the property costs.*
- Additional working sites for portals, shafts and step-plate junctions would be needed in what are largely residential areas of East London.*

Finding these sites would be challenging and create additional consultation and approval risks.

Again CLRL makes a subjective comparison without any comparative data.

The Crossrail Bill Scheme proposes construction Whitechapel Station, and the Shenfield and Abbey Wood branches that have significant costs and environmental problems that would be avoided with the SuperCrossrail scheme.

SuperCrossrail would require construction of approximately 45km of new surface railway, implying a permanent land take of approximately 1000 acres. Virtually none of this land is urban or available for intensive development, and property costs are likely to total £100 million or less. These costs are, in any case already included in the Superlink estimates, based on the experience of CTRL and other rail projects.

Environmental Impacts

2.13 In the outer areas, SuperCrossRail's proposed links to Shenfield and Harlow would require the construction of new railway lines through the Green Belt to the east and north-east of London. The proposal also identifies the option of constructing new stations on this new rail alignment at Barkingside and Hog Hill, as well as a new depot at Hog Hill.

2.14 As well as the difficulties in obtaining consent for major works in the Green Belt (discussed below in section 2.17), CLRL concluded that there would be problems of visual intrusion and noise associated with the construction and operation of up to 40km of new railway in open countryside.



SuperCrossrail proposes construction of 70km of new railway. Of this, approximately 25km is in tunnel, 22km along existing motorway or rail corridors, and only 22 km through “open” country. While noise and visual intrusion would certainly be matters of concern, CTRL shows how these can be addressed. Indeed, SuperCrossrail should be less noise and less visually intrusive as it would operate with slower trains, only 100 mph compared with the 185 mph or faster trains operating on CTRL.

Operational Feasibility

2.15 The high level assessment of the SuperCrossRail proposal identified a range of operational difficulties. In particular, the fact that there would be up to seven destinations at each end of the network, many of which would require joint running with other operators, would cause severe problems in maintaining service reliability through the central London section. In addition, with SuperCrossRail, a perturbation in service on one part of the network could quickly affect a large number of other national rail routes into London.

Again, CLRL makes a subjective comment without any objective analysis. GB Railways identified seven possible destinations at each end of the network, but always made clear that not all of them would be viable. All junctions with existing railways are grade separated and have space to hold trains so that perturbations can be contained on the branches, minimizing impacts on the core system.

There are many precedents for this type of system. The Munich S-Bahn network operates successfully, with 6 destinations at each end of the network and 30 trains per hour running through the central cross city tunnel.

Indeed, the Thameslink 2000 scheme, being promoted by Network Rail through a Transport & Works order, assumes operation to *eleven* destinations South of London.

The Crossrail Bill Scheme implies inter-working with surface operators, including freight. CLRL has as yet not demonstrated how they will fit their Shenfield services into the congested Great Eastern Main Line, which is shared with intensive long distance passenger and freight operators.

2.16 In addition, passengers waiting at the central stations for specific services – possibly the sixth or seventh train in the queue – could crowd and eventually block the platforms. There is a strong possibility that the SuperCrossRail stations would need to be built larger than those proposed for Crossrail in order to counteract this problem. No allowance for this additional cost has been made in the SuperCrossRail cost estimate.

This problem may apply more severely to CLRL’s own scheme. CLRL’s current plans are for 4 trains per hour to operate to Heathrow, out of 24 trains per hour. This means that airport passengers will often have to wait for the fifth or sixth train in a queue. Airport passengers are likely to have luggage and could become a serious obstacle on central London platforms. SuperCrossrail proposes 10 of 24 trains per hour to run via Heathrow, so airport passengers can always board the second or third train.

Impact on Planning Policy

2.17 SuperCrossRail would require the construction of new railway lines and a depot on Green Belt land in east London and Essex. PPG2 (ODPM, 1995) states that the fundamental aim of the Green Belt is to prevent urban sprawl and its key feature is



“openness”. In order to deliver this, PPG2 defines the type of development appropriate in the Green Belt and this definition does not include infrastructure development. PPG2 does acknowledge that, in exceptional circumstances, inappropriate development can be justified in the Green Belt and the Essex and Southend-on-Sea Structure Plan (Essex C.C., 2001) recognises that transport schemes can, exceptionally, be justified in the Green Belt. However, the length of railway, possible stations and depot envisaged by SuperCrossRail would involve very substantial land take in the Green Belt and would adversely affect the openness of the Green Belt land across a large area. Given the extent of the conflict with planning policy it is highly unlikely that such a substantial intrusion into the Green Belt could be justified.

Again, CLRL makes a subjective statement without any evidence of objective analysis. This judgement was apparently made by CLRL’s project team without any consultation with local stakeholders or planners. As noted above, about half of the new surface railway would be built along existing road and rail corridors, and total land take would be in the order of 1,000 acres.

It is the view of our team, which includes planning professionals,³ that CLRL’s environmental criticism of SuperCrossRail (and Superlink) is superficial and perverse. If major improvements to the rail network are not achieved to serve East of England and the South East, it will require much more emphasis on car travel, with the necessity to increase road capacity by highway construction. The environmental costs of Superlink need to be balanced against the considerable savings in environmental quality possible with a system of transport which has much less impact on the environment than its alternative.

The Green Belt needs to be addressed with care but proposals for a new railway like Superlink should not be rejected without balanced assessment. Plainly the impact would be much less than for example that of the M25, itself built through the Green Belt. Superlink will certainly reduce the pressure to widen and extend it and connecting roads.

By contrast the present Crossrail scheme takes little account of the relationship between London and the wider East and South East Regions.

Construction Cost

2.18 CLRL estimated that the construction cost of the SuperCrossRail proposal would be £18.4bn at first-quarter 2002 prices. Although only high level estimates could be made of the cost of some elements of the proposed scheme, such as line-wide rail systems, because of the limited development of the SuperCrossRail proposal, CLRL used a similar pricing policy philosophy to that employed for the safeguarded Crossrail route to generate an estimate. On a similar basis, the Crossrail hybrid Bill scheme is estimated to cost £10.3bn, meaning that the SuperCrossRail proposal would be around 80% more expensive.

2.19 A more detailed breakdown of the construction cost of SuperCrossRail is contained in Appendix 1.

We have commented on CLRL’s construction cost estimate in our letter of 3 May 2005. CLRL has refused to give us any further explanation of what is meant to be included in each item in their estimate, indeed they deny that they have any information as to what is

³ Drummond Robson is former Chairman of the Royal Town Planning Institute, London Branch, and Secretary of the London Planning and Development Forum.



included. However, it appears to include many elements that are not required for example adding additional tracks where there is spare capacity on existing lines, and building new lines that are not included in the SuperCrossrail scheme.

Conclusions

2.20 Given the issues identified in its analysis of the SuperCrossRail proposal, CLRL concluded that SuperCrossRail was not a feasible option and did not merit further analysis. This decision was based on four major areas of concern:

- *The cost of the scheme. At £18.4bn it is around 80% higher than Crossrail.*

Our estimate is that costs would be about £9.7 bn, or about 25% higher than Crossrail.

- *The environmental difficulties surrounding the scheme, particularly the construction of cofferdams in the River Thames and the difficulty of securing consent for the major construction works in the Green Belt.*

Cofferdams are not required in the river. CLRL has given no evidence to support its view that it would not be possible to obtain consent for the works in the Green belt.

- *The operational difficulties surrounding the impact of the high number of branches and inter-running with other services on the reliability of the service.*

Crossrail will suffer similar operational difficulties. We believe either scheme could be operated to an acceptable level of reliability.

- *The lack of congestion relief to the most overcrowded sections of the London Underground network in central London.*

SuperCrossrail will relieve the underground, potentially more than Crossrail.

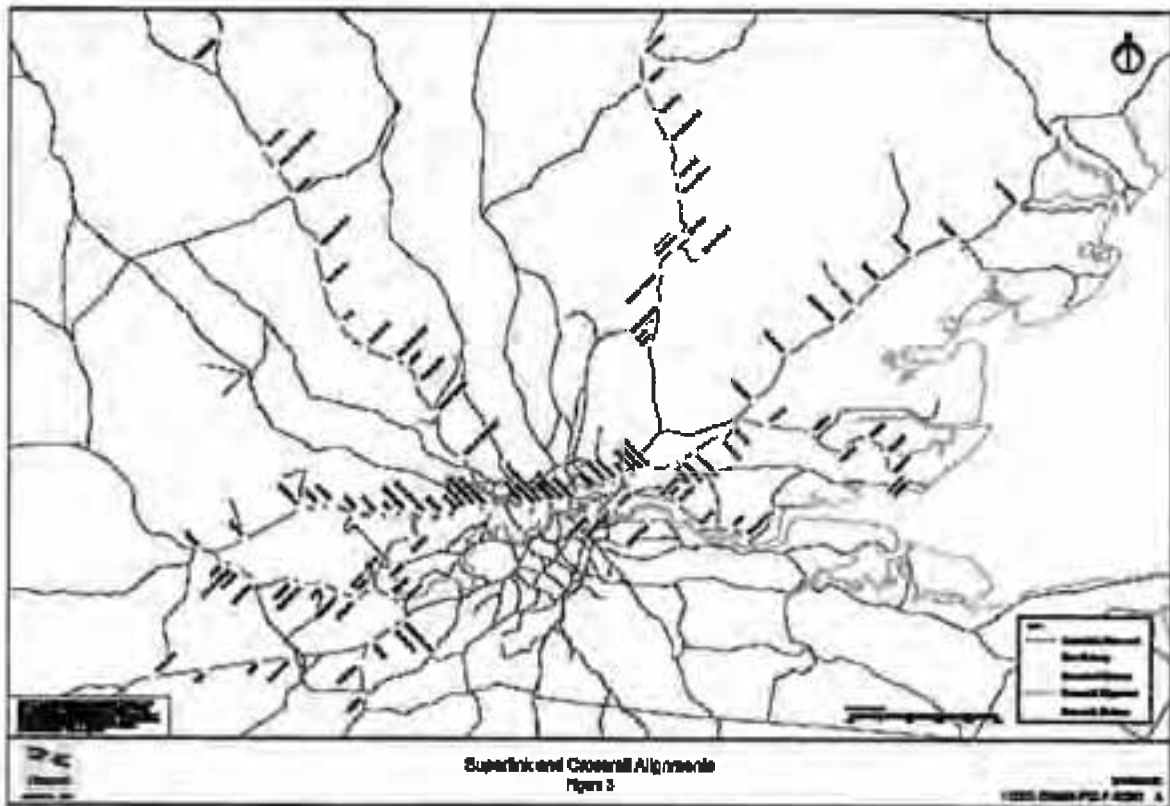
3 SUPER LINK AND DIFFERENCES WITH SUPERCROSSRAIL

3.1 In December 2004 a variant of the SuperCrossRail scheme, known as Superlink, was published by Superlink Ltd (Superlink Ltd, 2004).

Superlink Limited actually provided details of the scheme to the Department of Transport, who passed it on to CLRL, in July 2004.

3.2 Like SuperCrossRail, Superlink proposes to join, by means of a new east west tunnel across central London, a number of existing medium and longer distance regional routes, currently terminating at Euston, Liverpool Street, Fenchurch Street, Waterloo and Paddington. In total, this scheme would comprise a 550km network linking the following terminal points - Northampton, Reading, Basingstoke, Guildford, Cambridge, Ipswich, Southend Victoria and Tilbury. Superlink's proposed route is shown in Figure 3. The promoters of the scheme also suggest options to extend the system to Ebbsfleet and to continue services beyond the core network to the south and east coasts. These additional elements to the scheme are not shown in Figure 3.

3.3 Superlink proposes to use the alignment safeguarded for Crossrail, with the exception of the station at Whitechapel and the branch to North Kent, which would be omitted. Like SuperCrossRail, Superlink would require longer tunnels in the east, with a portal at Barkingside and construction of new rail routes from there into Essex.



3.4 Although the principle of the Superlink scheme is broadly similar to SuperCrossRail, there are a number of important differences in their precise definitions:

- In central London, Superlink proposes use of the safeguarded Crossrail route rather than the River Thames alignment proposed by SuperCrossRail. However routes via the River Thames, along with an alignment to the north of the safeguarded route in central London, are shown as options. These central London options are shown in Figure 4. Outside London, Superlink does not include the routes to Harlow Town and Aylesbury that featured in the SuperCrossRail proposal and curtails the Oxford branch at Reading. However, it extends the branch to Milton Keynes envisaged by SuperCrossRail to Northampton.

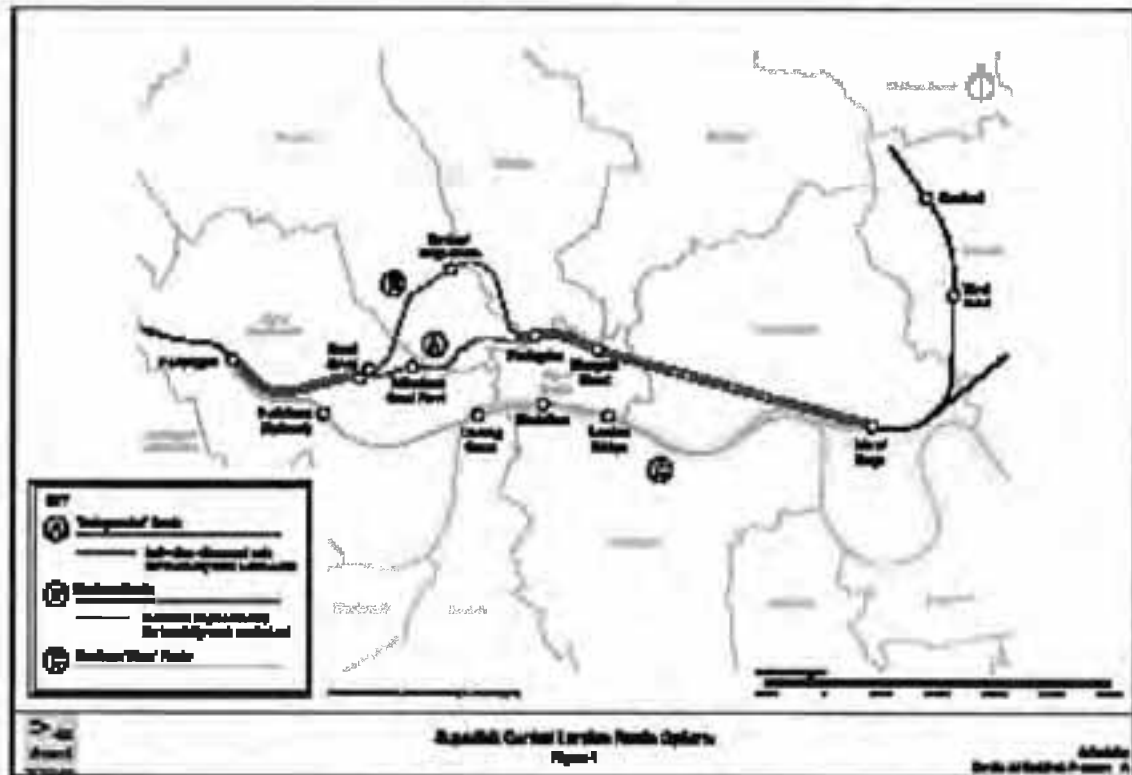
CLRL's Figure 4 incorrectly shows a Superlink branch from Canary Wharf via West Ham to Stratford. This was included in the SuperCrossrail proposal but not in Superlink. Figure 4 also shows the "Northern Route" running on the same alignment as the safeguarded route between Paddington and to Bond Street. As is made clear in our proposal, the "Northern Route" could run north of Oxford Street to a station roughly under Cavendish Square, connecting into both Bond Street and Oxford Circus stations.

- There are also differences in peak hour service levels between the two schemes. For example, the 4 trains per hour (tph) Harlow Town SuperCrossRail service becomes 2 tph with Superlink from Harlow South with the other 2 tph being used to increase the Superlink service from Colchester. The 4 tph proposed to run from Aylesbury in SuperCrossRail are diverted to Milton Keynes, with 2 tph starting at Northampton. The Reading via Bracknell service is halved from 4 tph in SuperCrossRail to 2 tph in Superlink, with the other 2 tph being diverted to Basingstoke. On the Great Western Corridor the 2 tph Oxford Express/4 tph Slough Metro proposed in SuperCrossRail becomes a 6 tph service from Reading via Slough.

3.5 Although Superlink can be considered to be a variant of the SuperCrossRail proposal, CLRL considered it appropriate to examine Superlink separately. Although the analysis of



SuperCrossRail was relevant to the analysis of Superlink, CLRL carried out new analysis on a number of areas, including operational feasibility, planning policy, patronage and revenue forecasts and construction costs.



SUPERLINK – OPERATIONAL ANALYSIS

Background

3.6 CLRL commissioned a number of leading experts in the railway operations field to produce a qualitative assessment of the Superlink proposal. This work concluded that the proposal for longer distance services from a range of destinations such as Ipswich and Northampton would not be viable for two principal reasons:

- The extreme difficulty of ensuring highly accurate train intervals through the central area while serving numerous out-of-London destinations.
- The difficulty in devising a rolling stock design which would meet the operational and marketing requirements of the short distance commuter and medium to long distance travellers.

3.7 These issues are considered in more detail in the following sections.

All of the identified operational issues apply to some degree (indeed some to a greater degree) to the Crossrail Bill scheme. They also apply to the Thameslink 2000 project now being promoted by Network Rail, with Government support. CLRL identifies the issues but does not provide any quantified analysis as to the severity of the impacts, for which proven computer models are available which have been used in development of other rail



schemes. CLRL does not provide any comparison with the Crossrail scheme. None of the flaws are “fatal”. Many tradeoffs must be made in the design of any successful project.

CLRL does not disclose the identity of the “leading experts”. Without information as to their credentials it is impossible to attach any weight to their opinions. Superlink has within its team several “leading experts”, including former senior executives of InterCity and Network Southeast, who believe that Crossrail, Superlink, and indeed Thameslink 2000 can all be operated to an acceptable level of reliability.

There are numerous international precedents for cross-city regional rail systems connecting into and inter-working with longer distance freight and passenger railways. CLRL’s comments do not provide a basis to reject the Superlink scheme on operational grounds.

Train Service Operation

Overview

3.8 Superlink’s proposal envisages serving three groups of routes to the east, west and north-west of London as outlined below.

3.9 In the east, the proposal is to serve four main corridors to Tilbury, Southend Victoria, Ipswich via Colchester and Cambridge (with a branch to Stansted Airport). All these routes, from the point where the new Superlink alignment joins the existing national rail network, would be shared with existing operators.

3.10 In the west, the proposal is to serve three main corridors: to Reading via the Great Western Main Line (GWML); Reading via Heathrow and the Windsor lines; and Basingstoke and Guildford via Heathrow and Woking. Superlink services would take over all the passenger services on the GWML Relief Lines (but would still inter-operate with freight) and use the Fast Lines to operate a non-stop “Airport Express” service to Heathrow. On the other corridors the route would be shared with existing operators.

3.11 On the north-western route, the proposal is to connect to the West Coast Main Line and serve stations to Milton Keynes and Northampton by taking over the current Slow Line passenger service (but still inter-operating with freight services).

3.12 There are three key features of this proposal which raise problems of operability:

- The high number of Superlink branches.*
- The length of routes proposed for Superlink.*
- Inter-running with other services.*

While the Crossrail Bill scheme will have fewer and shorter branches, the Thameslink 2000 scheme actually has more and longer branches. CLRL has yet to demonstrate how Crossrail services will interwork with the intensive longer distance passenger and freight services which currently operate over the Great Eastern and Great Western main lines.

Number of Superlink Branches

3.13 Superlink’s proposal envisages four routes feeding in from the east with trains starting from six separate locations and five routes from the west/north-west starting from nine separate locations. Superlink assumes that 24 trains per hour would be operated during the peak across the central section through London, and it appears that train planning and financial projections are based on using the line to the maximum capacity.

Our business case assumes operation of 24 peak trains per hour, which is the same level as proposed by CLRL, and Network Rail’s proposals for Thameslink 2000, operating on inherently more difficult infrastructure. However, we would ensure resilience by building the infrastructure and control systems to enable operation of 30/34 trains per hour.



3.14 The independent review of the Crossrail Business Case in July 2004 (DfT, 2004) raised concerns that a 24 tph service frequency might not be achievable on Crossrail, as then defined, because of the number of interfaces planned with the existing Network Rail system and the consequent potential for perturbations in services to spread to the Crossrail network. In summary it pointed out that the addition of branches to the core would progressively reduce the throughput, if no further measures to improve reliability were put in place. This was one of the reasons why Crossrail abandoned the branch to Kingston & Richmond and curtailed the south-eastern corridor at Abbey Wood.

Superlink is proposing specific measures to ensure that capacity through the core can be maintained. Other similar systems, for example the Munich S-Bahn, achieve 30 trains per hour through a 2-track cross-city tunnel, with six branches on each side of the city. Munich S-Bahn trains also inter-work with freight and other local and long distance passenger services. Several Tokyo Metro lines are worked jointly with private suburban railways.

To facilitate reliable operation, we envisage a dedicated purpose-built fleet, with common performance characteristics through the core central section. Grade separated junctions, with holding areas for train regulation, are provided at all major junctions.

Length of Routes

3.15 A second issue is that the Superlink proposal envisages linking long routes on either side of London. For example Northampton to Ipswich is 230km, Milton Keynes to Cambridge 185km, Basingstoke to Cambridge 190km and Southend to Reading 140km. The length of the proposed routes would compound the operational reliability problems discussed in this section. The longer the train route, the larger the risk of delay and hence the incompatibility with the requirement to provide a reliable service headway of 2.5 minutes across the central section. It would also increase the risk that delays from one part of the national rail network would be transmitted to other parts of the network across London.

These comments also apply to Thameslink 2000. We are satisfied an acceptably reliable service can be operated. While length of route is somewhat related to operational difficulty, it cannot be considered in isolation from service complexity and frequency. Considering the performance of rail services in London and the southeast, there is not obvious correlation between length of route and reliability. Superlink should *improve* the reliability of some existing rail routes, by diverting longer distance trains from the West Anglia, Great Eastern, and South West lines off congested tracks.

Inter-running

3.16 A third issue is that Superlink envisages services operating largely over existing mixed traffic railways which are already congested. For example, the proposed Milton Keynes/Northampton services would share capacity with the increasing demand for long distance freight over the West Coast Main Line.

CLRL appears to have misunderstood our proposals. We have not proposed any increase in the number of services to Milton Keynes and Northampton, but rather to divert existing trains into Superlink at the London end.

The Crossrail Bill scheme implies serious operational stress in the Stratford area, with the current 15 tph service increased with 12 tph running into Crossrail as well a 6 tph into Liverpool Street. CLRL has not been able to show how this would operate together with existing longer distance passenger and freight services.

CLRL also claim that, with diversion of GE services into Crossrail, they will be able to run six additional trains per hour from Stansted and Hertford East through Cheshunt into



Liverpool Street. We do not consider this feasible. It is, in our view, a fatal flaw in the Crossrail Bill scheme business case.

Although Superlink envisages grade-separated junctions between the core central tunnel and the newly constructed sections of lines, all trains would continue to share tracks with other services. There would need to be significant inter-working at other junctions on the network such as at Shenfield and Woking.

3.17 The effect of this inter-running is illustrated by a recent exercise conducted by South West Trains, which extensively modified the junction working and reduced the number of train paths at Woking to improve the quality of train operation. Previously, conflicting train movements across this junction were timed to take place every 2.5 minutes, but this was increased to 3 minutes to provide a greater chance of avoiding delays. These externally driven factors would also affect operational requirements and constraints at London termini such as Liverpool Street and Euston.

Superlink does not impact in any way on the operation of the existing junction at Shenfield, other than by reducing the number of trains using it; this appears to indicate a misunderstanding of our proposals.

Superlink's proposed service pattern would increase occupation of Woking junction, albeit within recent historical levels. However, the SWT timetable is complex and it is not clear that our proposals would reduce overall punctuality performance – they might well improve it. Superlink would also provide an alternative route to central London for passengers in the event of a major blockage.

Superlink would actually greatly relieve operations at Liverpool Street and Euston, by diverting many trains off the busy approach lines. This has been welcomed in discussions with freight and passenger train operators. We are not sure why CLRL think Superlink would “affect operational requirements and constraints” at Liverpool Street and Euston.

3.18 The need to inter-run with existing services on other tracks would mean that much of the reliability of the central area tunnel operation would rely on the efficiency and quality of other 'command and control' systems and infrastructure performance. There would be disparate objectives for the command and control systems of the five affected Network Rail regions/zones and their principal concerns would have priorities not associated with the precise requirements for the central area tunnel section.

Clearly this is a matter for Network Rail management, who can determine appropriate protocols and procedures to ensure reliable operation. Eurostar trains operate over tracks and “command and control” systems managed by the national railway authorities in three countries, and has recently achieved dramatic punctuality improvements. The Thameslink 2000 services will operate over three separate Network Rail regions/zones using a wide range of command and control systems.

3.19 There is a strong likelihood that service perturbations on one part of the Superlink network could easily spread to affect a large number of national rail routes. Given the interaction of the Superlink Airport Express to Heathrow with intercity services to the West of England and Wales on the GWML Fast Lines, these risks could be spread over a very wide geographical area.

In principle, this is correct, but it applies to Crossrail as to Superlink. For example Crossrail proposes to inter work with Heathrow Express trains, which also inter-work with long distance services. Delays to any one service could, in principle, affect all of the others. Similarly, Crossrail trains on the Shenfield branch would have to interwork both with Liverpool Street services and freight services on the Great Eastern main line. However the



extent of the problem depends upon timetable design (and the Rules of the Plan), and track layout. Superlink has “designed in” reliability throughout the network, and is proposing junction designs with space for holding one or more trains for regulation and compatible rolling stock.

Overall Assessment of Operability

3.20 Taken together, the number of proposed routes, multiple starting points, long distances that trains have to travel and the inter-running with other services make it unlikely that a full 24 tph service could be operated through the central tunnel. The ability to present trains reliably at the tunnel portals to achieve 2.5 minute headways through central London would be severely compromised. There is a significant risk that this would lead to out-of sequence working as delayed trains are unable to make their allocated path through the central section. There is also a significant risk that delays in the central area would lead to knock on delays, not just to Superlink services, but also to the many services that inter-run with them on the surface routes.

Delivery of an absolute headway is desirable but not essential nor fully achievable for any rapid transit operation. The headways actually achieved on key LUL lines vary considerably, with gaps where, for whatever reason, an individual train is cancelled or delayed. Given the preponderance of longer distance journeys on Superlink, small headway variations would in practice be less critical than, for example, on the Victoria line

As noted above there are many examples of regional railway systems, for example the Munich S-Bahn, interworking with several surface lines, and delivering 30 trains per hour through a cross city tunnel. Some systems, such as the one in Oslo⁴, even have freight services through the cross-city tunnel, although this is not proposed for Superlink.

3.21 An additional issue is that passengers leaving from the central area would be prone to wait until a train to their destination arrived, creating potentially difficult passenger flows. Because of the number of destinations being served, passengers would have to wait up to 30 minutes for some services. This poses a risk that passenger numbers would build up on platforms, creating congestion. This congestion would, in turn, make it more difficult for passengers to alight from and board trains, potentially increasing dwell times. Over-crowding on platforms could also raise safety issues.

This problem applies also to the Crossrail scheme. As noted above, the Crossrail Bill scheme will require Heathrow airport passengers, who may be encumbered with baggage, to wait for the fifth or sixth train. This could also raise platform safety and loading issues. It is understood that few, if any trains from the Shenfield branch will run through to Heathrow. This means that passengers from the Shenfield branch to Heathrow will need to change at a central London station.

While a few Superlink destinations would only be served by 2 trains per hour, most destinations would be served by 4 or more trains per hour. Very few passengers would actually need to wait more than 10 minutes.

3.22 In order to overcome these risks, it is likely that the Superlink central London stations would need to be larger than those proposed for Crossrail with, for example, wider platforms and bigger passenger waiting areas. No allowance for larger stations has been included in the construction cost estimates made for Superlink.

⁴ Michael Schabas, a Director of Superlink, is a Director of Ofotbanen AS which operates freight trains through the Oslo Cross-city tunnel. These trains inter-work with passenger trains including airport express services.



If CLRL's analysis is correct, then the same will apply to the Crossrail Bill scheme. CLRL representatives have recently stated in public meetings that branches can be added to Crossrail. If this is correct, then CLRL must already be satisfied that the design of the stations is adequate for future needs.

3.23 Given these issues, CLRL concluded that the Superlink scheme was operationally incompatible with the requirement to provide the reliable service headways of 2.5 minutes needed to achieve a 24 tph service frequency through the central London tunnel section.

CLRL has not made the argument for reaching this conclusion. On any intensively used railway system, there is a tradeoff that must be made between throughput and reliability.

Rolling Stock Design

3.24 A secondary, but nonetheless important, consideration is rolling stock design and its impact on dwell time. Dwell time is critical to the overall capacity (number of trains per hour) of the central area tunnels as this is the largest component of the calculated headway. If the dwell time is not achieved then the capacity is reduced. In order to meet the target of 24 tph through the central tunnel, CLRL found that the Crossrail service pattern would need to operate with a standard central area dwell time of 45 seconds, with 60 seconds at Liverpool Street and Paddington to accommodate the high levels of boarding and alighting at these stations. Studies carried out as part of the development of the rolling stock requirements of Crossrail concluded that, to support this, trains would need cars with wide doorways, generous standbacks and large internal standing areas to enable quick boarding and alighting from the train. At the critical stations, any other design would have a damaging effect on dwell times.

3.25 The requirements imposed by the need to minimise dwell times in the central area would mean that rolling stock would be suboptimal for longer distance services. The need to have cars with wide doorways, generous standbacks and large internal standing areas would restrict the quantity and type of seating which could be provided, reducing the level of service below that appropriate to the needs of longer distance commuters.

These arguments apply to the Thameslink 2000 project. Tradeoffs must be made, but the numerous successful regional metro systems in cities in Europe and Australasia, and indeed the success of the current Thameslink service, demonstrate that an acceptable tradeoff is possible.

Indeed, if Crossrail is to be extended to Reading as now suggested, end to end journey times on Crossrail will be approximately 2 hours which is similar to what is proposed for Superlink. So Crossrail will have to deal with the same trade-off.

3.26 A further issue is that many of the services that the Superlink proposal envisages being operated through the centre of London would be diversions of services already being operated into terminus stations such as Euston, Liverpool Street, Waterloo and Paddington. Although these services currently utilise modern rolling stock, it will have been designed to run on surface railways with seating and doorway arrangements appropriate to its current function. The fire worthiness of many of these trains is unlikely to meet the stringent requirements required for sub-surface running and the seating and doorway layouts would not suit a through-London metro service. As a result there would either need to be significant and costly engineering works undertaken on the trains to ensure their suitability for Superlink services or new rolling stock would need to be bought to replace them. The latter option would result in the displacement of large amounts of relatively new rolling stock that has no likely alternative use.

There are various potential uses for rolling stock, which will be cascaded by Crossrail or Superlink. This is actually a problem for the private sector rolling stock leasing companies,



- which own the trains, although there is a view that the public sector should seek to identify possible uses to ensure stability in the leasing market.

Crossrail, as well as Superlink, will displace a fleet of Thames Turbo Class 165/166 trains which were built 1991-93. We are not aware that CLRL has identified any alternative use for these trains, which are built to a larger clearance gauge.⁵

Crossrail would also displace Class 315 units on the GE Main Line, built in 1980-81. These units will be at the end of their life by 2015.

Superlink would displace Class 317 units on the West Anglia line, built 1985-1987, and Class 321 units on the West Coast and GE Main Lines, built 1988-1990. These units could be cascaded, for example to displace life-expired Class 315 units

Given the age of the units displaced, and the potential alternative uses elsewhere on the national rail network, including the need for additional rolling stock to meet projected demand growth, it is likely that the ROSCOs will find ways to continue to make productive use of their assets.

Operations Conclusion

3.27 Given these issues, CLRL concluded that the Superlink proposal would not be deliverable in terms of operational reliability. Serious concerns also existed about rolling stock design. The plan relies on achieving a commonality of operational practice and performance, which lacks reality in such widely varying markets as Stansted – London – Heathrow or Basingstoke – London – Tilbury.

CLRL has not presented evidence to reach this conclusion, nor has it presented evidence to support the view that Crossrail could be operated as planned.

It remains our view that Superlink could be operated, as proposed, to an acceptable level of performance. The current Thameslink operation, with very high loadings and high growth, has demonstrated that a cross London service can be successfully operated to meet different markets. Network Rail and government propose to build on this success by taking forward the Thameslink 2000 scheme

3.28 The 'quality of operation' of the services is also open to question given the inability to separate the operation of the outer London areas from other services and commercial interests and the requirement for new levels of command and control, which have not yet been seen in the UK or worldwide.

Neither Superlink nor CLRL has made specific statements as to the “command and control” system that would be used. The Superlink scheme is no more complex than other existing and operating regional railway systems in Europe and Australasia, or indeed other parts of the network in Britain.

SUPERLINK AND PLANNING POLICY

Background

3.29 Considerable population and employment growth is forecast in London and parts of Eastern and South Eastern England over the period to 2016 and beyond. This growth will place additional pressures on rail routes into central London. Although national rail and Underground improvements already scheduled will partially alleviate the impact of this growth,

⁵ The Class 165/6 and Class 317 trains are owned by Angel Trains, a division of Royal Bank of Scotland. Dr John Prideaux, a Director of Superlink, is also a Director of Angel Trains.



further improvements are required if capacity increases are to match demand in critical corridors.

3.30 The promoters of Superlink claim that their proposal would provide a better fit with proposed growth areas for the East and South East of England (Superlink Ltd, 2004, section 1.3). This section examines this claim, and the role Superlink might play serving other policy sub-regions within the East and South East of England not designated as "growth areas".

The Superlink Planning Context

3.31 The promoters of Superlink claim that "it has been designed to meet the rail transport needs of the London region, into the 21st Century" (op. cit., section 1.4) and that "Superlink supports key planning strategies" (ibid.). In particular, Superlink is designed to link together four "Growth Policy Areas" (op. cit., section 1.5) - Milton Keynes/South Midlands, the London-Stansted- Cambridge corridor, the Thames Gateway and the Western Wedge.

3.32 Superlink suggests that, by linking "development sites and strategic centres across the London region, to the centres of activity within Central London, and to major interchanges for inter-regional and international travel" (op. cit., section 1.4) their scheme would produce very significant benefits. In particular, they forecast very large modal shift from highways which would reduce the need to widen motorways. Without Superlink, the promoters suggest that "most development in the South East will continue to be orientated to road transport, especially around the M25 and the M3 and M4 corridors" (ibid.). The underlying assumption of their analysis is that the most significant impact of the development of the growth areas will be an increase in long-distance trip making.

It is naïve to say that employment will be generated locally to serve the new regional planned population growth. Just because more jobs are created locally is no guarantee that the new population will choose to or be chosen to work there. Some will, but for others it will continue to be necessary to have access to the Capital with its higher order services. Equally Superlink will enable Londoners to benefit from improved quality of life associated with the greater leisure and recreation opportunities offered by the Home Counties and beyond. The CLRL comments demonstrate a superficial understanding of the employment linkages; they are much more complex than CLRL seem to think.

We do not assume that "the most significant impact" would be an increase in long distance trip making. We assume that the roughly 1 million new homes to be built in the growth areas might generate 100,000 additional commuter trips per day into central London. Most residents of the growth areas will work locally, as residents of the post-war new towns do today, although a significant proportion will drive on the road network to work in another town or city.

There would also be substantial mode shift to rail, and probably also support for more sustainable development. We understand that commuting flows into Reading by rail already exceed outbound commuting flows. The same may already be the case at other some other regional centres. This could be repeated at Milton Keynes, Basingstoke, Heathrow and Stansted, where the major flows are already not London commuters.

3.33 The Superlink proposal does not explain how such sizeable modal shift from the highway network would be achieved as only 8% of commuters to central London use cars, with negligible flows from outside London.

We have stated that if Superlink is not provided, many of the 100,000 potential extra rail passengers will instead drive to work, not in central London, but to jobs in other towns and cities in the Home Counties.



CLRL also claims that Crossrail will bring substantial road congestion relief, also presumably by carrying trips by rail to central London that would otherwise have been made to jobs in the suburbs.

3.34 The following section reviews the validity of this assumption of long distance trip generation from the growth areas by reference to their emerging spatial and transport strategies.

