

THAMESLINK 2000

Proof of Evidence on Planning Policy

By
John Rhodes

NR/10/A1

Town and Country Planning Act 1990
Planning (Listed Buildings and Conservation Areas) Act 1990
Transport and Works Act 1992

Railtrack (Thameslink 2000) Order 1997
Railtrack (Thameslink 2000) (Variation) Order 1999

1. Inquiry into applications by Network Rail for the Thameslink 2000 railway project sites at:

11-15 Borough High Street, London SE1
2-4 Bedale Street, London SE1
7 Stoney Street, London SE1
16-26 Borough High Street and 7 Bedale Street, London SE1
Blackfriars Railway Bridge, London EC4
Blackfriars Station North, London EC4
Blackfriars Railway Bridge, London SE1 (includes proposed south bank station entrance)

2. Re-opened inquiry into applications made by Railtrack plc for orders under the Transport and Works Act 1992 and associated applications.

CONTENTS

1.0	INTRODUCTION	2
2.0	AN ASSESSMENT OF KEY CHANGES IN THE RELEVANT PLANNING AND TRANSPORT POLICY BACKGROUND SINCE THE FIRST INQUIRY, AND THEIR IMPACTS ON THE SCHEME (MATTER 2)	4
2.1	National Policy	4
2.2	Regional Policy	9
2.3	Local Policies	16
3.0	AN UPDATED ASSESSMENT OF THE KEY AIMS AND OBJECTIVES OF THE SCHEME AND ITS POTENTIAL TRANSPORTATION, REGENERATION AND SOCIO ECONOMIC BENEFITS, HAVING REGARD TO CHANGED CIRCUMSTANCES SINCE THE EARLIER INQUIRY (MATTER 1)	18
4.0	AN ASSESSMENT OF THE NEW PLANNING APPLICATIONS AT BOROUGH HIGH STREET AND BLACKFRIARS	26
4.1	Introduction	26
4.2	Borough High Street	27
4.3	Blackfriars Station and Bridge	32
5.0	WHETHER, IN THE LIGHT OF UPDATED ASSESSMENTS, THE TRANSPORT AND OTHER BENEFITS WOULD OUTWEIGH THE HARM ARISING TO HERITAGE INTERESTS, PRINCIPALLY IN THE BOROUGH MARKET AREA (MATTER 7)	38
APPENDIX 1:	STRATEGIC POLICY REVIEW	
APPENDIX 2:	LOCAL POLICY REVIEW	
APPENDIX 3:	NEW PLANNING APPLICATIONS	
APPENDIX 4:	PLANS ILLUSTRATING THE RELATIONSHIP BETWEEN THE THAMESLINK 2000 NETWORK AND DESIGNATED REGENERATION AREAS	

I.0 INTRODUCTION

- I.1 My name is John Stuart Rhodes and I am a Director of RPS Planning. I have a degree in Estate Management and I am a member of the Royal Institution of Chartered Surveyors. I have been a planning consultant in private practice for more than 25 years, for the last 20 of which I have been based in Southwark.
- I.2 I have a wide experience of planning and development projects in London and the south east and I am currently acting, for instance, on large regeneration schemes such as Stratford City and Brent Cross/Cricklewood. I am also instructed as strategic planning advisor to BAA plc in respect of the proposed further development of Stansted Airport.
- I.3 I was not involved in the first Thameslink inquiry but I was invited by Network Rail to review the Thameslink 2000 scheme in the context of updated circumstances and planning policies since the previous inquiry in 2001.
- I.4 My evidence is arranged having regard to the Statement of Matters set out in the letter from the Secretaries of State of 6th January 2005.
- I.5 My evidence covers the strategic planning issues raised by the Secretaries of State and, in addition, I examine the planning policy issues raised by each of the specific planning applications and listed building consent applications identified in the Statement of Matters. My evidence is intended to be complementary to and to draw upon the evidence of others. As a result, it attempts to draw the planning balance between the benefits of the project and any harm that it will cause, as required by matter 7.

- I.6 The text of my evidence seeks to avoid an encyclopaedic recital of planning policies from the numerous policy documents which are relevant. Instead, I provide at Appendix 1 [NR/10/B] a comprehensive catalogue of relevant national, strategic and local policies and at Appendix 2 [NR/10/B] a similar review of local planning policies as they affect the specific planning applications. At Appendix 3 [NR/10/B] I provide a schedule that summarises details of the new planning and listed building consent applications. Finally, Appendix 4 includes two plans which illustrate the relationship between the Thameslink 2000 network and regeneration areas that are designated in planning policy guidance. The first plan relates to the wider network and the second plan focuses on Greater London.
- I.7 I have felt it useful for the purposes of my evidence to deal with Matter 2 first, i.e. to place the evidence into a strategic policy context before examining those other detailed matters which relate to planning issues.

2.0 AN ASSESSMENT OF KEY CHANGES IN THE RELEVANT PLANNING AND TRANSPORT POLICY BACKGROUND SINCE THE FIRST INQUIRY, AND THEIR IMPACTS ON THE SCHEME (MATTER 2)

2.1 National Policy

2.1.1 In his report [CD/199] following the first inquiry, the Inspector addressed the issue of consistency with planning policies at Chapter 45.5. As he noted, the Thameslink scheme was developed as a joint exercise between Railtrack and the Franchising Director which resulted from the Thameslink 2000 Agreement of 1996 with the Secretary of State for Transport. The Agreement and the objectives of the Franchising Director (and therefore of the scheme itself) were held to be necessarily consistent with Government policy as applied to rail transport. As a consequence, it follows that the project itself was, by definition, consistent with national policy. Since that time, the Thameslink 2000 Agreement has ceased to be operative but the Department for Transport has confirmed its continued support for the project. Accordingly, the project remains consistent with national policy for transport. The consequence is that the project should be consented unless there are overriding environmental objections.

2.1.2 My Appendix I sets out the terms of relevant national planning policy, part of which derives from documents which were in existence at the time of the previous inquiry and part of which is new. The principal changes in national policies since the last inquiry are:-

- a. A Future for Transport (Department for Transport White Paper, July 2004)[CD/223].
- b. The Future of Rail (Department for Transport White Paper, July 2004)[CD/152].
- c. PPS1 Delivering Sustainable Communities 2005 [CD/149].
- d. Sustainable Communities : Building for the Future (February 2003)[CD/225].
- e. PPG13, March 2001[CD/172].

- 2.1.3 Whilst PPG13 was published prior to the close of the inquiry, it was published after the preparation of evidence and its specific terms do not appear to have been taken into account at the inquiry which relied principally on the 1998 White Paper *A New Deal for Transport : Better for Everyone*. [CD/24]
- 2.1.4 For the reasons I shall explain, I am in no doubt that these and other changes to national policy have served to strengthen the case for the Thameslink project.
- 2.1.5 Whilst it is ambitious to attempt to summarise the effect of a number of weighty and complex planning policy documents it is perhaps fair to suggest that taken together they emphasise the importance of coordinating land use planning and transportation in order to deliver the benefits of economic development within a sustainable framework. Rail is seen consistently as an important means of achieving these objectives.
- 2.1.6 PPG13 (paragraph 4) confirms the objective to integrate planning and transport at the national, regional and local levels in order to promote sustainable transport choices and to improve accessibility to jobs and services by modes other than the car. As a consequence, paragraph 20 requires local authorities to actively manage the pattern of urban growth and to locate major travel generating development so that it makes full use of public transport – an objective repeated at paragraph 27 of PPS1.

