

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS)
ACT 1990
TRANSPORT AND WORKS ACT 1992**

THAMESLINK 2000 PUBLIC INQUIRY 2005

**CLOSING SUBMISSIONSON BEHALF OF THE
LONDON BOROUGH OF LAMBETH**

1. Lambeth has appeared at this Inquiry because, as Mr Stewart explained the Council, through its relevant committee, considered that the scheme being promoted by Network Rail is serious flawed in a number of key respects.
2. The Thamelink 2000 Scheme promoted by Network Rail has its genesis in a period dating well back before the turn of the century, and has been carried forward substantially unchanged into this re-opened Inquiry.
3. In effectively representing their scheme with simply a few cosmetic alterations, Network Rail have failed to reflect the significant changes that have occurred, at least since the last Inquiry.
4. Those changes are set out in the evidence of Dr Harris, echoing many of the changes included in the evidence of CARA. A number, but not all, have been recognised by Network Rail, particularly in the evidence of Mr Steer. However,

Network Rail have failed to respond to these changes and to carry out the radical rethink, with fresh and comprehensive “optioneering” as Dr Harris has said is required.

5. The result is that the Thameslink 2000 Scheme continues to maintain its focus on London Bridge with the consequential need to carry out expensive and destructive works at Blackfriars, Borough Market and indeed to London Bridge itself. The scheme is also dependent upon being able to provide the necessary additional capacity through widespread lengthening of trains to 12 car formations. It is this element which would necessitate the closure of the Farringdon-Moorgate section.
6. Network Rail claim as a continuing virtue of their scheme that it enables not just the north-south crossing of London, but that it is intended to link services from the south coast to Norfolk. Whilst it may be very convenient for the occasional traveller from Littlehampton who does indeed want to go as far as Kings Lynn, this does nothing for the great majority of travellers who are peak hour commuters. In particular it does not do enough to facilitate access by train from a wide area of south London into the centre.
7. The London Borough of Lambeth’s interest arises naturally in a respect of the Borough’s own residents who are neglected by this scheme. However, in the approach which Lambeth suggest should be adopted it is clear that there would be significant benefits felt across a wide part of South London, whilst also benefiting

those travelling from greater distances. Although, of course, Lambeth's locus arises from a legitimate concern to maximise the advantages for its own residents, the case it has advanced is not a narrow or parochial one: those advantages would be widely shared across south London and further afield.

8. The London Borough of Lambeth's case is a direct response to the sixth matter upon which the Secretaries of State invited further consideration, namely:

“An updated assessment, in the light of changed circumstances since the earlier inquiry, of the feasibility of (a) routing Thameslink Services via Elephant and Castle and Herne Hill Stations; ...”.

9. The London Borough of Lambeth considers that insufficient consideration has been given to the opportunities that would flow from the use of the Elephant and Castle and Herne Hill corridor, which remains neglected in the published scheme.
10. In opposing the alternative approach the Council puts forward, Network Rail have, as one would expect them to do, raised the spectre of delay. However, this misses the point which is implicit, if not actually explicit, in the re-opening of this Inquiry. The Secretaries of State by ordering a fresh hearing and indicating that consideration be given to the Elephant and Castle alternative, have obviously contemplated that this might delay the implementation of the scheme. Given the scale of expenditure involved and the massive impact that it will have, for example, to the Borough Market area, admittedly not in Lambeth but of importance to all Londoners, it is crucial that the Secretary of State is not

stamped into a wrong decision which would have such profoundly damaging and far-reaching consequences. Instead there should be a pause while the Elephant and Castle alternative is considered, as Dr Harris has put forward, in the context of proper optioneering.

11. The option that Dr Harris, with Mr Smith's costings, has put before the Inquiry is not, as he explained, simply RACPLAN mark 2, although of course it suits Network Rail to categorise it in that way. The inspiration may be derived from RACPLAN, and the sterling pioneering work carried out by Mr Cust, however the Lambeth alternative for this Inquiry is considerably simplified from the original RACPLAN with a reduced network of services. It is significantly better and, most importantly, significantly cheaper than RACPLAN was. The conclusion reached at the last Inquiry in respect of RACPLAN cannot be simply transferred across to the Lambeth alternative as it has been advanced at this Inquiry.

12. As both Mr Stewart and Dr Harris acknowledged, and indeed asserted, the Lambeth alternative is not a fully worked up scheme and should not be judged as such. Mr Stewart spoke of it as a "runner". What this means is that the evidence produced demonstrates that there is a sufficiently strong case to require Network Rail to work up a scheme using the Elephant and Castle corridor: one based on the Lambeth alternative, rather than the half hearted approach adopted so far which has sought to maximise the cost and extent of property to be acquired, whilst minimising the benefits it would produce.

13. The nature of the alternative was set out in Dr Harris' proof and there is no need to repeat that evidence in these submissions. Its key element comprises a service with a greater frequency of short of trains. This requires three new stations at Southwark, Camberwell and Mitcham, but it would avoid the need for the extensive and hugely expensive works in the central core area.
14. The costing of this service and the conservative approach adopted by Mr Smith was explained by him. As he said, where he felt there was uncertainty he has doubled the estimates to cover the cost of that uncertainty. For example, in respect of Southwark Station he has doubled the cost to £90m, allowed £100m for property acquisition and £70m for a travelator.
15. When considering the analysis of the scope of Lambeth's alternative which Network Rail produced in NR/27, Dr Harris responded by explaining first that a number of the items included are relatively minor, e.g. the DDA works; some are alternatives, e.g. the resignalling south of Luton is simply a different way of increasing capacity compared to the flyovers in the Lambeth option; the construction of the Hitchin flyover is unnecessary; and most importantly the big central area costs are irrelevant as such works would only be required if a two track railway cannot cope with the level of service involved. He argued that it can: certainly in respect of the 8 car service which he suggests should be operated over this section. Having regard to these and other factors to which he drew

attention, it is apparent that Network Rail have significantly overstated the cost implications of pursuing Lambeth alternative.

16. There is indeed a case for the Lambeth alternative which has not been properly answered. A scheme based on the Elephant and Castle/Herne Hill corridor would not only avoid the major and devastating impacts which the Network Rail Scheme would bring in its wake; it would possess a number of significant advantages over it. It would facilitate the regeneration of the Elephant Castle. It would provide a network of services through a wider part of South London thus enabling more accessible public transport for commuters into Central London, which is the key objective of the Government's policy in favour of sustainable development. When costed on a fair and like for like basis, it is anticipated that it will actually achieve a better return than Network Rail's scheme.

17. The London Borough of Lambeth therefore urges the Secretaries of State to grasp the nettle now: reject this flawed and obsolete Thameslink 2000 scheme. Instead Network Rail should be instructed now to carry out a proper and fair analysis of a solution based on the Lambeth alternative. The Secretaries of State should certainly resist the pressure to avoid delay and make a decision that will be inherently flawed. Such pressure has been avoided so far. The Secretaries of State should stand firm again to ensure that the correct solution is found which will bring real benefits to the travelling public whilst preserving from destruction some of the most precious elements of our national heritage. The London

Borough of Lambeth hopes that you will recommend to the Secretaries of State accordingly.

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