Sustainable Communities Plan Growth Areas

3.35 The Deputy Prime Minister launched the sustainable communities initiative in February 2003 and included four growth areas in the East and South East of England: Milton Keynes/South Midlands, London/Stansted/Cambridge, Ashford and Thames Gateway. Table 1 summarises housing targets and employment growth for these areas.

Table 1: Growth Areas in the East and South East of England (outside London)

Growth Area	Jobs Growth	New Homes
<i>Thames Gateway (excluding London) (ODPM, 2004)</i>	<i>82,000 (2016)</i>	<i>69,500 (2016)</i>
<i>Milton Keynes/South Midland (ODPM, 2003)</i>	<i>300,000 (2031)</i>	<i>370,000 (2031)</i>
<i>Ashford (ODPM, 2003)</i>	<i>28,000 (2031)</i>	<i>31,000 (2031)</i>
<i>London-Stansted/Cambridge (EERA, 2004)</i>	<i>40,000 (2021)</i>	<i>63,250 (2021)</i>

Although not acknowledged by CLRL, this table only shows additional housing in the targeted growth areas. Substantial additional housing is planned in other parts of the southeast and eastern regions.

3.36 Superlink’s plan envisages serving major new communities in the Milton Keynes/South Midlands Growth Area at Northampton/Milton Keynes, in the London-Stansted/Cambridge corridor at Harlow and Cambridge and in the North Thames Gateway area in Essex & Southend/Thurrock.

3.37 Although development in these growth areas will undoubtedly lead to some increase in commuting flows into central London, the Office of the Deputy Prime Minister’s (ODPM) strategy for growth in these areas is based on sustainable development principles. These principles involve promoting balanced communities, with local employment opportunities and facilities. The development plans for these areas consequently focus on employment led growth, rather than housing growth dependent upon long distance commuting, by ensuring that there is a level of economic growth commensurate to the increase in housing in these areas.

Indeed, the same argument could be made against the Crossrail bill scheme, which is clearly predicated on increasing commuting from the Shenfield, Maidenhead and Abbey Wood corridors into London.

Clearly, most people should and will live near where they work. However, a proportion of people with specialist skills will need to make longer distance journeys. Without improved rail transport, many of these journeys will be made by road.

3.38 For example, for the Thames Gateway/South Essex area the Draft East of England Plan states: “The central requirement is to achieve employment-led regeneration and wealth creation”, (EERA, 2004, section 5.8) while for Cambridge it places the emphasis “on the expansion of employment...it is important that any significant residential development should be kept in balance with employment” (op. cit., section 5.109). For the area around Stansted, the basis of the emerging spatial strategy will be “housing development phased in accordance with employment growth” (op. cit., Policy ST1), while the vision for Harlow is of an “employment and housing growth area” (ibid.).



From discussions with representatives of the various development corporations, it is clear that they consider that Superlink would be highly supportive of their strategies, because the improved connectivity it offers would attract employers to relocate into their areas.

3.39 Because of this emphasis on building sustainable communities, the transport strategies for these growth areas focus on local highway and public transport improvements within the growth areas, and envisage only limited improvements to strategic connections between the growth areas and other parts of the country.

3.40 For example, the Milton Keynes/South Midlands Sub-Regional Strategy (GoSE et al, 2005) focuses on a range of local transport schemes and measures, including travel demand management, boosting walking and cycling, new local highways and bypasses, improved bus services and new local railway stations to meet the travel needs of the growth areas. The strategy also recognises the need for a range of strategic improvements, such as West Coast Main Line modernisation, reinstatement of a rail service between Bedford and Oxford via Bletchley and the widening of the M1 motorway. However, these strategic improvements are primarily focused on improving regional interconnections, rather than enhancing links to London.

3.41 The Strategy identifies three main reasons for these improvements (op. cit., section 25):

- Connecting the Sub-Region to key urban centres and national and international gateways, including London and Birmingham, the Haven Ports (Felixstowe/Harwich) and the London Airports.
- Connecting the Sub-Region to other nearby urban centres and gateways including Cambridge, Oxford and Birmingham Airport.
- Connecting the growth locations within the Sub-region, such as linking Milton Keynes with Bedford and Aylesbury.

3.42 These new developments in the East and South East of England will inevitably increase commuting flows into central London. However, these increases are likely to be relatively small, and are, in any event, already catered for in the emerging transport strategies for these growth areas.

3.43 In order to estimate the likely increase in commuting flows from each growth area, CLRL analysed Journey to Work census data on existing commuting patterns from each area. This Journey to Work data is provided in Table 2. It shows that Milton Keynes and Cambridge have relatively high rail trip rates to central London, while Northampton has a much lower proportion of the population making this journey by rail.

Table 2: Household Trip Rates to Central London

Table 2: Household Trip Rates to Central London

Area	Total Households in 2001	Total Employed in Central London	Trips to Central London by Rail	Rail Trips to Central London per 1000 Household
Milton Keynes	83,359	2,481	1,992	23.9
Northampton	80,822	724	471	5.8
Cambridge	42,658	846	684	16.0

3.44 Using this data on existing travel patterns from these areas, CLRL estimate that the additional 44,900 homes planned for Milton Keynes would generate just under 1,100 new daily rail trips to central London; the additional 30,000 homes planned for Northampton would



generate less than 200 extra rail trips; and an additional 22,600 homes within or close to Cambridge would generate less than 400 new rail trips to London. Even assuming that Superlink achieved a doubling of existing trip rates from the above stations, the total number of additional trips arising from the new homes at Milton Keynes, Northampton and Cambridge would amount respectively to just 2,200, 350 and 700 trips.

We are surprised CLRL uses census data, rather than the more reliable industry data. The value of the flows Milton Keynes – London and Bletchley London is approximately £26 million per year to the rail industry. Assuming an average yield of £15 (the Cheap Day Return is currently £17, with the season ticket less), this implies 1.5 million trips per year or about 5,000 trips per day. This is approximately twice as many trips as assumed by CLRL.

The value of flows from Cambridge to or via London is £44 million, implying even more trips than from Milton Keynes; CLRL has underestimated the value of this market several times.

CLRL appears to be fundamentally ill informed as to the volume and value of the rail market between Greater London and major centres in the South East. It has also failed to address the significant and increasing “reverse commuting” flows. London and the South East is one of the world’s most dynamic economic regions, with complex and constantly developing commuting patterns, dictated for example both by accelerated changes in individual employment and the needs of multi-income households. The concept that employment and population can be kept in balance without significant increases in long distance commuting, whether by road or rail, is unrealistic.

3.45 Increases of this scale are already catered to in the transport strategies for these growth areas. For example, the modernisation of the West Coast Main Line will enable a 30% increase in capacity on Silverlink services from Milton Keynes and Northampton and provide capacity for more than 5000 additional passengers to London in the morning peak period. The London to Stansted corridor is capable of supporting significant service expansion, including the operation of 12-car trains from Stansted Airport. There is also capacity to extend train lengths on some c2c services from the Northern Thames Gateway from 4 to 8 cars. Indeed in March 2005, the Department for Transport (DfT) announced that proposals to lengthen platforms at c2c stations in the Northern Thames Gateway on the line between Barking and Pitsea via Grays would undergo detailed appraisal in 2005 for possible funding by the Government’s new Community Infrastructure Fund.

Regrettably, it would seem that current transport strategies do not provide for the expected growth. The WCML project does provide for a significant increase in travel from Milton Keynes and Northampton, although it will not be possible to extend all trains to maximum length as some of the Silverlink platforms at Euston can only accommodate 8 car trains. But current plans are to double the size of Milton Keynes and to encourage additional development in the South Midlands. Similarly, lengthening Stansted Express Trains will provide, at most, a 50% increase in capacity but expansion plans for the airport imply a doubling of traffic over the next decade.

Crossrail is in fact claiming substantial benefits from adding capacity to Stansted (although in a way that is not operationally feasible). If this is not necessary, then what benefits are there to claim?

Other Policy Areas in Regional Guidance

Western Policy Area



3.46 The Superlink proposal also envisages serving what it calls the "Western Wedge," via services from Reading, Basingstoke, Guildford and Heathrow. This area corresponds approximately to the area covered by two sub-regions identified in regional planning policy. These are the Western Wedge in the London Plan and the Western Policy Area in Regional Planning Guidance for the South East (RPG9) (GoSE, 2001). However, neither of these areas are defined "growth areas" and there are no plans for growth on the scale planned for the growth areas discussed above.

3.47 The London Plan key diagram (GLA, 2004) identifies a "Western Wedge," although policy for this area is developed through the West London subregion. These policies seek to maintain the success and dynamism of the west London economy while tackling pockets of deprivation. They do not seek higher levels of growth in the way that growth areas such as the Thames Gateway do.

3.48 The Western Policy Area has a successful economy built upon the clustering of high-tech industries in the area. Policies, outlined in Regional Planning Guidance for the South East (RPG9) are geared towards maintaining the economy of this sub-region. The relevant Regional Transport Strategy (GoSE, 2004) for the area – outlined in the replacement to Chapter 9 of RPG9 - emphasises the importance of relieving congestion on the area's road network and improvements to the local rail and bus network to allow more trips to be made by public transport between towns within the area.

We agree. Superlink will directly serve Woking, Bracknell, Basingstoke and Reading, in addition to Slough and Maidenhead, which are served by Crossrail. Is CLRL implying that there is not merit in serving the Western Wedge? If so, why is Crossrail proposing to run to Maidenhead and now proposing to safeguard the route to Reading? In addition, Superlink provides direct, fast links to Heathrow, a vital contribution to relieving the area's road network.

Haven Gateway

3.49 Between Ipswich and Marks Tey, the Superlink alignment would serve the Haven Gateway sub-region by providing services from Colchester and Ipswich. Although not a designated "growth area", this area is identified as having particular needs that justify specific sub-regional policies.

3.50 The Draft East of England Plan recognises that parts of this sub-region have an employment deficit and substantial out-commuting (EERA, 2004, section 5.34). Policies are therefore aimed at achieving a sustainable balance of local jobs and workers with high levels of employment growth offering the opportunity to reduce levels of out-commuting (ibid.). Local development documents for the Haven Gateway Area forecast the provision of an additional 51,000 houses by 2021 (op. cit., Policy HG3) along with a further 50,000 net additional jobs over the same period (op. cit., Policy HG1), with the development of both Colchester and Ipswich as important centres for the whole Haven Gateway (op. cit., The Superlink proposal for increasing out commuting to London from this area runs counter to this emerging strategy.

CLRL appears to have misunderstood the Superlink proposals. As on the Milton Keynes – Northampton route, there are no spare paths on the GE Main Line from Shenfield to Colchester. Superlink is proposing to divert some existing trains onto the new infrastructure west of Shenfield Junction, freeing up paths for additional inner suburban trains. There will be some growth in out-commuting, but the main benefit will be to improve connectivity, making the area more attractive for companies who may locate there. This will increase all day and contra-peak travel. Superlink's proposals have been discussed with regional planning officers and are believed to be wholly compatible with the "emerging strategy".



Planning Policy Conclusion

3.51 The emerging spatial strategies for the growth areas aim to create sustainable communities by achieving balanced growth in both housing and employment. Although it is accepted that development within these growth areas will increase flows to London, no evidence is presented by the promoters of Superlink on why a project on the scale of Superlink is required to address this need for additional rail capacity.

In the absence of a rail scheme like Superlink, it will be possible for additional development to be supported by expanding the road system. The same can be said about Crossrail. We do believe Superlink would be highly beneficial to the “emerging strategies”, encouraging sustainable patterns of development and public transport use to a much greater degree than Crossrail. Moreover, it will be affordable, because it will attract many new rail trips, generating high fare revenues. Many of the new trips would not be commuter trips, but business and leisure journeys between the growth areas and central London, and between towns in the growth areas themselves.

SUPERLINK – PATRONAGE AND REVENUE FORECASTS

Background

3.52 Superlink’s promoters estimate that it would generate net revenues of £485m/annum in 2020, assuming a 24 trains per hour service across London. This is almost three times the net revenue forecast by Superlink Ltd for Crossrail using its methodology.

3.53 The claim that Superlink would have a much smaller external funding requirement than the current Crossrail proposal, despite a higher overall construction cost (discussed below in section 3.71 – 3.73), is dependant on its forecast of much larger amounts of new revenue.

3.54 This section assesses the Superlink estimates against industry best practice.

CLRL does not use “industry best practice” to carry out a properly quantified assessment of the additional revenue which would be generated by Superlink.

Superlink Forecasts

3.55 The promoters of Superlink estimate an overall net revenue increase of £485m/annum by 2020. With total scheme revenue estimated for all Superlink services to be around £1bn per annum, this suggests that new revenue attributable to the introduction of Superlink services would be almost 50% of its total revenues. This level of net revenue generation could only be achieved through significant improvements in services in the Superlink corridors compared with existing services or services that could be readily introduced where capacity is required.

This is correct. Superlink provides substantial improvements to the rail services on many corridors into London. Services are improved both on the Superlink routes, and on “Metro” services where capacity would be released by Superlink for improved local services. The actual type of improvement varies depending upon the corridor. On some corridors, capacity is increased and trains services operate through London rather than to a single terminal. On other corridors, there is no increase in capacity but improved distribution. On other corridors, for example on the West Anglia routes into Liverpool Street, there is no improvement in distribution but an increase in capacity and service pattern.

Superlink does forecast incremental revenue growth three times higher than that forecast by CLRL for Crossrail; this reflects the key regional centres served, for example Milton Keynes, Reading, Basingstoke, Guildford, Cambridge, Ipswich and Southend, and the growth in rail use enabled at Stansted and Heathrow, together with higher average fares, reflecting longer distance journeys. It is clear that Superlink will generate much more



additional revenue than Crossrail, which serves only the relatively mature and limited markets in the Maidenhead – Shenfield corridor.

3.56 Superlink patronage forecasts are presented with little explanation of input assumptions and, as a result, the methodology and its outcomes cannot be fully verified or tested. Revenue increases appear to be attributable to the additional capacity provided on the assumption that there is sufficient passenger growth to absorb new capacity. In effect, revenue generation in many Superlink corridors is assumed to be a direct product of capacity provided.

Superlink's revenue forecasting methodology is more transparent than that used by CLRL for Crossrail, for which the revenue forecasts are generated by a "black box" model which cannot be readily replicated or explained. CLRL has, in fact, refused to provide us with the details of its traffic and revenue forecasts for Crossrail.⁶

CLRL could verify and test the Superlink traffic forecasts using standard industry methodologies, such as PDFH and MOIRA. We caution against the use of the PLANET model as this has a fixed trip matrix outside Greater London.

It is correct that Superlink has assumed that demand in many corridors into London is, or will soon be, capacity constrained. It is also recognised that some corridors have more potential for growth than others. The Superlink team includes individuals who have had direct responsibility for operating many of the rail services into London and who are familiar with the different markets. John Prideaux CBE was Managing Director of InterCity, while Chris Stokes was Deputy Director of Network Southeast and then Deputy Franchising Director.

3.57 The Superlink proposal assumes that significant additional capacity is required to serve growth areas in the East and South East of England, although in the case of the Milton Keynes/South Midland Growth Area no additional capacity would be provided by Superlink. However, analysis of planning policy (See section 3.29 - 3.51 above) suggests that this assumption is questionable. In addition, there is little analysis of alternative service improvements that might capture this growth through improvements to services on existing routes. To accord with best practice in appraisal, the case for Superlink would need to be made against a realistic "do-minimum" scenario. Revenue growth should only be attributed to Superlink where there are no lower cost improvements that could provide capacity to accommodate development growth.

See our comments above in response to paragraph 3.44 and 3.45.

Superlink has assumed do-minimum growth rates of 10% to 40% on commuter flows, 60% on Stansted and 100% on Heathrow Express. For the Milton Keynes route, Superlink has in fact assumed 40% growth to 2020 in the do minimum scenario, greater than the claimed 30% increase in capacity that will be provided by the West Coast modernisation project.

This assumption was disclosed explicitly to CLRL in July 2004.

3.58 Superlink's revenue forecasts also use a simple spreadsheet-based approach, incorporating a series of high-level assumptions. Given the high level nature of these assumptions, Superlink's revenue forecasts cannot be considered to be accurate estimates in their own right without, in parallel, considering the associated risks and uncertainties. In these circumstances, it is necessary to demonstrate the validity of the assumptions made and to test the sensitivity of the overall forecasts to these inputs. Superlink has not presented such information and relies on a single point estimate of revenue without sensitivity testing.

⁶ CLRL has posted its "Summary Transport Case" on its website, but has refused to provide copies of the underlying detailed reports, refusing a request under the Freedom of Information Act.



We agree. CLRL could perform this analysis using standard industry methodologies such as MOIRA. We have previously noted, in our critique of the Environmental Statement, that CLRL has presented no sensitivity testing for the Crossrail forecasts.

3.59 Although it was not possible to replicate or check the Superlink forecasts per se because of the lack of information in the Superlink proposal, the information presented has been used to investigate their forecasting methodology and the likely sensitivity of their forecasts to variations in input assumptions. This helps to illustrate the range of uncertainty inherent in the Superlink forecasts. An alternative calculation of the level of new generated revenue has also been tested.

It was possible to replicate the Superlink forecasts. The entire model, including all assumptions, was disclosed to DfT and CLRL in July 2004. Perhaps the full model was not provided to CLRL's consultants? There is also a narrative describing the methodology in the Superlink Technical Report, which is available on www.Superlink.org.uk. For some reason, CLRL has chosen to ignore this.

Summary of Superlink Forecasting Methodology

3.60 The forecasting method employed by Superlink is based on historical (1996) market data for total annual revenue collected by each relevant Train Operating Company (TOC). The methodology consists of the following steps:

- *Total base revenue for each TOC is factored up by an assumed rate to represent growth to near present date (2002).*

This is not correct. Data for 1996 is provided for historical reference, and to show the actual growth rates achieved to 2002. The model actually works from the 2002 data. We are puzzled as to why CLRL did not understand this.

- *Each TOC's total revenue is factored up to represent an assumed level in the forecast year (2020).*

Indeed, as noted above we estimate a do-minimum revenue for each TOC, taking account of demand growth. We also apply a growth factor to reflect the current RPI+1% fares policy.

- *Total revenue for each TOC is proportioned to represent the percentage with London and the South East lines (the base market).*

This is correct

- *The market is divided into corridors included within the Superlink proposal and an assumed proportion of each TOC's revenue attributed to each corridor (base market by line).*

This is correct

- *Market revenues by line are factored to represent the percentage increases in revenue due to new/improved services (net revenue generation).*

This is correct

3.61 Each of these steps requires that a set of broad assumptions be made. However, these assumptions have not been clearly justified in the documentation supplied by Superlink and it is difficult to assess their validity. At each stage of the process, the effect of any potential errors would be multiplied, widening considerably the potential margin of error possible in the estimates of revenue. This is compounded by what appear to be highly optimistic revenue growth assumptions made by Superlink. However, no sensitivity testing of the forecasts appears to have been carried out to accommodate these risks



3.62 For example, significant growth has been applied by Superlink to 1996 revenues by TOC to estimate 2002 revenues. This produces an estimated revenue growth between 1996 and 2002 of 74%. Because of the lack of detail in the Superlink proposal, it is not possible to check the realism of these estimates. However, SRA data (SRA, 2005) shows that, over this period, revenue growth for both the UK rail network as a whole and those operators serving the London and South East of England market was only 42%. 3.63 From 2002 to 2020 growth is then assumed to vary between 25% and 40% by TOC, based on fares rising at Retail Price Index (RPI) plus 1% per annum to 2015 and then RPI plus 2.25% per annum to 2020. This assumes that Superlink would improve the network sufficiently for higher fares to be charged. However, the effects of real fare rises on revenue have not been assessed, nor has the sensitivity of net revenue forecasts to variations in other input assumptions.

3.63 From 2002 to 2020 growth is then assumed to vary between 25% and 40% by TOC, based on fares rising at Retail Price Index (RPI) plus 1% per annum to 2015 and then RPI plus 2.25% per annum to 2020. This assumes that Superlink would improve the network sufficiently for higher fares to be charged. However, the effects of real fare rises on revenue have not been assessed, nor has the sensitivity of net revenue forecasts to variations in other input assumptions.

As noted above, CLRL has misunderstood the model, which is driven off the actual 2002 revenue figures. While the average growth rate of the London and South East market may have been only 42%, there has been wide variation between TOCs. Revenue growth for TOCs south of London has been in the range of 30% to 50%, but growth has been much higher on some TOCS north of the river, up to 88% on Thameslink and 117% on Chiltern, nominal. Superlink assumes growth of 10% to 15%, on most corridors, over the period to 2020 in the “do minimum” scenario. Higher growth rates of 40% are assumed on West Coast, 60% from Stansted, and 100% from Heathrow. On top of this is assumed 20% growth in revenues due real fare increases. All of this is in the baseline, “do minimum” scenario. Additional growth of 10% to 100% is then assumed due to construction of Superlink.

Alternative Revenue Forecasts and Sensitivity Testing

3.64 Producing accurate revenue forecasts for Superlink would have meant carrying out a significant demand forecasting exercise. This would have required much more information than the Superlink proposal provides, including data on route-wide journey times and service stopping patterns.

Given the significant doubts about the operational feasibility of the Superlink proposal, CLRL concluded that work on this scale was not merited, and carried out a high-level study to estimate the amount of new revenue likely to be generated by the scheme.

3.65 Alternative factors for newly generated demand have been calculated, using standard Passenger Demand Forecasting Handbook (PDFH) (ATOC, 2002) elasticities and methodology, which estimate the impact on revenue of changes to train frequencies and journey time reductions arising from the introduction of Superlink services. A measure of improved egress for some journeys into central London was also included as well as a conservative response to real growth in fares above the background RPI+1% assumption.

The 2020 base without-Superlink revenues for each corridor assumed by the promoter's of Superlink have been taken, but the assumptions on historical growth have been varied as part of the sensitivity testing.

3.66 The resulting alternative revenue generation calculations suggest substantially lower forecasts of the additional revenue that would be generated by Superlink. For example:



- Northampton/Milton Keynes Superlink services reduce travel times to central London by 5 minutes but retain the existing train frequency. The assumption of a realistic elasticity of revenue with respect to the level of service suggests a revenue increase of only around half the 25% increase predicted by Superlink.

PDFH appears to have been incorrectly applied. PDFH recommends a penalty of “5 minutes, plus the walking time at the interchange station, plus the average waiting time for the onward train (i.e. walking and waiting times are weighted double in the overall generalised journey time).”⁷ While the actual journey time saving might be 5 minutes to central London, generalised journey time including interchange time for travel to common destinations in the City, West End, and Docklands (which currently requires two interchanges from Euston) would be reduced by 10 to 20 minutes. The interchange at Euston to the underground, which would be eliminated for most passengers, has a generalised journey time penalty of 10 minutes at least.

- Superlink would add 1 train per hour from Stansted and reduce journey times from 50 to 30 minutes. Again a realistic elasticity method suggests that this should increase revenue by less than half the 150% increase estimated by Superlink.

Again, our proposals have been mis-read and PDFH has been misapplied. Superlink would not add any fast trains from Stansted in the off-peak, although we would increase the peak frequency and add an all-day stopping service via Bishops Stortford. We would reduce the generalised journey time to Stansted for most passenger by 10 to 20 minutes, mostly be eliminating the interchange at Liverpool Street or Tottenham Hale. For airport passengers with bags, the journey time savings would be substantial.

- There are similar large increases from Southend Victoria (50%) and Tilbury (150%) that cannot be justified.

The case here is somewhat different. From discussions with planning and regeneration agencies in the Thames Gateway, it is apparent that Superlink will greatly increase the attractiveness of the area to housing developers and to employers. The best analogy here is the Jubilee Line Extension, which made a step change to the accessibility to Docklands without which most of the current development would not have happened.

3.67 Overall, use of this alternative approach suggests that a more realistic net revenue forecast for Superlink would be between £110m - £200m rather than the £485m assumed. The size of this range reflects the low level of confidence that can be placed in the Superlink forecasts. The range covers uncertainty in input assumptions, including historical revenue growth, journey time benefits and the assumed elasticity value. However, both ends of the range are still calculated based on the market capture asserted by Superlink, which in itself may involve the compounding of optimistic assumptions. However, this provides confidence that the revenue forecasts for Superlink are unlikely to justify their claimed revenue advantage over Crossrail.

Superlink’s forecasts are, overall, consistent with PDFH, with the growth of travel from 1997 to 2002, and in particular the experience of the Cross-London Thameslink service which opened in 1988.

Superlink’s estimates are also consistent with CLRL’s own estimates for Crossrail. CLRL’s own data show incremental revenues from Maidenhead of £826 million NPV from incorporating the Maidenhead and Heathrow services, equivalent to an increase of about £40m in 2020. The market from Maidenhead and inwards is currently worth about £25m,

⁷ Passenger Demand Forecasting Handbook, page B5 –3.



to which can be added perhaps a quarter of the existing Heathrow Express market which is believed to be worth about £60m. This means that Crossrail is projecting roughly a doubling (100% increase) in demand, on a corridor where there will be little reduction in in-train journey time but, as with Superlink, elimination of the need to interchange at the London terminal.

Similarly, CLRL is projecting revenue growth of £873m NPV or about £41m in 2020, by incorporating the Shenfield route. Crossrail actually provides little in the way of additional capacity on this route but does improve connectivity (like Superlink, although on fewer corridors). CLRL are relying on a 30% increase in capacity, and demand, on the West Anglia route. The demand may well be there, but the capacity cannot be delivered in the way that CLRL anticipate. The market is currently worth about £35 million on the Shenfield line and £25 million on the West Anglia routes, in from Harlow. So CLRL is assuming about a 40% increase in revenues on these corridors, mostly just from eliminating the interchange at Liverpool Street *and for only some of the trains*.

Superlink's forecasts are consistent with CLRL's own forecasts for Crossrail, although they are derived using a different method. CLRL uses a "black box" model while Superlink's calculations are wholly transparent in the model that was provided to DfT in July 2004. Superlink's assumptions may well be more conservative than those used by CLRL to justify the Crossrail scheme.

Patronage and Revenue Conclusion

3.68 Superlink revenue forecasts are based on increases in baseline revenue estimates by line. The allocation of TOC revenues to particular services is highly approximate; in addition significant growth from 1996 to 2020 has then been applied. There is no verification of revenue estimates by service against patronage data and the baseline estimates cannot be verified. No explanation is given of how patronage and hence revenue increases due to Superlink were derived.

As noted above the growth from 1996 to 2002 is based on actual figures, while a large portion of the increase from 2002 to 2020 is due to fares policy and assumed demand growth in the "do minimum" scenario. Our assumptions for further growth in the case with Superlink are, if anything, more conservative than the growth factors implied by CLRL's own forecasts for Crossrail.

3.69 Given minimal overall changes in frequency, it is unlikely that Superlink service improvements would generate significant patronage increases. Where Superlink does produce significant time savings, they are from outer commuting areas such as Northampton and Ipswich where trip rates to central London are likely to be tailing off. Even a doubling a trip rates, as a result of Superlink, would lead to only a modest increase in the number of rail trips made from these locations.

Superlink would provide a substantial increase in capacity, and greatly reduced journey times from a wide range of areas. These include many of the largest and fastest growing commuter markets in southeast England.

3.70 Sensitivity tests using standard rail industry elasticities suggest that the Superlink revenue forecasts over-estimate revenue gains by up to a three times and are unreliable.

Superlink's forecasts are consistent with industry experience and with CLRL's own forecasts for Crossrail.



SUPERLINK – CONSTRUCTION COSTS

3.71 The promoters of Superlink estimate its construction cost as £13.2bn, around 30% more than the estimated £10.3bn cost of Crossrail. Given the lack of detail in the Superlink proposal, this figure is difficult to verify. However, high level analysis by CLRL suggests that it is a considerable underestimation, and that the construction cost of the Superlink proposal would be around £15.9bn at first-quarter 2002 prices, or around 55% more than Crossrail.

Superlink provided a detailed breakdown of its cost estimate to DfT in July 2004. Our estimate of *construction* costs is actually £9.6 bn, against £7.5 bn for the current reduced Crossrail scheme. CLRL appears to be mixing up *construction* costs with *total* costs, which include incremental operating, maintenance and renewal costs over 60 years. Our figures are consistent with those published in the Montague review and disclosed to us by DfT under FOI.

The capital cost estimates prepared by CLRL are broadly consistent with Superlink's own estimates for many segments. For example, we estimate costs of £2,235 million to build the line from Canary Wharf to Stansted and Cambridge, while CLRL's estimate is only £1,469 million. CLRL's estimate for the Superlink segments totals £9,063 million as compared to our estimate of £9.6 billion.

However, CLRL has then added in £3,976 million of "risk and contingency", £1,617 million of "indirect costs", and a further £847 million for property acquisition and utility diversions. These appear to be "wet finger" allowances, which may or may not be justified. Superlink's estimates include allowance for these costs and have been calibrated against out-turn costs for CTRL, JLE, and the estimates for the Crossrail scheme disclosed by DfT.

CLRL also seems to have included allowances for some works that are not required for Superlink. For example, CLRL assumes costs of £262 million for the Staines –Reading route. It is unclear what work, if any, would be required to operate Superlink trains over this corridor. We propose to operate 2 trains in the peak hour, in addition to the existing 2 train per hour service. However, a 4 train per hour service operated over this route in recent years and so no work is likely to be required.

3.72 CLRL's estimate of the construction cost of Superlink was derived by amending the SuperCrossRail cost model to take into account recent cost estimation work carried out by CLRL and the route differences between the SuperCrossRail and Superlink proposals. The cost estimate was prepared on the assumption that the scheme would use the "safeguarded" Crossrail alignment in central London rather than the alternative northern or southern alignments suggested by Superlink Ltd. It should be noted that the cost estimate for Superlink does not include the need for an additional grade separated junction on the GWML between the central area tunnel and the Fast Lines which would be needed to operate the Airport Express service to Heathrow. A more detailed breakdown of the estimated construction cost of Superlink is contained within Appendix 2.

3.73 In estimating the construction cost of Superlink, CLRL assumed a similar level of contingency to that used for Crossrail. However, the Superlink proposal is much less well-developed than Crossrail. Treasury "Green Book" guidance is that risks and contingencies should be set at a higher level for projects in an early stage of development. Applying these guidelines would significantly increase the £15.9bn cost estimate for Superlink.



We accept that Superlink has not been able to develop its scheme to the same level of confidence as Crossrail – we have not had access to £154 million⁸! Before Treasury gives its approval to Superlink, or indeed to Crossrail, one would expect that risks and contingencies have been reduced to much lower levels.

SUPERLINK - CONCLUSIONS

3.74 Following a careful review of the Superlink proposal, CLRL concluded that it was not a feasible option and did not merit further analysis. This decision was based on four major areas of concern:

- The large number of proposed branches, long distances that trains would need to travel and the degree of inter-running with other operators would be operationally incompatible with the need to ensure highly regular train intervals through the central area. The DfT sponsored review of Crossrail highlighted the difficulties of integrating Crossrail, as then defined, with existing services due to poor punctuality and problems of allocating train paths. These problems would be compounded many times by the complex service pattern proposed for Superlink.*

- A major advantage over Crossrail claimed by the promoters of Superlink is that their scheme would serve major growth areas in the South East of England including Milton Keynes/South Midlands and the London–Stansted/Cambridge corridor. Although new developments in these areas will undoubtedly increase commuting into London, plans for growth in these areas are based on sustainable development principles and it is not the intention for housing growth to be dependent upon longer distance trip making. Instead, policy on development in the South East of England promotes balanced communities with local employment opportunities and facilities. In addition, there are already existing plans to increase rail capacity into London from many of these growth areas, primarily by operating longer trains.*

- A major claim of the promoters of Superlink is that the construction cost of Superlink would be only 30% higher than the cost of Crossrail (£13.2bn), but generate nearly three times the amount of new revenue. Analysis of potential construction costs of Superlink by CLRL suggests that the construction cost of Superlink would be at least £15.9bn, or 55% higher than the cost of Crossrail. Analysis of Superlink's revenue forecasts suggests that these are unreliable, and that revenues would be more likely to be in the range of £110m - £200m. Given the underestimation of the cost of the proposal and the overestimation of the new revenue generation, it is difficult to accept the assertion that Superlink would be easier to finance than Crossrail.*

- Many of the environmental and consent risks associated with SuperCrossRail would also apply to Superlink. The proposal would require construction of an additional 7km of tunnel and new lengths of surface track, along with a depot and possible stations, between Barkingside and Shenfield and Harlow. This construction would need to take place primarily within the Green Belt.*

We reject CLRL's conclusions for the reasons set out above.

⁸ This is in addition to the £200 million or more spent on Crossrail in the early 1990s, and the costs to safeguard the central London route.

Crossrail - reaction to Crossrail SES continued

From: "Sven Parker" <devo.vz@tiscali.co.uk>
To: "Tim Neate" <crossrail@dft.gsi.gov.uk>
Date: 08/06/2005 17:38
Subject: reaction to Crossrail SES continued

from: JS Parker, Tower Hamlets resident, 26 Barnardo St, E1 0LT

to:

Tim Neate,
Consultation Manager
Dept for Transport
Major Projects Division 3
Zone 2/08
76 Marsham St
SW1 P 4DR

about: Crossrail construction plans

Dear Mr Neate,

I am emailing again with a further reaction to the Crossrail SES, which is as follows:

if an alternative to having a TBM launch shaft at Hanbury St or in the Hanbury St area were to be adopted - such as those discussed in appendix 3 to the SES - there would be no need whatsoever for either the conveyor belt between Pedley St and Mile End Park, or the dump itself in Mile End Park. This would make large-scale truck movement unnecessary also: no spoil, no trucks.

This is because the amounts of spoil would be massively less, if a simple vent/escape shaft was built, and not a TBM launch shaft, as there would not be a huge daily output of spoil once the simple vent/escape shaft was in place: it would be a one-off shaft construction - not part of a spoil transit route for the whole tunnel project.

In fact there would be no daily spoil output from Hanbury St area shaft, once the shaft was constructed, if spoil were removed from tunnel ends elsewhere, as discussed in Appendix 3, and not from the shaft in E1.

This would make huge savings in terms of environmental degradation, and all forms of pollution associated with spoil transit and storage and associated machinery, as discussed in earlier correspondence, for all those affected by current Crossrail proposals to this area.

Thanks again for taking the time to process this representation.

Yours sincerely,

Sven Parker

PLEASE NOTE: THE ABOVE MESSAGE WAS RECEIVED FROM THE INTERNET.

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015



Open Spaces Society

Chairman RODNEY LEGG Charity no 214753 General Secretary KATE ASHBROOK

Mr Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08, 76 Marsham Steet
SW1P 4DR

Hon. Parliamentary Consultant:
BERNARD SELWYN
3 Hogarth Road
London
SW5 0QH

Tel & fax: (020) 737 00 854

12 June 2005

Dear Mr Neate

Crossrail Bill

We have examined the main and supplementary Environmental Statements with particular reference to the open spaces affected, temporarily and permanently.

We recognise the technical difficulties with regard to the construction of the railway and accept there must be some adverse consequences, particularly during the construction and reinstatement periods. Nevertheless we consider that the loss of community enjoyment has been under-estimated and is particularly unacceptable in relation to sites in overcrowded and deprived areas of Tower Hamlets which make active use of them. These are at the Stepney Green shaft and work site (including Stepping Stones Farm) and the two areas of Mile End Park - the shaft and work site at the south end, and the north end site and climbing wall affected by Works 1/25B and 1/25E.

If the Bill receives a second reading, we see no alternative but to petition against them and, possibly, other open space and rights of way issues, and hope that alternative or less harmful solutions can be found.

Yours sincerely

Bernard Selwyn
Hon Parliamentary Consultant, Open Spaces Society

~~25A Bell Street, Henley on Thames, Oxon RG9 2BA~~
~~tel: 01491 573535 fax: 01491 573051 e-mail: hq@oss.org.uk website: www.oss.org.uk~~

RESPECT

THE UNITY COALITION TOWER HAMLETS BRANCH.
C/O 60 Brokesley Street, London, E3 4QJ

Timothy Neate/Alistair Darling
Department of Transport
Great Minster House
76 Marsham Street
London SW1P 4DR



13.6.2005.

Dear Sirs.

I have read the Supplementary Environmental Statement Summary regarding Crossrail, and would like to make the following objections concerning works in Tower Hamlets on behalf of the Tower Hamlets Branch of RESPECT and George Galloway, MP for Bethnal Green and Bow.

These concerns are in addition to those already raised regarding the Environmental Statement itself, in letters dated 14/4/2005 and 11/5/2005. We would like these concerns to be considered when drawing up the principle of the bill.

Air Pollution.