2.1.7 Several of the policy documents emphasise the importance of an efficient public transport system to the achievement of economic objectives. The Foreword to the Transport White Paper confirms that good transport is essential for a successful economy and society. It provides access to jobs, services and schools, gets goods to the shops and allows us to make the most of our free time. Similarly, the Rail White Paper identifies the twin economic and environmental benefits of rail investment, as follows:-

“When demand grows faster than the supply of new transport services and infrastructure, problems are likely to emerge such as road congestion and over crowding on public transport (which may in turn constrain economic growth). Investment in transport is needed to alleviate and prevent these problems and rail has a vital and essential role in this. (2.5.5)

Encouraging more people to use rail rather than road also has a key role to play in meeting environmental objectives.” (2.5.6)

2.1.8 The period since the first inquiry has also seen a dramatic reorganisation of the rail industry, as explained by Janet Goodland. The Rail White Paper explains the policy intention behind these changes, as follows:-

“The railways are a vital public service. They are an essential part of the transport system, supporting a growing economy. Last year they carried over a billion passengers for the first time since the early 1960s; they are carrying 45% more freight than in 1995.

That is why we are tackling the long standing problems the railways face. Historic under investment has been made more acute because of the increasing pressure that comes from a growing economy. We are putting that right with record levels of investment. (Foreword)

Substantially increased levels of investment are now being made to address this legacy, but the structure must also be changed if we are to build the railway that the country needs for the future.” paragraph 7).

2.1.9 In my judgement, new public transport infrastructure benefits from greater (and less conditional) policy support than any other form of development. It is recognised as beneficial in its own right and is capable of producing substantial economic and sustainability benefits (The Future of Rail paragraphs 2.5.5 – 2.5.7, PPS1, PPG13). The significance of enhanced public transport infrastructure also grows with every successive major Government initiative relating to the physical development of the economy. Examples include:

- a. Enhanced concern about congestion; and
- b. Government intentions for aviation.

2.1.10 The Government has increasingly recognised the need to tackle rising levels of congestion, particularly in the South East. This much was apparent in the Transport White Paper of July 2004 (Foreword by the Prime Minister) and has recently seen significant attention through the recent announcement (7 July 2005) by the Transport Secretary of the need to trial the introduction of road user charging to tackle congestion. The Rail White Paper points out the central role of rail services in alleviating problems of congestion and recognises the handicap which increased congestion places on the economy:

“When demand grows faster than the supply of new transport services and infrastructure, problems are likely to emerge such as road congestion and overcrowding on public transport (which may in turn constrain economic growth). Investment in transport is needed to alleviate and prevent these problems and rail has a vital and essential role in this.” (2.5.5)

2.1.11 The Air Transport White Paper of December 2003 (Foreword) [CD/224] recognises the national economic interest in responding to the demand for air travel, particularly in the South East. The White Paper sets out a strategy of making the maximum use of existing airport capacity, including at Gatwick and Luton, together with proposals for the development of a second runway at Stansted. Airport expansion is seen as playing a key role in delivering employment led growth but the White Paper is clear that expansion must take place as consistently as possible with the principles of sustainable development. In particular, strong emphasis is placed on maximising public transport accessibility to airports and reducing the proportion of passengers who travel to airports by private car (4.56).

2.1.12 The Air Transport White Paper recognises the value of Thameslink as part of its integrated strategy, e.g. as follows:-

“The SRA’s view is that, with improvements to links from the airport to Luton Airport Parkway Station for example through a new tracked transit system, the rail capacity enhancement projects underway or planned for Thameslink and Midland mainline should be sufficient to support expansion to maximum use of one runway.” (11.86).

2.1.13 The same essential link between Government initiatives and enhanced public transport capacity is apparent, for instance, in the Government’s White Paper Sustainable Communities, Building for the Future (February 2003). The document seeks a step change in the scale of the delivery of new housing in order to meet the needs of the economy in London and the South East. It promotes growth particularly in four Growth Areas, ie:-

- a. Thames Gateway
- b. Milton Keynes/South Midlands
- c. Ashford
- d. London-Stansted-Cambridge

2.1.14 As I shall explain, Thameslink 2000 has a relevance to each of these growth areas. The Sustainable Communities Plan emphasises the importance to its success of good public transport infrastructure both within each community and linking those communities to urban, rural and regional centres.

2.1.15 One further characteristic of recent developments in national policy is the emphasis on actual delivery, rather than just plan making. This emphasis lies behind the Sustainable Communities Plan and the Air Transport White Paper. It is also inherent in the Government's approach to the delivery of major infrastructure projects themselves, particularly in relation to rail projects where the rail industry itself has been reformed in order to maximise delivery and to overcome the historic infrastructure deficit.

2.2 Regional Policy

2.2.1 Since the close of the first inquiry, regional planning guidance has moved on in each of the three regions served by Thameslink 2000, in the following way:-

- a. In the South East: RPG 9 was issued in March 2001; a Regional Transport Strategy was approved by the Secretary of State in July 2004 and draft RSS 9 was published in January 2005 [CD/228].
- b. In the East of England: draft RSS14 [CD/231], incorporating a draft RTS was placed on deposit in December 2004 and will be the subject of Examination in Public in September 2005.
- c. In Greater London, the London Plan [CD/150] was adopted in February 2004, replacing RPG3 which had formed the basis of regional guidance in London at the time of the inquiry.

2.2.2 The policies from each are set out in my Appendix I. A short summary could simply record that Thameslink 2000 is directly consistent with all elements of each regional guidance. This consistency is confirmed by a deeper analysis but such analysis also draws out other important strategies which reinforce the need for Thameslink 2000.

2.2.3 RPG 9 [CD/173] for the South East was published in March 2001 and will have been taken into account in the interim decision letter of the ODPM of 30 July 2002. It sets out, of course, direct support for the Thameslink 2000 project, not least because of the project's potential to improve access to airports and to employment markets in London and the South East (paragraphs 12.20, 12.36, 12.37 and 9.29). It also recognises that:-

“Congestion in parts of the region is at a level that will provide a constraint on growth unless changes are made to the way people and goods travel.” (Paragraph 3.12)

2.2.4 Subsequently, a Regional Economic Strategy (RES) [CD/227] and a Regional Transport Strategy (RTS) [CD/174] have both been developed and approved for the South East. The RTS characterises difficulties in the South East as follows:-

“Despite this impressive economic performance there remain pockets of severe deprivation throughout the region, often relatively poorly connected, Conversely, in the most economically buoyant parts of the region severe congestion, particularly on the road and rail networks, gives rise to unreliable and protracted journeys that reduce business performances and productivity for the region as a whole.” (9.2)

2.2.5 Similarly, the RES recognises that the chronic peak hour congestion on both road and rail restricts the sustainable growth potential of businesses, as well as damaging the environment and adding problems to already disadvantaged communities (2.44).

2.2.6 The RES identifies the importance of enhanced cross-regional transport initiatives and it provides full support for the Thameslink 2000 project (page 63).