The SES Summary suggests that any increase in air pollution caused by the construction project itself will be more than offset by the decrease in traffic fumes once Crossrail is operational. This assumes that Crossrail will result in fewer car journeys being made. No evidence is presented to justify this assumption, which seems cavalier in the extreme.

Tower Hamlets is one of the most polluted boroughs in the country, in 2003 it exceeded acceptable levels of air pollution in all three of the borough's monitoring stations.

COMEAP, the Committee on the Medical Effects of Air Pollution, state in their QUARK Study that the "quantification of the effects of air pollution in the UK show that deaths occur earlier and that hospital admissions for respiratory disease are probably both caused de novo and advanced by exposure to air pollution."

COMEAP further state: " The results of preliminary work on the impact of long term exposure to air pollutants is certainly consistent with current levels of air pollution having a significant effect on life expectancy."

This makes sobering reading for Tower Hamlets residents, whose age standardised cardiac and respiratory illness, admissions and death rates are well above average.

The SES summary suggests that the pollution will be limited to a very small area around the construction site. However, it is well known that PM10s, which will be a major component of the pollution, travel long distances, and easily travel indoors. Contrary to suggestions in the SES summary, the Spitalfields area is one of the most densely populated in the country, the pollution will blight the lives of residents there.

Noise Insulation

The SES Summary states that Modern Noise Insulation is **likely** to mitigate noise in those properties which qualify for noise insulation, which begs the question, "what about the properties which do not qualify for noise insulation, and what about the external environment?"

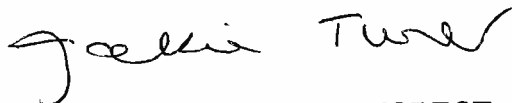
Hanbury Street.

It seems that the tunnelling site at Hanbury Street is being justified merely on the grounds of cost, the SES Summary states that without it the project would cost a further 500 million pounds and take an additional sixteen months to complete. We object that the need of private companies to make large profits is considered more important than the needs of local residents, who by enlarge, will not benefit from the transport links provided, while the dust and disruption will adversely affect their health as outlined above.

Bow Midland Yard West

We object to the projected 800-1300 job losses and the potential increase of road freight if Crossrail were to use this site.

Yours sincerely



Jackie Turner, Branch Secretary of Tower Hamlets RESPECT.

The Consultation Manager
Major Projects Division 3
Department for Transport
Zone 2/08
76 Marsham Street
London SW1P 4DR

14 June 2005

Dear Sir/Madam

Comments - Crossrail Supplementary Environmental Statement

The Society is responding to requests for comments on the Crossrail Supplementary Environmental Statement by 8 July 2005 and in particular Section 6 dealing with Hanbury Street.

The Society has been considering the Crossrail proposals for Hanbury Street with expert railway engineers commissioned by Tower Hamlets Council. It is our opinion that it is clear from that exercise that:

1. the scheme promoted in the Bill in February was settled without a proper investigation of alternatives;
2. the further work commissioned by CLRL has been with the sole intent to prove that the Hanbury Street option should be the preferred option; it has not been carried out in an objective way in order to find the best alternative;
3. alternatives put forward by local groups during the course of discussions have been ignored by CLRL and we have evidence of their refusal to consider those alternatives;
4. on the specific point of what is called the "Woodseer Street alternative" it is clear to us and expert engineers appointed by Tower Hamlets Council with whom we have discussed these reports that the surface impact of the Hanbury Street site is much worse, arguments put forward by CLRL as to depth of piling are spurious, and the sole disadvantage given by CLRL, on which they base their case that Hanbury Street should be preferred, is an inferior horizontal alignment (which is itself is not proven) - the fact remains that this route could be improved to a much better horizontal alignment and yet CLRL have made no attempt to do this at all; in our opinion CLRL have deliberately put forward an alternative on which they can base a case that the horizontal alignment is sub-standard ie they have not properly considered the alternatives;
5. it is clear from the reports now produced by CLRL that they had given no proper consideration to the impact of relocating the tunnel drives until very recently; their report is dated April 2005 and we have evidence from previous meetings that they had no firm information to support their contention that Hanbury Street should be used as the tunnelling access site; expert engineers say this report does not contain sufficient information for them to judge its merits despite what we understand to be their repeated requests of CLRL to produce it;

6. we draw your attention in particular to Section 6.2.2 which states "this is a densely built-up area with a number of surface features such as listed buildings, shopping areas and religious establishments which make the selection of an appropriate site for a shaft difficult"; in our opinion, there is no appropriate site for tunnelling intervention in this area and there are much better alternatives for the siting of a ventilation shaft. We have expert evidence on these issues which we shall use in any petition to Parliament.

We shall put forward all our correspondence since March 2004 alerting CLRL, the Department of Transport and the Secretary of State to these concerns, none of which you have properly addressed and which have caused this community, which is one of the poorest and most deprived in the country, to incur considerable expense and the potential expense of petitioning before Parliament.

We repeat our contention that second reading of the Bill is premature as the alternatives have not been properly considered.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Jones', written over a light blue circular stamp.

Patricia Jones

cc Alasdair Darling
Dr Stephen Ladyman
Derek Twigg
Karen Buck

The Consultation Manager
Major Projects Division 3
Department for Transport
Zone 2/08
76 Marsham Street
London SW1P 4DR

14 June 2005

Dear Sir/Madam

Comments - Crossrail Environmental Statement and Supplementary Environmental Statement

I attach a copy of the Crossrail Project Bulletin 1 I have recently received on behalf of the Society. This refers to both the extension of the period for comment on the main ES to 10 June 2005, and to publication of the supplementary ES and the ability to send comments before 8 July 2005.

1 Lack of Notification

Please let me have a list of the names and addresses of all those to whom you have sent this bulletin. I am quite sure that the vast majority of the people in the Spitalfields and surrounding areas who will be affected by the Crossrail proposals have not been notified and will not know that they could make further comments on the ES and will not know that a supplementary ES has been published and they can make comments on it. You will appreciate that the majority of the community in this area who will be most severely affected do not have English as their first language, may well not be able to read English and will certainly not be able to understand the ES or the Supplementary ES even if they knew they were available and could access them in the first place.

2 Presentation

Again, the substantial bulk of the supplementary ES makes it difficult to assess in a straightforward manner - or indeed at all for our community, bearing in mind the above comments.

3 Human Rights

The extension of the time for comment on the main ES and the publication of the supplementary ES, neither of which have been properly publicised, mean that those affected by the impact of the Crossrail proposals outside the compulsory purchase zone are still unaware that they can make statements and, as such, the Bill violates their human rights.

Timing

I understand that second reading is anticipated to take place by the end of June 2005 and yet your timescale for comments on the supplementary ES is 8 July 2005. The Bill cannot be presented before everyone has been given a proper opportunity (and that means telling everyone who may be concerned that they have that opportunity) and taking their comments into account. Until this has been done, second reading of the Bill is premature.

The comments set out in the Society's previous letters to you are repeated. The Society believes that promotion of the scheme is premature and that the rights of its members are unduly, unfairly and adversely affected. The Society has also received advice concerning the revised safeguarding of the route under the Benchmark scheme and we shall shortly be asking for scrutiny of the process which led to the revised safeguarding.

Yours sincerely



Patricia Jones

cc Alasdair Darling
Dr Stephen Ladyman
Derek Twigg
Karen Buck

PO BOX 24826
SPITALFIELDS
LONDON E1 7UH

Tim Neate
Consultation Manager
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

16 June 2005

spitcomass@yahoo.co.uk

Dear Tim Neate

CROSSRAIL HYBRID BILL SUPPLIMENTARY ENVIRONMENTAL STATEMENT

On behalf of the Spitalfields Community Association (SCA) I am responding to the Supplementary Environmental Statement (SES). The content of this letter should be read in conjunction with our letter dated 13 May 2005 which commented in detail on the substantive Environmental Statement presented with the Crossrail Hybrid Bill in February 2005.

1. **WORKING HOURS**

We find it completely unacceptable to propose that work in the densely populated neighbourhood of Spitalfields has to remain at **7am to 7pm**. The usual hours for construction set out in the conditions attached to planning permissions here in the London Borough of Tower Hamlets (LBTH) is **8am to 6pm Monday to Friday and 8am to 1pm on Saturdays with no construction on Sundays or Public Holidays**.

The arguments given in the SES for retaining the **12 hour** period of construction takes no account of the impact that such a 12 hour period of noise, pollution and lorry movements will have on local residents. We also know from experience of large scale construction sites in Spitalfields, that contractors frequently breach permitted hours of work contrary to planning conditions.

We also assume that the proposed retention of the 7am to 7pm working hours relates **only to surface work** with no account given to the expected 24 hour 7 day per week working underground. We question the assessment that the difference in the noise impact between a 10 hour working day and a 12 hour working day to be insignificant. Assuming that comparative studies have been done to support this claim of insignificant differences, we would ask that the SCA is provided with a copy of these comparative studies.

2. **CONSTRUCTION PROGRAMME**

2.1 **Traffic**

Members of the SCA are bemused by the SES claim that the potential for traffic growth in Central London will be severely constrained by among other factors the Congestion Charge and traffic congestion, and we believe that this statement is naive and unrealistic. The SES has paid no regard to the fact that the Spitalfields neighbourhood has one of the highest and increasing number of children in the country. As a substantial number of these children are presently at secondary school, by 2009, the new proposed date of commencement, many of these young "Never doubt that a small group of thoughtful committed citizens can change the world; indeed, its the only thing that ever does." MARGARET MEAD

people will be car drivers and congestion will have increased substantially in and around our narrow streets.

2,2 Air Quality

The SES claims that air quality is expected to improve in the 2 years between 2007 and 2009, and we ask for evidence of proof for that statement. The claim that the increase in pollutant concentration due to construction traffic would be the same in relative terms in 2009 in comparison to 2007 is, we believe, a fatuous argument to be proffering in support of a delay to the start time.

Tower Hamlets is one of the most polluted boroughs in the country and in 2003, acceptable levels of pollution were exceeded in all three of the Borough's monitoring stations. The SES ignores the existing asthma and eczema problems of many children in Spitalfields, and it is undisputed that these health difficulties are exacerbated by air pollution. The suggestion that serious air pollution will be limited to a very small area around the construction site does not carry weight as PM10s, a major component of pollution, travel considerable distances and also appears inside houses. The SCA is of the opinion that the increase in air pollution that will inevitably result from lorry movements and the 2 construction sites in Spitalfields will result in those children living closest to the construction sites and along the roads to be used by lorries, will be at greater risk of serious health problems. This is discriminatory.

3. NOISE

We understand that the expected level of noise from the construction sites will be above the level that requires ear protection for workers on the site. This level of noise is totally unacceptable to local residents, and we are not confident that any noise insulation can or will offer the appropriate amount of protection. The SES consistently fails to consider the welfare of residents here in Spitalfields, and the underlying implications of this is that residential amenity and our health and safety are not matters that require Crossrail to seriously address or attempt to mitigate.

4. HEALTH CONSIDERATIONS

The SES statement [quote] *"The temporary breaches (of Air Quality Action Plans) are limited to within a few metres of a small number of roads, where only a small number of people are expected to be present..... The likelihood of people being exposed for significant periods of time within the limited areas of breach is very low. This is because people do not remain in the same location for such significant periods but move around."* [end quote] is breathtaking in its arrogant disregard of the residential nature of the Spitalfields neighbourhood. The claim that the effects on peoples health from breaches of Air Quality Objective will be low is seriously misleading at best and completely wrong at worst.

Residents do not frequently move around but often stay at home during the day, especially if there is a small child or an elderly or sick person in the house. There is no consideration given to evening and night time occupation of homes which may be extremely close to the construction sites, when residents will then be exposed to any breaches of Air Quality Objectives.

5 HANBURY STREET

5.1 At a meeting at City Hall on 13 June 2005 Keith Berriman, acting Chief Executive said when questioned about the conveyor belt technology, that it was too early to say how it might be constructed and insulated from noise pollution, The best example of conveyor belt technology that he could give was an existing one in operation in Gerrards Cross which was not insulated and crossed a car park.

As it is proposed that the conveyor belt from Pedley Street to Mile End Park, will run 24 hours 7 days each week and be sited immediately adjacent to homes, we find it an astonishing fact that no reassurances can be given to people at this late stage in the proceedings, about the conveyor belt technology and noise insulation.

5.2 At this same meeting Keith Berriman informed us that the final decision to consider tunnelling across London from each end and not using Hanbury Street as a tunnelling site will be a political decision. This is contrary to information previously provided to us by Crossrail who have consistently claimed that it was absolutely imperative to tunnel from Hanbury Street to save construction time and therefore cost. It now seems that the final decision lies elsewhere other than with Crossrail .

5.3 However, there has never, to our knowledge, been a full and proper comparative study to support the claim that it is imperative to tunnel from Hanbury Street rather than from each end. Evidence of this lack of proper comparative assessment was provided by Bernard Gambrill, Head of Public Affairs in a letter to Oona King our then MP and dated 3 March 2005 when he states [quote] “ *The tunnelling from both ends has been investigated. According to our current estimates the main impact of this would be to extend the overall period of construction of Crossrail by at least 12-15 months. This would extend the environmental impact on those people effected by other parts of the works. It would also effect the cost of the project. **No detailed work has been done on a longer construction period, but using a rough ‘ rule of thumb’ based on other similar projects we estimate that the costs would increase by about £300 million.*** [end quote – our emphasis] We were informed by Keith Berriman on 13 June, that the overall estimated cost of the Crossrail project is £10 billion based on 2002 figures and that there was also an additional sum of £4 billion as a contingency fund to deal with any unforeseen events.

5.4 We would therefore question the justification and validity of a saving of some £300 million in a £14 billion project. In the scheme of things this appears to us to be a significantly small amount in estimated savings. To members of the SCA this clearly reflects how cheaply the well being, health and welfare of residents here in Spitalfields is considered and costed by Crossrail.

5.5 In view of the anticipated delay in start time from 2007 to 2009 we see no reason why that 2 year period cannot be used to investigate the impact that tunnelling from each end would have on other central London work sites. Any resulting revision of the Environmental Statement could also be done during this time.

6. CONCLUSION

6.1 In view of the above comments, we repeat that members of the Spitalfields Community Association are of the opinion that the promotion of this scheme is very premature. We are also of the opinion that our human rights as Spitalfields residents and small businesses have been unduly, unfairly and adversely effected.

6.2 The concerns set out in this letter are not exhaustive and are made without prejudice to our rights to raise these and other matters during discussions at the Select Committee stage following the submission of a Petition from the Spitalfields Community Association in due course.

I would be pleased to receive confirmation of safe receipt of this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jil Cove', with a horizontal line underneath the name.

Jil Cove

Secretary

Copy via email to:- Alistair Darling MP – Secretary of State for Transport

Derek Twigg MP – Minister for Crossrail



Mike Robinson
Head of Strategic Planning and Technical Services
London Borough of Havering
The Whitworth Centre
Noak Hill Road
Romford RM3 7YA

Telephone: 01708 432947
Fax: 01708 433607
email: mike.robinson@haverling.gov.uk

My Ref: MR/JE

Your Ref:

Date: 01 July 2005

Mr Tim Neate
Consultation Manager
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Dear Mr Neate

Crossrail Environmental Statement and Supplementary Environmental Statement

I write to inform you that the Council will not be formally responding to the consultation on either of the above documents.

This should not be taken to mean that the Council has no concerns about the statements and the environmental impacts that they identify. The Council does have a number of concerns and The Department and Crossrail will be aware of the nature of them from the helpful meeting held at the Department on 27th April 2005.

The Council is currently translating these concerns into its formal petition which we look forward to presenting during the petitioning period when this is eventually determined.

Yours sincerely

HEAD OF STRATEGIC PLANNING & TECHNICAL SERVICES

004

PLANNING AND CONSERVATION

THE TOWN HALL HORNTON STREET LONDON W8 7NX

**THE ROYAL
BOROUGH OF**

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS



**KENSINGTON
AND CHELSEA**

Mr T Neate,
Consultation Manager
Department for Transport,
Major Projects Division 3,
Zone 2/08,
76 Marsham Street,
LONDON SW1P 4DR.

Switchboard: 020 7937 5464
Extension: 2944
Direct Line: 020 7361 2944
Facsimile: 020 7361 3463
Email: planning@rbkc.gov.uk
Web: www.rbkc.gov.uk

6th July 2005

My reference:

Your reference:

Please ask for: Mr. French

Dear Mr Neate

Response to Crossrail Supplementary Environmental Statement

Further to our response of May 10th which commented on the main environmental statement (ES), we now write to you with our concerns regarding this supplementary environmental statement (SES).

The production of this supplementary statement came as a surprise to this and every other local authority. In future it would be helpful to have advanced warning of any further publications.

Construction Timetable and Strategy

The SES explores what would happen if working hours were reduced to ten hours per day, from 0800 to 1800 (instead of 0700 to 1900) which are the working hours adopted by most boroughs. The consequences of this are predicted by Crossrail to:

- affect delivery and removal of materials to and from worksites;
- create problems with storing stockpiles due to lack of space, and;
- extend the construction programme.

Para 2.2.4 states; *'The loss of the hours between 0700 and 0800 will be particularly important as it is in the first hours of the working day that hauliers aim to clear excavated material stockpiled from works during the previous night'*.

Between 0700 and 0800, vehicle movements are likely to disturb residents even more, as the local background noise (which is usually due to traffic) is quieter, therefore lorry movements will be even more noticeable. Similarly the earlier start times for general construction will also be more apparent.

If commencing at 0800 is likely to cause more disruption to traffic on the roads, perhaps further consideration should be given to removing more of the materials via rail?

Although it is stated that these reduced working hours will result in an extension of the construction programme, no indication is given as to what this actually means in terms of time.

Para 2.2.7 says *'There is also a significant advantage in being able to make deliveries between 1800 and 1900 in preparation for tunnelling operations carried out on the night shift'*.

What is this advantage? This is not an adequate justification for extending the working hours – there is no reason why this preparation could not be carried out slightly earlier in the day.



Para 2.2.8 comments on the noise and vibration assessment that was undertaken in the main ES. With a ten hour day it is predicted that there will be a 1dB (L_{Aeq}) reduction in noise level, and this is not significant. What this document fails to look at are our concerns about early and late construction activities (and vehicle movements) occurring beyond the Council's usual working hours when as mentioned before, background levels are lower and the site activities will be more noticeable. Furthermore there is no discussion about the intrusion and disturbance caused by impact noises (L_{Amax}) at times of the day when these will be more apparent due to lower background noise levels.

We therefore do not consider that the information provided justifies a 12 hour working day. The benefits in terms of reduced traffic impacts would not be commensurate with the noise nuisance that it would cause to residents.

Construction Programme

This part of the SES looks at the impacts that might arise on traffic, noise and air quality, if the construction phase does not begin until 2009. No reason has been given as to why the year 2009 has been selected for construction to begin.

Air Quality

No figures have been provided to show what the forecasted background concentrations for 2009 are, and how they and the emission factors were adjusted. A table should be included showing the figures for these and the overall predicted concentrations from the construction phase and operational phase. It is not sufficient to say that the impact of the construction traffic on air quality will not be significantly altered from that of 2007. Has the model actually been re-run?

Noise Insulation

In the ES, 85 dB (L_{Aeq}) is quoted as the highest external noise level at which temporary housing will be provided. The SES states however, that because of improved glazing and ventilation systems in residential properties, the number of residents identified as needing to be re-housed is significantly less.

We are concerned that again this is based on the L_{Aeq} level, which does not show the impact of noise events and the intrusiveness of some construction activities. As the number of people to be re-housed is to be significantly less (because of the mitigation proposed in the SES), more properties will be exposed to the impact noise events, which the L_{Aeq} indicator will not reflect. Measurements should therefore be represented by L_{Amax} noise levels.

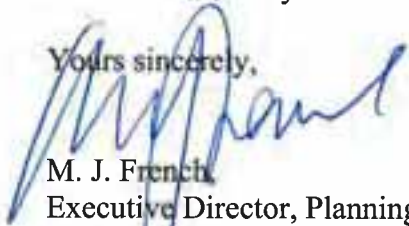
Health Considerations

Air Quality

Para 5.3.5 mentions CO₂ and construction related dust known as PM₁₀ and states that '*These emissions are not considered to have adverse health effects.*' For PM₁₀ this is incorrect. Para 5.3.9 acknowledges the health effects of PM₁₀ so this sentence must therefore be amended.

We trust the above comments are useful, and will be taken into consideration. If you would like clarification on any of the above, then please do not hesitate to contact me.

Yours sincerely,



M. J. French
Executive Director, Planning and Conservation.

c.c. Councillor Daniel Moylan,
Deputy Leader and Cabinet Member for Planning Policy and Transportation

009



**ENVIRONMENT
AGENCY**

Our Ref : NE/2005/013156-1/1
Your Ref : NA

Date : 06 July 2005

Tim Neate
Department of Transport
Consultation Project Manager
Major Projects Division 3
Zone 2/08, 76 Marsham Street
London
SW1P 4DR

Dear Mr Neate

CROSSRAIL BILL - SUPPLEMENT TO ENVIRONMENTAL STATEMENT

Thank you for consulting us on the supplementary Environmental Statement (ES) in a letter dated 26th May 2005 from Cross London Rail Links Ltd. We have the following comments on the supplementary information. This is in addition to our earlier comments on the ES (a copy of which is attached to this letter) and also in addition to our ongoing discussions with the consultation team at Cross London Rail Links Ltd.

1. Romford Depot - Land Remediation

We will need to see the proposed methodology to be used for the land remediation process at an early stage. Details of the control regime for the potential release of noxious dust, increased odour levels and contaminated surface water run off need to be supplied.

The proposed remediation of contaminated land on site at this location will require a mobile plant licence. For any re-deposit of treated material on site an exemption from waste management licencing will be needed.

2. Conservation/ Biodiversity Issues

a) Noise & noise insulation - reference is needed to the impacts of noise on wildlife, particularly in close proximity to watercourses and for species sensitive to noise and disturbance such as fish, Teal and other waterfowl. Details of mitigation against the impact of noise should be included.

b) Delayed start - it is stated that a delayed start would lead to potential cumulative impacts with other planned development and that this was likely to be significant with respect to traffic. However, there has been no mention of whether there would be any cumulative impacts in relation to impacts on wildlife and this therefore needs to be addressed within this document.

c) Removal of excavated material by barge -

i) Abbey Wood - it should be stated whether the intention is to use existing structures to aid removal of material by barge, or whether it is through refurbishment of derelict structures. This would have potential environmental impacts on bird populations using the Tidal Thames. Many of these structures are used as roosting sites. This potential impact needs to be considered.

ii) Pudding Mill Lane & Bow Midland Yard - it should be clarified in this supplementary statement that material will be transported by barge using the City Mill River and/or the Lee Navigation. It should also state whether new or existing facilities or structures including conveyor belts will be required and whether this will have additional ecological impacts, which need to be identified, duly assessed and mitigation and compensation provided.

iii) If there is a substantial increase in river transport associated with works and taking material away by barge, there may be a need to carry out a hydraulic assessment or an assessment of the impacts on the river foreshore/bed where the barges will be.

iv) In all cases it should be noted that we would require buffer zones along all watercourses affected by the above planned works.

I trust this information is useful. Please contact me if you have any questions.

A copy of this letter has been sent to Cross London Rail Links Ltd.

Yours faithfully



DEBORAH SIMONS

Planning Liaison Officer

Telephone Number: 01707 632405

Fax Number: 01707 632515

Email: Deborah.Simons@Environment-Agency.gov.uk

cc: Tom Holstein, Cross London Rail Links Ltd.
Rob McCarthy, Peter Taylor, Graham Dunn, Environment Agency

Environment Agency

Apollo Court, 2 Bishops Square Business Park, St Albans Road West, Hatfield, Herts, AL10 9EX, Tel no:08708 506506, Fax no:01707 632498

memo



ENVIRONMENT
AGENCY

To	The Consultation Manager	Our ref	Crossrail/ ES1
From	Environment Agency	Date	17 May 2005

For the attention of the Consultation Manager (Major Projects Division 3)

Please find attached comments the Environment Agency has prepared on the Crossrail Environmental Statement.

Please note at this stage these are not a definitive list of all our comments and we reserve the right to raise further issues at a later stage in the process.

Cc Anthony Ferguson (DoT)
Rob McCarthy, Chris Birks, Peter Taylor, Graham Dunn (Environment Agency)

Environment Agency

2 Bishops Square Business Park, St Albans Rd West, Hatfield, Herts, AL10 9EX
Tel 08708 506 506 Fax: 01707 632497

CROSSRAIL BILL ENVIRONMENTAL STATEMENT

The following are the initial comments of the Environment Agency on the Environmental Statement accompanying the Crossrail Hybrid Bill.

We have two broad areas of concern arising from the Environmental Statement (ES):

1. The ES fails to recognise and address all impacts on the watercourses, waterbodies and the flora and fauna dependent upon them.

The ES has failed to identify adequate mitigation and compensation (including monitoring, cumulative impacts and timing).

The Environment Agency's (EA) remit is covered under Section 6 and 7 of the Environment Act and Section 109 of the Water Resources Act.

2. The mitigation proposals identified are not wholly appropriate.

This will lead to mitigation objectives not being reached.

In particular technical detail for:

- Fisheries (Environment Agency & Water Resources Act)
- Water voles (Environment Agency Act & lead agency – Biodiversity)
- Foreshore (Environment Agency Act & Encroachment Policy + DEFRA HLT)
- Bats (Environment Agency)

Specific issues that need addressing

In addition to the points above, there are some specific points we feel need to be addressed. They are summarised as follows:

Water Resources

The Water Resources (WR) section only looked at impacts on statutory designated sites. The report acknowledges that no assessment of the significance of predicted water level and flow changes on the aquatic ecology was made as part of the water resources assessment. We believe such an assessment should be included.

The impact of WR changes to surface water morphology, through culverting, river diversions, abstractions and draw-downs also needs to be identified within the ES.

Noise on fauna

Despite 'sensitive' receptor's including sites of nature conservation importance and other designations, these impacts were not recognised and therefore not assessed. We believe they need to be.

Landscape impact on Habitats

Despite 'sensitivity' including conservation interest, the impact on landscape from a habitat perspective was not recognised and therefore not assessed. We believe it needs to be.

We would also point out that our landscape remit does not appear to have been recognised and we were not approached for any landscape assessment data.

Waste transport (movement by water)

The impact of the following areas on flora, fauna and existing boat users has not been acknowledged or recognised and no mitigation has been suggested:

Additional mooring facilities, wharves, boat action, dredging, disturbance, numbers of vessels, cumulative impact from anticipated use of the Lower Lea/Thames navigation by the Olympic bid team

This needs to be addressed.

Assessment of impacts

The following areas were not adequately recognised or assessed and therefore no mitigation has been proposed:

Cumulative impacts, life cycles, habitat maturity levels, fragmentation of habitat, loss of buffer zone, proximity, shading, loss of in-channel flora and fauna, loss of geomorphological processes, loss of channel form and structure, longevity of construction phase, construction techniques, dredging, mobilisation of sediments, mobilisation of contaminants, loss of natural bank, loss of open water, impacts of alien species present in the working area, culverting, channel re-alignment.

This needs to be addressed.

Assessment criteria for impacts

A criterion used appears to look at sites as individual units rather than inter-connected sites, linked by a mobile corridor and therefore does not appear to consider habitat functionality or geographical context. This is not addressed within the cumulative impact section and should be.

Mitigation

Technical amendments are required to submit mitigation proposals. Mitigation proposals are not due for implementation until after works have been completed, this is not appropriate.

**Environment Agency
May 2005**

the Friends of Mile End Park

Please reply to: Neil Sinden, 40 Driffield Road, London E3 5NF

Tim Neate
Crossrail Consultation Manager
Department for Transport
Zone 2/08
Great Minster House
76 Marsham Street
London SW1P 4DR

7 July 2005

Dear Mr Neate

CROSSRAIL SUPPLEMENTARY ENVIRONMENTAL STATEMENT.

I am writing on behalf of the Friends of Mile End Park in response to the request for comments on the Supplementary Environmental Statement concerning the Crossrail project. The Friends of Mile End Park (FMEP) is a voluntary group with hundreds of members whose purpose is to promote the interests of the park (developed with the support of the Millennium Commission) and its use and enjoyment by the local and wider community.

FMEP has previously submitted comments in response to the consultation on the initial Crossrail Environmental Statement on 15 May 2005. We indicated then that the interests of FMEP are directly affected by the Crossrail project, and in particular by the proposals to:

- use Haverfield Green to the west of the Regent's Canal and adjacent to Grove Road as a holding area for excavated material, and
- construct a tunnel access shaft in the south east corner of Mile End Park adjacent to Burdett Road.

In view of our previous submission, we are disturbed that we were not directly informed of the further consultation on the Supplementary Environmental Statement. We do not believe this accords with good practice or legal requirements concerning the preparation of Environmental Statements as required under EU law.

We have the following additional comments to make on the Supplementary Environmental Statement (SPS). These should be read in conjunction with our initial response:

An independent local group to represent the community

friendsofmep@hotmail.com

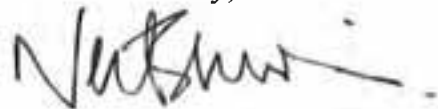


the Friends of Mile End Park

1. We welcome the consideration given to alternatives to the use of the Hanbury St location as a launch site for a tunnel boring machine (TBM). We do not believe that adequate consideration is given, however, to the benefits of these alternatives in terms of avoiding the impact on Mile End Park which would arise from its use as a materials holding site if the Hanbury St location were to be used as a TBM launch site. In particular, we do not agree that benefits of alternative options would be restricted to the immediate vicinity of Hanbury St as stated in the SPS. Mile End Park is at least one mile from Hanbury St and the associated impacts of its use as proposed in the original scheme need to be properly assessed alongside the impacts on communities in the Hanbury St area.
2. Furthermore, we believe that inadequate information is provided to justify the claim in the SPS that alternatives would result in costs and programme delays in the region of £500m and 16 months. Even if it were possible satisfactorily to justify these figures, we believe that avoidance of the negative environmental impacts and associated disruptions affecting the use of Mile End Park and neighbouring communities, alongside the reduction in the impacts on communities in the Hanbury St area, would more than justify the claimed costs.
3. We are firmly of the opinion that end to end, or 'portal to portal', tunnelling and materials disposal would be the most suitable option for securing the construction of Crossrail with the minimum environmental impact and disruption to local communities. We have yet to see convincing evidence that either the promoters of the Crossrail scheme or the Department of Transport has properly considered this option.
4. We are disappointed that the SPS pays no attention to mitigation or compensation connected with the construction of a tunnel access site to the southern end of Mile End Park.

We trust that these comments will be taken into account in consideration of the Crossrail scheme and that they result in amendment of the scheme as proposed in the Hybrid Bill currently before Parliament.

Yours sincerely,



Neil Sinden

On behalf of the Friends of Mile End Park





Tim Neate
Consultation Manager
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SWIP 4DR

John Herman C.Eng.,M.I.C.E.
Head of Environmental Engineering
Forward Planning & Transportation, Town Hall,
High Street South, East Ham, London E6 2RP
Tel No.: 020-8430-2000 Ext: 22298
Fax No.: 020-8430-6656
Direct Line: 020-8430-6630

If telephoning ask for: **Dominic West**

Your ref.: T82/DNW

Our ref.:

Date: 7th July 2005

Dear Mr Neate,,

CROSSRAIL SUPPLEMENTARY ENVIRONMENTAL STATEMENT

Please find enclosed the Council's response to the Supplementary Environment Statement for Crossrail. A hard copy version has also been sent in the post.

Yours sincerely,

Dominic West
Group Leader Transportation

CROSSRAIL IN NEWHAM

Comments on the Crossrail Supplementary Environmental Statement from LB Newham

Construction Noise

- 2.2.3 There is no indication that Crossrail has approached operators of landfill sites with a view to amending their opening hours. It is noted that at least some of the landfill sites do not close at 16:00
- 2.2.4 There is no justification to the assertion that the loss of one hour's work would impact on the project
- 2.2.5 What is the justification for the assumption that lorry movements would be concentrated in the morning? The ES assumes that all the work-sites require the same working hours whereas each work-site should be considered individually on its merits
- 2.2.9 Whilst the extension of the working hours from 10 to 12 *may* have a negligible effect on the *average* overall noise climate. Starting construction work at 07:00 for six days a week. Is likely to cause serious disturbance. The use of Leq to average out noise will obscure significant noisy events.

Construction Noise General

The supplementary ES emphasises the importance to the project of deliveries to & from the work-site. There is no justification in the document for normal construction works to be carried out outside 08:00 – 18:00 as is the normal requirement for all construction sites in Newham which include similar infrastructure projects to Crossrail as the CTRL & DLR extension projects.

Noise Insulation

If the project wishes to evade its responsibility for providing proper sound insulation if a property has 'modern windows', it must show on a property by property basis, that the windows and sound attenuated ventilation fitted to any room at least match the minimum legal requirements

FAX TRANSMISSION

Company: DEPARTMENT FOR TRANSPORT

Message: Re: Consultation on Crossrail
Environmental Supplementary Statement.

Also, on SuperCrossrail and Superlink.

Enclosed please find consultation
document response

For the attention of: NIGEL NUTTALL

No of Pages : 5

Date: 8 / 7 / 05 From: J. Jackson per.
South and West
Transport Action Group
(SAWTAG).

The Stationery Cupboard
12 Market Place
Devizes, Wiltshire SN10 1HT
Tel: 01380 729429 Fax: 01380 728388

Crossrail

- 1.1 This response derives from yours of 27th June 2005 (enclosed) and your report on SuperCrossrail and Superlink (SC&S) herein forwarded.
- 1.2 In the Crossrail – Supplementary Environmental Statement; May 2005 Environmental Resources Management (ERM); para 1.1.5 on page 1-1 is important.
- 1.3 It sets out that Additional Information on Alternatives to Crossrail, specifically SuperCrossrail and Superlink is available in the (above mentioned) Cross London Rail Links limited (CLRL) document Super/crossrail and Superlink Update Report May 2004.
- 1.4 The custodian of the above mentioned report is John Landels.
- 1.5 A note appears on the title page to “Notify the custodian of all errors, omissions and suggested improvements.
- 1.6 This report will now proceed to outline the errors, omissions and improvements concerned.
- 1.7 As part of the Crossrail project, Cross London Rail Links Limited considered a wide range of options (SC&S 1.2 Page 1).
- 1.8 This process is outlined in Chapter 6 of the Crossrail Environmental Statement, published in February 2005 (CLRL, 2005) (SC&S 1.2 page 1).
- 1.9 This response regrets that the Crossrail Alternative set out herein has not as yet been evaluated by the promoters. *It is shown on the map enclosed.*
- 1.10 For Brevity Alternative Crossrail is described as ACR.^b
- 1.11 Preliminary indications are that based on a length for length comparison ACR is roughly half the cost of the promoter’s scheme.
- 1.12 Compared to the £10.3 milliard (£10,300M) cost of Crossrail (reference SC&S 3.72 page 19); ACR is estimated to cost £5 milliard.
- 1.13 The promoter’s scheme is in the same range of cost ^{as} the 1994 Channel Tunnel._^
- 1.14 Eurotunnel was opened in 1994 by HM The Queen and President Mitterand. *of France*
- 1.15 It quickly became apparent that receipts of Eurotunnel were insufficient to service the £10 milliard capital cost.
- 1.16 This writer is of the belief that there was at that time a concurrent Crossrail Private Bill in Parliament with a similar estimated cost as currently.
- 1.17 This Bill failed when a comparison with Eurotunnels financial difficulties became apparent.