- 2.2.7 Large scale growth aimed at meeting housing needs and supporting the potential of the regional economy is also apparent in Draft RSS9 for the South East. Particular emphasis is placed upon the requirement to co-ordinate transport providers to develop rail services to provide better connections both within the region and with other regions. Thameslink 2000 is treated as part of the baseline, i.e. as a committed scheme and the draft strategy has been developed on that basis. This means the spatial strategy for the South East has been developed on the basis that Thameslink 2000 is proceeding and that expectation is likely to have been a consideration in the identification of regional growth areas and regeneration areas in order to accommodate projected housing requirements and economic growth.
- 2.2.8 The draft identifies particular regeneration or growth objectives in a number of areas served by Thameslink 2000 including the Kent Thames Gateway and the Sussex Coast. In addition, a number of larger urban centres are identified as Regional Hubs which are intended to be the focus for development and investment in the transport network (Section D4 paragraph 1.25). The 17 Regional Hubs identified in Draft RSS9 include Ashford, Brighton and Hove, Crawley, Guildford and Reigate/Redhill which (are proposed to) accommodate Thameslink stations. Draft RSS9 also clearly states that priority should be given to measures that increase the public transport accessibility of these hubs and the development of high quality interchange facilities (Policy T4).
- 2.2.9 Consistent with the Communities Plan, growth is a major feature of both of the emerging RSSs. In the East of England, the draft RSS proposes an increase of 450,000 dwellings and 480,000 jobs in the period to 2021 and the employment strategy aims to ensure that the East of England is one of the top 20 performing economic regions in Europe.

2.2.10 Again, consistent with the Communities Plan, the draft RSS brings forward proposals for particular growth in the London – Stansted – Cambridge – Peterborough growth corridor (Policy SS2, Policy SS11). The draft also emphasises the absolute necessity for enhanced public transport provision across the region if the growth aspirations are to be achieved.

2.2.11 In order to enhance the competitiveness of the region, the RES is in no doubt about the importance of transport investment:-

“The ability to transport goods, services and people efficiently is crucial for modern, open and competitive economies that rely heavily upon intra regional and International links...The region also has the opportunity to take full advantage of major airport and sea port expansion plans and associated rail freight enhancements...Both airports and sea ports are dependent upon high quality transport and connections for the efficient movement of freight and passengers.” (Page 63).

2.2.12 Some measure of the significance of further investment can be gained from the following:-

- a. The draft estimates that the introduction of area wide road user charging will be necessary soon after 2010 if the area’s roads are not to become unacceptably congested (paragraph 8.82); and
- b. The Regional Assembly has suspended support for its own draft RSS pending Government confirmation that sufficient funds will be made available for necessary infrastructure enhancements. The draft RSS already assumes that Thameslink 2000 is a committed scheme (Table 8.3).

2.2.13 The draft identifies a number of Priority Areas for regeneration, several of which would be served directly by Thameslink 2000 including King’s Lynn, Luton/Dunstable/Houghton Regis, Peterborough, Stevenage, Bedford/Kempston and part of Cambridge – all of which would benefit directly from the Thameslink project.

- 2.2.14 In London the publication of the Mayor's Transport Strategy in July 2001 and then of the London Plan [CD/150] itself in February 2004 were major landmarks in strategic planning for the capital. The London Plan provides a city-wide spatial development strategy looking forward 15-20 years and represents a significant policy advance in strategic planning for the city. It identifies six forces that are driving change in London, the most significant of which are population growth and economic growth. The plan projects that population growth over the period to 2016 will be 800,000 and that there will be a net increase of 636,000 jobs over the same period (paragraphs 1.35, 1.42). The plan sets out policies to accommodate this growth in a determined, sustainable and co-ordinated manner.
- 2.2.15 The London Plan is based on a vision that London should develop as an exemplary sustainable World City and the documents leave no room for doubt about the significance of major transport infrastructure investment in order to achieve that vision. As the Transport Strategy advises:-

“To support the vision of London as an exemplary sustainable world city, the Strategy will increase the capacity, reliability, efficiency, quality and integration of the transport system to provide the world class system the Capital needs. This improved transport system will be developed with sufficient capacity to facilitate sustainable population and employment growth, and support London's growing prosperity. It will support regeneration and promote social inclusion, allowing the benefits of prosperity to be experienced more widely. It will also contribute to improving the quality of London's environments and reducing energy consumption. It will ensure that all Londoners and London's transport users benefit from a better quality of life, greater safety and security, and improved health.” (3.8)

2.2.16 Specific objectives include (TS paragraph 4A.5) facilitating commuting, reducing overcrowding, increasing safety and increasing the overall capacity of London's transport system by promoting major new cross London rail links and improving access to international transport facilities. Good public transport access to Gatwick, Stansted and Luton are said to be "essential" (TS paragraph 4L.20). Strategic policy could not be stronger in its support for the principle of a project with the characteristics of Thameslink 2000.

2.2.17 The Thameslink 2000 project is, unsurprisingly, identified for specific policy support in the Transport Strategy (paragraphs 4Q.1-10). Proposal 4Q.1 states:

"The Mayor supports the development of Thameslink 2000 and with Transport for London will press the Strategic Rail Authority to ensure that the services fully meet the needs of London."

2.2.18 Thameslink 2000 is one of three proposed cross-London links (along with Crossrail and Hackney-South West Line) that are considered to address the shortage of capacity in the central area, while simultaneously bringing significant public transport benefits to inner London and key areas of outer London (Paragraph 4Q.6).

2.2.19 The London Plan also includes specific policy support for the Thameslink 2000 proposal (Policy 3C.11, paragraph 3.187, 5.24, 5.42 and Policy 5F.1). In particular, paragraph 3.187 states:

"Thameslink 2000, expected to be completed in 2012, is a significant enhancement of cross-London capacity, connecting north and south, linking King's Cross to Blackfriars and London Bridge and enabling more through journeys, as well as increasing interchange opportunities. The scheme supports key development opportunities in the vicinity of King's Cross and London Bridge."

2.2.20 The plan makes clear (Policy 3C.3, paragraph 3.182) that the support derives not only from the need for major new infrastructure to serve growth ambitions in the capital but also to serve sustainability objectives which place emphasis on the need to reduce travel by car.

2.2.21 There are numerous passages of the plan which emphasise the necessity for enhancement of the public transport network. Paragraph 3.182 is an example:-

“Public transport offers an efficient and sustainable means of carrying large numbers of people. It is key to tackling chronic road congestion and provides access for many people who are not able to travel by car. London’s public transport network has helped shape London’s development and will continue to do so. Existing networks serve the current urban structure but need to develop, to raise the standards of service, provide an attractive alternative to the car and cater for the bulk of London’s forecast additional population and activity. Network extensions and new services can help foster new development and regeneration...”

2.2.22 The scale of planned population and economic growth is very considerable and these growth aspirations and expectations met with strong support from the independent panel who examined the London Plan. The Panel, however, was keen to understand the extent to which the growth was genuinely achievable having regard to transport infrastructure in the capital. (The Plan identifies an intention to modernise an overstrained infrastructure in 10 years to compensate for 3 decades of under-investment – page XII). As a consequence Policy 3C.2 potentially requires a brake to be applied to growth or at least for growth in specific locations to be phased pending the phased enhancement of transport infrastructure. Insufficient investment, therefore, will directly slow the achievement of critical employment, regeneration and housing aspirations across the capital. (Panel report paragraph 5.8).

2.2.23 The London Plan sets out a spatial strategy for accommodating growth in the capital, concentrated in a number of Opportunity Areas and Areas for Intensification. Those areas typically require large scale regeneration but benefit from either existing or projected public transport infrastructure. In the next section of evidence, I identify the correlation between the Opportunity Areas and Thameslink 2000. In strategic terms, however, it is sufficient to note that there is a strong correlation.