- 1.18 Pertaining to SuperCrossrail etc (SC&S 1.2 page 1) it says that all the options but not ACR were appraised in a manner consistent with the Government's New Approach to Appraisal (NAtA).
- 1.19 This response asks for a Crossrail as above to be appraised in a manner consistent with both the Government's New Approach to Appraisal NAtA and the statements made by the Government in the New Deal for Transport Cm3950 20th July 1998 which epitomises this Government's transport development.
- 1.20 The final sentence of SC&S 1.2 page 1 highlights the purpose of NAtA (within the New Deal framework above), and is to provide a consistent framework for comprising options (including ACR) for solving the same (cross-London) problem and in so doing to inform decisions in Parliament about the selection of the appropriate option.
- 1.21 This response agrees with SuperCrossrail in as far as the western and northern destinations in SC&S 2.1 page 2 are concerned, particularly Oxford. It is a condition of Messrs Laing's Chiltern Franchise to promote the alternative closed route to Oxford via Thame and Wheatley.
- 1.22 In that Superail cuts out Oxford due to problems quoted at New Deal for Transport Appendix F page 162; these representations ask for Oxford to be reached by way of Princes Risborough, Thame and Wheatley route closed from 7th January 1963. The route is 56 miles long.
- 1.23 These representations seek new railways to be constructed west of Heathrow Airport as in SC&S 2.1 page 2.
- 1.24 These representations seek a Paddington – Charing Cross alternative.
- 1.25 This is about 4km compared to the promoter's 10km.
- 1.26 The route east from Charing Cross uses two of the four tracks to capacity; whereas these two tracks are currently limited in peak hours capacity by the bottleneck and pinch point at Borough Market Junction that the associated Thameslink proposals are intended to alleviate.
- 1.27 At Waterloo associated the Channel Tunnel International station is closing and transferring to St Pancras.
- 1.28 Between 1860 and 1910 ^{Waterloo was} Was a through station with one track through to Cannon Street.
- 1.29 Railway grouping combined the Waterloo LSWR and SECR portions.
- 1.30 No trains could run between the two halves after Waterloo was rebuilt.
- 1.31 This had an unfortunate effect during World War One.
- 1.32 Sir Herbert Walker of the LSWR became Chief of the Railway Executive where the Government controlled the railways and paid an agreed revenue for their use.
- 1.33 Waterloo LSWR was the key station in World War One despite it having lost the through route mentioned.

- 1.34 Sir Herbert Walker controlled Waterloo, the LSWR network and the Railway Executive created by the Government for World War One.
- 1.35 Until ^{1990's} the ^{to} ~~Stewarts Lane~~ Flyover Waterloo main line had no access the south-east.
- 1.36 As integration with ^{the} ~~one~~ Thameslink proposals is in point here, it has to be mentioned that military trains took over in 1916 the Farringdon to Blackfriars link that ^{did not reappear until} open in the 1980's.
- 1.37 With the precedence of military trains imposed remaining suburban trains were removed in 1916.
- 1.38 Thus cross London train capacity was squandered from 1916 to the arrival of Thameslink, ^(ACR) in the 1980's.
- 1.39 Integration of Thameslink and A CrossRail is to be transferred from Farringdon to Cannon Street and its environs adjacent to the City of London.

Direct Line: 020 7941 7600
 Our Ref:
 Your Ref:
 Date: 27 June 2005

Cross London Rail Links Limited
 1 Butler Place, London SW1H 0PT
 Tel: 020 7941 7600
 Fax: 020 7941 7703
 Website: www.crossrail.co.uk



→ Mr John Jackson
 4 Withem Road
 Keynsham
 Bristol
 BS31 1QZ

Dear Mr Jackson

Thank you for your interest in the Crossrail proposals and your telephone call to the helpdesk on the 23 June 2005.

Further to your request I enclose a copy of the update report on Supercrossrail and Superlink.

Should you require any further information or assistance with any other aspects of the project please do not hesitate to contact the helpdesk on (0845) 602 3813 or email helpdesk@crossrail.co.uk

Yours sincerely


 Carol Bawala
 Crossrail Helpdesk

Crossrail operates in accordance with the Data Protection Act 1998 and the policy statement as set out below. If at any time you no longer wish to receive information from us please let us know in writing or by email and we will confirm that your details have been removed from the list.

Cross London Rail Links Limited and their agents will process personal information that you may provide for the purpose of consultation, statistical analysis, profiling and administration of the Crossrail project. The data may be used in order to keep you informed about the progress of the Crossrail proposals and for the preparation of a Book of Reference which is a requirement of the Standing Orders of Parliament in connection with the promotion of a Bill in Parliament to authorise the construction and maintenance of the Crossrail scheme.







By Appointment to
Her Majesty The Queen
Royal Train Operator
English Welsh & Scottish Railway Ltd
London

Department for Transport
Crossrail Bill Consultation Manager
Major Projects Division 3
Zone 2/08
76 Marsham Street
LONDON
SW1P 4DR

08 July 2005

Dear Sir/Madam

Crossrail Bill Supplementary Environmental Statement

In response to the Department for Transport (DfT) News Release of 26th May 2005 calling for comments on the Crossrail Supplementary Environmental Statement by 8th July 2005, English, Welsh & Scottish Railway Ltd (EWS) tenders the following comments.

While we welcome the consideration given to the Bow Midland Yard West site, it is only one of ten EWS sites that will be affected by, and may be lost to, Crossrail. The loss of many of these will also mean the displacement of freight traffic from rail to road, in the same way as the loss of Bow Midland Yard West.

Even the treatment given to Bow Midland Yard West is inadequate. It assumes that the present tenants will find an alternative rail-served site, when this is highly unlikely. It therefore does not assess the most likely environmental effect of the loss of the site, which is increased road traffic, which could be 10 million lorry miles per year if all current traffic transfers to road. This will have an effect on CO₂ and other emissions, noise levels and traffic congestion.

There appears to be a lack of scientific and statistical rigour in the data relied upon in assessing the traffic movement on the Bow Midland Yard West site. It is unacceptable to favour the displacement of rail served businesses from the Bow Midland Yard West site without investigating or assessing alternative rail served sites for these businesses.

007



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allen.marsden@ews-railway.co.uk
<http://www.ews-railway.co.uk>

English Welsh & Scottish Railway Ltd

Registered Office :
310 Goswell Road London EC1V 7LW
Registered in England and Wales
Registered No : 2938988

08 July 2005

Page 2 of 2



It must be noted that in our comments on the principal Environmental Statement (copy attached) we called for a Supplementary Environmental Statement that addressed the deficiencies of the first, it is disappointing to find that those points have still not been addressed.

We trust these comments and our previous comments will be properly addressed through the publication of a further Supplementary Environmental Statement, which will no doubt be necessary in any event given that London has been awarded the 2012 Olympics.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'A Marsden', is written over a light blue horizontal line.

Allen Marsden
Manager Regional and Local Government

Crossrail - KHOODEELAAR! resposne to SES, filed by 1230 Hrs GMT Friday 8 July 2005

From: KHOODEELAAR! No_Crossrail_hole <khoodeelar@yahoo.co.uk>
To: <crossrail@dft.gsi.gov.uk>
Date: 08/07/2005 13:39
Subject: KHOODEELAAR! resposne to SES, filed by 1230 Hrs GMT Friday 8 July 2005
CC: <kay.jordan@ssba.info>

MUHAMMAD HAQUE / CBRUK /KHOODEELAAR 2004 - 2005

To

Danny Jowers
DFT

Dear Mr Jowers

This is to confirm that the contents of all the relevant documents cited or referred to in your email to myself dated 23 June 2005 have been studied in essence and have been found to NOT include the answers to the key and the core questions that we have so far put to the Secretary of State for Transport.

I can confirm for the record as follows: -

That the DFT has not shown nor implied any existence of any evidence in support of the demolition, Robert-Mugabe-style, of parts of the community in the Brick Lane London E1 area that is affected by the Holes/tunnels Bill

That neither the statements made in the House of Commons by Alistair Darling nor the plethora of documents issued by or in the name of the Mayor London constitutes any recognition of the serious concerns that exist in the Brick Lane London E1 area about all the aspects of the planned holed and digging and the other aspects of the Crossrail assault on the East End of London today

That the bland reference to the assertion by Alistair darling that in his formally stated view the Bill complies with the ECHR is in itself a gross violation of the rights of the people affected.

That the lies that have been included in the promotional statements attributed to various members of local councils including Tower Hamlets, have not been addressed by the Secretary of State

That the comparative factual analyses that we have called for in relation to similar environmental attacks on areas comparable to the Brick Lane London E1 area have been absent from all the DFT publications, statements. As they have been absent from all Crossrail Company's publications statements and promotional materials. , all the statements made by or attributable to the Secretary of State and there is no evidence to support t the claim made about eceinmic regeneration of the E1 area that have been incdoeud in the r0mpotionaluttearnes by Micahel keith or kjen Linsgsintoen or by their associates or agents.

That the Secretary of State ahs not answered the concerns of the ordinary families, residents, small businesses and community groups and cultural and social groups that have been concerned - and have expressed those concerns to the Secretary to state, to Crossrail and to the local Tower hamlets council - about the Crossrail hole/s plans Bill.

That there has been no recognition of the fact that the Crossrail attacks will cause Degeneration of and in the area.

There has been no ECONOMIC evidence produced by the Secretary of State in support of a Crossrail station at Whitechapel or in any other part of Tower Hamlets.

That the entire project is an abuse of the parliamentary majority that the Secretary of State is aware of in relation to the majority side in the UK House of Commons.

That the facts of economic life and the other social and environmental facts in the present time and in the foreseeable times do not warrant the causing of a Crossrail attack to be made or legitimised on the community and the area in Brick lane London E1

Please include this and all our previous documentary representations as parts of our response to the SES on the record.

Thank you

Yours sincerely

Muhammad Haque

© Muhammad Haque
CBRUK - KHOODEELAAR ! 2005
BRICK LANE AREA AGAINST THE CROSSRAIL
TUNNEL/S hole/s Bill
London Community Audit Network
LATEST NEWS AND PHOTOS FROM
our constantly updated campaign and education web pages at
<http://uk.geocities.com/khoodeelar/today.html>

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In case of problems, please call your organisational IT helpdesk

The Consultation Manager
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SW1P 4DR

Your Ref

Our Ref
DNM/Y045083

Date
8 July 2005

50 Broadway
London
SW1H 0BL

Tel +44 (0)20 7227 7000

Fax +44 (0)20 7222 3480
DX 2317 Victoria
www.bdb-law.co.uk

BY HAND

Dear Sir

**Crossrail Bill
Supplementary Environmental Statement
Tarmac Limited**

We refer to the News Release of 26 May 2005 issued by the Department for Transport inviting comments on the Supplementary Environmental Statement for Crossrail by 8 July 2005.

We act for Tarmac Limited ("Tarmac") who have three principal properties which are directly and seriously affected by the Bill's proposals. One of the sites affected is that at Bow Midland Yard. We note that the supplementary Environmental Statement addresses in some further details the impacts relating to Bow Midland Yard West, the site immediately adjacent to our client's property.

Tarmac are concerned that the additional assessment work which led to the Supplementary Environmental Statement did not seek to address the impacts on their site which, as the Supplementary Environmental Statement mentions, is liable to be significantly affected by the proposals. With reference to our comments on the lack of consideration of alternatives which we made in our letter of 17 May 2005 in respect of the Environmental Statement, our clients are concerned that there is no commentary either in the Environmental Statement or the Supplementary Environmental Statement detailing the consideration of alternatives for the proposals at our client's site at Bow Midland Yard.

Whilst the Environmental Statement (Chapter 15, Route Window C13, Pudding Mill Lane Portal) addresses the general scenario should the London 2012 Olympic proposals be successful, there is no detailed consideration in the Environmental Statement nor in the Supplementary Environmental Statement as to the impacts of the substantial construction activity at the site which will result from the now successful bid. Nor is there any detailed assessment of the impact of a successful Olympic bid on the timing of construction activities, the length of occupation of our client's site, or integration between the two schemes. In these respects the Environmental Statement remains inadequate in relation to our client's site.

A list of the partners of Bircham Dyson Bell is available for inspection at the above address and at www.bdb-law.co.uk

Brussels	Rond Point Schuman 6, box 5 1040 Brussels Belgium	Tel +32 2 234 63 06	Fax +32 2 234 79 11
Cardiff	Temple Court Cathedral Road Cardiff CF11 9HA	Tel +44 (0)29 2078 6574	Fax +44 (0)29 2078 6573
Edinburgh	1-3 St Colme Street Edinburgh EH3 6AA	Tel +44 (0)131 220 8294	Fax +44 (0)131 220 8394

Bircham Dyson Bell is regulated by the Law Society. Member of Lexworld International **86** association of independent law firms.

Bircham Dyson Bell

The comments contained in this letter are without prejudice to additional comments which Tarmac will raise in its petition.

Yours faithfully

A handwritten signature in black ink that reads "Bircham Dyson Bell". The signature is written in a cursive style with a large initial 'B'.

Bircham Dyson Bell

**Barbara Smith
Crossrail Action Group**

Comment received by e-mail on 08/07/05

Dear Sirs,

This is the comment of the Crossrail Action Group on the Crossrail Supplementary Environmental Statement.

- **Details of the depot site selection criteria were asked for by the group as far back as July 2004. After many delays, the information was finally made available to us in May 2005 despite it being dated December 2003. The delay in supplying this information was at best unhelpful and at worst, obstructive. Having looked at the site selection/elimination details, it is clear that the degrees and types of assessment used, are not uniform.**

Regards,

Barbara Smith
Crossrail Action Group

The Crossrail Sub-Committee of the Spitalfields Society

018

Tim Neate
Consultation Manager
Major Projects Division 3
Department of Transport
Zone 2/08
Great Minster House
76 Marsham Street
London SW1P 4DR

8 July 2005

By courier delivery

Dear Sir

Further Comments on the Supplementary Environmental Statement

We refer you to the report prepared by Dr Keith Bowers of Arup, a specialist railway consultant and expert in his field, for the London Borough of Tower Hamlets dated 11 June 2005 on the Crossrail proposals for the Spitalfields/Banglatown/Brick Lane area. In our opinion it is clear from that report that:-

- 1 the consultation process has been wholly deficient,**
- 2 the contents of the ES and Supplementary ES are deficient,**
- 3 critical facts in the ES and Supplementary ES are wrong**

You will note that:-

- Tower Hamlets council have had to instruct an independent firm of specialists to extract what information they can from CLRL and subject it to analysis; we understand that their initial budget for this exercise was £100,000; this is clearly far beyond the resources of community and residents' groups in this area which is a very poor area; it is ludicrous to expect our members to have the technical ability and resources to extract and understand the relevant information from CLRL when even specialist consultants have been unable to do so to allow them to comment properly; **our members have not been given any proper opportunity to comment on the proposals and the process has been wholly deficient**
- Dr Bowers notes at various points that the information supplied by CLRL is insufficient, not available, not robust, its delivery has been delayed, work is incomplete, comparisons have not been developed by CLRL, CLRL have acknowledged that their own information is incomplete, proposals are not clearly defined, conclusions drawn by CLRL are questionable and not supported by the evidence, there is a weak basis for CLRL conclusions. ie It is clear that CLRL have not substantiated their proposals and do not have the information to do so. **Put simply, it is our view that the base case has not been properly prepared, information is either inadequate, not available and what information is given may be wrong; the content of the ES and Supplementary ES in in our opinion is wholly deficient;** it appears to the Society that reports commissioned by CLRL for this area at our insistence have been done with the intention of preferring the base case and have not looked at all the possible alternatives and those alternatives

which have been considered have not done so objectively and dispassionately or with any proper analysis of facts.

- To give a specific example, on the basis of Dr Bowers' report the tunnelling strategy using Hanbury Street as an intervention site has not been justified and irrespective of the tunnelling strategy there are overriding planning and environmental reasons to prefer an alternative site to Hanbury Street and that alternative may even offer a net benefit to the project; we have numerous examples of members of this community having, in the Society's opinion, been given misleading and factually incorrect information by CLRL, some of which is reproduced in the ES and Supplementary ES and borne out by Dr Bowers' report; **on expert analysis it is clear to us that facts in the ES and supplementary ES are wrong**

CLRL have not investigated all the alternatives as they are required by the relevant European Directive to do and the analysis of such alternatives which they have looked at is deficient; accordingly they have not selected the best option prior to presentation of the Bill; we understand that the Commission for Racial Equality have expressed the view to CLRL that regard has not been paid to the general statutory duty under the Race Relations Act in view of the racial disproportionality of the proposals in the Sptialfields area; **in our opinion the further progress of the Bill is in contravention of the Directive , the Human Rights legislation and the Race Relations legislation and will inevitably lead to claims of invalidity**

Without prejudice to that contention, **the Society requires:**

1 rejection of Hanbury Street and Pedley Street as a tunnelling access and spoil removal point as there is no justification for the current tunnelling methodology

2 rejection of Hanbury Street as a shaft site as there is a better alternative which as Dr Bowers notes may provide a net benefit

Yours sincerely



Patricia Jones

encl

cc Dr Stephen Ladyman
Derek Twigg
Karen Buck
Rt Hon Alasdair Darling

London Borough of Islington's comments on the Crossrail Supplementary Environment Statement

8th July 2005

The Council would like to express concerns about the consultation of the Supplementary Environment Statement (SES). The timing of the document was poorly communicated with boroughs and the scope of information and rationale for the content is unclear and somewhat spurious.

There was a complete lack of justification as to why some options were presented in the SES whilst other options including those expressed by Islington have not been properly considered or assessed.

In addition, Islington would like to make the following more detailed comments regarding the SES.

Environment Statement Errata

We may have specific comments on the Errata and will forward these on asap.

- The Council notes the additional of the major impact as a result of loss of parking in relation to the Farringdon Western Ticket Hall. (Table 1.8 ref C6, p 83). The Council requests that CLRL undertake a full assessment of the impact of the loss of parking from the Cardinal House and Smithfield basement worksites.
- The Council notes the clarification in text in relation to the 2 adjacent worksites at Moorgate and Aldersgate Street (Table 1.13, para 1.12, p89). There has been no evidence presented to the Highway Authority to substantiate the change in text. Our own assessment has highlighted serious concerns about the impact on these 2 worksites and the impact on traffic delays and residential roads.

Request for further assessments in Farringdon area

Further to the Council's comments on the main ES, Islington believes that both the main ES and the supplementary ES are deficient and requests that Crossrail examine and present a SES of options for the Farringdon area, including:

1. Combined Crossrail western ticket hall /T2000 station on Cardinal House site;
2. Combined Crossrail western ticket hall /T2000 station on T2000 site (54-60 Cowcross Street);

3. Combined construction of Crossrail western ticket hall /T2000 station rail on existing proposed sites;
 4. Alternative locations for track crossover currently proposed at Aldersgate Road;
- The Council believes that in particular the option to provide a combined station would significantly reduce construction and environmental impacts in the local area. The Council would also like a clear assessment of the impacts of construction of the T2000 and Crossrail proposal in tandem by one contractor following the CTRL model for the construction of the Thameslink box at Midland Road.
 - Furthermore, the Council requests information on the proposed cost of the Western Ticket Hall at Farringdon and comparative costs for a combined ticket hall.
 - The Council believes the main ES and the supplementary ES are deficient in that they do not explain how Crossrail appraised the various options for the Western ticket hall location and decided upon the Cardinal House and Cardinal Tower site.
 - In conjunction with the assessments in Farringdon, the Council requests a full assessment of the capability of spoil to be removed by rail from the worksites in the area adjacent to Farringdon.
 - The Council believes that the demolition of 38 Charterhouse Square is unnecessary. The ES and supplementary ES are deficient, as they do not justify the demolition of this building. The Council believes that this building is not required for the construction of the emergency stair shaft and should therefore be retained. The Council believes that this will be possible through underpinning of parts of the building and requests further information from Crossrail showing how this could be carried out.

In addition, CLRL have failed to provide details of the following information despite numerous assurances to do so:

- T2000/Crossrail joint statement of principles of schemes and co-ordination;
- T2000/Crossrail interchange arrangements and we request a clear drawing with the full extent of both proposals;

Hours of working

The Council believes that there is still a lack of justification for the 12 hour working day. The Council requests further information on what the implication of moving for a 12 hour to a 10 hour construction day is and why Crossrail may be looking for in any shoulder hours that might be agreed. The Council requires further information as regards the optimum period for HGV movements. The Council also requires further information regarding the link to licensed disposal sites outside London and their closure at 4pm – in

particular have there been any discussions with the Licensing Authorities for the extension of working hours at these sites?

Construction Programme

- The assessment of environmental impacts if the project commenced 2 years later i.e. 2009 would increase the overall duration of construction works at Farringdon from both T2000 and Crossrail.
- A delayed construction period would also raise concerns in relation to the construction programme for development on the Kings Cross Rail Lands. The impact on the TLRN roads, congestion charge scheme and borough roads could lead to unacceptable congestion in Islington. We would urge CLRL to undertake a detailed assessment of the overall traffic impacts in the area.
- The main ES assumes that when Crossrail commenced works at Farringdon, T2000 works would not be substantially complete. However if the Crossrail construction programme were delayed 2 years then T2000 works would be substantially complete. Correspondence from Crossrail has stated that if T2000 works at Farringdon were complete then Crossrail would consider incorporating the western ticket hall within the T2000 station rather than using the Cardinal House site. The Council is concerned that this scenario is not assessed in the ES or supplementary ES. The Council believes that this option of a combined station would significantly reduce environmental impacts arising from the construction of station infrastructure at Farringdon.

Noise insulation

The Council is in the process of looking into this and will make comments asap.

TBM launch site

The Council notes the study examining alternative TBM launch sites. The Council would like to raise deep concern at the lack of clarity of the study, the scope and the rationale, which examined options for a launch site including Farringdon. The additional environmental impact for the area and the resulting increase in noise and construction impacts would be unacceptable. An option using Farringdon as a TBM launch site in Farringdon would be strongly objected to by the Council.

The Council sincerely hope that these points will be taken into consideration by the Crossrail project and requests that these issues are properly assessed in a further supplementary ES.

P R A C T

Paddington Residents' Active Concern on Transport

Officers and Founder Members:

Chairman: Pam Budge
Vice Chairman: Christopher Wright
Hon. Treasurer: James Spillius

Hon. Secretary: John Walton

70 Gloucester Terrace, W2 3HH

Tel: (020) 7262 1346

Fax: c/o (020) 7402 1726

E-mail: JohnWSWalton@compuserve.com

Bayswater Residents' Association

Paddington Waterways and Maida Vale Society

Hyde Park Estate Association

South East Bayswater Residents' Association

Other Residents' Associations are affiliated.

Tim Neale
Consultation Manager
Department for Transport
Major Projects Division 3,
Zone 2/08,
76 Marsham Street,
SW1P 4DR

10 July 2005

Dear Mr Neale

CROSSRAIL LINE 1: COMMENTS ON THE SUPPLEMENTARY ENVIRONMENTAL STATEMENT (SUPPLEMENTARY ES)

I am sorry if these comments on the Supplementary ES are late: I have been hospitalized.

On 9 June I sent you a letter with PRACT's comments on the main ES. That informed you that PRACT is a consortium of four wide-area residents' associations (listed in our letterhead, above), all recognised by Westminster City Council for statutory consultation on planning applications, with objects to secure improvements on transport and traffic matters affecting Paddington residents.

Our only comment remains that already expressed in a footnote to the attachment to my letter of 9 June. It relates to Box 1, page 4, of the Supplementary ES. We note with interest the statement there that, if construction of Crossrail is delayed by two years, it may be possible for the Transport Deck part of the Span 4 development, on the main-line station's eastern side, to be completed in time to avoid the need for temporary vehicular access to the station on that side.

/ Continued overleaf

At present, however, we assume that the temporary taxi facility on the station's eastern side remains part of the base case for Crossrail. So long as this is so, the need remains for a new design, now, of proper vehicular access to the main-line station's in its "Departures Road" after completion of the construction of Crossrail, with station traffic focused towards the strategic road network, in line with the undertakings made by the Promoters of the Heathrow Express Railway Bill 1991, during the passage of that Bill through Parliament. This is because, unfortunately, the design for long-term vehicular access, if in the "Departures Road", agreed after prolonged discussions between Westminster City Council, Network Rail and the British Airports Authority, has been rendered nugatory by the present design of the Crossrail station underneath Eastbourne Terrace.

In the absence of a previously completed Transport Deck in the Span 4 area, suitable vehicular access arrangements to and from the "Departures Road" will still be needed, during the prolonged period of construction in the Span 4 area, starting 10 years or so hence; and if these are to achieve the objective of focusing station traffic towards the strategic road network, changes to the present design of the Crossrail station would almost certainly be needed, to provide a tunneled taxi run-around facility linked to the "Departures Road". Moreover, there is always the possibility that, by then, plans for construction at the Span 4 site will have changed so as not to include provision for vehicular access to the station at that site, in which case the "Departures Road" would become the permanent site for vehicular access to the main-line station.

In our submission, it is a major defect in both the ES and Supplementary ES that no mention at all is made of the question of suitable long-term vehicular access arrangements to Paddington main-line station after construction of Crossrail has been completed, other than to outline the possibility (dependent on other developers) of completing these on the station's eastern side before Crossrail's construction starts, if this is delayed two years. Desirable though this possibility is, a properly worked out fall-back solution is needed and has not been addressed by Crossrail, who do not appear to have taken the point yet, that such a fall-back solution is likely to conflict with their present design of the Crossrail station at Paddington.

Yours sincerely



JOHN WALTON

Hon. Secretary, PRACT



Gordon Chard – Director of Planning and City Development

Graham King
City Planning Group

Your ref:
My ref: ESSUP

Direct Tel. No: 020 7641 2749
Direct Fax No: 020 7641 8535
Email: gking@westminster.gov.uk

Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Westminster City Hall
64 Victoria Street
London SW1E 6QP

Date: 14th July 2005

Dear Sirs

Response to Crossrail's Supplementary Environmental Statement and its Non Technical Statement

Following receipt of the above documents in May 2005, below is the City Council's formal officer level response.

At various fora since release of these documents neither the Department for Transport nor CLRL Limited have been able to give a satisfactory explanation to the following questions:

- Why was the SES produced and why at this time?
- Why no forewarning of their release was given. Surely consultation should have taken place with local authorities prior to preparation and subsequent release? and;
- What other ancillary documentation may be released in the future?

The above points are fundamental to the management and process of the project and it is reasonable to request an explanation.

In general terms the following points are raised:

- What is the rationale behind the two year deferment to the programme now set out in the SES?
- What is DfT / CLRL approach to advanced works in light of the above?
- The SES still does not cover all the issues previously raised in our response to the original Environmental Statement
- Therefore the SES is relatively unhelpful to the assessment of impacts and confuses issues rather than clarifies them

- The SES fails to provide answers to earlier questions or usefully indicate a positive way forward

The Department is aware of the City Council's concerns, particularly at the meeting with officers on 25 April 2005 when we went through the points in our draft petition systematically. It is unfortunate that the only significant issue addressed seems to be *Working Hours* although that is still unsatisfactorily.

In terms of detail with regard to working hours, the Supplements predispose a 12 hour working day without giving the rationale behind the concept in the first place. It fails to make any statement as to why it should not operate to the principle hours and regimes that other Local Authorities apply. Both these points are fundamental and most of the arguments put forward in section 2.2 of the SES are nebulous.

The City Council's experience with regard to major infrastructure projects and significant developments is that firstly they are planned around the restrictions applied, something that has not happened here. Secondly, there is no consideration of the impact of the proposed hours on the management of the hundreds of construction sites that will be underway during the course of the works. The reason why restrictions are in place is to protect the amenity of residents, businesses and visitors and to allow the City to function. The SES does not advance a proper consideration of this.

The potential later construction start date assumes at Paddington Station that Span 4 can be built to a significantly advanced stage and therefore works to the Red Star deck will not be required. This may be the case but the principle of the argument rests on Network Rail and no assumption can be made that they will build Span 4. Indeed the same applies to any other proposed development activity along the route. Given all the unknowns surrounding the project, e.g. funding, Parliamentary timescales and still an unclear programme which will not be of any real meaning until the nominated Undertaker has been appointed and contracts are let, blight and uncertainty will continue.

The City Council has, over a number of years, been promoting the construction of the Span 4 transportation deck in advance of CLRL as the best "joined up thinking" solution because:

- It avoids the costs and adverse environmental impacts of constructing and removing the red star deck.
- It provides a permanent long term solution to the various issues regarding the servicing of Paddington Station both during and after the construction of the new station box in Eastbourne Terrace. We still await further details from CLRL to explain how this may be achieved without the Span 4 deck.

The only downside is a potential risk of delay to the start of CLRL if the Span 4 transport deck is not adequately managed.

What therefore appears to be lacking is any effective co-ordination between CLRL and Network Rail or any central government decision and commitment to make this happen.

The City Council has over many years consistently rehearsed this with CLRLL and Network Rail and is discouraged to find that neither the ES or SES adequately deals with this critical issue.

In terms of Tottenham Court Road station, the same arguments apply as with Paddington station in so far as LUL's proposals are concerned, simply they predispose that LUL will start their works in advance of Crossrail. The current phasing for works here are firstly problematic and considerable more discussion is required so that a safe and workable scheme can be achieved. This not the case to date.

The City Council reserves its right through negotiation and ultimately Parliamentary procedure to expand on the content of this letter, as more details arise.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Graham King', written over a horizontal line.

Graham King
Head of City Planning

186 High Street
Ripley, Woking
Surrey. GU23 6BE
19th January, 2006

Secretary of State c/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3

SIR,

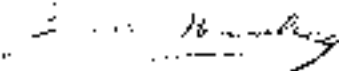
The Crossrail Project Bulletin 4 asked for comments.

I think it will be short sighted folly to build Crossrail with the tunnels too small to take double decker carriages or the new higher freight containers. The extra cost of building a slightly larger tunnel is marginal to the overall cost of the project.

Even if we do not have double decker trains for the first few decades of Crossrail, we should at least have the foresight to leave this option open for future generations.

An inadequate, mousehole tunnel will impact the Environment by forcing passengers & freight back onto our congested roads.

Yours faithfully,



John A. Hartley

1874

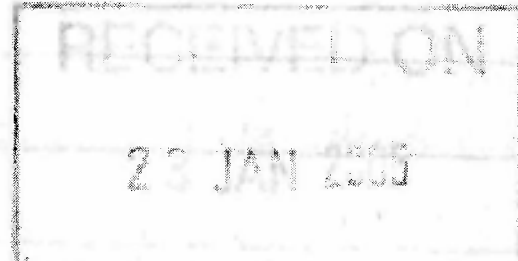
1

MR RYAN DENNIS,
57 RENOWN CLOSE,
WEST CROYDON, SURREY
CRO 3SD

Thursday 19th January 2006

002

To Mr Tim Neate,



MPD

I'm writing to you about the Supplementary Environmental statement (SES2) on crossrail line 1 concerning the planned Romford depot. Instead of building a crossrail line 1 Train depo in Romford, why not build one at old oak common in West London.

For instance:

International Train operator Eurostar is building a new Train de, in Temple Mills, Stratford (East London), and they will move there to the CTRE works is finished next year (2007), abandoning the current North pole Int'l depot in West London. If train operator Great Western mainline takes the North pole depot to store their trains, the old oak common area is yours!!

P.T.C

2

Other things to mention on crossrail line 1:

1) Consider constructing a "Staines - Heathrow Airport Term 5" Rail Tunnel to extend crossrail line 1's future services to Weybridge & Chertsey from Heathrow Airport. Service patterns could look like to

Abbeywood
Sheffield
Maidenhead
Weybridge via Heathrow Airport and Chertsey

2) Cross London Rail links (crossrail lines 1, 2, and 3) should have 10-car dual-voltage 75mph inner-suburban "double-deck" Trains! They are popular in Europe, U.S.A., and Japan, and it's strange that Britain does not yet have double-decker Trains (Although Britain may have invented one in 1949, but later abandoned).

Take note of this letter. Thanks for your co-operation!
From Mr Ryan Dennis, Croydon, Surrey

12, Sotheman Close, Milton Keynes MK12 6LL 21/1/08
 Tim Neale Esq
 Crossrail Consultation Manager
 DfT etc

Dear Mr Neale

Thank you for Project Bulletins 384. The dreaded "bug" has prevented me reacting to one aspect in Bulletin 3 - Maidenhead Bridge scaffolding.

I presume it not to be a reference to Brunel's construction scaffolding as recorded elsewhere. If to do with the erection of the electrification supports - you SHOULD simply refer to the work carried out on the Whamcliffe Viaduct Hanwell now nearly a decade ago.

At the time that the previous Bill was being prepared, your then representatives met a small group of local (Hanwell) residents to discuss primarily the electrification through Hanwell Station. We took it upon ourselves (I was one) to comment upon the proposal for the viaduct remembering the railway had had ~~a~~ telephone wires on poles until the advent of fibre optic cables. These telephone wires were, optically, far more intrusive even than a girder across all four tracks.

In general, "standardisation" of the broad gauge had been on the left side rail remaining in situ thus leaving a considerably wider interval between the two "fast" tracks.

What was done at Whamcliffe was to slue the up fast closer to the down fast & make the interval thence to the down slow track wide enough for intermediate catenary supports of a much lighter nature than a "whole-width" girder support. On the down fast side, the catenary support was placed in (or immediately adjacent to) the telephone pole's foundation i.e. at each two arches.

I do not know the views of the railway bridge at Maidenhead but see no reason why the same electrification method should not be adopted identical with that ~~in~~ IN SITU at Hanwell. Here, after the electrification had been completed, local people DID concede that the work was far less intrusive, optically, than the "intrusion" of the former telephone wires: as shown in photographs from the earlier periods.

I enclose a photograph (from one of the local MK freebies) of the viaduct here at Wolverton: you will see that a full width girder (over 4 tracks) is barely visible. Quite frankly, I do NOT think that many people can get as close to the Maidenhead bridge as this.*

Please return the cutting at your most early convenience. Doubtless you can obtain an actual photograph/negative from the newspaper at the quoted address.

Yours sincerely

Leonard Lean

(LEONARD LEAN)

* The photographer's access is THROUGH the arch on the other side of the river Great Ouse.

Our ref SE/1584/1/2 Pt 1
Your ref
Date 13 February 2006



Secretary of State
C/O Mr Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3, Zone 2/08
76 Marsham Street
London SW1P 4DR

South East Regional Office
20th Floor, Portland House, Stag Place
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Telephone 020 7932 5821
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david.hammond@countryside.gov.uk
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Dear Mr Neate,

CROSSRAIL - AMENDMENT OF PROVISIONS AND SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2

Thank you for the recent correspondence in respect of the above proposal, received in this office on 24 January 2006 seeking the Countryside Agency's comments on the planned works, which has been forwarded to me as the Positive Planning Officer for London.

The Government intends to change the way in which it delivers rural policy. Part of this change will be the establishment of an integrated Agency - Natural England - to be formed in 2006 from English Nature, the Rural Development Service and part of the Countryside Agency. Natural England will have a broad environmental remit set in a sustainable development context. In preparation for the move, the Countryside Agency has focussed its planning activity predominately on those interests relating to landscape, access and recreation (LAR). These interests are as important for urban, as well as rural areas, and therefore relevant to this urban development proposal.

After careful consideration it is our view that this application does not affect any priority interests of the Countryside Agency within Greater London and we accordingly make **no formal representation**. Please be aware that this response should in no way be construed as either support for, or objection to, this proposal.

Although the Countryside Agency does not wish to offer any formal representations we would encourage Crossrail to continue discussion and dialogue with the relevant Local Planning Authorities where temporary closure and or deviation of paths and access to public spaces have been identified. This would be particularly appropriate for the following sites:

- Hyde Park
- Park Lane Shaft



INVESTOR IN PEOPLE

Stepney Green
Eleanor Street
Pudding Mill Lane (in respect of possible closure of part of the River Lea/Lee Tow Path
together with the City River Mill Tow Path)

I trust that the above is of use in your deliberations, but should you have any queries or wish to discuss any aspects of the Countryside Agency's response, please do not hesitate to contact me at the above address.

*Yours sincerely
D. Hammond*

David Hammond
Positive Planning (London)

CC Peter Massini – English Nature

Crossrail - Crossrail comments

From: <Stevemaryderek@aol.com>
To: <crossrail@dft.gsi.gov.uk>
Date: 21/02/2006 17:22
Subject: Crossrail comments
CC: <kellyh@maidenads.co.uk>, <salterm@parliament.uk>

Secretary of State, c/o Tim Neate, consultation manager, DfT, London

Sir,

I would like to add my 'informal comment' on the Crossrail project, as invited in the 23rd January 2006 edition of the 'Metro' newspaper.

As a user of the Tilghurst - Paddington service I find it astonishing to learn that Maidenhead is the favoured terminus. What commercial and operating logic is behind this, other than the 'Maidenhead' influence I wonder?

Are the planners unaware that many intending users would be travelling on either mainline services from far west of Reading, or off the many separate local lines serving intermediate stations between either Oxford and Reading; Newbury and Reading; Basingstoke and Reading; and Wokingham and Reading; and most would then have TWO changes, at both Reading AND Maidenhead, [instead of just at Reading only], in order to join the Crossrail service onward through London (and vice versa applies).

As a result, more of the currently non-stop Reading to Paddington trains would all have to additionally stop at Maidenhead, which would not only worsen the overall journey time but also create an 'imbalance' in the seating capacity, whereby, for instance, should 30% of passengers alight off an 'up' train at Maidenhead for the Crossrail service through London, then this is capacity now lost for other Paddington-bound passengers.