2.2.24 In summary, therefore, not only is the Thameslink 2000 scheme consistent with and supported by regional strategies for the East of England, the South East and for London but also its delivery is a critical component in the success of the strategies which underlie the regional plans.

2.3 Local Policies

2.3.1 Along the route, local policy has moved on in almost every one of the boroughs or districts through which Thameslink 2000 will pass since the close of the inquiry. Individual, site specific policies are reviewed subsequently but, for the purposes of the strategic issues which are particularly relevant to this re-opened inquiry, the following changes in policy circumstances are the most relevant:-

- a. The UDP for the City of London [Appendix 2, NR/10/B] has achieved statutory status (April 2002). Not only does it set out explicit support for Thameslink 2000, it also builds a strategy for economic growth of the City as a world capital upon an expectation of investment in enhanced public transport infrastructure.
- b. The Islington UDP [CD/244] has achieved statutory status (June 2002). Thameslink 2000 is identified as one of the public transport schemes that are said to be essential in maintaining regeneration efforts in the Borough and in implementing the Council's transport policies.
- c. The London Borough of Southwark UDP of 1995 [Appendix 2, NR/10/B] (which contained only conditional support for Thameslink 2000, Policy T.3.2) has been replaced by a deposit version of the emerging UDP which removes that conditionality.

2.3.2 Each of the UDPs develops policies for identified regeneration and Opportunity Areas which are derived from strategic guidance.

3.0 AN UPDATED ASSESSMENT OF THE KEY AIMS AND OBJECTIVES OF THE SCHEME AND ITS POTENTIAL TRANSPORTATION, REGENERATION AND SOCIO-ECONOMIC BENEFITS, HAVING REGARD TO CHANGED CIRCUMSTANCES SINCE THE EARLIER INQUIRY (MATTER I)

3.1 The stated objectives of Thameslink 2000 are set out and explained by Janet Goodland. They remain unchanged, i.e. to provide the railway infrastructure necessary to allow a major expansion of Thameslink rail services. Specifically, the scheme will:

- a. reduce overcrowding on Thameslink and other London commuter services;
- b. reduce overcrowding on the Underground;
- c. reduce the need for interchange between mainline and underground services;
- d. provide for the introduction of new cross London services, so improving public transport accessibility in South East England, including access to areas of expected demand growth such as the London Bridge development area, Docklands, the King's Cross lands and London's airports; and
- e. facilitate the dispersal of passengers from St. Pancras following the completion of the CTRL.

3.2 Whilst these objectives are specific to the Thameslink 2000 project, it is clear that achieving them would also unlock the opportunity for objectives of strategic planning policy to be achieved.

3.3 Since the first inquiry, helpful research has been published demonstrating the linkage between enhanced public transport and regeneration. In particular, TfL commissioned two studies to examine the property market effects of the extension of the Jubilee Line around Southwark tube station and Canary Wharf. The Jubilee Line extension opened in December 1999 and the two studies examined its impact on property and land values over the period to December 2002. The studies were undertaken respectively by Jones Lang LaSalle (February 2004) [CD/253] and Atisreal with Geofutures (May 2005) [CD/254]. The findings of the two reports are consistent and they identified that the JLE extension was responsible for an increase of over £2 billion in property values in the immediate proximity of the two stations. The findings included:-

- a. The “JLE Uplift” affected both residential and commercial property;
- b. The increased values were caused by increased demand brought about by the improvement in accessibility. It is reported, for instance, that office availability in Southbank fell by 75% over an 8 month period in 2001 following the opening of Southwark tube station.
- c. The JLE Uplift would not have been limited to the two locations studied but would have also been apparent in areas accessible to those two locations via other public transport interchanges.

3.4 The work was commissioned by TfL in order to inform the debate on whether it may be possible to assist with the funding of major infrastructure projects by capturing the uplift in property value that they bring about. This would be likely also to be generally applicable to Thameslink but, more significantly for the purposes of my evidence, the studies confirm the expectation that enhanced public transport accessibility can transform the demand for property and thereby substantially assist with regeneration objectives.

- 3.5 In order to consider how this may apply to the enhanced network proposed by the Thameslink 2000 project, I have prepared two plans. The first shows the correlation between regeneration and growth areas identified in regional guidance outside London with Thameslink 2000. The second shows the linkage that Thameslink 2000 would achieve directly with identified Opportunity Areas and Areas for Intensification in the London Plan (see Appendix 4).
- 3.6 As an example, there are a number of Priority Areas for regeneration in RSSI4 [CD/231] including:
- a. King's Lynn;
 - b. Luton/Dunstable/Houghton Regis;
 - c. Bedford/Kempston;
 - d. Peterborough;
 - e. Stevenage;
 - f. Parts of Cambridge.
- 3.7 In the South East, the connections to Brighton, Ashford, Dartford and the Kent Thames Gateway are particularly significant. The Inspector's report [CD/199 Section 4] sets out the strong support for the project from the Thameslink Consortium – an organisation with about 150 members including 11 County Councils, 1 unitary authority, 15 London Boroughs and 52 City, Borough, District and town Councils. The level of support is hugely impressive and the points made in support are compelling. It would be inappropriate to repeat them but they are unequivocal in their blessing for the project which would significantly reduce the isolation felt by a number of towns, connect together areas of deprivation and unemployment with growing employment markets and provide a significant boost to the business community across the region. The quality of life for thousands of commuters who currently return home "late, harassed and tired" would be substantially enhanced by reduced overcrowding, shorter journey times and less

interchanging. This will also improve the perception of rail travel, thereby encouraging people to use public transport rather than the private car, in accordance with sustainable development objectives.

- 3.8 Since the first inquiry, the Consortium has maintained its clear support and as set out previously, strategic planning policy has developed in the regions outside London to confirm its support for Thameslink, further growth areas have been identified and national policy has established the intention to maximise the use of Gatwick and Stansted Airports and to ensure that they are provided with high quality public transport.
- 3.9 In London, the position has been more dynamic since the first inquiry as the result of the identification of a substantial growth agenda in the London Plan and the identification of a range of Opportunity Areas within which the growth is to be focussed. Thameslink will achieve direct linkages with the identified regeneration areas of London Bridge, King's Cross, Elephant and Castle, Cricklewood/Brent Cross, Croydon town centre, Farringdon/Smithfield and Kidbrooke (see plans in Appendix 4).
- 3.10 The adopted London Plan [CD/150] leaves no room for doubt about the importance of ensuring sufficient public transport capacity in order to enable London to achieve its economic potential. A similar point is made in the City of London UDP [Appendix 2, NR/10/B], adopted in April 2002:-

“The city’s function as the world’s leading international financial and business centre is heavily dependent on an efficient and attractive transport system to move large numbers of people daily and to enable the efficient servicing of its main activities. The increasing numbers of commuters, the servicing of the business and residential communities and the existence of through traffic movements places a great deal of demand upon the rail and highway networks serving the city.” (paragraph 9.1)

3.11 The ability of London to sustain its growth aspirations without further infrastructure investment was directly investigated by the Panel at the Examination in Public of the London Plan. Technical evidence was presented on behalf of TfL which compared the projected increase in demand for travel with the existing and projected capacity of the rail system. TfL concluded that sufficient capacity did exist to support the growth aspirations of the London Plan if all of the projected capacity increases took place, including Thameslink 2000 which was identified as being responsible for 19% of the projected increase in rail capacity for London (TfL technical evidence table 6). In relation to three of the identified five sub-regions of London (North, Central and South), TfL's evidence identified Thameslink 2000 as making an important contribution to ensure that sufficient capacity would exist to support the development of the Opportunity and Intensification Areas set out in the Plan.