Needless to say, in the opposite direction, would Crossrail passengers be assured of seats on westbound mainline trains as from Maidenhead, just for the short distance to Reading where many would AGAIN change into their respective local services? The very nature of the Maidenhead interchange would affect longer-distance passengers who would be competing for space with those travelling from local stations as quoted earlier.

To use Maidenhead as Crossrail's western terminus would only serve to create more road traffic congestion and environmental damage, as extra car parking spaces would be necessary for those who have to drive there, whereas Reading is the more popular rail interchange station on the network, and should be recognised as such with any proposal of this magnitude.

One perhaps is doubtful that there is more Train Depot space available at Maidenhead than at Reading, but if it was intended to service these trains at Reading, then needless 'empty' running to/from Maidenhead would be a waste of resources when it would be better to convey passengers on this section.

It is therefore hoped that the overall benefit expected to result from the Crossrail scheme is not short-changed by the short-term expediency of ignoring Reading.

Yours, in anticipation,
 Stephen P Derek

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Crossrail - Crossrail Evidence

From: "Joanna Lloyd-Davies" <joanna@lloyd-davies.demon.co.uk>
To: <crossrail@dti.gsi.gov.uk>
Date: 01/03/2006 00:07
Subject: Crossrail Evidence

For the attention of The Secretary of State for Transport, C/o Mr Tim Neale,
Major Projects Division 3, Zone 2/08, Department for Transport, 76 Marsham
Street, London SW1 4DR

Comments to the Supplementary ES - SES 2 etc

I am writing on behalf of Paddington Waterways and Maida Vale Society to
express support for the comments made by both PRACT and WCC (Westminster
City Council) in relation to Crossrail.

Joanna Lloyd-Davies
Chairman
Paddington Waterways and Maida Vale Society
29 Castellain Road, Maida Vale, London W9 1EY
Telephone: 020 7289 6922

joanna@lloyd-davies.demon.co.uk

www.paddingtonwaterways.com

The Amenity Society officially charged with working towards the preservation
and enhancement of the architectural and environmental quality of Little
Venice, Maida Vale and the Paddington Waterway area (including planning and
licensing issues), and concerned with the well-being and sense of community of
its residents.

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further details.

Crossrail - CROSSRAIL LINE 1 : COMMENTS ON THE SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2 (SES 2) for the kind attention of Tim Neale

From: "Simon Walton" <simonpwalton@btinternet.com>
To: <crossrail@dfi.gsi.gov.uk>
Date: 01/03/2006 22:38
Subject: CROSSRAIL LINE 1 : COMMENTS ON THE SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2 (SES 2) for the kind attention of Tim Neale

Tim Neale

South East Bayswater Residents' Association (SEBRA) is an area-wide Amenity Society and was formed in 1970. We are recognised by Westminster City Council as the Amenity Society which they formally consult in this area (from Paddington Station to Queensway and Bayswater Road to Westway including the Westbourne Park Road Triangle, all in London W2) on Licensing, Planning, Traffic & Environmental issues. We comment on about 300 town planning applications a year and a host of other matters. We seek to improve the environment and to protect it from unauthorised construction or changes in the use of shops or other buildings, traffic threats, litter and refuse on our streets, and to curtail or prevent disturbance from late night activity, etc. We are a founder member of Paddington Residents' Active Concern on Transport (PRACT).

We have been closely involved and have had considerable input in the preparation of the attached letter from PRACT dated 1 March 2006 to you, written by our President and ex Chairman John Walton. We would like to state that we totally support the letter as we do the principles of Crossrail. We do however, consider that it should be constructed with the minimum amount of disruption and disturbance to those who live along or near the route.

Simon Walton
South East Bayswater Residents' Association

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P R A C T

Paddington Residents' Active Concern on Transport

Officers and Founder Members:

Chairman: Pam Budge
Vice Chairman: Christopher Wright
Hon. Treasurer: James Spillius

Hon. Secretary: John Walton

70 Gloucester Terrace, W2 3HH

Tel: (020) 7262 1346

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E-mail: JohnWSWalton@compuserve.com

Bayswater Residents' Association

Paddington Waterways and Maida Vale Society

Hyde Park Estate Association

South East Bayswater Residents' Association

Other Residents' Associations are affiliated.

Tim Neale
Consultation Manager
Department for Transport
Major Projects Division 3 (and by e-mail to crossrail@dft.gsi.gov.uk)

1 March 2006

Dear Mr Neale

CROSSRAIL LINE 1 : COMMENTS ON THE SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2 (SES 2)

This letter responds to your press release seeking comments on SES 2. PRACT is a consortium of four wide-area residents' associations (listed in our letterhead, above), all recognised by

Westminster City Council for statutory consultation on planning applications, with as objects:-

“to protect the local environment, in the area covered by the four founder members, from damage caused by all-London or national transport projects and to promote improvements in the public transport and other transport facilities available to Paddington residents.”

Our Petition seeking mitigation is No. 120.

Please find attached a four page note containing our comments on SES 2.

I am copying this to Toren Smith at Crossrail, and internally.

Yours sincerely



JOHN WALTON

Agent for PRACT.

Encl. : 1.

P R A C T

Paddington Residents' Active Concern on Transport

(Petition No. 120)

CROSSRAIL : RESPONSE TO SES 2

CONTENTS

	<u>Paragraph</u>
Introduction	1
Issues on SES 2 : a.) Noise nuisance, including	3
Control of the activities of contractors	4
Issues on SES 2 : b.) Traffic diversions, especially	5
Bus diversions	6
Issues on SES 2 : c.) Access to Paddington Station	9
Issues on SES 2 : d.) Capacity of sewer	11
Connected issues :	
Bus stands	12
Impact of congestion charging extension	13
Long-term vehicular access to Paddington Station	14

INTRODUCTION

1. These comments should be read in conjunction with our Petition (No. 120) and with our comments on the main ES (letter and annexes of 9 June 2005) and on the first supplementary ES (letter of 10 July 2005). There is insufficient detail in SES 2 about vehicular and pedestrian access to Paddington Station, and on other matters, during the successive phases of the enabling works, main construction and reinstatement. PRACT's response to SES 2 is limited to this extent.
2. Clearly there is a need for an early meeting between PRACT and Crossrail, to obtain further information, clarify points about the proposed works set out in SES 2 and in the ES and to resolve, if possible, issues set out in our petition and in these comments – preferably with representatives of Westminster City Council (WCC) also present.
3. ISSUES ON SES 2 : a.) : NOISE NUISANCE.

Environmental protection is stated to be necessary for the small number of premises listed in the non-technical summary as suffering severe noise nuisance. However, we are concerned about much wider noise nuisance due to trenching and creation of underground chambers, especially during the early period of the “enabling works” (relocating existing services). The SES 2 appears to have the stance that such work by statutory undertakers happens anyway and so must be put up with. But these works are on an unprecedentedly large scale, most of them in a highly residential area. Therefore much more attention needs to be paid to control of the activities of the contractors.

4. **CONTROL OF THE ACTIVITIES OF CONTRACTORS (Re. ISSUE a.)**

In our opinion, subject to the provisions of the Act, Westminster City Council (WCC) should be designated as the authority which controls the environmental impact of the activities of the contractors and which monitors their adherence to standard hours of work, prescribed lorry routes, etc. The Council should be reimbursed for the monitoring costs, as is normal in the case of major developments in the Paddington area. We think that lorry routes should be prescribed. We also think that contractors should be obliged to apply in advance for authority to work outside normal hours in residential streets and that the authorizing authority should be WCC.

5. **ISSUES ON SES 2 – b.) : TRAFFIC DIVERSIONS (PARTICULARY OF BUSES)**

These have environmental impacts on residents in the form of added noise nuisance and vibration, especially from buses, and on passengers and other road users through delays and making connections less easy. Not having very detailed information, we fear that the impact will be much greater during the early period of the enabling works than during the subsequent period of the main construction and reinstatement. The enabling works will require occupation of the carriageway in residential streets such as Westbourne Terrace, whilst during main construction there will be traffic diversions alone. To put the point the other way round, we would find it easier to accept a relatively short period of heavy disruption during the enabling works, if the disruption during main construction were substantially less.

6. **Bus diversions.** Our general position (see our petition, paragraph 24) is that virtually full traffic capacity should be maintained along Eastbourne Terrace at all times, by greater use of temporary rafts, in common with best practice overseas. We believe strongly, therefore, that eastbound buses should continue to use Eastbourne Terrace during the main construction, as well as westbound buses (which is already proposed in SES 2). If necessary, buses, ambulances headed for St. Mary's Hospital and fire engines should have priority over other traffic in use of Eastbourne Terrace (in the south-easterly direction) during main construction; if some traffic has to be diverted to Westbourne Terrace, better that it should be ordinary light vehicles.
7. An additional compelling reason for keeping Eastbound buses on Eastbourne Terrace is that we believe it will be virtually impossible for 'bendy buses' to make the left turn from Westbourne Terrace into Craven Road (stages 3A and 3B); even if the stop-line for westbound traffic in Craven Road were set back a lot, the turn by 'bendy buses' would be difficult, and there would be traffic delays and possible danger if, in order to make the turn, they were to use up the entire width of the carriageway of Westbourne Terrace at the approach to the traffic lights. (See also 9 below.) We seek exploration of the possibility of making the run-around of these buses, at the end of their route, to be via the new enlarged Bishops Bridge and the improved junction with Harrow Road
8. Yet another reason for keeping eastbound buses on Eastbourne Terrace throughout main construction – including stages 3A and 3B in SES 2, see Utilities Maps C2 (2d) and (2e) – is the capacity limitation of the critical junction between Bishops Bridge

Road and Westbourne Terrace. A right turn into Westbourne Terrace (southbound) is proposed for buses coming along Bishops Bridge Road in the easterly direction. Yet under the congestion charge extension (see paragraph 13 below), there would be an opposing right turn from Bishops Bridge Road (westbound) into Westbourne Terrace (northbound). This would probably require a three stage operation of the traffic signals at this junction, splitting the present single phase for east-west movement, so reducing capacity. We are also concerned that the present right turn from Westbourne Terrace (northbound) into Bishops Bridge Road (eastbound) should be maintained, so as to enable loaded taxis heading for the temporary access point to Paddington Station to reach it (by making a right turn off the bridge), if they do not wish to travel along Edgware Road.

9. **ISSUES ON SES 2 - c.) : Access to Paddington Station, bus passengers and more generally.**

As regards the convenience of bus passengers, whilst a stop in Eastbourne Terrace of buses going in the westbound direction would be of little use during main construction, we seek the continued provision of a stop for buses going in the eastbound direction, perhaps by diverting some or all buses to the Departures Road. We note, too, that the proposed new stop for eastbound buses, in Westbourne Terrace near to Craven Road, is not at all convenient for connections to other public transport at Paddington. It would severely limit capacity in Westbourne Terrace at the approach to the traffic lights at Craven Road, in addition to the constraint caused by 'bendy buses' (see 7 above), and would also require removal or relocation of a pillar box.

10. As regards access to Paddington Station more generally, we do not understand the apparent need to close all entrances to Paddington Station from the Departures Road and seek clarification – would the footway along the Departures Road also be closed? How is access for residents to the Sainsbury's etc. stores to be maintained?

11. **ISSUES ON SES 2 – d.) CAPACITY OF SEWER.**

It is our impression, but we seek further information, that a sewer underneath Eastbourne Terrace will be diverted in some way to join the existing Victorian sewer underneath Westbourne Terrace. We understand that there are already problems with the existing connections from houses to this sewer, and we seek assurances that the capacity and state of repair of this sewer, or of any other existing sewer affected by the diversion, is adequate – including the capacity to cope with flash floods. We note that the residential area has already suffered much disruption, damage and inconvenience due to inadequacy of an existing sewer underneath Westbourne Grove.

CONNECTED ISSUES

12. **Bus stands.**

As stated in our petition (paragraph 28), we object to the creation of a number of bus stands in Westbourne Terrace, on grounds of adverse impact on residential amenity and limitation of traffic capacity.

13. **Impact of Congestion Charge Extension.**

We would accept as necessary the temporary diversion of the boundary from Eastbourne Terrace/Bishops Bridge Road to Cleveland Terrace/Westbourne Terrace, but only during the early period of the enabling works; we have concerns about the safety of the junction between Cleveland Terrace and Westbourne Terrace, particularly if traffic levels along Cleveland Terrace increase. We would have reservations, therefore, about making this change permanent – on balance, we support Westminster City Council's proposals for shifting the boundary to Sussex Gardens/ Westbourne Terrace, with eligibility for the discount of residents between these streets and the boundary now proposed by TfL. This relieves pressure on Praed Street and Eastbourne Terrace and, importantly, facilitates the passage of emergency vehicles, including ambulances headed for St. Mary's Hospital. It also alleviates capacity constraints at the critical junction between Bishops Bridge Road and Westbourne Terrace during part of the Crossrail enabling works and main construction, by removing a right turn (see paragraph 8 above).

14. **Long-term Vehicular access to Paddington Station ("LTVA")** We seek confirmation that the reinstated services, after main construction, would be consistent with taxi egress on the surface from the Departures Road, as a "U" turn into Eastbourne Terrace (northbound); that is, just as is expected to operate in the period soon approaching, from the reopening of Bishops Bridge up to the transfer of taxi access temporarily to a location to the East of the station. This is without prejudice to our position (see our petition, paragraphs 10-13) that such a system would have inadequate capacity in a period, say for five years from 2013, whilst permanent access as part of a redevelopment of Span 4 is being constructed (let alone the possibility that this development does not then go ahead).

John Walton

Agent for PRACT

1 March 2006

02 MAR 2006



RECEIVED



Our Reference: P&E/Trans/TRA4/LO02

01 March 2006

Secretary of State
C/O Tim Neate
Consultation Manager
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Dear Sir

CROSSRAIL - AMENDMENT OF PROVISIONS AND SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2

I write to you in connection with above. In principle the Port of London Authority supports the Crossrail as a direct benefit to London and the wider South East region. Having now had the opportunity to examine the submitted documentation the PLA would however like to make the following comments:

- Limmo Worksite – The proposed moorings and loading area for barges alongside the Limmo Peninsula are so extensive they could block access to the rest of Bow Creek and close the navigation. Amongst other things this could have a detrimental impact on the proposals to use the creek to bring in building materials for the 2012 Olympic construction works. The Crossrail proposals need to ensure that there is always a navigable channel past the barge loading area for other river users.
- Manor Wharf – There do not appear to be any issues regarding navigation in respect of Manor Wharf. The changes all appear to be ashore. However, it is questioned what the 'limit of deviation' box around the Manor Wharf jetty means in drawing no. 110408– E2W14-FOO-F-50000 Rev E? Does it have any significance with regard to possible encroachment on the Cory Environmental project in the river?

The PLA is pleased to note the continued proposals to transport excavated material away from the construction site along the River Thames by barge and would urge that this is secured.

In summary therefore subject to issues relating to Limmo Worksite being satisfactorily addressed, clarification being provided in relation to Manor Wharf and the securing of the transport of excavated material by barge, the Port of London Authority raises no objection in principle to the proposed development.

Yours Faithfully

Lucy Owen
Planning Officer





no 009

Your ref:

My ref:

Tim Neate,
Consultation Manager
Department for Transport
Major Projects Division 3, Zone 2/08
Great Minster House
London SW1P 4DR

Graham King

Head of City Planning Group

Direct Tel. No: 020 7641 2749
Direct Fax No: 020 7641 8535
Email: gking@westminster.gov.uk

City Planning Group

Westminster City Hall
64 Victoria Street
London SW1E 6QP

Date: 2nd March 2006

Dear Mr Neate

CROSSRAIL – SUPPLEMENTARY ENVIRONMENTAL STATEMENT 2

This is Westminster City Council's response to the Crossrail Supplementary Environmental Statement 2 (SES2).

The City Council is concerned about the considerable impact of the proposed utilities works at all of the Crossrail worksites in Westminster. This includes in particular, the impacts (set out in SES2) on the built heritage, townscape and visual amenity; traffic and transportation; and noise and vibration. Some of these concerns are already set out in the City Council's petition in respect of the Crossrail Bill (September 2005).

The City Council is also very concerned about the continuing lack of detailed information about the impacts at the Crossrail worksites, some of which is covered in SES2, and the piecemeal way in which further information is being provided. This makes it particularly difficult to have a view on cumulative and area-wide impacts and assessing any possible mitigation measures. The City Council reserves the right to make further comments on the issues covered in SES2 as more detailed information becomes available. There are also a number of factual errors in SES2 (which are not listed in this letter) and should be corrected. For example, the existing bus route between Cleveland Terrace and Bishops Bridge Road is via Westbourne Terrace, not Gloucester Terrace as shown in Figure 3.2. Perhaps a meeting would assist on these factual matters.

Westminster City Hall, 64 Victoria Street, London SW1E 6QP
Main Switchboard: (020) 7641 6000 www.westminster.gov.uk

Given the above I have the following detailed comments:

- 1.2.1 The definition of major utilities works by size or type is a useful starting point but in terms of environmental impact, other factors need to be taken into consideration. The specific location of works, taking into account the physical constraints of the highway, pedestrian and vehicular traffic, the character and function of the area and its environment should be the starting point for impact assessment. This should then be denominated by the duration of the works. Where multiple services are to be diverted at such a location, the impact becomes exponential.
- 1.2 As the design of the project is advancing, it should be possible to ensure that services are diverted well away from work sites so as to avoid any further diversions. This is important for any future Over Site Development. Conversely, new buildings will require services so future connections must be considered within the scope of these works.
- 1.3 Full details of the road movements for each of the generic activities are required, in particular the cumulative impact of all of the activities.
- 1.3.10 The temporary or permanent reinstatement of the highway must be to the specification of the City Council, no matter how the works are expedited, i.e. within or outside the scope of the Bill or by whom.
- 1.3.15 The protection of services must consider potential works outside the framework of Crossrail. Within Westminster there is continual development activity. Over the life-time of Crossrail many major developments will occur that could well be adjacent to Crossrail work sites. Therefore protection should be afforded to services that anticipate other works.
- 1.5.1 Given the numbers of services to be diverted, the substrate of the highway will be severely affected. Given a potential "honey-comb" effect, i.e. there are so many trenches as to render the substrate ineffective, cumulative account must be considered.
- 1.6 Consideration must be given to the responsibilities of the City Council with regard to the Traffic Management Act 2004, (movement of traffic). The framework whereby service diversions are planned and programmed needs regimentation. Clarification is sought here, e.g. will this be within the Traffic Liaison Groups and how are they to be chaired and co-ordinated.
- 1.6.5 Serious consideration needs to be given as to the timing of a "freeze notice" under NRSWA. Given this will happen after Royal Assent of the Bill, this may be too late. Further discussions with

highway authorities are needed on this issue.

- 2.1.1 The issue of working hours is subject to on-going discussions with the City Council on behalf of other local authorities.
- 2.1.2 At specific locations, acoustic hoardings may be required.
- 2.2.2 It is accepted that “street works” are common place. However subsidiary impacts on adjacent buildings should not be dismissed. Consideration of possible impacts must be given when works such as deep level sewer diversions are undertaken.
- 2.2.3 When and where will night time working be necessary?
- 2.7.2 See 1.2 above. When is it expected that further details will be available so that a proper assessment of the impact of the utilities works can be made.
- 2.7.3 The City Council will assume overall responsibility.
- 2.8.3-2.8.5 The London Borough of Tower Hamlets is leading on behalf of local authorities on noise insulation and trigger levels, etc.
- 3.2.3 The phasing and timing of the Paddington works is dependent on the Red Star Deck being completed and fully operational. The City Council has yet to see a scheme to deliver this or an assessment of the issues involved. What contingencies are there if this is not the case?
- 3.2.4 Further information is required about the structural implications of the demolition of part of Macmillan House, which is a listed building. A joint site visit should be arranged as soon as possible.
- 3.2.5 Detailed plans and programmes for each stage of the Paddington works are required.
- 3.6 Further information is required about the impacts on buses during the Eastbourne Terrace utilities works particularly with regard to the operation of the key junctions and links and the anticipated delays to buses, and also to the location of bus stops and stands.
- 3.6.17 The explicit agreement of TfL to the diversion of traffic into the CCZE without charge is required.
- 3.6.18 The traffic displaced by the closure of Bishops Bridge Road has been absorbed into the local road network without major problems because of extensive consultation and liaison with stakeholders and local residents: comprehensive publicity, planning and advance warning and direction signing; and regular monitoring requiring changes to be made to the road layout. Would the Crossrail

project anticipate carrying out a similar package of measures?

- 3.6.28 Why is it necessary to reinstate the right turn from Spring Street into Praed Street? What will be the impact on traffic and pedestrian movements at this junction? What options for mitigation of the significant delays to buses are there?
- 3.6.30 On what basis is it concluded that the suspension of parking bays in Spring Street will not cause a significant adverse impact?
- 3.6.34 Further details are required about the operation of the Bishops Bridge Road / Westbourne Terrace junction during the utilities works. This will be a key junction in the local road network following the opening of the Paddington Station Long Term Vehicular Access (in May 2006) and the implementation of the congestion charging western extension (in February 2007) which result in considerably higher traffic flows through the junction than at present. Detailed phasing and programming information is required given that utilities works will be taking place at this junction as well as being affected by traffic diverted from other sites. The diversion of traffic to Gloucester Terrace which will be inside the congestion charging zone is unacceptable, as is night-time working at the Westbourne Terrace / Bishops Bridge Road junction which is adjacent to residential properties.
- 3.6.38 Further details are required on the impacts of proposed one way working in Craven Road.
- 3.6.41 After the opening of the Red Star Deck, traffic flow needs to be maintained on the Departures Road for disabled access, delivery and service vehicles, emergency services and other essential users. The design and operation of the Praed Street / Eastbourne Terrace / Departures Road junction during the utilities works will need to cater for this traffic and also retain the existing pedestrian crossing facilities. What has been the outcome of discussions with Network Rail regarding the use of the Departures Road?
- 3.6.42 Further details are required on the impacts of proposed one way working in Praed Street.
- 3.7.1 A separate discussion is needed on the baseline assumptions that identify potential adverse impacts for noise and vibration at specific locations.
- 4.2 Are there now revised utilities proposals for the Hyde Park / North Carriage Drive site in the light of the recently announced modified ventilation shaft proposals?
- 5.7.5 Further details are required on the impacts of the closure of the junction of Park Lane with Green Street.

- 6.6.17 On the basis of the information supplied, the scenarios of narrow footways, narrow carriageways, single alternate lane working, or one way working in this section of Oxford Street are all unacceptable given the transportation, environmental and economic impact. Further details and assessment of the impacts of all the scenarios is required.
- 8 Hanover Square: Would there be any differences to the SES 2 proposals for 18/19 Hanover Square which we understand is to be early purchased and demolished to avoid use of the gardens (which will only be used in an emergency).
- 8.7.4 A visual presentation of the proposed 3.6m hoarding for Hanover Square is required.
- 9.7.9 199 Wardour Street: We are concerned about this being raised as a new issue. Clarity is required on the impacts, particularly at night-time and the mitigation strategy.
- 9.7.13 Will the West End hostel require rehousing under these proposals and Crossrail's compensation proposals?
- 10.6.6 The impact on bus services is a concern. What options are there for mitigation of the significant delays to buses? Further discussion with TfL and the City Council is required.
- 10.6.11 The loss of 10 parking spaces in Soho Square is unacceptable, especially considering it is unlikely that these bays could not be relocated elsewhere in the immediate area. The City Council would welcome further discussion on this issue.
- 10.7 See response to 3.7.1 above.
- 33.5 4-18 Bishops Bridge Road: It is noted that SES2 states that "it is now considered likely that demolition of the whole building will be required". When will it be known if demolition will definitely be required or not? Further details are required about the impacts (on traffic and transportation, townscape and built heritage, visual amenity, and noise and vibration) of the proposed demolition of all of 4-18 Bishops Bridge Road, and the subsequent redevelopment. In the absence of any detailed information about these impacts and proposed mitigation, the City Council cannot comment on the proposals at this stage. The City Council will draft a planning brief for this site when further information becomes available on Crossrail's proposals.

General Comments

Further information and clarification is required on:

- Cumulative impacts. In particular all works affecting Paddington and Oxford Street (chapters 3, 8, 9 and 10) need detailed programmes to be mapped, and an assessment made of the cumulative impact.
- Traffic and pedestrian management measures assessed and proposed
- Programme of works and any alternatives
- Clarification of powers under which works are being undertaken and status of negotiations with relevant utilities
- Forward planning and coordination with other works outside the scope of assessment for Crossrail
- How street works and developer activity other than Crossrail works in the vicinity are to be managed.

I look forward to an early meeting to discuss the City Council's concerns set out above. I would be grateful if you could advise when a response to these will be forthcoming.

Yours sincerely



Graham King
Head of City Planning Group (Strategic Schemes)

cc Toren Smith, Crossrail
Don Murchie, WCC
Brent Turton, WCC



Risk Reward Limited

**Risk Consultancy Training Consultancy
Capital & Finance Consultants**

The Secretary of State
C/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/06
76 Marsham Street
London SW1P 4DR

9 Nov 2006

Dear Sir

Re: Crossrail

I am writing to express our concerns regarding the Crossrail project and the lack of a benefit analysis having been conducted regarding the Liverpool Street-Shenfield line.

We have now received information from Crossrail on the impact on travel times from Shenfield. We find that travel times to both Liverpool Street and Docklands will be longer once Crossrail has been implemented than is currently the case.

Most people on the Liverpool Street – Shenfield line currently travel to the City. Effectively the Crossrail plan brings disruption without any benefit to the majority of travellers on this line. Unless additional lines were being built on the Liverpool Street – Shenfield line all the existing users can expect would be a significantly worsened service.

Even travel times even to Heathrow are barely improved and on a regular day I would expect less than 1% of commuters go anywhere near Heathrow. So my question and plea is simple – who is actually benefiting from this massive expenditure? Surely it would make more sense to have a line from Stratford to Heathrow and use the existing infrastructure.

**Risk Reward Limited
Canada House, 9 Walton Gardens, Shenfield, Essex CM13 1EJ**

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Tel: +44 (0) 1277 218843
Fax: +44 (0) 1277 264497
E-mail: dwc@riskrewardlimited.com

I have been in contact with the Crossrail project team who have provided me with much of the information to which I refer. Even they have effectively admitted there are no benefits for the Eastern commuters.

Yours sincerely



Dennis Cox

Risk Reward Limited
Canada House, 9 Walton Gardens, Shenfield, Essex CM13 1EJ

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+ 11/11/2006.
ST. PATRICK'S CATHOLIC CHURCH

Dear Sir or Madam,

I would like to register my disagreement and unhappiness with the Crossrail project and believe that the route taken is not the appropriate one given the high density of building in this part of London.

Yours sincerely

Father Alexander Sherbrooke.



Secretary of State
C/O Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Engineering & Building Services

**Dave Renvoize, BSc (Hons), CEng,
CEnv, MICE, FCIWEM**
Chief Engineering & Building Services Officer

Lynton House, 255-259 High Road,
Ilford, Essex. IG1 1NY

Please ask for Geoff Claxton
Direct line 020 8708 3670
Fax 020 8708 3970
geoff.claxton@redbridge.gov.uk

Our ref E&BS/TE/GC/AH
Your ref
Date 11th December 2006

Dear Mr Neate

Crossrail – Amendment of Provisions

The documents containing the above have now been considered. There are two main issues of interest to Redbridge namely the provision of lifts at Goodmayes Station and the use of Ilford sidings. Both of these issues have been discussed at meetings between our respective officers. In view of the limited time to consider the documents the Council's Cabinet at its meeting on the 5th December 2006 delegated authority to the Director of Environment and Regeneration in consultation with the Cabinet Member for Highways and Cleansing to agree a response to the proposed amendments.

The following comments are made:

a) Goodmayes Station

- the Council has consistently pressed for accessibility improvements to all stations in the Borough. It welcomes the proposals to install lifts at Goodmayes Station but requests that similar measures be installed at Seven Kings and Chadwell Heath Stations.
- as with the re-building of Ilford Station it is requested that the work to Goodmayes Station should be completed prior to the Olympics so that step free access is available to existing rail users as early as possible including visitors to the Olympics.

For general Council enquiries please call our
Customer Contact Centre on 020 8554 5000

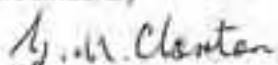


- further discussions will be required about the constructions works including the programme, the time of day when works will be carried out, lorry and other construction traffic movements and the temporary loss of car park spaces.
- the Council will wish to be compensated for the loss of income arising from the use of the car park.

b) Ilford Sidings

- It is noted that the use of Ilford sidings is required for the stabling of Crossrail trains and that the amended proposal is due to a revised depot strategy.
- It is noted that there will be a predicted loss of local employment albeit that the jobs may be elsewhere in recreated London. The Council regrets the loss of local employment and requests that effects are kept to a minimum.
- The Council wishes to see the provision of a new bus stand on the east side of Ilford Town Centre and is committed to work with Transport for London on the provision of bus services and associated facilities through its Local Implementation Plan. The Council believes that Crossrail's revised Depot strategy provides the opportunity to explore the possibility of a bus stand being provided on the site and wishes to pursue this with Crossrail, Network Rail, Transport for London and any other interested parties. It seeks Crossrail's co-operation in doing so.

Yours sincerely



Geoff Claxton
Head of Transportation

The Ramblers' Association

The charity working for walkers



Her Majesty's Secretary of State for Transport
(For the attention of Tim Neate, Consultation Manager)
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SW1P 4DR

Our ref: 21/1/27

18 December 2006
By e-mail and post

Dear Secretary of State

Crossrail Bill **Proposed amendments, November 2006**

I write as Parliamentary Agent to the Open Spaces Society and the Ramblers' Association, on behalf of whom a petition has been submitted against the proposal set out in Chapter 12 of the Supplementary Environmental Statement 3 ("S3.12") for a footpath as replacement for Dog Kennel Bridge, Iver, Bucks. This bridge, although alleged not itself to be a right of way, is an essential link in a public footpath route which continues on both sides of the railway.

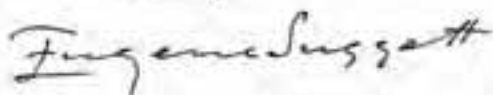
Our organisations hope that this petition will be accepted but they recognise that there is a risk of challenge to its validity because it is not against a proposed amendment to the Bill. If such a challenge occurs, we are likely to appeal against it, but we respectfully request that, in the event of failure on technical grounds, it be accepted as a representation that ought to be considered by Parliament on its merits.

A copy of the petition is appended, and attention is drawn to paragraph 7, quoting an extract from the earlier petition of our two organisations against not replacing the bridge, and paragraph 8, quoting the Chairman of the Select Committee who, after hearing our evidence, expressed the intention of the Committee to return to this subject after the Promoters and Petitioners had tried to find an alternative solution to the problem. The present petition alleges that the proposal contained in S3.12 is not an acceptable solution for the reasons given in paragraph 15 of the petition and, while no alternative will substitute for the replacement of Dog Kennel Bridge, no proper consideration has been given to the other options that had been suggested, especially the one most favoured by the petitioners, as described in paragraph 16 of the petition.

The reason for the proposal in S3.12 appears to be because it is entirely within the limits of deviation, and the Promoter alleges in the Introduction to this Environmental Statement, paragraph 1.1.2, that therefore no changes to the powers set out in the Bill are necessary.

That is quite unacceptable, and our organisations again respectfully urge you as Secretary of State to ensure the matter is considered by Parliament on its merits.

Yours faithfully

A handwritten signature in cursive script that reads "Eugene Suggett".

Eugene Suggett

Parliamentary Agent to the Open Spaces Society and the Ramblers' Association

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2006-07

CROSSRAIL BILL

Additional Provision arising from
Supplementary Environmental
Statement 3

PETITION OF -

- (1) The OPEN SPACES SOCIETY
and
(2) The RAMBLERS' ASSOCIATION
-

AGAINST, BY COUNSEL &c.

Eugene Suggett
The Ramblers' Association
2nd Floor, Camelford House
87-90 Albert Embankment
London, SE1 7TW

020 7339 8522

12.12.2006

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2006-07

CROSSRAIL BILL

Supplementary Proposals, November 2006

Against Additional Provision – on merits – Praying to be heard by Counsel &c

To the Honourable the Commons of the United Kingdom of Great Britain
and Northern Ireland in Parliament assembled

THE HUMBLE PETITION of (1) the OPEN SPACES SOCIETY, 25a Bell Street,
Henley-on-Thames, Oxfordshire, RG9 2BA, and (2) the RAMBLERS'
ASSOCIATION, 2nd Floor, Camelford House, 87-90 Albert Embankment,
London, SE1 7TW.

SHEWETH as follows:-

1. A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your Honourable House entitled "A Bill to make provision for a railway transport system running from Maidenhead, in the County of Berkshire, and Heathrow Airport, in the London Borough of Hillingdon, through Central London to Shenfield, in the County of Essex, and Abbey Wood, in the London Borough of Greenwich; and for connected purposes"
2. The Bill is promoted by Mr Secretary Douglas Alexander supported by The Prime Minister, Mr Chancellor of the Exchequer and others.
3. On 7 November 2006 the Promoter deposited certain amendments to the Bill with revised plans and sections and at the same time presented a Supplementary Environmental Statement 3 (S3) relating to additional proposals which, if found acceptable to the Select Committee considering the Bill, appear likely to be the basis for the submission by the Promoter of further amendments.
4. Clause 1 of the Bill provides for the construction and maintenance of the works described in Schedule 1 to the Bill and within limits of deviation shown on deposited plans. In that Schedule 1, Work no.3/9 provides for a railway partly in the County of Buckinghamshire, District of South Bucks, Parish of Iver, and includes the removal of Dog Kennel Bridge at Iver.
5. The Promoter alleges, with the acceptance of Buckinghamshire County Council as highway authority, that there is no public right of way over Dog Kennel Bridge and this was taken into account for the purposes of the British Railways (No.2) Act 1992 (c.xi) which authorised the construction of a relief goods line on the north side of the main line.

- 6 Chapter 12 of the Supplementary Environmental Statement 3 (hereinafter called S3 12) proposes a new footpath to replace the route over Dog Kennel Bridge and assesses the temporary and permanent environmental effects of that proposal.
- 7 Your Petitioners hereunder, the Open Spaces Society and the Ramblers' Association, submitted to your Honourable House a petition (no.91) against the Bill which included the following paragraph:
- 8 Dog Kennel Bridge [Sheet 103: South Bucks no.39] is the link between Iyer footpaths 15 and 15a [South Bucks nos.41 and 35]. Your Petitioners are therefore disturbed to read Environmental Statement, paragraph 9.14.29, which is as follows:

"For the demolition of Dog Kennel Bridge, an option was considered for replacing the bridge with a new lightweight structure close to its current alignment. This was rejected owing to cost, and because the bridge is a permissive footpath, not a public right of way."

The bridge, while alleged to be permissive, has been part of a public footpath route for many years and is a necessary part of a chain that enables walkers to make a circuit which avoids retracing or road walking. Paragraph 14 of Schedule 3 permits agreements to be entered into with a highway authority for possible contribution towards construction expenses, and the nominated undertaker may have a case for seeking this from Buckinghamshire County Council. Nevertheless, your Petitioners respectfully urge your Honourable House to require the replacement of the bridge.'

- 8 The Select Committee appointed by your Honourable House to consider the Bill heard the evidence of your Petitioners on 26 July 2006 and Mr Alan Meale MP, Chairman, then announced:

'16786. Can I just say that the Committee has had a deliberation on this. We want to say that we are not minded to apply for extra provision to require a new bridge or replacement bridge to be built. However - however - we are not minded either to make a decision on this matter today. We want the parties to go away and examine other ways that might facilitate a solution of the problem, and therefore we ask them to keep on discussing matters. We are perturbed and we have not closed the decision that we may retain a foot access over this line. However, we are not minded at this present time to make application for provision for a replacement bridge to be built. So we are asking for the Promoters and the Petitioners to go away and see if there are ways there that a solution can be found and to do that as quickly as possible, and when that is done we will return to the subject in due course.'

- 9 Subsequently, representatives of the parties, including Buckinghamshire County Council and South Bucks District Council (which had also petitioned for the retention of this bridge) met to discuss the matter

10. Your Petitioners' representatives at the meeting expressed strong preference for the replacement of Dog Kennel Bridge but put forward other suggestions if that is proved to be impracticable. The option most favoured by your Petitioners was a new path from the canal towpath south-east to Iver Station to cross land east of Bison Concrete Works which, according to the Book of Reference for the Bill, is in the ownership of BRB (Residuary) Ltd, believed to be an associate company of Network Rail.
11. Your Petitioners allege that the proposal contained in S3.12 is not supported by any argument against replacing Dog Kennel Bridge or any of the other options discussed at the meeting, and they respectfully allege that, if your Honourable House approves an amendment to the Bill to provide for that proposal, it will adversely affect your Petitioners' interests to a material extent for the reasons, among others, hereinafter appearing.
12. No-one now walking along the paths FP 15 and 15A linked to Dog Kennel Bridge is likely to be going to or from Iver Station.
13. Your Petitioners allege the estimated cost of providing a replacement bridge submitted in the Promoter's evidence to the Select Committee (without previous notice to your Petitioners) is unreasonable and the Promoter should be required to produce detailed support for this. It should also indicate the saving estimated to be achieved by not having to carry out Works 3/9A, 9B and 9C (demolition and replacement of the Thorney Lane road bridge and ancillary works) by Iver Station as described in S3, Sections 10.18 - 10.22, which appears likely to more than offset the cost of replacing Dog Kennel Bridge.
14. While your Petitioners do not claim intensive use of the bridge and the paths FP 15 and 15A leading to it, they allege that the route has an attractive rural aspect with views as far as Windsor Castle and, for pleasure, is far superior to the Promoter's proposal and any of the other options, and your Petitioners allege there is sufficient local usage to warrant the replacement of the bridge.
15. The path proposed in S3.12 would be a little over 1km in length from the south end of FP 15A east to Thorney Lane North along the south side of the private service road heavily used by lorries to and from Bison Concrete Works, with the railway cutting on its other flank. This most unpleasant route would be of no practical value to any walker except in the unlikely event of the land west of FP 15A (now designated as Metropolitan Green Belt) being developed and its occupiers requiring more convenient access to Iver Station.
16. Nevertheless, although not a proper substitute for Dog Kennel Bridge, it might be useful for walkers on the canal towpath (FP 17), if the path to the station suggested in paragraph 10 above is provided, and it would be even more beneficial if it can connect to the bridge serving the platforms within the station (the only access to which is from an ungated southern entrance) extended over the northern goods line.

17. Your Petitioners allege that the works under the British Railways (No.2) Act 1992 were carried out without affecting Dog Kennel Bridge and, notwithstanding the views of the Promoter and Buckinghamshire County Council regarding the bridge, your Petitioners reserve the right to dispute that there is no public right of way over it if they discover evidence to the contrary

YOUR PETITIONERS therefore humbly pray your Honourable House that the Bill not be allowed to pass into law as it now stands or as is now proposed in S3.12, and that they may be heard by their officers, Counsel, Agent and witnesses in support of the allegations of this Petition against so much of any amendment to the Bill based on the proposal herein described as may affect the rights and interests of your Petitioners and in support of such other clauses, amendments or provisions as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioners as your Honourable House shall deem meet.

AND your Petitioners will ever pray &c.



Eugene Suggett
Agent for the above-named Petitioners

The Secretary of State
c/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SW1P 4DR

18th December 2008

Dear Sir,

Crossrail Line 1: Amendment of Provisions No 3 and Supplementary Environmental Statement No 3

I am writing to set out the Council's views on the Amendment of Provisions (AP3) and the Supplementary Environmental Statement (SES3) that were deposited on November 7th as they relate to the London Borough of Camden.

Denmark Place

The amended provisions seek to demolish an additional three buildings within the Denmark Street Conservation Area – nos. 138 – 140 Charing Cross Road, 142 – 146 Charing Cross Road, and 144 Charing Cross Road. These are all situated to the north of Denmark Place.

It is understood that this further demolition is sought in order to facilitate a revised construction methodology for the northern Line escalator shaft, which is being proposed for the following reasons:

- Avoid the detrimental settlement of the retained buildings above the Northern Line escalator shaft;
- Mitigate the risks associated with excavating a tunnel rather than open cut box construction for the installation of the escalators in this position;
- Install piled foundations, which can support any future building on the site.

Assessment

In terms of their age, form, style, materials, detailing, position, and historical association with the laying out of Charing Cross Road in the late 19th century, numbered 138 - 140 Charing Cross Road and 142 – 146 Charing Cross Road are considered to form a positive contribution to the character and appearance of the Denmark Street Conservation Area. Alterations such as modern shop-fronts and inappropriate signage detract from their appearance to some degree, but these alterations are not considered to be so significant as to denude the buildings of their intrinsic quality.

The Council considers that the loss of these buildings would be regrettable as this would result in an adverse visual effect on the townscape, and the erosion of the urban grain and the buildings' historical association with the development of the area. This would be detrimental to the character and appearance of the conservation area.

PPG 15 and demolition

PPG 15 at paragraph 4.27 states that the general presumption 'should be in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area,' and that proposals to demolish such buildings should be assessed against the same criteria as proposals to demolish listed buildings, that is:

- The condition of the building, the cost of repairing and maintaining it in relation to its importance and the value derived from its continued use;
- The adequacy of efforts made to retain the building in use; and
- The merits of alternative proposals for the site (not merely subjective claims for the architectural merits of the proposed replacement buildings but, for example, exceptional cases where substantial benefits for the community which would have to be weighted against the arguments in favour of preservation)

The Council's policy

Policy B7 in the 2006 UDP states that, consent will not be granted for the demolition of a building, which creates a positive contribution 'unless exceptional circumstances are shown that outweigh the case for retention.'

The Denmark Place Planning Brief (Adopted July 2004) seeks the retention of the historic frontages on Charing Cross Road (paragraph 7.6) although it does state that most of the site is suitable for redevelopment:

It is envisaged that any redevelopment involving the demolition of buildings will be confined to the area of land around and to the north of Denmark Place. There is scope for a sensitive development of this area, which would retain as far as possible the historic frontages on Charing Cross Road and St Giles High Street and create a new frontage on Andrew Borde Street. On St Giles High Street the presumption should be to retain the frontage buildings (York and Clifton Mansions) if their physical condition allows while on Charing Cross Road it would be desirable to retain the existing façade with higher density development behind. The properties that front Denmark Street and all four listed buildings, including the warehouse at 16 Denmark Place which forms part of 20 Denmark Street being, should be retained and refurbished.

Paragraph 15.6 of the 'Denmark Street Conservation Area Statement' also gives new development in the conservation area:

*Proposals should be guided by the UDP in terms of the appropriate uses. Denmark Street has a distinct character which the music industry related uses along with residential use contribute to. Proposals, which retain these uses, will be particularly welcome. New development should be seen as an opportunity to **enhance** the conservation area and should respect the built form and historic context of the area, local views as well as existing features such as building lines, roof lines, elevational design and, where appropriate architectural characteristics, detailing, profile, and materials of adjoining buildings.'*

Conclusion

It is not considered that replacement buildings will alone mitigate the harm caused by the loss of these buildings and the detrimental effect upon the appreciation of the historical development of the area, the urban grain, and the appearance of the townscape. The Council will expect replacement buildings to make a positive contribution to the character and appearance of the conservation area.

However, it is considered that this amended provision, seen in the context of the wider Crossrail proposal, constitutes "exceptional circumstances" wherein the wider community benefits outweigh the localised detrimental effect on the conservation area.

Centre Point

The Council does not object to the principle of a temporary entrance at the north-east corner of the Centre Point tower on the understanding the Bill when enacted will give outline planning consent. The Council does, however, have some concerns on matters of detail, which it will wish to see addressed before the submission under Schedule 7 of the Bill. Of most importance is the need to ensure a much greater 'clear' area between the entrance and the footway kerb. The footway width should ideally be maintained at 5m (especially in consideration of nearby bottlenecks), and a 5m buffer or 'convergence' area outside the pedestrian access is also desirable. The Council will, therefore, seek an unobstructed distance of 10m between the pedestrian access and the kerb line on New Oxford St.

During construction of the expanded station, there will be much potential pedestrian congestion and conflicts. The Council, in its petition deposited for the original bill, has already expressed concerns about pedestrian and vehicular movement in paragraph 35:

'It is your Petitioners' view that the construction of Crossrail is likely to cause serious disruption for pedestrians, cyclists and vehicle drivers in the area. There will be numerous temporary movements during the construction phase and these need to be adequately controlled. Your Petitioners are particularly concerned about the phasing and re-routing of pedestrians and vehicles during the construction of Tottenham Court Road station over a period of six years. Your Petitioners have grave concerns for the safety and security of pedestrians during this period.'

This view is shared by the City of Westminster and, therefore, neither Council would wish to exacerbate problems at this location. Both Councils believe that they should be fully involved in discussions both now and at the time the works are to be carried out to ensure that the safety of the public is not compromised. It is hoped that an agreement can be reached with the owners of Centre Point and London Underground over this matter.

SFS3 issues

Fisher Street ventilation shaft

The revised tunnelling strategy does not require the removal of the tunnel boring machines at Fisher Street. This allows the retention of 8-10 Southampton Row, which the Council welcomes as this retains the integrity of the townscape at this location.

Additional significant impacts

Paragraph 6.4.41 and 6.5.1 identify the need for temporary closure of Northern and Central Line platforms during construction. Not only will this cause increased journey times and inconvenience to passengers, but also potential problems of congestion at adjoining stations.

and at street level. These closures should be kept to a minimum number and duration and a dispersal strategy for the use of alternative stations should be drawn up. All other stations are congested at some times of the day and the streets to and from also suffer from very heavy use.

I trust these views will be placed before the Select Committee so that they may see the impact these works will have on the area, albeit accepted by the Council.

Yours sincerely



Laurie Baker
Head of Transport Planning

cc: Teren Smith, CI RI
Nicholas Brown, Bircham Dyson Bell

Mr Tim Neate
Department for Transport
Major Projects Division 3
Zone 2/08
Great Minster House
(76) Marsham Street
London
SW1P 4DR

Our ref: NE/2006/100168/01-L01
Your ref: -
Date: 18 December 2006

Dear Mr Neate

Crossrail - Amendment of Provisions November 2006. Environmental Statement and Supplementary Environmental Statement 3.

Thank you for consulting us on the amendment of provisions, environmental statement and supplementary environmental statement (ES). We have the following comments.

West Drayton Station

The Environmental Statement (AP3 pg 145) states that the development would impact upon the Fray's river, which is part of a Site of Metropolitan Importance (SMI) for Nature Conservation. The development would result in the loss of natural banks, permanent shading of the watercourse and loss of willow woodland. This loss amounts to 0.35ha. Though this represents 0.5% of the SMI, the ES acknowledges that the SMI is made up of a number of units, each of which has local value.

The ES includes no specific plans to compensate for this loss, and concludes that there will be a 'significant residual impact' (pg 146) at West Drayton. We agree with this assessment.

The ES does not however consider or recognise the potential adverse impact of the proposals, through loss of river habitat and shading of the watercourse, on the fisheries value of the River Frays and the River Colne, which is an important fishery with high local economic and amenity value. Appropriate measures would need to be identified to mitigate for these impacts.

Environment Agency
Apollo Court, 2 Bishops Square Business Park, St Albans Road West, Hatfield, Hertfordshire, AL10 9EX
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..



The environmental impacts of these proposals and the absence of appropriate mitigation is not acceptable. Accordingly we have deposited a petition against these amended plans for the West Drayton Station site.

The impact of the widened bridge on local flood risk will need to be investigated and any increase in flood risk will need to be mitigated for. We accept that were this proposal to go ahead this matter could be addressed and resolved through the protective provisions.

For information:

The proposed bridge should meet our standard bridge requirements.

- The soffit level should be 600mm above the 1 in 100 year 20% flood level.
- The soffit should be no lower than 300 mm above either of the upstream bank tops.
- The bridge should produce no afflux across its structure, since this would increase flood risk upstream.
- The abutments should be set back from the bank top by a minimum of 1m.

Route Window SE1: Blackwall Way and Limmo Peninsula

We favour the use on Instone Wharf over the previous Limmo Peninsula site because we believe that the environmental impact of dredging and barge operations will be less at this site, and will be less likely to adversely affect the flood defences. We do however still have a number of comments.

The site is located next to Bow Creek and the Tidal Thames. In order to reduce disturbance to wildlife the lighting should be directional to the work site and designed so that the light spill on the surrounding area is reduced as far as possible.

We would like to see the method statement and specification of the clean inert gravels and cobbles to be back filled into any scour holes. This must be appropriate to the tidal Thames.

Given the nature of the contamination identified in the sediment at the Instone Wharf site, we are concerned that the dredging operation and scour at this site may mobilise contaminants and cause pollution. Methodologies will need to be adopted to minimise the mobilisation of sediment and we would need to be involved in agreeing such methodologies.

The ES does not refer to the impact of birds and it does not appear that any bird surveys were carried out for this area. We feel that the site should be assessed for the presence of Black Redstarts, a protected species under Schedule 1 of the Wildlife and Countryside Act 1981. The site may, at the various stages of use and construction, provide suitable habitat for Black Redstarts (e.g. rubble and crushed concrete). This should be considered and addressed as part of the site assessment for Black Redstarts. Please note that these species often feed on invertebrates in the river wall.

The Instone Wharf amendment affects a fairly large area and mitigation needs to consider the range of impacts that may arise. Mitigation should include replacing some of the type of substrate that supports invertebrates. Depending on the nature of the flood defences at this location will depend on the type of mitigation that could be proposed. The intertidal study undertaken to support the ES shows that the wooden fender substrate supports a much higher diversity and abundance of

invertebrates. Therefore, as part of the mitigation we feel that the amount of this type of substrate should be increased, for example by adding timber fendering or lattice to the sheet piling or if the sheet piling needs to be replaced by providing a different solution for the river wall. Following project completion we would expect that a 'buffer zone' of at least 16m be established between the riverbank/wall and any future development.

AP Plans and AP ES Works no. 1/29A shows the new conveyor has the potential to have an adverse impact on the tidal river walls. Buried elements of the river walls could be damaged by the construction. This issue is not addressed in the ES. However, if mitigation is required we believe an acceptable method of working could be agreed and any works to the river walls. There is a need to consider this issue in the design of the works and the method of working.

If works to the walls are needed following further site investigation there might also be some opportunity to set back the walls to some extent to provide some improved habitat and some compensatory flood storage for the losses due to the Isle of Dogs station construction.


The site may also need to be checked for any archaeological or heritage features prior to dredging. The foreshore of the Thames contains important archaeological features and evidence, the GLAAS (Greater London Archaeology Advisory Service) should be contacted to advise on the importance of the site and any required works in accordance with PPG16. An impact of the proposed development should also include impacts on any archaeological features of interest and the landscape character of the site.

Isle of Dogs

The revised method of working requires West India Dock to be drained, breaking the link between Blackwall Basin / Poplar Dock and the rest of the dock system, further reducing the volume of flood storage during the five and a half years of construction. You have indicated that changing the works, so that a link for the passage of water between to be maintained, would not be beyond the scope of the powers proposed under the bill. Whilst we recognise that there would be some additional work and design changes we would ask that this link is achieved if reasonably practical. This is to minimise the loss of flood storage capacity during the works.

I trust the above is clear. Please contact me if you have any questions

Yours sincerely



Candice Beard
Planning Liaison Officer
Tel: 01707 632406
Fax: 01707 632515
Email: candice.beard@environment-agency.gov.uk

cc. Charles Thompson, EA

End

The Secretary of State for Transport
c/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Your Ref:
Our Ref: AL1496171
E-mail: news@sharpepritchard.co.uk
Fax: 020 7297 1491

19 December 2006

Sent by post and e-mail – crossrail@dfi.gsi.gov.uk

Dear Sir,

**Crossrail Bill
Targetfollow (Centre Point) Limited
Supplementary Environmental Statement 3**

We act for Targetfollow (Centre Point) Limited, who are the freehold owners of the Centre Point Tower, and associated buildings and the Plaza. As you probably know, our clients have deposited a petition against the original Bill and AP3. They have expressed their concerns in those petitions about (amongst other matters) the impact of the highway works at the Tottenham Court Road Station site.

Our clients have noted that some significant alterations are proposed in addition to traffic management arrangements at the site and the timescales for their implementation, and they are described in SESS3.

Our clients take the view that more detail about the exact proposals for traffic management in this area during the period of the construction works and about the impact on the occupiers of its buildings should be made available to them, before they can take a proper view on the impacts, and consider alternatives.

This further detail should include a detailed description of the impact of the schemes (using whereby the London Underground works are brought forward earlier than the main Crossrail works). It would be helpful to understand the implications of a time separation between the LU and Crossrail works – this may already be implicitly built into the new timetable, but it is unclear.

The SESS3 is also vague as to how the indicative timetable relates to adjacent LU/CLRL construction activity and associated access requirements.

Our clients have instructed Steer Davies Gleave to advise on these issues and discuss with Crossrail possible alternative proposals for traffic management at the site, particularly with a view to reducing the length of time during which traffic will be disturbed.

Yours faithfully,





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The Secretary of State c/o Mr Neate
Consultation Manager
Dept of Transport
Major Projects Division 3, Zone 2/08
76 Marsham Street
London SW1P 4DR

19th December 2005

Dear Sir

SPITALFIELDS SMALL BUSINESS ASSOCIATION SUBMISSION TO THE DEPARTMENT FOR TRANSPORT ON THE CROSSRAIL SUPPLEMENTARY ENVIRONMENTAL STATEMENT 3 (SES3) AND THE AMENDMENTS OF PROVISIONS ENVIRONMENTAL STATEMENT 3 (APES3)

This submission is made on behalf of the Spitalfields Small Business Association, a black and minority ethnic Social Enterprise providing managed workspaces and business support to other community projects and over 200 small businesses and in the Brick Lane and Whitechapel area of London E1 as well as owning property adjacent to and opposite the original shaft site in Hanbury/ Princelet Street. The concerns expressed below relate primarily to the Route Wide: Revised Tunneling Strategy and Route Window C8: Whitechapel Station.

Our primary concern, on behalf of our members and other businesses and community projects in the Brick Lane area, relates to the proposal to still dig an emergency intervention and ventilation shaft in Hanbury Street and to excavate and remove vast quantities of waste material through our tightly knit residential area and past the many schools, small business premises and community facilities that serve one for the most deprived ethnic minority communities in the country.

We cannot understand why Crossrail seem set on pursuing this proposal when they have failed to reconsider in detail two alternative southern alignments (and associated shaft sites) identified by themselves in March 2001 as being viable yet discounted due to a 40 storey development planned to the east of Bishopsgate.

The development proposal east of Bishopsgate should not have been used to set the preferred alignment through Hanbury Street and as this proposal no longer exists and the revised tunnelling strategy eliminates the need for a spoil tunnel to the Pedley Street site, we cannot understand why Crossrail have not now taken up one of the viable southern alignments to eliminate the need for the Hanbury Street shaft and its ensuing severe environmental impacts on our local community. Taking the viable southern alignments would also avoid the projected particular significant settlement impacts on our area which contains one of the largest concentrations of early Georgian housing in London.

We would ask that Crossrail be invited formally to withdraw the proposal to excavate an emergency intervention and ventilation shaft in Hanbury Street and to adopt one of their previously identified viable southern routes.

SPITALFIELDS SMALL BUSINESS ASSOCIATION LTD

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A COMPANY LIMITED BY GUARANTEE AND REGISTERED IN ENGLAND NO. 3881133

We are also concerned about the following points which are either excluded from the Supplementary Environmental Statement 3 or not dealt with in appropriate detail :-

3.4.42 The revised location of the shaft being immediately adjacent a disused brewery's deep well and the effect the excavation of the shaft will have on water resources in the area.

3.4.45 The significant settlement effects of excavation the shaft in an area with extremely poor ground conditions and a deep well and the physical impact of this on the adjacent properties in the Brick Lane Conservation area.

3.4.46 The potential disruption caused by differential settlement and the need to demolition Britannia House due to the movement of its piled foundations and concrete structure.

3.4.49 The severely adversely affected visual amenity of a large number of local residents living in high housing blocks surrounding the Hanbury Street shaft and overlooking the site.

3.4.54 The extreme disturbance and disruption caused by the reduced number of lorries still accessing the worksite and the traffic implications of using Hanbury Street itself to load and unload the lorries.

3.4.55 The extreme disturbance and disruption still caused to local schools by the proposed lorry movements and the inability of large lorries to turn the corner at the junction of Buxton Street and Valence Road.

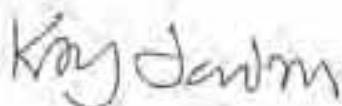
3.4.58 The noise, vibration and other environmental pollution issues arising from the major industrial scale operation still proposed for Hanbury Street.

3.4.62 Residential properties being affected by significant night-time construction noise impacts even though work above ground is restricted to normal working hours.

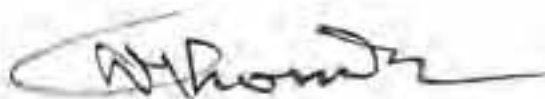
In closing we would ask that prior to the third reading of the Hybrid Bill, Cross London Rail Links be required to amend their Supplementary Environmental Statement 3,

- To withdraw the proposal to excavate an emergency intervention and ventilation shaft in Hanbury Street.
- To confirm that it will proceed with one of the viable southern alignments previously rejected because of above ground development proposals.
- To amend the Supplementary Environmental Statement 3 to address the other concerns raised above.

On behalf of
Spitalfields Small Business Association



Kay Jordan MBE
Director & Company Secretary



Aziz Choudhury
Chairman

6

WOODSEER AND HANBURY RESIDENTS ASSOCIATION

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Douglas Alexander
The Secretary of State for Transport
Department for Transport

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December 20, 2006

Dear Mr Alexander,

Re: Comments - Crossrail Environmental Statement (ES3) and Additional Provisions (AP3) and the Crossrail Hybrid Bill

WHRA (Woodseer and Hanbury Residents Association) received legal advice to submit comments on the Environmental Statement, Additional Provisions and the Crossrail Hybrid Bill yesterday. We are responding to a limited timescale of December 20, 2006 after being made aware of the ability to make such comments.

We think it unreasonable that neither the promoter nor the Department for Transport has advised us in this regard especially as a letter from Bindman & Partners solicitors, which outlined concerns about the lawfulness of the bill and the Crossrail Bill was not made available to the House during the second reading. Given the seriousness of the concerns outlined in this letter, we hope it will be made available to the House without any censorship.

The promoter has and continues to use the hybrid bill process to refuse to justify or provide comparative studies of feasible alternatives to locating a large ventilation and intervention shaft and tunnelling underneath Spitalfields and siting of the nearby Whitechapel Station. We have evidence to show that the proposals in Spitalfields and Whitechapel in the London Borough of Tower Hamlets are unnecessary and are related to development purposes rather than the building of a successful railway. We think it is unreasonable that the promoter is seeking passage of this bill before giving petitioners detailed assessments of harm. This denies petitioners a fair hearing in relation to comment on the likely harm and also prevents participation in the mitigation of that harm.

We believe the substance of the present Crossrail hybrid bill should be questioned given that we do not know the cost of Crossrail as the previous figures relate to 2002 prices, the time

scales are disputed by experts, the promoter is seeking wide ranging powers including interference with property rights, the availability of a skilled workforce is being questioned as are the benefits by proven industry and rail professionals. We also believe the present Crossrail Hybrid Bill disproportionately interferes with human rights. Taxpayers are being expected to pay for an unproven scheme where most of the harm will be suffered by London's residents and communities.

We believe the failure to inform the public of the process determining the principle of the bill has prejudiced their interests during the process and passage of this bill so far. In particular, we are concerned about the failure to allow proper public participation and the mechanisms to deal with unnecessary harm and the substantial flaws of the Crossrail Bill in its present form. The promoter claims to build on the experiences of CTRL. However, proven industry experts have rubbished such claims. Indeed, the CTRL promoter had to ensure that impact on residential housing was at a minimum but this promoter is being allowed to do the exact opposite in the heart of London's communities. The consultation carried out by the promoter continues to be non-existent. The failure to produce this information does not allow petitioners or the public to comment on the proposals or mitigate against harm.

Similarly to the communities in Romford, Richmond and Mayfair, we are facing unnecessary harm by the promoter of this hybrid bill except we live in an historic but deprived area. However, we have evidence that a less harmful route is possible and proven industry experts state there is no need for an intervention shaft in Spitalfields despite claims made by the promoter. However, unlike the groups in Romford and Richmond, groups in Spitalfields find the promoter is using the hybrid bill process to tinker with the proposals and continues to deny making comparative studies or detailed impact assessments available to petitioners so they can subject the proposals to scrutiny or request appropriate mitigation measures.

1) In summary:

- a. We request the Promoter reviews the need to locate the intervention shaft in Hanbury Street. The new plans remove the tunnel launch site and spoil adit. This is in light of the change in tunnelling strategy, which allows the Promoter greater flexibility on location. As far as we are aware this has not been done. Given the disruption to our lives and community we think this should be done as a matter of fairness and reasonableness.
- b. We request that the promoter does as claimed "build on the CTRL experience" and avoids densely populated residential areas. Furthermore, we request the reasonable consideration of proposals for protection measures during the construction period. They are based on extensive discussions with residents affected by the Channel Tunnel Rail Link. Following serious problems, matters did eventually improve for these residents and we ask that their experience is considered especially as to the impact on their lives.
- c. Our concerns continue to relate to the promoter's failure to supply detailed comparative studies of tunnelling strategy, the need for a vent shaft and impact assessments in relation to our area as it does not allow us to evaluate the likely harm especially given the health problems. We believe it is unreasonable for the promoter of this multi-billion pound Crossrail scheme to leave all the risk, uncertainty and potential liabilities of unknown variables with us. We request the application of best practice standards for residents in the absence of this information.

- d. We support the arguments made by proven industry experts in relation to the need for proper consideration of alternative tunnelling routes for the railway, the need for Whitechapel Station and the shaft. We do not believe it is consistent for the promoter to deny a Woolwich Crossrail Station on the basis of evidence from a cost benefit analysis while on the other hand, demanding Whitechapel Station but refusing to provide a cost benefit analysis. Experts say there is no public support for Whitechapel Station, it is a disbenefit, an unnecessary cost to taxpayers at £400 million plus and would not meet the public interest test.
- e. We request how the Select Committee and the House will be able to formulate a statement as to why this Bill has been approved without public participation given the failure to consult and provide the public information about this bill. We do not recall being informed if there has been full directions in relation to the third reading and if by law, the House has given any instruction to the Committee on whether the Promoters have an onus to prove the expediency of the Bill. We are advised that an additional process of reporting the comments to the House is required. We believe that relevant information about matters relating to Spitalfields was denied without just cause before the second reading. The contents of a legal letter sent prior to the second reading on behalf of the WHRA and SCA was not made available to the House.
- f. We note that the Joint Committee on Human Rights have been unable to comment on a previous submission on the compatibility of this Bill with human rights because the submission concentrated on the paucity of the consultation process. However, your Petitioners believe that we are now able to show that the substance of the present bill and the passage and procedures adopted for this hybrid Bill are incompatible with human rights and various Convention rights. In addition, we understand the premature safeguarding directions interfere with property rights due to the nature of the proposals and the permission to grant what appear to be indefinite extensions.

Revised proposals for Spitalfields

- 2) The Department for Transport has given assurances that the promoter would consult and provide reasons to justify the decision to tunnel, locate the ventilation and intervention shaft in the densely populated area of Spitalfields and locate a station at nearby Whitechapel. However, the consultation remains a matter of informing rather than consulting and the above information remains outstanding even though we are at the petitioning stage of this bill. Furthermore, information about health, social, environmental and other impacts are still not being made available to Petitioners. This prejudices petitioners and public alike and more importantly fails to discharge duties under the human rights act and the case law governing Environmental Impact Assessments.
- 3) Despite the best efforts of residents, community and small business groups in the densely populated area of Spitalfields being the most deprived areas in the UK, it has appears that the promoter intends to:

- Use the hybrid bill process to avoid provide an adequate description of the main measures to avoid, reduce or offset the major adverse effects of the project including adverse health, settlement, noise and vibration impacts prior to the Bill being enacted.
 - Avoid providing justification for Whitechapel Station by omitting a cost benefit analysis for its existence.
 - Use a predetermined tunneling strategy, which mainly involves tunneling under what the promoter describes as an area that is "extremely sensitively environmentally".
 - Avoid providing Stage 3 settlement impacts studies to substantiate claims that there is no danger to properties and lives in this densely populated area prior to gaining permission and also refuse to guarantee to substantiate such claims.
 - Select a tunneling strategy that is harmful for residential homes in stark contrast to CTRL avoiding residential areas and considering variety of routes before arriving at the optimum solution.
 - Use the hybrid bill to avoid proper social, economic and environmental scrutiny of a £20bn + scheme which is to be paid for by taxpayers.
- 4) The promoter revised the tunnelling strategy to eliminate the proposals to use Hanbury Street as a tunnel access point for the tunnel boring machines. However, the Promoters preferred choice of route for Crossrail was governed in part by the original tunnelling strategy. The change in the tunnelling strategy places a duty on the Promoter to reconsider the current Crossrail route as promoted in the Bill. The promoter refuses to follow best practice by considering alternatives before arriving at the optimum solution even though the justification for the present alignment to-date is wholly insufficient to discharge the Promoters duty under the present hybrid Bill. We submit that the main reasons and considerations for the present tunnel alignment going through the densely populated area of Spitalfields are absent and the available information shows they are not for the purposes of building a successful railway scheme or in the wider public interest. In addition, your Petitioners we are able to show that a less harmful southerly route is possible and has been discounted without good reason. Your Petitioners require the Promoter to provide a more detailed and comprehensive comparative assessment of the need for tunnelling under Spitalfields.
- 5) An intervention and ventilation shaft will be constructed in Hanbury Street. The shaft will be half the size of a tower at Tower Bridge. According to the Promoter the major works to build it will take just over 2 years although work will continue for a further 2 years. Experts dispute these figures. To make room for the shaft, the Promoter is purchasing an industrial building and a car park on Hanbury Street, together with some flats behind the industrial building on the adjoining street. It may be that in addition the Promoter will be required to purchase the large building so it will lose its car park¹. The Promoter has failed to demonstrate that there is a need for a ventilation/intervention shaft or that there is no other more suitable location for the

¹ The Promoter may be required to purchase Britannia House if the owner argues that the loss of the car park (which is being compulsorily purchased) has reduced the value of his property by 15% or more. The London Borough of Tower Hamlets, who refused to assist the community in relation to earlier consultation and also held negotiations with Crossrail over the route and stations, is now proposing that the shaft be dug on the corner of Woodseer Street. The promoter has failed to justify the decision to tunnel underneath Spitalfields, locate a ventilation and intervention shaft in Hanbury Street or justify the existence of Whitechapel Station. Our view is Parliament, the Select Committee and petitioners need comparative studies as evidence. The contrary evidence given by the promoter to the Select Committee, petitioners and the public to date heightens our concerns.

shaft. We understand that the Promoter has undertaken, following discussions with the London Borough of Tower Hamlets, to investigate the possibility of employing a construction methodology that would eliminate the need for any shaft at Hanbury Street. We believe the shaft is wholly unnecessary.

The Crossrail Bill, consultation and impacts

- 6) We have tried to understand the impacts of the Crossrail proposals on our lives and community for the next 4 – 5 years. We have found it very difficult to do so because the information has been omitted during the petitioning period for which we are being asked to formulate our concerns. We have and continue to reasonably request this information so we have the opportunity to express an opinion before the project is initiated otherwise it prejudices the rights of your Petitioners and unreasonably limits their ability to comment on the project's impact or mitigate likely harm.
- 7) Details of construction works, operations and associated impacts have yet to be determined. The terms of the Code of Construction Practice are still being formulated and yet the bill has been timed so as to avoid making the information about actual impacts available during the petitioning period and the giving this bill royal assent. The Promoter has not provided detailed risk and impact assessments for this area. We have been told this information will be supplied at a future date, which has not been set. This raises serious concerns for us. When we request information from the Promoter, we tend to receive generic documents, which are often difficult to understand because we do not have the relevant expertise or is not specific to the likely impacts for this area. Apart from the Committee there is no independent entity (e.g. Counsel for the residents) looking after the interests of all residents along the route and co-ordinating all their common issues.
- 8) The community is aware of the Crossrail scheme in spite of rather than because of the consultation carried out by the promoter. Despite the best efforts of the committee, consultation continues to be hugely problematic. We believe it is reasonable to recognise how important consultation is in a scheme of this scale particularly in relation to impacts on residents. The Committee has already heard evidence about the consultation failures in Spitalfields. We do not wish to repeat the evidence given by others. We do however feel particularly dismayed that the promoter has not shown any comparative alternative tunnelling routes to the one chosen. The process continues to be one of informing rather than consulting. We comment further on the Promoters consideration of alternative routes below.
- 9) The Department of Transport must have noted the number of complaints about Professor Tony Kennerley with concerns about his effectiveness and indeed, impartiality. We are particularly concerned that it is proposed that a singular Complaints Commissioner, who is to be Professor Tony Kennerley, will consider complaints about Crossrail once it is given permission. To this end, we requested an alternative to a Complaints Commissioner as this office will be set out under the same principles of the Crossrail Referee, which proved wholly inadequate in the Spitalfields and other areas. In addition, we would seek it to be subject to independent scrutiny.
- 10) The result of the problems with understanding information and consultation is that it leaves the public without any actual or clear idea of what to expect in terms of impacts. We cannot be expected to petition before the Crossrail Committee when we

cannot fully assess the impacts on us. Our concerns are heightened by the promoter's failure to supply detailed assessments on specific impacts on affected residents following discussions about the construction of the Channel Tunnel rail-link. Talking to them has provided us with a far clearer idea of what we might expect over the next few years than anything to be gleaned from the mass of technical detail provided by the Promoter.

(1) So far as we can ascertain, we can expect the following impacts

- **Settlement**– The promoter has failed to provide us detailed and comparative information as to whether and to what extent our houses will be damaged by this scheme. The generic predictions produced by the Promoter are based on Greenfield sites and generic assessments and are wholly inadequate for an area they admit is “extremely sensitive environmentally”. Settlement, compensation experts and proven industry people who worked on CTRL advise us that there will be substantial settlement because of the area's complex geology and the variety of, and density of residential housing. We request proofs of evidence for the reasons to tunnel underneath Spitalfields. Experts say the deed of settlement produced by the promoter is poor and does not provide residents with proper compensatory measures in the event of harm. To this end, we request proofs of evidence for tunnelling underneath Spitalfields and more importantly Stage 3 impact studies so we are able to scrutinise the justification for tunnelling in our area, the likely harm to the differing properties so we are able to mitigate harm.
- **Health problems**– We are concerned after receiving information from the promoter that the works will result in particulates and nitrogen dioxide from the construction works. These cause breathing problems²; noise can lead to sleep deprivation inducing stress heart and breathing problems. Dr Jeff Safi said his practice comprising of 12,500 patients was “top of the pops” for most admissions, most expense, most everything for hospital admissions due to lung disease [and] the most deprived areas in the whole of the UK”. According to the “Jarman Index which listed deprivation on social, medical, health, housing, unemployed etc etc.” Given the concerns of the local GP, we repeat that the promoter should not be permitted to impose a scheme without making a public policy statement on health. We are particularly concerned that the London Borough of Tower Hamlets has not taken any public health measures to address the serious health issues raised by Dr Safi. To this end, we shall expect the London Borough of Tower Hamlets to discharge their duty and conduct proper public health assessments and take appropriate measures to ease the existing problems in Spitalfields at the present time. That aside, the Promoter's health assessment does not take account of the present problems or how conditions such as existing levels of asthma and respiratory problems will be exacerbated in the Spitalfields area. We seek a full health study in the Spitalfields area so we can subject the promoter to proper scrutiny in order to mitigate harm.
- **Noise and vibration**– the noise schedules are technical and appear to be based on the number of complaints rather than actual impacts is inappropriate for an area where a large number of residents speak a foreign language, are poor and have little understanding on how to enforce their rights. We are aware that residents at Kings Cross affected by the Channel Tunnel Rail Link experienced constant background noise from drilling.

² Dr Safi giving evidence on behalf of the local GP practice. Transcript ref 10399 to 10407. In addition, a health report commissioned by Camden Council for the CTRL project submitted by Jill Cove of the SCA. George Galloway MP also raised the issue.

machines, generators and saws as well as vibrations through the house. We request noise and vibration information is given in detail so petitioners can subject it to proper scrutiny in order to mitigate harm.