3.12 The Panel examined this issue closely and endorsed the approach set out in Policy 3C.2 of the London Plan which provides:-

“The Mayor will and Boroughs should consider proposals for development in terms of existing transport capacity, both at a corridor and local level. Where existing transport capacity is not sufficient to allow for travel generated by proposed developments, and no firm plans exist for a sufficient increase in capacity to cater for this, Boroughs should ensure that development proposals are appropriately phased until it is known these requirements can be met.”

3.13 This policy approach had met with objection from London First, the CBI and others arguing that it would put a brake on development in the capital. Indeed, it is true to say that there had been a reluctance to reject major development proposals in London on the grounds of a lack of adequate infrastructure capacity. In the conclusions relating to the Heron Tower inquiry in the City in July 2002, for instance, the Inspector resisted the suggestion that office development in the City should be restricted until improvements in the public transport system have been

implemented (paragraph 15.152). The adoption of the London Plan, however, signals a different approach, in particular via the application of Policy 3C.2, as cited above. The Panel was conscious of the significance of the policy and its conclusions included the following:-

“We acknowledge that Policy 3C.2 may well result in some proposals not being approved, or even being tightly phased, because of an absence of transport capacity to accommodate the increased movements generated. However, we do not consider this to be unacceptable. Indeed, permitting development which would create a significant additional movement demand where adequate transport capacity is not available has the potential to seriously exacerbate existing peak hour problems...It is not acceptable to allow development to be undertaken based only on the hope that necessary transport capacity improvements will occur some time in the future...” (paragraph 5.8)

- 3.14 In my judgement, the adoption of this policy approach creates an added impetus to the case for the approval and implementation of the Thameslink 2000 project. Jim Steer’s evidence identifies the extent of overcrowding and congestion already affecting a number of routes into the City and the urgent need for capacity improvements. The planning policy documents reviewed in the previous section of my evidence are already agreed that these levels of congestion can impair economic growth; they now hold the ability to prevent further development unless commitments are made to infrastructure enhancements such as Thameslink.
- 3.15 Thameslink has the ability to help maximise the sustainable regeneration of a number of significant Opportunity Areas – particularly at King’s Cross, London Bridge, Farringdon and Brent Cross/Cricklewood. These Opportunity Areas are identified as having the capacity to accommodate new homes and jobs to support London’s growth, as projected in the London Plan. Thameslink provides direct increased transport capacity and more direct linkages which will support new development within the Opportunity Areas, in accordance with Policy 3C.2 in the plan (see paragraph 3.12 above).

- 3.16 At Brent Cross/Cricklewood, for instance, the GLA and the London Borough of Barnet have adopted Supplementary Planning Guidance in the form of a Development Framework (April 2004) which promotes major mixed use development of up to approximately 1,300,000m². The Development Framework identifies, however, that the principal employment generating phase of the development (approximately 400,000m² of offices) cannot be implemented until the developer provides a new station and enhanced rail capacity.
- 3.17 At London Bridge, Jim Steer's evidence identifies the prospect that the severe lack of rail capacity will necessitate the closure of the station at peak times unless the Thameslink improvements are implemented. London Bridge is the focus of one of the largest Opportunity Areas identified in the London Plan which states an anticipated development yield of at least 500 houses and 24,000 jobs.
- 3.18 At Elephant and Castle, the London Plan anticipates regeneration to provide 4,200 jobs and 4,200 new homes. At the first inquiry, there was debate about the possibility of an enhanced service being provided to Elephant and Castle beyond that already proposed by Thameslink 2000. Whilst the Inspector did not favour routeing via Elephant and Castle rather than London Bridge, he nevertheless concluded that Thameslink 2000 would be a substantial asset to the important regeneration initiative at Elephant and Castle [CD/199 paragraph 6.3.74]. LB Southwark's concern to secure an enhanced Thameslink 2000 service serves to demonstrate the substantial accessibility and regeneration benefits that Thameslink 2000 can provide. LB Southwark, of course, strongly supports the Thameslink 2000 project which is described in its committee report [CD/252] on the current applications at Blackfriars as a "keystone" of the UDP.
- 3.19 The significant benefits that would arise from the proposed Thameslink/Crossrail interchange at Farringdon would dramatically enhance the accessibility of the Farringdon/Smithfield area which is identified as an Area for Intensification in the London Plan with a development potential of 2,000 jobs.

- 3.20 At King's Cross, the London Plan identifies a development opportunity to create at least 11,400 jobs and 1,250 homes. The site comprises over 27ha of brownfield land and a development known as King's Cross Central is currently the subject of a planning application to LB Camden for a mixed use development of 750,000m². The Transport Assessment submitted with the application confirms that Thameslink 2000 would transform services using Thameslink through King's Cross, opening up a much wider network of accessibility and providing significant capacity benefits. Works are progressing at King's Cross as part of the Channel Tunnel Rail Link project which include the replacement of King's Cross Thameslink Station with a new interchange under St Pancras Station; those works ensure that a new Thameslink box under St Pancras will be constructed. Once the box is 'fitted out' as an operational station it will replace the sub-standard King's Cross Thameslink station.
- 3.21 The Thameslink 2000 project, therefore, would make a significant contribution to providing the increased capacity required to enable the growth aspirations of London as a whole to be achieved. In addition, its routeing is integrated with development opportunities in the regions and across London. Indeed, development plans have been prepared on the assumption that Thameslink is proceeding and that expectation has been a significant element in the identification of regeneration and opportunity sites. Due to its long gestation, Thameslink 2000 is not only supported by policy, it has become a "keystone" on which policies themselves have planned future development. As a consequence, the objectives of the scheme and its clear transportation, regeneration and socio economic benefits are even more significant than they were at the time of the earlier inquiry and the need to secure these benefits more urgent.

4.0 AN ASSESSMENT OF THE NEW PLANNING APPLICATIONS AT BOROUGH HIGH STREET AND BLACKFRIARS

4.1 Introduction

- 4.1.1 Following the identification of three deficiencies by the Inspector at the first Inquiry, modifications were made to the Thameslink 2000 project. It is now proposed to replace the six-storey Blackfriars Station building with a building of similar scale. Network Rail now also seeks formal consent for the provision of appropriate replacement buildings for those buildings which are required to be demolished in the Borough High Street area.
- 4.1.2 These modifications required the submission of a further nine applications for planning permission and listed building consent to be made to the Corporation of London and LB Southwark. All nine applications were called in by the Government Office for London in November 2004 so that the First Secretary of State could determine them himself.
- 4.1.3 The statutory development plans in relation to these proposals comprise the London Plan at a strategic level and the City of London / LB Southwark Unitary Development Plans at a local level.
- 4.1.4 Section 5 of the Network Rail Statement of Case [CD/191] demonstrates that the proposals at Borough High Street and Blackfriars are in accordance with the respective development plans; a view I endorse and explain further in the sections below.

4.2 Borough High Street

4.2.1 Since the Inquiry closed four new planning applications have been submitted to LB Southwark in relation to the following sites:

- a. 7 Stoney Street;
- b. 2-4 Bedale Street;
- c. 11-15 Borough High Street;
- d. 16-26 Borough High Street.