- **Loss of buildings on our street and planning permissions**– Part of Hanbury Street will disappear to be replaced by a ventilation and intervention site with possible permission for an over site development. Clause 11 provides that deemed planning permission for the scheduled works will be subject to a 10-year time limit, which can be extended by order of the Secretary of State. The ability to extend this period causes uncertainty and is prejudicial to our members so we will be seeking to challenge it, as it is likely to interfere with the rights of owners and occupiers disproportionately.
- **Lorry movements**– We understand from the Promoter that at the height of building activity there will be 15 lorries a day going through part of Hanbury Street. The Promoter does not currently know the exact route the lorries will take but it may go through a street, which has 3 schools on it, which children from our streets attend. We object to the London Borough of Tower Hamlets support for lorry movements going on the streets with schools. We ask for the exact route so petitioners can assess the detail and subject it to proper scrutiny.
- **Working hours**– We understand that Tower Hamlets propose to allow the Promoter to work between the hours of 8 am and 6 pm on weekdays and until 2pm on Saturdays. The Promoter is asking for an additional hours on either end of the weekday for preparation work. The draft Construction Code will enable the Promoter to apply to Tower Hamlets to work additional daylight hours during the summer nights. We believe our rights are prejudiced by such a proposal. Furthermore, the Code indicates that tunnel construction work will continue 24 hours a day and that the pumps and generators will operate for 24 hours a day. We are aware from CTRL residents that even so called preparatory activity can lead to site activity and lorry movements. We want proper controls laid down by Parliament so contractors are properly controlled if they seek to expand the working hours.
- **Blight** – anecdotal evidence suggests that our two streets are starting to suffer from low-level blight. An architect's practice has recently decided not to refurbish and move into commercial premises on Hanbury Street after hearing about the Crossrail proposals. The building has remained empty. Some residents have moved out of the area. We have read with concern the evidence given by Norman Winbourne a chartered surveyor with 50 years experience who gave evidence on behalf of the Mayfair Residents' Association about the inadequacies of the compensation system proposed for Crossrail. The compensation framework set out by the promoter is poor even by the standards of Mayfair residents let alone those with little access to the law or money.

Protection from impacts

- 12) We have attempted to request information from the promoter on how to protect ourselves from impacts but to no avail. Since, we have also discussed how best we might seek to protect our community from the construction impacts with the 'Channel Tunnel Rail Link residents and have set out our concerns and requests for undertakings in our petition but we have had no response from the promoter.

Alternative routes and Whitechapel Station

- i3) The so-called "Round 1" consultation, the Promoter did not show us any alternative routes or indicate their existence and yet the route, shafts and station was pre-determined during this period through the issuing of safeguarding directions. The failure to show proper detailed comparative studies shows the promoter did not want to consider an alternative and the absence of detailed information shows the promoter also seeks to avoid proper scrutiny of the present proposal. Furthermore, information about the promoter's refusal to provide justification of the route, shaft and station at Whitechapel from day 1 until this day has, and was not been fully made available to the House during the second reading. Members of the Committee have already heard evidence about the objections to the construction of Whitechapel Station and the absence of a cost benefit analysis. We support these arguments. Given the evidence of independent experts and the public opposition to Whitechapel Station, we again request proper consideration be given to alternative routes.

In summary, we are concerned that the promoter is being given excessive powers for this present Crossrail Hybrid bill, which will lead to unnecessary harm to residents and businesses in Spitalfields. The passage of the Bill has not been subject to proper scrutiny and the Promoter has refused and failed to provide detailed assessments of impacts and comparative studies to ensure the optimum solution is the least harmful.

We believe the Crossrail Bill in its present form, which is likely to cost £20bn+, will leave taxpayers with unstipulated liabilities and limited benefits. We believe this Bill is no longer in the public interest as the harm is disproportionate to the benefits.

Yours sincerely

Guy Carpenter
WHRA Secretary

THE SPITALFIELDS SOCIETY

*The Crossrail Subcommittee of
The Spitalfields Society*

20 December 2006

The Secretary of State
c/o Tim Neate
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SW1P 4RR

13

Dear Mr Alexander

Comments on the Crossrail Environmental Statement ES3 and Additional Provisions AP3 and the Crossrail Hybrid Bill

The Society understands from its solicitors, Bircham Dyson Bell, that comments may be made on the above by 20 December 2006. Had the Society not employed lawyers, it would have been unaware of its ability to comment, having received no notification from the promoter. It is therefore certain that others who are prejudicially affected by the Hybrid Bill are unaware that they may make comments. We therefore seek your undertaking that the House will be made clearly aware that all those who may have wished to comment have not been given the opportunity to do so.

We do not consider it appropriate to comment in detail on the specific statements set out in these documents primarily because they seek to highlight the advantages of the changing tunnelling strategy, without making it abundantly clear that there will still be a large construction site in the heart of a densely populated residential area with chronic health problems, aggravated by construction activities and traffic movements over a construction period of probably between six and seven years. The promoter states that work at the construction site will go on for around four years, but has omitted to state that this does not include the subsequent over site development, has failed to take into account any delays which there will inevitably be in a project of this nature, and has failed to state working hours which, if they are limited, will inevitably increase construction time.

The promoter has also failed to make it clear that because of the change in tunnelling strategy and the need to retain Britannia House as a noise shield, the site to be taken is now much smaller which makes construction activity very constrained and the loading and unloading of vehicles difficult, if not impossible. This was clearly demonstrated by the Society before the Select Committee. Although a point of detail, the promoter has stated that over the main construction period of nine months (again not accounting for delays) there will be around thirty-six lorry movements. It has failed to state that a lorry movement is two journeys, i.e. one in one out, over what will probably be a ten hour working period which equates to one every nine minutes or so. That, when one takes into account the loading and unloading time, is clearly an impossible situation for local residents and businesses.

The promoter has failed to properly examine further alternatives suggested by expert evidence before the Select Committee, and has failed to provide any assessments of viable alternatives to the south of the Spitalfields area. The ES refers, in passing, to other assessments, but gives no detailed critique and none of those assessments have been provided to the community. The Society requires sight of and proper analysis of all these assessments.

The selection of Hanbury Street was based on a tunnelling strategy which is now redundant. The location of a shaft was chosen for its proximity to Pedley Street so that spoil could be removed from the tunnelling operation. With the change in tunnelling strategy, the entire issue of the location of the site and the route must be re-assessed and submitted to rigorous examination.

The area in Spitalfields is one of priceless cultural, historic and architectural significance and yet, in the ES, the promoter states that it is a townscape of moderate quality and sensitivity. Settlement effects are estimated at around 8 cm radiating out from the shaft site. As the promoter admits, that will cause some damage to the listed buildings (around fifty on the route of the tunnels and in the vicinity of the shaft site) and moreover without any assessment of the impact on other buildings which make up that priceless townscape, which may not themselves be listed, but are also of considerable historic and architectural significance.

The promoter has steadfastly refused to look at alternatives with any degree of objectivity and in the face of expert evidence requiring it to do so.

We request:-

- 1 That the promoter carries out a fair and objective analysis of the route and location of the shaft site in the light of the revised tunnelling strategy.
- 2 That the promoter reviews the route and the location of the shaft site so as to avoid (and therefore protect) a densely populated residential area with significant health problems, an area of world renowned architectural, historical and cultural significance, so much so that it has on a number of occasions been proposed as a world heritage site.
- 3 That the promoter reviews the need for a station at Whitechapel, bearing in mind that there will now be no need to provide any "sop" to the local council in return for allowing the area to be used as the dumping ground and spoil removal point. No cost benefit analysis has been carried out in relation to Whitechapel station.
- 4 Proper and full participation and involvement in the process.

In summary, we consider that the process so far infringes the promoter's duties, the requirements of European law, and the human rights of the Society's members.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. C. Jones'. The signature is written in a cursive, flowing style.

SPITALFIELDS COMMUNITY ASSOCIATION
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Spitalfields
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20 December 2006

Douglas Alexander MP
The Secretary of State for Transport
Department for Transport
c/o Tim Neale
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Dear Douglas Alexander,

Re: Comments - Crossrail Environmental Statement (ES3) and Additional Provisions (AP3) and the Crossrail Hybrid Bill

The Spitalfields Community Association (SCA) has not received any advice from either yourself or Crossrail about submitting comments on the Environmental Statement, Additional Provisions and the Crossrail Hybrid Bill, but have learnt of this requirement via others here in Spitalfields. We understand these comments will be made available to the House and are responding to a limited timescale of December 20, 2006 after being made aware of the ability to make such comments.

We think it unreasonable that neither the promoter nor the Department for Transport has advised us in this regard especially as a letter from Bindman & Partners solicitors, provided on behalf of the SCA and the Woodseer & Hanbury Street Residents Association (WHRA) and which outlined concerns about the lawfulness of the bill and the Crossrail Bill was not made available to the House during the second reading. Given the seriousness of the concerns outlined in this letter, we hope it will be made available to the House without any censorship.

The promoter has and continues to use the hybrid bill process to refuse to justify or provide comparative studies of feasible alternatives to locating a large ventilation and intervention shaft and tunnelling underneath Spitalfields and siting of the nearby Whitechapel Station. We have evidence to show that the proposals in Spitalfields and Whitechapel in the London Borough of Tower Hamlets are unnecessary and are related to development purposes rather than the building of a successful railway. We think it is unreasonable that the Promoter is seeking passage of this Bill before giving us as Petitioners detailed assessments of harm. This denies SCA members as Petitioners a fair hearing in relation to comment on the likely harm and also prevents participation in the mitigation of that harm.

SCA members believe that the substance of the present Crossrail hybrid bill should be questioned given that we do not know the cost of Crossrail because the only previous figures we have knowledge of relate to 2002 prices, the time scales are disputed by experts, the promoter is seeking wide ranging powers including interference with property rights, the

availability of a skilled workforce is being questioned as are the benefits by proven industry and rail professionals. We also believe the present Crossrail Hybrid Bill disproportionately interferes with human rights. Taxpayers are being expected to pay for an unproven scheme where most of the harm will be suffered by London's residents and communities.

We believe the failure to inform the public of the process determining the principle of the Bill has prejudiced SCA members interests during the process and passage of this Bill so far. In particular, we are concerned about the failure to allow proper public participation and the mechanisms to deal with unnecessary harm and the substantial flaws of the Crossrail Bill in its present form. The promoter claims to build on the experiences of CTRL. However, proven industry experts have rubbished such claims. Indeed, the CTRL promoter had to ensure that impact on residential housing was at a minimum but this promoter is being allowed to do the exact opposite in the heart of London's communities. The consultation carried out by the promoter continues to be non-existent. The failure to produce any meaningful information does not allow petitioners in particular or the public in general to comment on the proposals or seek mitigation against harm.

Similarly to the communities in Romford, Richmond and Mayfair, we are facing unnecessary harm by the promoter of this hybrid Bill except we live in an historic but deprived area. However, we have evidence that a less harmful route is possible and proven industry experts state there is absolutely no need for an intervention shaft in Spitalfields despite claims made by the promoter. However, unlike the groups in Romford and Richmond, groups in Spitalfields find the promoter is using the Hybrid Bill process to tinker with the proposals and continues to deny making comparative studies or detailed impact assessments available to petitioners so they can subject the proposals to scrutiny or request appropriate mitigating measures.

1). In summary;

- a. We request the Promoter reviews the need to locate the intervention shaft in Hanbury Street. The new plans remove the tunnel launch site and spoil adit. This is in light of the change in tunnelling strategy, which allows the Promoter greater flexibility on location. As far as we are aware this has not been done. Given the disruption to our lives and community we think this should be done as a matter of fairness and reasonableness.
- b. We request that the promoter does as claimed "build on the CTRL experience" and avoids densely populated residential areas. Furthermore, we request the reasonable consideration of proposals for protection measures during the construction period. They are based on extensive discussions with residents affected by the Channel Tunnel Rail Link. Following serious problems, matters did eventually improve for these residents and we ask that their experience is considered especially as to the impact on their lives.
- c. Our concerns continue to relate to the promoter's failure to supply detailed comparative studies of tunnelling strategy, the need for a vent shaft and impact assessments in relation to our area as it does not allow us to evaluate the likely harm especially given the health problems. We believe it is unreasonable for the promoter of this multi-billion pound Crossrail scheme to leave all the risk, uncertainty and potential liabilities of unknown variables with us. We request the application of best practice standards for Spitalfields and Whitechapel residents in the absence of this information.
- d. We support the arguments made by proven industry experts in relation to the need for proper consideration of alternative tunnelling routes for the railway, the need for Whitechapel Station and the Hanbury Street shaft. We do not believe it is consistent for the promoter to deny a Woolwich Crossrail Station on the basis of evidence from a cost benefit analysis while on the other hand, demanding Whitechapel Station but refusing to provide a cost benefit

analysis. Experts say there is no public support for Whitechapel Station, it is a disbenefit, an unnecessary cost to taxpayers at £400 million plus and would not meet the public interest test.

- e. We request how the Select Committee and the House will be able to formulate a statement as to why this Bill has been approved without public participation given the failure to consult and provide the public information about this Bill. We do not recall being informed if there has been full directions in relation to the third reading and if by law, the House has given any instruction to the Committee on whether the Promoters have an onus to prove the expediency of the Bill. We are advised that an additional process of reporting the comments to the House is required. We believe that relevant information about matters relating to Spitalfields was denied without just cause before the second reading. The contents of a legal letter sent prior to the second reading on behalf of the SCA and the WHRA was not made available to the House.
- f. We note that the Joint Committee on Human Rights have been unable to comment on a previous submission on the compatibility of this Bill with human rights because the submission concentrated on the paucity of the consultation process. However, as your Petitioners, we believe that we are now able to show that the substance of the present bill and the passage and procedures adopted for this hybrid Bill are incompatible with human rights and various Convention rights. In addition, we understand the premature safeguarding directions interfere with property rights due to the nature of the proposals and the permission to grant what appear to be indefinite extensions.

Revised proposals for Spitalfields

- 2) The Department for Transport has given assurances that the promoter would consult and provide reasons to justify the decision to tunnel, locate the ventilation and intervention shaft in the densely populated area of Spitalfields and locate a station at nearby Whitechapel. However, the consultation remains a matter of informing rather than consulting and the above information remains outstanding even though we are at the petitioning stage of this bill. Furthermore, information about health, social, environmental and other impacts are still not being made available to Petitioners. This prejudices us as Petitioners, as well as the public, and more importantly fails to discharge duties under the Human Rights Act and the case law governing Environmental Impact Assessments.
- 3) Despite the best efforts of residents, community and small business groups in the densely populated area of Spitalfields being the most deprived areas in the UK, it has appears that the promoter intends to:
 - Use the hybrid bill process to avoid provide an adequate description of the main measures to avoid, reduce or offset the major adverse effects of the project including adverse health, settlement, noise and vibration impacts prior to the Bill being enacted.
 - Avoid providing justification for Whitechapel Station by omitting a cost benefit analysis for its existence.
 - Use a predetermined tunneling strategy, which mainly involves tunneling under what the promoter describes as an area that is "extremely sensitively environmentally".
 - Avoid providing Stage 3 settlement impacts studies to substantiate claims that there is no danger to properties and lives in this densely populated area prior to gaining permission and also refuse to guarantee to substantiate such claims.

- Select a tunneling strategy that is harmful for residential homes in stark contrast to CTRL avoiding residential areas and considering variety of routes before arriving at the optimum solution.
 - Use the Hybrid Bill to avoid proper social, economic and environmental scrutiny of a £20bn + scheme which is to be paid for by taxpayers.
- 4) The promoter revised the tunnelling strategy to eliminate the proposals to use Hanbury Street as a tunnel access point for the tunnel boring machines. However, the Promoters preferred choice of route for Crossrail was governed in part by the original tunnelling strategy. The change in the tunnelling strategy places a duty on the Promoter to reconsider the current Crossrail route as promoted in the Bill. The promoter refuses to follow best practice by considering alternatives before arriving at the optimum solution even though the justification for the present alignment to-date is wholly insufficient to discharge the Promoters duty under the present hybrid Bill. We submit that the main reasons and considerations for the present tunnel alignment going through the densely populated area of Spitalfields are absent and the available information shows they are not for the purposes of building a successful railway scheme or in the wider public interest. In addition, as your Petitioners we are able to show that a less harmful southerly route is possible and has been discounted without good reason. As your Petitioners, we require the Promoter to provide a more detailed and comprehensive comparative assessment of the need for tunnelling under Spitalfields.
- 5) An intervention and ventilation shaft is proposed to be constructed in Hanbury Street. The shaft will be half the size of a lower at Tower Bridge. According to the Promoter the major works to build it will take just over 2 years although work will continue for a further 2 years. Experts dispute these figures. To make room for the shaft, the Promoter is purchasing an industrial building and a car park on Hanbury Street, together with some flats behind the industrial building on the adjoining street. It may be that in addition the Promoter will be required to purchase the large building so it will lose its car park¹. The Promoter has failed to demonstrate that there is a need for a ventilation/intervention shaft or that there is no other more suitable location for the shaft. We understand that the Promoter has undertaken, following discussions with the London Borough of Tower Hamlets, to investigate the possibility of employing a construction methodology that would eliminate the need for any shaft at Hanbury Street. We believe the shaft is wholly unnecessary.

The Crossrail Bill, consultation and impacts

- 6) SCA members have, over past years, tried hard to understand the impacts of the Crossrail proposals on our lives and community for the next 4 – 5 years. We have found it very difficult to do so because the information has been omitted during the petitioning period for which we are being asked to formulate our concerns. We have and continue to reasonably request this information so we have the opportunity to express an opinion before the project is initiated otherwise it prejudices the rights of

¹ The Promoter may be required to purchase Britannia House if the owner argues that the loss of the car park (which is being compulsorily purchased) has reduced the value of his property by 15% or more. The London Borough of Tower Hamlets, who have had close contact with Crossrail over the route and stations, is now proposing that the shaft be dug from the corner of Woodseer Street. The promoter has failed to justify the decision to tunnel underneath Spitalfields, locate a ventilation and intervention shaft in Hanbury Street or justify the existence of Whitechapel Station. Our view is that Parliament, the Select Committee and Petitioners need comparative studies as evidence. The contrary evidence given by the promoter to the Select Committee, petitioners and the public to date heightens our concerns.

your Petitioners and unreasonably limits our ability to comment on the project's impact or to mitigate likely harm.

- 7) Details of construction works, operations and associated impacts have yet to be determined. The terms of the Code of Construction Practice are still being formulated and yet the Bill has been lined so as to avoid making the information about actual impacts available during the petitioning period and the process of giving this Bill royal assent. The Promoter has not provided detailed risk and impact assessments for this area. We have been told this information will be supplied at a future date, which has not been set. This raises serious concerns for us. When we request information from the Promoter, we tend to receive generic documents, which are often difficult to understand because we do not have the relevant expertise or is not specific to the likely impacts for this area. Apart from the Committee there is no independent entity (e.g. Counsel for the residents) looking after the interests of all residents along the route and co-ordinating all their common issues.
- 8) The Spitalfields and Whitechapel communities are aware of the Crossrail scheme in spite of rather than because of the consultation carried out by the Promoter. Despite the best efforts of the committee, consultation continues to be hugely problematic. We believe it is reasonable to recognise how important consultation is in a scheme of this scale particularly in relation to impacts on residents. The Committee has already heard evidence about the consultation failures in Spitalfields. We do not wish to repeat the evidence given by others. We do however feel particularly dismayed that the Promoter has not shown any comparative alternative tunnelling routes to the one chosen. The process continues to be one of informing rather than consulting. We comment further on the Promoter's consideration of alternative routes below.
- 9) The Department of Transport must have noted the number of complaints about Professor Tony Kennerley with concerns about his effectiveness and indeed, impartiality. We are particularly concerned that it is proposed that a singular Complaints Commissioner, who is to be Professor Tony Kennerley, will consider complaints about Crossrail once it is given permission. To this end, we requested an alternative to a Complaints Commissioner as this office will be set up under the same principles of the Crossrail Referee, which proved wholly inadequate in the Spitalfields and other areas. In addition, we would seek it to be subject to independent scrutiny.
- 10) The result of the problems with understanding information and consultation is that it leaves the public without any actual or clear idea of what to expect in terms of impacts. We cannot be expected to petition before the Crossrail Committee when we cannot fully assess the impacts on us. Our concerns are heightened by the promoter's failure to supply detailed assessments on specific impacts on affected residents following discussions about the construction of the Channel Tunnel rail-link. Talking to them has provided us with a far clearer idea of what we might expect over the next few years than anything to be gleaned from the mass of technical detail provided by the Promoter.

11) So far as we can ascertain, we can expect the following impacts:

- **Settlement**– The Promoter has failed to provide us with detailed and comparative information as to whether and to what extent our houses will be damaged by this scheme. The generic predictions produced by the Promoter are based on greenfield sites and generic assessments and are wholly inadequate for an area they admit is "extremely sensitive environmentally". Settlement, compensation experts and proven industry people who worked on CTRL advise us that there will be substantial settlement because of the area's complex geology and the variety of, and density of residential

housing. We request proofs of evidence for the reasons to tunnel underneath Spitalfields. Experts say the deed of settlement produced by the promoter is poor and does not provide residents with proper compensatory measures in the event of harm. To this end, we request proofs of evidence for tunnelling underneath Spitalfields and more importantly Stage 3 impact studies so we are able to scrutinise the justification for tunnelling in our area, the likely harm to the differing properties so we are able to mitigate harm.

- **Health problems**— We are concerned after receiving information from the Promoter that the works will result in particulates and nitrogen dioxide from the construction works. These cause breathing problems²; noise can lead to sleep deprivation inducing stress heart and breathing problems. Dr G. Safir said his practice comprising of 12,500 patients was “top of the pops” for most admissions, most expense, most everything for hospital admissions due to lung disease [and] the most deprived areas in the whole of the UK” according to the “Jarman Index which listed deprivation on social, medical, health, housing, unemployed etc etc.” Given the concerns of the local GP, we repeat that the Promoter should not be permitted to impose a scheme without making a public policy statement on health. We are particularly concerned that the London Borough of Tower Hamlets has not taken any public health measures to address the serious health issues raised by Dr Safir. To this end, we shall expect the London Borough of Tower Hamlets to discharge their duty and conduct proper public health assessments and take appropriate measures to ease the existing problems in Spitalfields at the present time. That aside, the Promoter’s health assessment does not take account of the present problems or how conditions such as existing levels of asthma and respiratory problems will be exacerbated in the Spitalfields area. We seek a full health study specific to the Spitalfields area so that we can subject the Promoter to proper scrutiny in order to mitigate harm.
- **Noise and vibration**— the noise schedules are technical and appear to be based on the number of complaints rather than actual impacts is inappropriate for an area where a large number of residents speak a foreign language, are poor and have little understanding on how to enforce their rights. We are aware that residents at Kings Cross affected by the Channel Tunnel Rail Link experienced constant background noise from drilling, machines, generators and saws as well as vibrations through the house. We request noise and vibration information is given in detail so petitioners can subject it to proper scrutiny in order to mitigate harm.
- **Loss of buildings on our street and planning permissions**— Part of Hanbury Street will disappear to be replaced by a ventilation and intervention site with possible permission for an over site development. Clause 11 provides that deemed planning permission for the scheduled works will be subject to a 10-year time limit, which can be extended by order of the Secretary of State. The ability to extend this period causes uncertainty and is prejudicial to our members so we will be seeking to challenge it, as it is likely to interfere with the rights of owners and occupiers disproportionately.
- **Lorry movements**— We understand from the Promoter that at the height of building activity there will be 15 lorries a day going through part of Hanbury Street. The Promoter does not currently know the exact route the lorries will take but it may go through a street, which has 3 schools on it, which children from our streets attend. We object to the London Borough of Tower Hamlets support for lorry movements going on the streets with schools. We ask for the exact route so petitioners can assess the detail and subject it to proper scrutiny.
- **Working hours**— We understand that Tower Hamlets propose to allow the Promoter to work between the hours of 8 am and 6 pm on weekdays and until 2pm on Saturdays. The Promoter is asking for an additional hours on

² Dr Safir giving evidence on behalf of the local GP practice. Transcript ref 10399 to 10407. In addition, a health report commissioned by Camden Council for the CTRL project submitted by myself on behalf of the SCA when giving evidence to the Committee.

either end of the weekday for preparation work. The draft Construction Code will enable the Promoter to apply to Tower Hamlets to work additional daylight hours during the summer nights. We believe our rights are prejudiced by such a proposal. Furthermore, the Code indicates that tunnel construction work will continue 24 hours a day and that the pumps and generators will operate for 24 hours a day. We are aware from CTRL residents that even so called preparatory activity can lead to site activity and lorry movements. We want proper controls laid down by Parliament so contractors are properly controlled if they seek to expand the working hours.

- **Blight** – anecdotal evidence suggests that two streets in here in Spitalfields are already starting to suffer from low-level blight. An architect's practice has recently decided not to refurbish and move into commercial premises on Hanbury Street after hearing about the Crossrail proposals and the building has remained empty. Some residents have moved out of the area. We have read with concern the evidence given by Norman Winbourne a chartered surveyor with 50 years experience who gave evidence on behalf of the Mayfair Residents' Association about the inadequacies of the compensation system proposed for Crossrail. The compensation framework set out by the promoter is poor even by the standards of Mayfair residents let alone those with little access to the law or money.

Protection from impacts

- 11) SCA members have attempted to request information from the Promoter on how to protect ourselves from impacts but to no avail. Since, we have also discussed how best we might seek to protect our community from the construction impacts with the 'Channel Tunnel Rail Link residents and have set out our concerns and requests for undertakings in our petition but we have had no response from the promoter.

Alternative routes and Whitechapel Station

- 12) The so-called "Round 1" consultation, the Promoter did not show us any alternative routes or indicate their existence and yet the route, shafts and station was pre-determined during this period through the issuing of safeguarding directions. The failure to show proper detailed comparative studies shows the Promoter did not want to consider an alternative and the absence of detailed information shows the promoter also seeks to avoid proper scrutiny of the present proposal. Furthermore, information about the Promoter's refusal to provide justification of the route, shaft and station at Whitechapel from day one until today has not been fully made available to the House during the second reading. Members of the Committee have already heard evidence about the objections to the construction of Whitechapel Station and the absence of a cost benefit analysis and the SCA supports these arguments. Given the evidence of independent experts and the public opposition to Whitechapel Station, we again request proper consideration be given to alternative routes.

In summary, we are concerned that the Promoter is being given excessive powers for this present Crossrail Hybrid bill, which will lead to unnecessary harm to residents and businesses in both the Spitalfields and Whitechapel areas. The passage of the Bill has not, so far, been subject to proper scrutiny and the Promoter has refused and failed to provide detailed assessments of impacts and comparative studies to ensure the optimum solution is the least harmful.

We believe the Crossrail Bill in its present form, which is likely to cost £20bn+, will leave taxpayers with unstipulated liabilities and very limited benefits. We believe this Bill is no longer in the public interest as the likely harm which will ensue is quite disproportionate to any benefits that may accrue.

Yours sincerely

Jil Cove
Secretary

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E: peter.hitchen@rbwm.gov.uk

Your Reference

Our Reference: PMH/TM/8280

Date: 2 January 2007



Secretary of State
C/O Tim Neate Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London
SW1P 4DR

Email: crossrail@dft.gsi.gov.uk

Dear Mr Neate

Supplementary Environmental Statement 3

I am writing further to SES 3 which was deposited on 7th November 2006.

On 14th December 2006 the Borough Council's Cabinet considered a report on Crossrail Progress and covered matters included in SES 3 affecting the Royal Borough. As part of its resolution, Cabinet agreed the following:

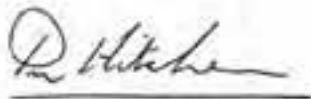
* An objection be made to the inclusion in the Supplementary Environmental Statement of works to the listed Brunel Rail Bridge which involves the temporary removal of sections of the parapet, and further clarification be made to the method of construction relating to the proposed electrification and the location of masts*

I have attached a copy of the Cabinet report for your information. You will note that the matters of concern to the Council are contained in Appendix 1 of the SES 3 as 'errata'. However, they raise either new issues not previously included in the deposited documents, or matters which have changed through further discussions with Crossrail.

The first issue relates to the possible removal of sections of the parapet to the bridge, and has been previously highlighted as a concern to the Borough during Heritage meetings. The second matter involves the fixing of masts to the bridge superstructure and the need to attach 4 of these to the face of the bridge which Crossrail have since found to be unnecessary. The inclusion of both these references in the appendix therefore needs further clarification.

I trust that you will be able to include these comments on SES 3 in any further report.

Yours sincerely



Peter Hitchen
Planning Policy Manager
Planning Unit
Directorate of Community Services

CROSSRAIL – PROGRESS ON PETITION

CABINET: 14 December 2006

MEMBER REPORTING: COUNCILLOR WOOD

1. PURPOSE OF REPORT

- 1.1 To consider the progress on issues raised as part of the Borough's petition to Parliament on the Crossrail Bill, to endorse the undertaking to be agreed with the Bill's promoters and to delegate final approval on the wording of the draft deed of undertaking to the Planning Policy Manager and Borough Secretary in consultation with the Lead Member for Transport.

2. **MEMBER'S RECOMMENDATION:** That Cabinet agrees the principles of the proposed undertaking in relation to the Borough Council's concerns in its petition on the Crossrail Bill and that agreement of the final wording be delegated to the Planning Policy Manager and Borough Secretary in consultation with the Lead Member for transport. An objection be made to the inclusion in the Supplementary Environmental Statement of works to the listed Brunel rail bridge which involve the temporary removal of sections of the parapet, and further clarification be made to the method of construction relating to the proposed electrification and the location of masts.

3. SUPPORTING INFORMATION

3.1 Wards Affected

- 3.1.1 Oldfield, Maidenhead Riverside.

3.2 Relevant Matters Upon Which Decision is Based & Reasons Supporting Recommendation

- 3.2.1 The Borough Council submitted its petition on the Crossrail Bill in September 2005. The Parliamentary Select Committee has been engaged in hearing petitions since January 2006. The Borough's Petition was scheduled to be heard on 27th June 2006 at which time the Council's evidence on the transport issues affecting Maidenhead Station was presented to the Committee. Other petitions affecting Maidenhead were also heard on that occasion including the Maidenhead Civic Society and the Thames Reach Residents' Association.

- 3.2.2 The Crossrail Select Committee reconvened on Tuesday July 18th to consider the Borough's Petition following evidence presented on 27th June but which had not been completed at that point. At the outset Counsel on behalf of the Promoters of the Bill (Crossrail/DfT) offered to give an undertaking in response to the Borough's concerns on two key areas of concern, which is seen as very significant progress and represents a major success for the Borough in relation to:

- the provision of additional car parking to serve the station and enable a significant transport interchange at the station approach;
- the relocation of the proposed Guards Club Park worksite to an area beneath the rail bridge arches;
- the use of barges to deliver materials and service the construction works to the central pier of the rail bridge;

- the limited use of the listed Victorian footbridge to Guards Club Island for personnel only.

Car Parking – Maidenhead station

- 3.2.3 Firstly, Crossrail will work with the Borough to assemble and part fund a suitable site to build a multi storey car park providing an additional 100 spaces over what is currently available at the station car parks. This is a positive response to the Borough's case that there will be growth in passenger demand at Maidenhead as a result of Crossrail, and that there needs to be a fundamental rethink of the way facilities are provided at the station, not only for car parking but for the provision of improved interchange facilities for buses, taxis, cycles and pedestrians.

Guard's Club Park and Island

- 3.2.4 Crossrail will use a barge to deliver construction equipment and service the central pier of the viaduct at Guards Club Island avoiding the use of the listed footbridge and island to transport materials and equipment. They will also undertake to:
- relocate the worksite proposed at the park so that the compound and site facilities are accommodated within land situated outside the park and beneath the railway arches, subject to surveys to assess impact on trees.
 - Delivery of materials to the worksite will be limited to those necessary for the erection of scaffolding, and the facilities for site welfare and administration will be contained in smaller cabins which can be towed into place by smaller vehicles.
 - Use of the footbridge will be limited to foot access for personnel carrying hand tools only.
 - Limit the construction period at the worksite to 13 months after which scaffolding and facilities will be removed.

This will reduce the extent of activity and disruption to the Park and residents by limiting the need for lorries to access the worksite using Oldaces.

- 3.2.5 Crossrail have further proposed to list the area of the worksite at the Park and adjacent land as an Environmentally Sensitive Site which will involve a comprehensive management plan for the works and associated activities. Subject to satisfactory assurances and conditions to protect the environment of the park and conservation area, which will be drawn up in full consultation with the Borough, this will further safeguard the sensitive and attractive setting of the park and island.

- 3.2.6 The Borough had also raised the issue of the principle of the overhead electrification of the railway at the historic Brunel rail bridge and evidence presented to the Committee requested consideration of alternatives to the construction of overhead lines on the bridge. Responses from Crossrail gave full consideration to these points making the case for overhead electrification and why the alternatives are either not practical or fail to meet European standards. Whilst the Council would prefer not to see the bridge altered in this way, Crossrail are prepared to work with the Councils affected, South Bucks and RBWM, and English Heritage, to draw up an agreement to specify a design that will minimise the impact of supporting masts and the construction method on the viaduct itself to avoid harming the listed structure and its appearance. The Council will, therefore, be a party to this Heritage Agreement.

- 3.2.7 Other points raised in the Borough's petition regarding possible degradation of the rail service available for passengers at Maidenhead to London Paddington were met by Crossrail's proposals that there would still be available fast or semi fast services as part of the residual diesel services currently operated by First Great Western.
- 3.2.8 The Select Committee welcomed this approach towards resolving differences and commended this to other issues that may be heard during the course of their deliberations. Whilst the Committee is still continuing its work, the agreement of an undertaking does not have to wait until the Committee has concluded and reported its findings. The agreement will take the form of a legal deed which will be binding on the promoters and does not involve a change to the Bill's provisions.
- 3.2.9 A draft undertaking has been received by the Council's solicitors and will need to be carefully scrutinised to ensure that the provisions incorporate the principles put forward at the Select Committee and to protect the Borough's and local residents' interests.
- 3.2.10 In November 2006 Crossrail deposited Additional Provisions 3 (AP3) including various amendments to the Bill reflecting a number of changes discussed during the Select Committee process. Whilst the majority of these do not affect the Borough's interests, AP3 includes a revised access to construct the new long bay platform on the north side of Maidenhead Station. This is proposed in order to allow an adjacent development for flats to proceed but requires a technical amendment to the Bill's provisions as part of the land required falls outside the Bill's limits. There is no particular concern with this change and the adjacent development is currently underway. The access required involves a landscaped strip to the rear of the site which will be reinstated on completion of the station works.
- 3.2.11 The Parliamentary process provides for interested parties to submit further petitions in relation to any changes to the Bill's provisions. Petitions against the additional provisions must be deposited on or before 13th December 2006. In this case, it is considered that the Borough need not petition on the proposed change.
- 3.2.12 In addition to AP3, Crossrail have also deposited a third supplementary environmental statement ("SES3"). SES3 has been produced because there have been a number of alterations to the Crossrail proposals which do not require the authorisation of an additional provision (for example, because no additional land is required). An example is the knock on effect of the lowering of the line in the western section to enable electrification to take place, and which is being done as an alternative to raising road bridges.
- 3.2.13 Petitions cannot technically be deposited in respect of SES3 alone. If a person is affected by both AP3 and SES3 then it would be possible to mention SES3 in the petition. However, comments may be submitted separately on the environmental statement.
- 3.2.14 Of particular interest in SES3 is, as agreed with the promoters, a reduction in the extent of Maidenhead Bridge worksite in Guards Club Park and relocation to underneath the bridge arches and the provision of a pontoon worksite moored in the river. These changes reflect the principles to be incorporated within the deed of undertaking. SES3 assesses the impacts of the proposed arrangements for access and servicing of the works to the listed rail bridge. Whilst access to the Guards Club Park car park is still required for lorry delivery of materials this will be reduced by the delivery of materials to the central bridge pier by barge. During construction, an area of the car park will be fenced off. From this location an

access route will be created to the site facilities to be located within the bridge arches. Delivery lorries will turn around in the park, which may require a temporary extension to the hardstanding area.

- 3.2.15 A detailed tree survey will be carried out to assist the design of the access route to the site facilities located beneath the bridge. However, the statement does include the proviso that if it is agreed with the local authority that the effects on mature trees are unacceptable then the site facilities will be located within the car park and such extension to the hardstanding as may be required to facilitate deliveries. It is considered that this is not desirable and will need to be given particular attention in the wording of the agreement.
- 3.2.16 The assessment concludes that the revised scheme will not result in any additional significant temporary or permanent adverse impacts on the visual amenity of nearby residents or park users. The revised worksite is significantly smaller in area, only occupying part of the existing car park, and views of the temporary works beneath the railway arches will be substantially enclosed by retained mature trees and shrubs.
- 3.2.17 One matter which does raise concern, however, is the inclusion in SES3 in Appendix 1 to the document of revisions to earlier documents on the impacts of OHLE works on the structure of the listed Brunel bridge. In order to carry out the electrification, the supporting masts have to be located on the bridge superstructure. Three of these have to be located at the main bridge supports on either side of the railway lines. The revised wording refers to the possibility of temporary removal of 2 metres of the bridge parapet at each location in order to avoid permanent damage during the construction works.
- 3.2.18 Whilst the parapet would be reinstated, it would obviously involve a significant impact on the listed bridge. Your officers are particularly concerned at the impacts of this temporary removal of the parapet and the prospect of damage to the existing brickwork and having to replace this with newly sourced material. This concern has already been raised by your Conservation Officer at heritage meetings relating to the proposed works and has yet to be satisfactorily resolved. An objection to the revised wording in the SES3 is therefore recommended.
- 3.2.19 There is also reference in the appendix to the mitigation of impacts on the listed structure by employing a fixing mechanism that avoids damaging the cornice by offsetting the masts from the bridge. This does not take account of updates to the proposed construction of the masts that Crossrail has supplied to the Borough and the Select Committee which now involve positioning the masts within the bridge structure and avoids any unsightly attachment to the face of the bridge. We would request that the promoters clarify this updated position in the Environmental Statement.

3.3 Options Available and Risk Assessment

	Option	Comments
1.	To comment on the Supplementary Environmental Statement	The comments included in the report will provide the opportunity to influence outcome of the impact of works on matters of local importance.

Option		Comments
2.	Not to comment on the Statement	This would not protect the interests of the Borough in the event that the proposed works proceed.

3.4 Relevant National/Regional Guidance

3.4.1 None.

3.5 Relevant Council Policies/Strategies

3.5.1 The relevant Council strategies and policies are:

- RBWM Local Plan

3.5.2 The recommendations contained in this report are relevant to the Community Strategy in the following ways:

Key Themes:	Relevant?	
	Yes	No
getting about.	N	
learning for life	N	
being safe and secure	N	
caring and health	N	
living and working in a good place.	Y	
Guiding Principles:		
working together	N	
leaving no one behind	N	
involving people	N	
safeguarding the young	N	

4. CONSULTATION CARRIED OUT

4.1 There has been no external consultation carried out in the preparation of this report.

5. IMPLICATIONS

5.1 Financial

5.1.1 None relating to this report's recommendation.

5.2 Legal

5.2.1 The statutory procedures required a relation to a hybrid bill are set out in the report, in relation to the proposed undertaking and the current and anticipated progress of the Select Committee.

5.3 Human Rights Act

- 5.3.1 Article 1 of First Protocol – Protection of Property
Article 14 Prohibition of Discrimination.

5.4 Planning

- 5.4.1 There are no planning implications as a result of the report's recommendations.

5.5 Sustainable Development

- 5.5.1 The outcome of the proposed undertaking will have positive effects for sustainable development in relation to the provision of transport choice and the amelioration of temporary adverse impacts on the environment.

5.6 Diversity and Equality

- 5.6.1 In terms of the Council's Equality Impact Assessment Policy, the recommendations in this report have no negative equality and diversity implications.

Background Papers:

Crossrail – Amendment of Provisions Environmental Statement, November 2006
Crossrail – Supplementary Environmental Statement 3, November 2006



15

PLANNING POLICY BUSINESS UNIT

Secretary of State
C/o Tim Neate
Department for Transport
Major Projects Division 3, Zone 2/08
76 Marsham Street
London
SW1P 4DR

Dealt with by: Belinda Lau
Your Ref:
My Ref: T2.7
e-mail: Belinda.lau@southbucks.gov.uk
Direct Line: 01895 837278
Date: 15 January 2007

Dear Mr Neate,

Crossrail Supplementary Environmental Statement 3 (SES 3)

I am writing in response to the above statement and would like to express our concerns, in particular to the issues related to Dog Kennel Bridge and Thorney Lane Bridge located within South Bucks District.

The Council maintains its strong objection to the decision made by the Transport Minister and Crossrail in June 2006 regarding Dog Kennel Bridge and Thorney Lane Bridge. Dog Kennel Bridge was listed as Grade II on 18 April 2006. It has 75% of the original bridge surviving, and is amongst one of the best-preserved over-bridges along the London to Maidenhead section of the Great Western Railway. Government policy stresses the importance of protecting listed buildings, and this decision to allow its demolition would be contrary to that policy. The Council objects to SES 3 paragraph 12.5.3, which states that no statutory listed building will be directly affected by the construction or operation of the revised scheme to the Dog Kennel Bridge, as Dog Kennel Bridge itself is a listed building. The Council urges the responsible Minister and Crossrail to reconsider their decisions on demolishing the Grade II listed Dog Kennel Bridge, which is the best-preserved bridge along this section of the railway line. The Council considers the demolition of Dog Kennel Bridge with the replacement of the footpaths in the revised scheme unacceptable - the provision of the footpaths will not compensate for the demolition of the bridge since they provide a much less convenient route than that currently provided by Dog Kennel Bridge.

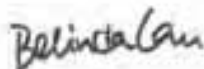
The original Crossrail Bill, which was introduced to the House of Commons on 22 February 2005, proposed a replacement of the Thorney Lane Bridge with a wider new bridge. The Council considered the proposed new bridge would bring overall benefit to the local transport network and therefore supported the proposal in principle. The Council is very disappointed at the decision to retain the existing Thorney Lane Bridge. The existing bridge is narrow and does not facilitate two HGVs, travelling in opposite directions, passing on the bridge. There are significant traffic problems in this immediate locality, and the original proposal for a wider bridge would have assisted in ameliorating those to some extent. That benefit will be lost with the proposal to retain the existing bridge.

The Crossrail case for retaining the existing Thorney Lane Bridge is based on heritage grounds. However, this is inconsistent with its proposals to demolish Dog Kennel Bridge. It makes no sense that Crossrail is

working hard, for heritage reasons, to protect Thorney Lane Bridge, which is not listed, whilst it is determined to demolish Dog Kennel Bridge which is Grade II listed. It would seem that the reason for this approach from Crossrail relates to cost solely. Paragraph 10.21-18 of SES 3 acknowledged that the original scheme would have been an improvement on the existing situation. The Council objects to the revised scheme to Thorney Lane Bridge, since this will not bring the benefits to the local area that the original proposals would have brought.

The Council would like to re-iterate its position as in its written petition to Parliament submitted in September 2005. The Council objects to the demolition of the Dog Kennel Bridge and supports the proposal of building a new bridge replacing the existing Thorney Lane Bridge. The Council strongly urge the relevant parties to reconsider these matters.

Yours sincerely,



Belinda Lau
Senior Planner, Planning Policy
South Bucks District Council

c.c. Richard Ward (Buckinghamshire County Council, by email)

Tim Neate
Consultation Manager
Department of Transport
Major Projects Division 3
Zone 2/19
76 Marsham Street
London
SW1P 4DR

Our ref: NE/2007/102745/01-L01
Your ref: -
Date: 25 June 2007

Dear Mr Neate

CROSSRAIL - SUPPLEMENTARY ENVIRONMENTAL STATEMENT 4.

Thank you for consulting us on the above document. We have the following comments.

Isle of Dogs

We recognise the amended proposal is an improvement on the original.

Poplar Dock and Blackwall Basin will no longer be isolated from the surrounding docks and so will reduce the impacts on fish and water quality.

The amendments mean that there is no longer such a large loss of flood storage during the temporary works.

Woolwich Station

We generally concur with the findings in the Environmental Statement. Land contamination should not prove to be a problem if controls are in place.

Excavated contaminated soils may be considered as waste and should therefore conform to modern waste legislation. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

1. Duty of Care Regulations 1991
2. Hazardous Waste (England and Wales) Regulations 2005
3. Waste Management Licensing Regulations 1994 (as amended)
4. Pollution Prevention and Control Regulations (England and Wales) 2000

Environment Agency
Apolito Court, 2 Bishops Square Business Park, St Albans Road West, Hatfield, Hertfordshire, AL10 9EX.
Customer services line: 08708 508 508
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

End

5. Landfill (England and Wales) Regulations 2002

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed off site operations is clear. If in doubt, we should be contacted for advice at an early stage to avoid any delays.

I trust this is satisfactory but if you have any queries, please contact me.

Yours sincerely



Candice Beard
Planning Liaison Officer

Tel: 01707 632406

Fax: 01707 632515

Email: candice.beard@environment-agency.gov.uk

cc. Charles Thompson, EA

14003

20 June 2007

The Secretary of State c/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 7
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ref: Ref
Ltr 06
HD-W:PIFF-Y9-15080
Date
27 June 2007

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Email: info@bdbl.co.uk

Dear Mr Neate

Crossrail Bill - AP4 Environmental Statement

We act for the Association of Train Operating Companies (ATOC), and its member London and Southeastern Railway Limited (LSER), which holds the Integrated Kent franchise to operate passenger rail services in southeast London, Kent and parts of East Sussex, including services that use the North Kent line and that will be affected by the works described in AP4.

LSER is the lessee and occupier of the parcels of land that are described in the Book of Reference for AP4 as being leased and occupied by "South Eastern Trains Limited", the former holder of the Integrated Kent franchise. As South Eastern Trains Limited was a wholly owned subsidiary of the Department, it did not petition against the Crossrail Bill or comment on the Environmental Statement for the original Bill when the Bill was introduced into the House of Commons. LSER has held the franchise since April 2006, and fully endorses the statements expressed in the petition of ATOC, in ATOC's comments on the original ES, and also the statements made by Theo Steel before the Select Committee on the Bill on 4 July last year (HC 837-xviii, paragraphs 13897 - 13941). Each of those statements should be treated by the Department as applying equally, so far as appropriate, to the North Kent line and to LSER's services on that line.

So far as AP4 is concerned, LSER operates services through and manages Abbey Wood Station and Woolwich Arsenal Station. Both of these stations are significantly affected by the Crossrail proposals. In Volume 3 of the Environmental Statement in the original Crossrail Bill at paragraph D.12.63 the impact of weekend works and track possessions between Plumstead and Abbey Wood is pointed out as causing 'disruptions to passenger services that will result in a significant impact for rail users.' This will inevitably have a negative impact on the number of passengers using LSER services during the construction period of up to three and a half years (the length of time taken to complete all of the proposed works at Abbey Wood). The extent of the impact on the Train Operating Companies has not been assessed in the Environmental Statement and no mitigating measures are outlined for the construction period.

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Birmingham: 0121 275 2200
Cardiff: 01495 275 2200

Edinburgh: 0131 275 2200
Glasgow: 0141 275 2200
Newcastle: 0191 275 2200

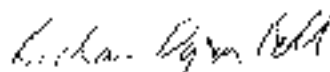
Bircham Dyson Bell

Similarly, the Environmental Statement Volume 8d to the original Crossrail Bill outlines plans to demolish and replace Abbey Wood Station, to lay two new tracks, and to realign the existing tracks (paragraphs 28.22 - 28.24). Public transport, road, and pedestrian access to and from the station, and car parking facilities will be highly adversely affected by the work involved in these alterations (paragraphs 28.38 - 28.44). Not only will this add further to the negative impact on passenger numbers during the lengthy construction period (as outlined in the preceding paragraph), but it will have a significant impact on LSEB's role as manager of Abbey Wood Station. The works will cause a considerable amount of confusion amongst passengers and staff that will inevitably place a strain on LSEB's resources. Again, the extent of the impact on LSEB is not addressed in the Environmental Statement and no substantial mitigation measures are outlined.

The proposed construction of a new station at Woolwich in AP4 will have a long term adverse effect on the services that LSEB runs through Woolwich Arsenal Station. In paragraphs 2.5.112 to 2.5.115 of the Environmental Statement for AP4 significant time savings for reaching major London stations are outlined with a forecast that this will lead to a net increase of 6,100 passengers entering and 4,200 passengers leaving all the rail stations in Woolwich town centre. It is noted that despite this increase there will be a reduction in passengers to Woolwich Arsenal national rail which LSEB manages and runs services through. LSEB is also concerned about the disruption that will be caused to its services during the construction of the Crossrail works along the NRI, and urges the Secretary of State to mitigate these in accordance with the suggestions put forward by ATOC in its petition.

Paragraph 2.5.119 of the Environment Statement for AP4 states that the inclusion of the station at Woolwich will result in fewer additional passengers at Abbey Wood than was earlier predicted in the original Crossrail Bill (1,350 additional entries instead of 1,200 additional entries during morning peak period). LSEB considers that 1,350 additional passengers each day is significant and, although the station will benefit from a reconstruction, it is not clear what impact the Crossrail passengers will have on LSEB passengers using the station and on LSEB's role as manager of the station.

Yours faithfully



Bircham Dyson Bell LLP

SHARPE PRITCHARD

Solicitors and Parliamentary Agents

Secretary of State
c/o Tim Neate
Consultation Manager
Department for Transport
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27 June 2007

20 JUN 2007

And by e-mail: crossrail@dfi.gov.uk

Dear Sir,


**Crossrail Bill
Supplementary Environmental Statement 4 ("SES4")
Wood Wharf (General Partner) Limited**

We act for Wood Wharf (General Partner) Limited ("Wood Wharf") who, as you may know, have development proposals for the Wood Wharf area of the Isle of Dogs. Wood Wharf have presented petitions in the House of Commons against the Crossrail Bill and negotiations are ongoing between Wood Wharf and the Promoter of the Bill in relation to a number of matters. Two of those matters are the interaction between the construction of the Crossrail works and the Wood Wharf Development and also the potential use by Crossrail of a canal which is proposed by Wood Wharf as part of the development, and which would link Poplar Dock and South Dock.

SES4 sets out a new construction methodology for the Isle of Dogs Station, and in summary it provides that by the construction of a cofferdam in North Dock, a navigable channel can be kept open between Poplar Dock and South Dock via the Bellmouth Passage.

Whilst Wood Wharf have no objections in principle to this idea, they remain concerned about the potential for conflict between the Crossrail construction works and the construction of their development. In particular, Wood Wharf understands that large moorings could still be located at a location in South Dock where part of the Wood Wharf Development is liable to be constructed (most notably a proposed foot and road bridge). Wood Wharf re-emphasises its concerns about the potential clash but hopes that negotiations will bring an acceptable compromise.

The second issue is the canal. This is mentioned specifically in paragraphs 2.4.34 of SES4. Again negotiations continue between the parties. Wood Wharf remain willing to continue discussions with Crossrail on this issue, and the current position is that there is no objection in principle to an early canal construction so long as it is not incompatible with Wood Wharf's construction phasing and logistics and that Crossrail make an acceptable financial contribution.

Yours faithfully

SHARPE PRITCHARD

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Our ref B04/1-1/4
You ref
Date 27 June 2007



Mr Tim Neate
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Dear Mr Neate

**CROSSRAIL - AMENDMENT OF PROVISIONS MAY 2007 AND
SUPPLEMENTARY ENVIRONMENTAL STATEMENT 4**

Thank you for your letter and enclosures dated 16 May 2007 in respect of the above consultation document and seeking the views and comments of Natural England, which has been passed to me as a member of the Natural England, London Region, Area Management Team for response.

The Government has changed the way in which it delivers rural policy. Part of this change has been the establishment of an integrated Agency - Natural England - formed in October 2006 from English Nature, the Rural Development Service and parts of the Countryside Agency's planning activities relating to landscape, access and recreation. These interests are as important for urban, as well as rural areas, and therefore relevant to this urban development proposal.

After careful consideration of the information provided it is our opinion that this proposal has suitable and appropriate mitigation measures in place for the proposed development as detailed in the Main Environmental Statement - Appendix B1 as originally submitted, and that this covers the areas of interest for Natural England, in respect of conservation of biodiversity, geology or landscape issues within Greater London.

Therefore we make no formal objection to this proposal, however, should you know of any reason why Natural England should comment on this application, please let us know as soon as possible.

I trust that the above is sufficient for your purposes but should you have any queries or wish to discuss any aspects of this proposal, please do not hesitate to contact me at the above address

*Yours Sincerely
David Hammond*

David Hammond
Natural England - London Region
Area Management Team
CC N Panchmatia - Crossrail Project Manager



INVESTOR IN PEOPLE

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Tim Neale,
Policy Adviser
Department of Transport
Crossrail Bill Team
Zone 2/08
Great Minster House
76 Marsham Street
London
SW1P 4DF

11th July 2007

Dear Mr Neale,

Re. Crossrail Supplementary Environmental Statement 4 – Revised proposals for the construction of the Isle of Dogs Station

I refer to the above Supplementary Environmental Statement that was received on 11th May 2007 and would like to take the opportunity to comment on some aspects of the document.

First, the council very much welcomed the opportunity provided by Crossrail to comment on and discuss the revised proposals well in advance of the publication of the SES4. This enabled formal Undertakings and Assurances to be agreed with Crossrail in advance of the closing date for receipt of petitions, and thus avoid the need to petition formally.

Second, although supporting the principle of maintaining access for boat owners to Blackwall Basin during the construction period, the Council was concerned about possible noise impacts arising from the revised proposals. In this respect the provision of the noise model data for the construction methodology and the subsequent meeting with Crossrail officers on 6th June 2007 was very beneficial in clarifying the noise impacts of the proposals.

Unfortunately (or in the light of subsequent events perhaps fortunately), in carrying out an analysis of the data provided the council discovered a mistake in para 2.3.3 of the Supplementary Environmental Statement 4. This paragraph refers to the method of constructing the coffer dam and states in the last sentence "The piles will be installed from a barge by percussion driving or hydraulic pressure and sand fill placed between the two rows of piles to form the coffer dam." Percussion piling can be a noisy operation, but when officers examined the noise model produced by Crossrail it appeared to underestimate the noise impact of this method of piling.



2000 - 2007
Early Intervention
Children at Risk
2003 - 2004
Minister of Education
Beacon Authority



PROTECTOR DE PROPIA



Corporate Director
Development and Renewal
Emma Peters

The matter was raised with Crossrail at a meeting held on 8th June 2007. The inaccuracy in the SES4 was immediately acknowledged by Crossrail who stated that in fact vibratory piling would be used, but there may be a need for impact piling, although it is hoped that it could be avoided or that hydraulic piling could be used. We were told that the noise model related only to vibratory piling as this was felt to provide a reasonable average. Using this assumption, Crossrail confirmed that the conclusions in para 2.4.13 that there would be no additional noise impacts was correct.

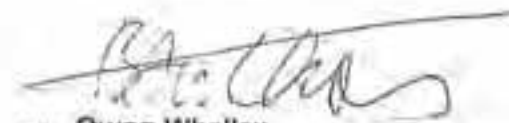
Having discovered and accepted the mistake, Crossrail did indicate at that meeting that they would issue a formal erratum to the SES4 in order to ensure that consultees were made fully aware of the mistake, and its implications in relation to noise impacts. The Council supported this approach and provided a suggested wording for the amendment to the SES4. Unfortunately, whilst Crossrail provided an Assurance in its letter of 11th June 2007 to the council dealing with this issue, Crossrail considered that the mistake did not justify the issue of a formal erratum.

In responding to the SES4, the council considers it important to place on the public record its concerns about the decision not to issue a formal erratum. In this respect the council considers that existing wording of Para 2.3.3 should be replaced by the following:-

"Regarding the method to be used for installing the piles, we are currently exploring various options. It is hoped that we may be able to use a quiet hydraulic method, but failing that we will use a vibratory method. In either case, there may be a need for some impact piling but we hope that this can be avoided. Sand-fill will be placed between the two rows of piles to form the cofferdam. For the purposes of this supplementary environmental statement, vibratory piling has been assumed for the purposes of calculating the likely noise impact as this broadly represents the average impact from the various methods being considered"

In the council's view this revised wording more accurately reflects the approach that will actually be adopted in implementing the revised construction proposals for the Isle of Dogs station.

Yours sincerely,


PP Owen Whalley
Head of Major Project Development

CROSSRAIL BILL – ADDITIONAL PROVISION

Against – on Merits – Praying to be heard by Counsel, &c.

To the Honourable the Commons of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled.

THE HUMBLE PETITION OF THE SOUTH AND WEST TRANSPORT ACTION GROUP.

SHE WE TH as follows:-

1. An Additional Provision to the Crossrail Bill has been introduced and is now pending in your honourable House intituled a new station for Woolwich and variations in the Crossrail alignments both there and at Canary Wharf.
2. Your Petitioners are the South and West Transport Action Group (SAWTAG), an unincorporated association and voluntary organisation or society established in 1996 to further current railway passenger and freight and future interests.
3. SAWTAG originated prior to the Heathrow Terminal 5 Inquiries held at the Ramada Hotel before Roy Vandermeer QC. The catalyst for the Group's formation was the impact on London Green Belt. The Heathrow Terminal Five Vandermeer commenced (Day1) in May 1995 shortly after a tunnel collapsed in Central Terminal Area, undermining Cambourne House. SAWTAG remained involved with the Heathrow T5 Inquiry concluding in March 1999 (Day 525).
4. SAWTAG was involved in a public inquiry into a (now £500 million) tunnel bypass at Stonehenge for the A303 trunk road; and two inquiries into the £3 billion Thameslink 2000 project, expected in fact about 2012. SAWTAG recalls that the original feasibility study was only £780,000. The Thameslink 2000 route intersects the Crossrail Bill in Central London near the boundaries of The City, Islington and Camden. SAWTAG recalls the Secretaries of State particularly wished to be informed regarding the integration of Thameslink 2000 and Crossrail.
5. Not only did such tunnel collapses affect the generality of the £3.5 billion Jubilee Line Extension which opened in 1999. Parliament itself escaped a fate similar to Heathrow's Cambourne House when flawed tunnelling methods proposed for Westminster Station (Jubilee Line) were changed on safety grounds.
6. The Jubilee Line Extension Bill received Royal Assent in 1992. Thus the Additional Provisions to the Crossrail Bill may directly and specially affect your Petitioners, their general and human rights and interests amongst other effects.
7. Your Petitioners and their rights, interests and intellectual property are injuriously affected by the Crossrail Bill, to which your Petitioners object for reasons amongst other, hereinafter appearing.
8. Messrs Berkeley Homes is to build several thousand houses on the Woolwich Arsenal site, where once 80,000 persons were employed.

9. On Day 81 of the Crossrail Bill Hearings, it was announced that over £100 million is to become a developer's contribution for the new station at Woolwich. This is in addition to the £16 billion budget for Crossrail as made in a statement by the then Transport Secretary Rt Hon Alistair Darling M.P; (Hansard report on the Second Reading of the Crossrail Bill).
10. On 23rd June 1998 Prime Minister Tony Blair and Deputy Prime Minister John Prescott travelled between Paddington and Heathrow to inaugurate and open a new railway and train service – Heathrow Express. Later, on 20th July 1998 the Government published the far-reaching Integrated Transport White Paper, entitled “A New Deal for Transport (Cm3950 NDfT).
11. This contained a Foreword by DPM John Prescott MP that continues to exert a strong influence on the Crossrail Bill. Before John Prescott's signature on page 3 the paragraph appears stating “This White Paper(NDfT Cm3950) reflects the Government's commitment to giving (Crossrail) transport the highest possible priority. We (the Government following NDfT Cm 3950) now looks to others – companies, individuals (particularly SAWTAG), employees and local authorities – to join us in shaping a new future for sustainable (here Crossrail) transport in the U.K.
12. Accordingly SAWTAG Petitions Parliament regarding Crossrail, as the Government explicitly looks to SAWTAG to join the Crossrail Bill process, in shaping a new integrated future for sustainable Crossrail transport.
13. Furthermore the fourth paragraph of the Foreword states the main aim of this White Paper (NDfT Cm3950) is to increase personal choice (in London) by IMPROVING THE (CROSSRAIL) ALTERNATIVES (including the SAWTAG Railway Alternatives forwarded herewith); To secure (London) mobility that is SUSTAINABLE in the long term; The Crossrail incorporation of Heathrow Express and network benefits through its enlargement from the inadequate 5.5 metres diameter tunnels inaugurated in 1998; All to comply with the international standard 7.3 metres diameter derived from the European Community Directives 1991/440 and 1996/48 of the Channel Tunnel Rail Link.
14. There are three paragraphs in the New Deal for Transport (Cm3950) that support the above mentioned exhortation included in DPM John Prescott's Foreword; that SAWTAG Petition Parliament on Crossrail, as the Government explicitly looks to SAWTAG to join the Crossrail Bill process, in shaping a new integrated future for sustainable Crossrail transport.
15. NDfT Cm3950 para 1.33 page 16 “A New Deal for the Public Transport Passenger” requires four integrated items for incorporation in the above SAWTAG Petition Process on Crossrail.
16. A stronger voice for the (SAWTAG) passenger (on the Crossrail Bill).
17. More (Crossrail) trains.
18. Better (Crossrail) interchanges and better connections.
19. Enhanced (Crossrail) networks – as will be set out in the Petition herewith.
20. Going to NDfT Cm3950 paragraphs 1.26 and 1.28 it is clearly stated that we (the Government) are not relinquishing responsibility for what happens locally (in London especially in the London Borough of Greenwich, including Woolwich resulting from the Crossrail Bill).
21. There should be a far greater number of station re-openings enhancing the valuable work performed in re-openings on shoe-string budgets by Heritage Sector railways at lower cost than elsewhere.
22. Furthermore para 1.26 continues – “we (the Government) will need to be satisfied that these new powers will be used as part of clear (herewith Crossrail Bill) transport strategies that have the backing of local communities.

23. Proceeding to 1.28 it is clearly stated “we (the Government) will put greater emphasis on listening to transport users (such as SAWTAG in the current Crossrail Bill Petitioning process). There will be (paragraph 1.33 on page 16 derived as the four points highlighted above) a New Deal for the (SAWTAG) public transport passenger.
24. Taking together NDfT Cm3950 page 18 paragraphs 1.44 to 1.46 (inclusively), will strengthen the sharing of decisions regarding SAWTAG’S Crossrail Bill Petitioning.
25. Firstly, we (the Government) will bring (Crossrail Bill Petitioning) power closer to people (such as SAWTAG) and play our (the Government’s) part (through the Crossrail Bill process) in building effective partnerships (in Parliament) (NDfT Cm3950 page 18 para 1.44).
26. Secondly, we (the Government) want people to have a real say and real influence over transport (Cm3950 para 1.45).
27. Thirdly, “the New Deal for Transport (NDfT Cm3950) means: strengthened planning arrangements (overarching the Crossrail Bill in Parliament) to secure INTEGRATION between transport and land use planning including the role of (Crossrail) railways; London City Airport; the Port of London including regenerating powers (NDfT Cm3950 page 104 para4.57) from the advocated integration of the Thames, Lea and Royal Docks and roads, especially investigating a Crossrail surface crossing on the Thames Gateway Bridge which has such Docklands Light Railway intended provision rather than a Thames Crossing railway tunnel as in the Crossrail Bill.
28. Fourthly, the Mayor for London and the Greater London Authority are to produce an INTEGRATED transport strategy and improve air quality.
29. NDfT Cm3950 DPM John Prescott’s Foreword page 3: We now look to others - companies [SAWTAG as] individuals, employers and local authorities - to join us in shaping a new future for sustainable (Crossrail) transport, in the UK.
30. There is a strong link with NDfT Cm3950 page 139 para 5.1 Partnership for action. Here the Government highlights individuals (such as SAWTAG) have a part to play in responding to the (Crossrail) challenge.
31. Returning to “a New Deal for the public transport passenger”, (NDfT 3950 page 16 para 1.33) better (Crossrail) interchanges and enhanced (Crossrail) networks are required. Furthermore in page 29 paragraph 2.45 it is highlighted that the New Deal for Transport sets the framework to integrate three requirements:
32. Produce better public transport.
33. Enhance (Crossrail) NDfT Cm3950page 16 paragraph 1.33) public transport networks.
34. Give the (via SAWTAG) passenger a bigger voice in (Crossrail Bill process endeavours) public transport.
35. The Energy Review, of June 2007 of DTI Secretary Alastair Darling MP page 157 para 5.3.69, highlights the Planning Policy Statement (PPS) on Climate Change requiring substantial new developments, such as Crossrail, should seek to source a significant proportion of their energy supply from low carbon sources (including on and off-site renewables).
36. It is advocated that the Docklands Light Railway is used for Crossrail. The reference is Michael Shabas Crossrail Hearings Day 81 where he has also advocated the Docklands Light Railway being upgraded for Crossrail purposes.
37. NDfT Cm3950 page 127 para 4.165 requires better protection to those sites and routes (both existing and potential) which could be critical in developing infrastructure to widen transport choices.

38. The example for water transport is given, developing the strategy introduced earlier of regenerating the rivers Thames and Lea, and the Royal Docks in conjunction with the operation of the Thames Barrier. Going to NDfT Cm 3950 page 104 para 4.57 - Thames Gateway regeneration advocates an integrated package of new river crossings including better public transport links.
39. SAWTAG makes the point with regard to minimising carbon dioxide emissions that there are five existing east to west railways crossing London, via respectively Gospel Oak, Camden Road, Euston Square, Sloane Square and Brixton (the Atlantic lines). By connecting these routes with short lengths of new line there is less production of carbon dioxide by virtue of there being no concrete or cast-iron tunnel segments to be manufactured; because 13km of new tunnel construction is avoided.
40. Cogniscent of NDfT Cm3950 para 4.199 it is important that alternatives to new construction are considered at the earliest stages of planning. Alternatives include making better use of existing infrastructure.
41. In this regard of alternatives to new works SAWTAG suggests that the cost of five pairs of connections between the lines of Network Rail and the London Underground routes is significantly less by several orders of cost. The absurd cost proposals for Crossrail in regard to purchasing 13km of brand new line in tunnel should be the subject of an investigation by the National Audit Office. Having due regard to the point that Transport for London is currently procuring 1,000 new coaches for London Underground routes, coaches which are themselves incompatible with Network Rail Group Standards.
42. Five routes across London with a pair of connections at each end totals twenty connections. These connections may usefully be each less than 100 metres in length; particularly where connections were once and have been removed. A considered view of £750,000 for each connection including signalling modifications implies £15 million. Inter alia Network Rail budgets per annum some £5 million for small projects to a total of £500 million.
43. These connections may include locations at Barking, Upminster, Paddington, Ealing Broadway and Richmond. As an indication of feasibility there are connections between the Metropolitan line and Network Rail at Harrow-on-the-Hill and at Harrow & Wealdstone. With the facility to run trains from Network Rail to London Underground and back again means that Crossrail companies trains become indivisible from that of various train operating companies. Thus paths are not required for both because there is no transfer of passengers one to another.
44. There is currently an electro-diesel development programme that will ultimately produce a diesel-powered train able to run in tunnels with below optimum ventilation.
45. Returning to the NDfT Cm3950, there is a cumulative effect of paragraphs 1.22, 1.33, 4.165, 4.195 and 4.199:
46. Para 1.22 requires integration within and between different types of transport - so that each contributes its full potential and people can move easily between them.
47. That is to say, there should be integration between Docklands Light Railway and Crossrail near North Woolwich.
48. Para 1.33 requires a New Deal for the public transport passenger including more trains better interchanges and enhanced networks.
49. Herewith, these enhanced networks should integrate the Docklands Light Railway and Crossrail.
50. Para 4.165 requires better protection to those sites and routes (both existing and potential) which could be critical in developing infrastructure to widen transport choices.

51. Long-term there is the opportunity to connect Limehouse through to Tower Hill.
Para 4.195 highlights the government is developing a new approach to the appraisal of different solutions to transport problems. It looks at the contribution of different forms of transport in developing alternative solutions.
52. In order to unify Crossrail rolling stock with Docklands Light Railway several incompatibilities need highlighting: Docklands has non-standard minimum curve radii, loading gauge clearances, axle loadings, third rail collection, signalling systems and couplers.
53. The proposal for 7.3 metre tunnels begins the task of unifying standards across the national railway network. London has more different standards for loading gauge, traction supplies than the rest of Britain put together! For example, Sydney in New South Wales, the host of the 2000 Olympics, provides double-deck trains for its services. Stratford East London will host 2012 Olympics and there is no intention to install double-deck trains on Crossrail. However, TGV double-deck Duplex trains can run to Stratford International from the Pas-de-Calais.
54. Para 4.199 requires that alternatives to new construction are considered at the earliest stages of planning. Alternatives include making better use of existing infrastructure and managing demand for it and the use of other forms of transport.

The Secretary of State
c/o Tim Neate
Consultation Manager
Department for Transport
Major Projects Division 3
Zone 2/08
76 Marsham Street
London SW1P 4DR

Mr Neate,

I am writing to you in response to the publication of the second Supplementary Environmental Statement (SES2) for Crossrail and would like the following concerns to be included in the report to be submitted to both houses prior to the Third Reading of the Bill in the House of Commons.

These concerns relate to works proposed within Route Window NE8: Romford Depot and NE9: Romford Station.

24.2.4 and 24.2.5 (along with mapping NE8/9 2a and 2b) details works to be carried out in two phases to facilitate the protection of cable routes in the southern footway of London Road, the diversion of cables within the footways of Jutsums Lane to the carriageway of Jutsums Lane and subsequent reinstatement of both. It does not explain:

1. Why the cable re-routing is being undertaken in Jutsums Lane.
2. What "alternative route" will be provided for the busy pedestrian access route to St Edwards School during the closure of the southern footway on London Road.
3. What "arrangement for pedestrians" will be provided during the closure of the western footway under Jutsums Bridge apart from the provision of "extended intergreen periods" within the operation of the traffic signals (24.7.8). This will exacerbate risk in an already dangerous pedestrian area unless additional crossing provision is made.

24.2.23 details gas pipeline diversions involving the "crossing of Crow Lane... using open trench in two halves utilising single lane working" although no reference is made to this within mapping NE8/9 2a, 2n or 2m as stated. This will result in severe traffic congestion in the immediate area and impact on the circular route into and through Romford via Oldchurch Road. This will also effect the efficiency of the circular bus which is widely used by all the community especially the elderly.

24.2.28 mentions "the stopping and removal of the golf course HP (high pressure) gas link" but does not provide any detail or what effect this will have on residents or patrons of the course. Upon speaking with Crossrail we were told that they are unsure as to where exactly the services are and that they

would have to sink boreholes. The utility provider must have service maps so why is this necessary apart from being used by Crossrail as another stalling exercise restricting our ability to comment objectively.

24.3 assesses impacts on townscape and uses descriptions such as low quality and low sensitivity. These phrases indicate poor conditions and disparate elements which do not reflect the nature of the property in this area in which the residents take pride. These phrases have no criteria set in planning and are purely objective.

24.4 assesses impacts on visual amenity and 24.4.3 concludes that the additional works will not result in any significant impacts in addition to those reported in the main ES. The amendments and additional detail provided in this SES are numerous and very concerning to the many residents not previously afforded this information.

24.8 assesses noise and vibration impacts specifically caused by the utility works mentioned elsewhere in the document and maintain that in almost all cases noise is not predicted to "exceed levels at which a significant impact will occur" however what this level is remains unpublished by Crossrail and clearly works in such close proximity to residential property will indeed impact significantly.

In addition it should be noted that Crossrail have stated that noise barriers will be provided in certain locations adjoining the depot and associated works and yet to date no detail including material used has been forthcoming.

25.7 details traffic and transport impacts and 25.7.9 cites the "suspension of an existing bus stop" and that "in the absence of a suitable location for a temporary replacement the loss of the stop will result in a significant impact". This is adjacent to Romford station and the accompanying traffic management plan proposed in this section will result in a lack of provision for commuters leaving and arriving at the station and further traffic congestion.

25.9.2 describes potential contaminants in the area utility works for Romford station pass through including "acids, heavy metals.. ammonia, cyanide.. and asbestos" however 25.9.3 concludes that "with the application of measures set out in the main ES...no significant impacts will occur during the construction phasing or in the long term". This conclusion is not sustainable given the lack of testing carried out by Crossrail to date by their own admission.

As a general observation mapping extracts from SES2 indicate that certain worksites have been extended, often in areas of contention. An example of this is Jutsums Park which until now was not affected by the worksite to the Northern boundary but according to new mapping will be. Whilst we appreciate that it is still within "safeguarded" limits this constitutes yet another piece of recreational land take to add to the significant number of school playing fields we will lose permanently as a result of the dive under for the depot.

In addition to these points we have been made aware of plans that show the service road that is to run from Jutsums Lane to the depot. Until now we have been told by Crossrail that it would be on the top of the embankment but the plans show that the embankment is to be cut away and the road will be nearer to ground level. Why does this not appear on the Environmental Statement, SES1 or this, SES2?

We would further wish to state that we feel the SES2 does not give sufficient detail of additional works or recommended mitigation and as such we are only able to provide general comment on much of it.

Yours sincerely,

Anthony Wood

Chairman – Crossrail Action Group

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