4.2.2 These applications propose replacement buildings at the above sites where the new section of viaduct between Metropolitan Junction and London Bridge Station necessitates the demolition or alteration to existing buildings. (Details of these four planning applications are summarised in Appendix 3).

4.2.3 The new viaduct that is proposed for the Borough High Street area is a fundamental part of the Thameslink 2000 scheme in that it will enable the existing bottleneck to the west of London Bridge Station to be removed.

4.2.4 In Sections 2 and 3 I have already demonstrated the strength of policy support for the Thameslink 2000 scheme set out in the London Plan, and its contribution to meeting strategic transport, regeneration and sustainability objectives. In addition, I have also highlighted policies in the adopted Southwark UDP (Policy T.3.2) and emerging Replacement UDP (Policy 5.4) that offer explicit policy support for the Thameslink 2000 scheme.

4.2.5 Although these four planning applications were called in, the applications were reported to the LB Southwark Development Control Committee on 8 February 2005. Officers recommended that, were the Council able to determine the applications, planning permission should be granted for all applications, subject to the provision of further details.

- 4.2.6 With regard to 7 Stoney Street, the Council resolved that, were the Council able to determine the application, planning permission would be granted. With regard to the other three applications, however, the Council resolved that, were the Council able to determine the applications, planning permission would have been refused on the grounds of failure to preserve and enhance the conservation area.
- 4.2.7 The three committee reports that relate to the applications at 2-4 Bedale Street, 11-15 Borough High Street and 16-26 Borough High Street acknowledge the benefits of the Thameslink 2000 scheme. In each of the three reports, Paragraph 8.1 states:
- “Implementation of the proposed scheme, necessitating the proposed works to the Borough High Street buildings, would mean improved services, better pedestrian circulation and access and a wider range of retail units and services. Thameslink 2000 is a strand of the Mayor’s Transport Strategy, and would be a significant enhancement of cross-London capacity, connecting north and south, linking King’s Cross to Blackfriars and London Bridge and enabling more through journeys, as well as increasing interchange opportunities. The scheme supports key development opportunities in the vicinity of King’s Cross and London Bridge.”
- 4.2.8 The only potential policy conflict which has been identified is, therefore, whether the proposed buildings will preserve and enhance the character and appearance of the conservation area. The design and heritage matters raised by these proposals are considered in the evidence being given by William Filmer-Sankey and Tom Jestico.
- 4.2.9 This matter aside, I now demonstrate that, in terms of land use, the proposals in Borough Market are in accordance with the statutory development plan. (For ease of reference the relevant UDP policies are set out in Appendix 2).

Area-Wide Policies

- 4.2.10 The Borough High Street area is subject to a number of area-wide policies. The LB Southwark Adopted UDP identifies that all four sites fall within the Bankside Regeneration Area. Policy R.2.1 states that investment will be welcomed in these designated areas and planning permission will normally be granted for proposals that generate employment, improve the environment, meet the needs of local residents and bring back into beneficial use vacant land or buildings.
- 4.2.11 The LB Southwark Replacement UDP shows the four sites located in the Bankside and the Borough Action Area which is identified as a District Town Centre. It is also identified as a Local Policy Area where Policy 1.2 seeks a mix of uses, including appropriate employment generating activities and culture and tourism uses, with active frontages and retail uses at ground level. It also seeks urban design solutions which respond to and reinforce locally distinctive patterns of development. The UDP recognises that the Local Policy Areas are undergoing significant change. They provide many opportunities for development and have considerable potential for regeneration. Proposals will be expected to promote sustainable forms of transport and reduce car travel (supporting text to Policy 1.2).
- 4.2.12 The Bankside and the Borough Draft SPG [CD/234] provides further area-specific guidance, expanding on Policy R.2.1 (Regeneration Areas) in the Adopted UDP and Policy 1.2 (Local Policy Areas) in the Replacement UDP. Paragraph 2.2.1 sets out a vision for the area:

“Bankside as a vibrant, unique location combining historical character with the best attributes of new developments. Bankside should be a mixed use area full of vitality with a range of housing and employment opportunities, cultural and visitor attractions, increased densities, high quality services and improved transport infrastructure.”

- 4.2.13 The draft SPG sets out criteria for the development of all land uses and activities within the area. In general, it supports a mix of uses, active street frontages and the retention of existing street patterns and plot layouts.

7 Stoney Street (TL3)

- 4.2.14 The provision of a beer garden at 7 Stoney Street will clearly accord with the area-based policies referred to above. The building is currently vacant and in a poor state of repair. In the Adopted UDP the site falls within an Employment Area, whilst in the Replacement UDP it is within a Preferred Office Location. Although the proposals will not directly provide employment opportunities, the use will complement the existing public house use which does provide employment opportunities. Furthermore, it will provide an active street frontage which complements the surrounding mix of uses and is attractive to tourists/visitors to the area.

2-4 Bedale Street (TL4)

- 4.2.15 The proposed erection of a 2-storey retail/office building would re-instate existing retail uses at ground floor and office uses above. This is in accordance with Objective B.1 (Employment Protection), Policy B.1.2 (Protection Outside Employment Areas and Sites) and Policy S.1.4 (Shops Outside Primary and Secondary Shopping Frontages), which seek the retention of employment generating and retail uses. The proposal is also consistent with the mixed-use approach supported in the Replacement UDP, in particular Policy I.5 (Mixed Use Development) and Policy I.9 (Change of Use and New Development within Town and Local Centres). The new building will also provide a more convenient access to Borough Market.
- 4.2.16 Although a small loss of housing would occur this would still accord with Policy H.1.1 (Protection of Existing Housing Accommodation) in the Adopted UDP and Policy 4.6 (Loss of Residential Accommodation) in the Replacement UDP. These policies state that a loss of residential floorspace will not normally be permitted

although exceptions may be made where the environment is unsuitable for housing. The LB Southwark committee report, dated 8 February 2005, states that the loss of existing housing accommodation is considered acceptable since the viaduct above would be likely to lead to an unacceptable living environment (Paragraph 7.2).

11-15 Borough High Street (TL5)

- 4.2.17 The proposed erection of a 4-storey retail/office building replaces existing uses on the site. According to the Adopted UDP, the site falls within an Employment Area and within a Primary Shopping Frontage. Under the Replacement UDP the site lies within a Preferred Office Location and within a Shopping Frontage. The retention of retail use at ground floor and office use above accords with Policy S.1.1 (Primary Shopping Frontages) and Policy B.1.1 (Protection of Employment Areas and Identified Sites). Similarly, the proposal is in accordance with Policy 1.4 (Preferred Office Locations) and Policy 1.9 (Change of Use and New Development within Town and Local Centres) in the Replacement UDP. In addition, the proposed replacement building provides a widened pedestrian plaza at ground level.

16-26 Borough High Street (TL9)

- 4.2.18 The proposed erection of a 4-storey retail/office building replaces existing uses on the site. According to the Adopted UDP, the site falls within a Primary Shopping Frontage. Under the Replacement UDP the site lies within a Shopping Frontage. The retention of retail use at ground floor accords with Policy S.1.1 (Primary Shopping Frontages) in the Adopted UDP and Policy 1.9 (Change of Use and New Development within Town and Local Centres) in the Replacement UDP. The proposed re-instatement of office use at upper levels accords with Objective B.1 (Employment Protection) and Policy B.1.2 (Protection Outside Employment Areas and Sites) in the Adopted UDP and Policy 1.5 (Mixed Use Development) in the Replacement UDP.

4.3 Blackfriars Station and Bridge

4.3.1 The Blackfriars Station and railway bridge sites fall within the administrative areas of two local planning authorities – the Corporation of London and LB Southwark. Since the first Inquiry closed a total of five new applications for planning permission and listed building consent have been submitted to the relevant authority in relation to Blackfriars Station and Bridge (see Appendix 3). These applications relate to three sites:

- a. Blackfriars North;
- b. Blackfriars Bridge North;
- c. Blackfriars South.

4.3.2 The Thameslink 2000 project requires remodelling of the track and station layout at Blackfriars in order to accommodate twelve-car trains, to remove conflict between through and terminating services caused by the existing layout of tracks, and to improve passenger amenity, access and interchange with the Underground. The platforms will be extended across the whole length of Blackfriars Bridge which spans the River Thames. A new roof will be provided across the entire length and breadth of the bridge. On the north bank it is proposed to replace the existing Blackfriars Station building. On the south bank it is proposed to provide a new station entrance and ticket hall.

4.3.3 In Sections 2 and 3 I have already demonstrated the strength of policy support for the Thameslink 2000 scheme set out in the London Plan, the LB Southwark Adopted UDP, the LB Southwark Replacement UDP and the Adopted City of London UDP.

4.3.4 I now demonstrate that, in terms of land use, the proposals in regard to Blackfriars Station and Bridge are in accordance with the statutory development plan. The design of the proposals is considered in the evidence being given by William Filmer-Sankey and Michael Haste. (For ease of reference the relevant UDP policies are set out in Appendix 2 [NR/10/B]).

Blackfriars North (TL6 and TL20)

4.3.5 Two applications have been submitted to the Corporation of London in relation to the proposed development at Blackfriars North. The first is a planning application that proposes to replace the existing six-storey building at 167-179 Queen Victoria Street with a new building of a similar scale. This building will provide a new station concourse and a single, integrated street level ticket office serving Underground and main line rail passengers. Retail units will be provided at street level and elsewhere within the station.

4.3.6 The second is a parallel listed building consent application for the proposed partial demolition of the rear abutment and re-alignment of the Queen Victoria Street footbridge. The proposed work to the listed Black Friar public house is required to allow provision of a new pedestrian bridge over Queen Victoria Street, which would provide passengers with direct access to the Thameslink platforms.

4.3.7 The Corporation of London's Statement of Case, which was previously reported to Committee on 1 March 2005, states that the Corporation supports the principle of redeveloping the present Blackfriars Station building (Paragraph 18). The application has been the subject of detailed discussions with Corporation officers and has been revised to accord generally with those discussions (Paragraph 23). The proposed work to the listed building is considered acceptable in historic building terms (Paragraph 22). The Corporation of London does not object to this application subject to the imposition of satisfactory conditions in respect of finishes (Paragraph 39).

4.3.8 The works proposed at Blackfriars Station are a fundamental part of the Thameslink 2000 scheme, which I have already demonstrated in Sections 2 and 3 is strongly supported by the Adopted City of London UDP and the London Plan. In particular, the proposals accord with strategic policies regarding transport and movement (STRAT 9A, STRAT 9B, STRAT 9C) and policy TRANS 1, which seeks the promotion and improvement of public transport, and policy TRANS 2, which supports improved passenger interchange facilities. The provision at Blackfriars of a new station concourse and a single, integrated street level ticket office serving Underground and main line rail passengers will be a substantial improvement to the public transport interchange. In addition, the Thameslink 2000 scheme is in accordance with the Corporation of London's economic objectives (STRAT 2A, STRAT 2C).

4.3.9 In accordance with Policy SHOP 1, which resists the loss of retail floorspace to non-retail use, the Blackfriars Station proposal includes retail units at street level and elsewhere within the station.

Blackfriars Bridge North (TL7)

4.3.10 A planning application for the widening of the railway bridge with a new platform roof canopy spanning bridge, new track alignment and platform layout was submitted to the Corporation of London.

4.3.11 The Corporation of London's Statement of Case, which was previously reported to Committee on 1 March 2005, states that the current scheme is considered to be more workable than that seen at the public inquiry and overall represents an improvement (Paragraph 36). The Corporation of London does not object to the proposals but would require that any permission granted would be subject to conditions and matters to be approved prior to construction (Paragraph 38).

4.3.12 Design matters including the scheme's regard for the St Paul's Heights limitations in relation to the above applications are considered in the evidence being given by Michael Haste and William Filmer-Sankey.

Blackfriars South (TL8 and TL21)

4.3.13 Two applications have been submitted to LB Southwark in relation to the proposed development at Blackfriars South. The first is a planning application seeking permission for the widening of the railway bridge and new station on the South Bank (TL8) and the second is a parallel application for listed building consent in relation to the remodelling of the stone abutment in order to accommodate the widened bridge structure (TL21).

4.3.14 Although these two applications were also called in, the two applications were reported to the LB Southwark Development Control Committee on 8 February 2005. Officers recommended that, were the Council able to determine the applications, planning permission and listed building consent should be granted, subject to the provision of further details. The committee report concludes:

“The Blackfriars Bridge proposal, as part of the wider Thameslink 2000 scheme will facilitate the delivery of significant improvements to public transport provision and cross-London links. This is a keystone of both the Mayor of London’s transport policy and Southwark Council’s emerging replacement Unitary Development Plan. In terms of the impact of the proposed development on amenities, visual outlook and existing views, these matters have already been explored by the Inquiry inspector who concluded that the public benefits of the proposal are such as to outweigh harm (Paragraph 6.16).”

4.3.15 The Council resolved that, were the Council able to determine the applications, planning permission and listed building consent would be granted subject to further details and appropriate conditions.

- 4.3.16 According to the LB Southwark Adopted UDP, the site to which these applications relate falls within the Bankside Regeneration Area. The Thames Path, which is identified on the Proposals Map, passes through the site, alongside the River Thames. An Employment Area lies to the immediate south of the bridge. According to the LB Southwark Replacement UDP, the site lies within the Bankside and the Borough Action Area and the Thames Special Policy Area, while a Preferred Office Location lies immediately to the south.
- 4.3.17 As detailed in Sections 2 and 3 of the proof the Thameslink 2000 proposals are in clear accordance with the transport objectives and policies in the Adopted and Replacement UDPs. The LB Southwark committee report recognises the benefits that the scheme offers, in particular that the scheme supports key development opportunities in the vicinity of King's Cross and London Bridge (Paragraph 6.2).
- 4.3.18 The provision of a new South Bank station entrance will make a significant contribution to the regeneration of this area. In particular it accords with Policy I.2 (Local Policy Areas) in the Replacement UDP in relation to the Bankside and the Borough Action Area. Clause vii) of this policy seeks the integration of development with public transport facilities which promotes sustainable modes of travel and reduces the need to travel by car. Furthermore the improved access that the new station entrance will offer will be in accordance with the Bankside and the Borough Action Area Draft SPG [CD/234]. Paragraph I.1.3 states:

“The Council is committed to ensuring that Bankside and the Borough continue to develop as a central London location where people aspire to live, work and visit.”

- 4.3.19 Improved access to the area will also accord with the employment objectives in the Adopted and Replacement UDPs, providing better public transport access for employment uses, such as the Bankside 1-2-3 development, which is currently under construction. The proposal will also provide direct access to the area for visitors and tourists in accordance with LB Southwark's wider objectives regarding the South Bank which is designated as a Strategic Cultural Area, and principal attractions such as Tate Modern.
- 4.3.20 Under the proposals the Thames Path will be retained and re-routed in accordance with Policy E.7.1 (Riverside Townscape, Thames Path and Public Access to Thames Frontage and Shoreline) in the Adopted UDP and Policy 3.29 (Development within the Thames Special Policy Area) in the Replacement UDP.

Conclusion

- 4.3.21 My review of the nine new applications that relate to Borough High Street and Blackfriars Station and Bridge clearly demonstrates that, in land use terms, the applications are in full accordance with the current development plans. Furthermore, the proposed works in these two areas are of fundamental importance to the Thameslink 2000 scheme, the delivery of which accords with wider land use, transport, sustainability and regeneration objectives.

5.0 WHETHER, IN THE LIGHT OF UPDATED ASSESSMENTS, THE TRANSPORT AND OTHER BENEFITS WOULD OUTWEIGH THE HARM ARISING TO HERITAGE INTERESTS, PRINCIPALLY IN THE BOROUGH MARKET AREA (MATTER 7)

5.1 This inquiry is well aware that at the first inquiry the Inspector had three primary reservations in respect of the Thameslink 2000 scheme:-

- a. The inadequacy of a new single storey solution at Blackfriars Station;
- b. The need for “special arrangements” at Borough Market and Borough High Street to ensure that listed buildings were not demolished without adequate replacement; and
- c. That proposals for the redevelopment of London Bridge Station were inadequate for a City of London’s status.

5.2 It is important to recognise, however, the strength of the Inspector’s overall conclusions in relation to the project [CD/199] which included:-

- a. the benefits are compelling and decisive (paragraph 1.29);
- b. very substantial public benefits, including to the economy of London and in connecting communities (paragraph 4.1.10);
- c. the need for extra train capacity is totally convincing (paragraph 45.2.15).

5.3 In addition, in relation to the specific heritage concerns, the Inspector acknowledged:-

- a. There is no reason why the historic character portrayed in the street pattern (of Borough Market) should suffer (paragraph 10.6.23).
- b. The proposals will preserve the character of this part of the Conservation Area (paragraph 10.6.30).
- c. It is important to balance the harm to Borough Market against the benefits of the project (paragraph 6.3.36).
- d. Overall, the benefits outweigh the harm (paragraph 1.27).

- 5.4 The planning issue in relation to London Bridge Station is no longer one for this inquiry. Indeed, the proposals now in place for London Bridge hold in prospect significant benefit. The Inspector described the Masterplan for London Bridge as being a design which by common consent would be appropriate to a major rail terminal in one of the World's great cities. Furthermore, he concluded that it would bring with it the possibility of an additional substantial office development within the confines of the station, with significant benefits in terms of accessibility and ensuring the dominance of public transport for its workers. Network Rail is now committed to incorporating the Masterplan proposals for London Bridge as part of the Thameslink proposals and it is important to remember that it is Thameslink which provides the track configuration to facilitate the construction of the Masterplan with its acknowledged economic, regenerative and visual benefits. This is a significant additional benefit which was not present at the time of the last inquiry. Christopher Bennie gives evidence about the compatibility between Masterplan and Thameslink 2000.
- 5.5 The Inspector and the Secretaries of State will consider the extent to which the specific designs now put forward at Blackfriars and for the replacement buildings in Borough High Street/Borough Market are appropriate as replacements for the existing. My evidence has demonstrated that the proposals are consistent with strategic and local planning policies. There are, however, one or two significant points to be made about the overall balance.

5.6 My evidence does identify a strong national and regional interest in the delivery of the Thameslink 2000 project. There is also a strong benefit in its delivery now. The evidence of others demonstrates that its delay has already put pressure on the strained transport infrastructure of the region, whilst my evidence demonstrates that a delay to the project represents a deferment of substantial economic and social benefits. After decades of under investment, the forewords to both the Transport and White Papers emphasise the increased emphasis on delivery now. Delay also brings two additional consequences:-

- a. Direct deferral of or compromise to a number of major regeneration schemes along the route which depend upon the project; and
- b. National embarrassment which risks adding to a reputation that this country is incapable of delivering large scale projects which really matter.

5.7 This latter point, in my judgement, is a matter of national significance. The previous Inspector recognised (paragraph 10.6.76) that delay in order to explore alternative options (CARAPLAN) would lead to overall delay which, in itself, would be harmful. That same principle should now be applied to the issue of appropriate designs for the Blackfriars and Borough Market buildings. Clearly, I urge a conclusion that the proposed designs are of high quality and entirely acceptable. If that is the case, and taking the previous Inspector's conclusions as a baseline so that only changes in circumstances are examined, there is no balance to be drawn – the only prudent outcome is the grant of consent and the confirmation of the Order.

- 5.8 I have clearly identified the advances in planning policy which have taken place at national, regional and local levels since the previous Inquiry closed. The most significant advance has been the adoption of the London Plan which, in accordance with national policy, requires the close integration of land use and transport planning in order to deliver sustainable development. Moreover, the London Plan projects significant economic and population growth for the Capital, identifying specific regeneration and opportunity areas which can accommodate the growth. This is subject to the delivery of strategic public transport improvement schemes, such as Thameslink 2000, that support the Mayor's vision of an exemplary sustainable world city. Indeed, the spatial strategy to accommodate London's projected growth which is set out in the London Plan assumes that the Thameslink 2000 project will proceed.
- 5.9 In my judgement, these are important new material considerations. In particular, the London Plan represents a major land mark in the development of strategic planning for London. It sets out a deliberate strategy of substantial growth in order to achieve a vision for London as a World City. Policies are in place to support major investment in public transport infrastructure including Thameslink 2000 but also to defer much needed development if such infrastructure is not brought forward. At a national level, this approach is complemented by the Government's increased emphasis on the delivery of major infrastructure projects. All of these factors weigh heavily in favour of the grant of planning consent.
- 5.10 Similarly, at a local level UDP policies in support of the project have either increased their status or strengthened that support. Similarly, specific high quality designs have now been put forward for those areas previously of concern to the Inspector and the support e.g. of English Heritage demonstrates that acceptable solutions can be found at Blackfriars and at Borough Market.

- 5.11 Against this background, I urge the grant of planning consent even if the Inspector and/or the Secretaries of State are insufficiently impressed with either one or all of the reinstatement proposals. It is my view that every effort should be made to find a mechanism to grant consent and confirm the Order, rather than condemn the project to further years of delay.
- 5.12 Conflict with the precise wording of PPG15 [CD/7], i.e. harm to the policy rather than actual harm, would be insufficient in the current planning context to delay or reject a project of this national significance. Such harm could only logically arise if the conclusion is to be drawn that there may be no acceptable form of redevelopment at Blackfriars or Borough Market in place of the buildings to be demolished. The quality of the proposed designs and the position, for instance, of English Heritage and of the officers of LB Southwark suggest that this is not the case. If, nevertheless, any element of the proposed designs is felt to be of insufficient quality, genuine harm would be protected against by a simple condition preventing demolition prior to the approval of designs for reinstatement.
- 5.13 There are, therefore, strong new material considerations which enable a conclusion to be drawn that the Order should be confirmed and that planning and listed building consent should be granted for the proposed applications.