



Consultation Response

Bakerloo Line Extension Response to TfL Public Consultation

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1 Executive Summary

This document outlines the Council's support for the proposed Bakerloo Line Extension. The Council makes the representations responding to the following issues being consulted on:

Overall comments on the Bakerloo Line Extension

- *The Council is strongly supportive of the BLE scheme to Lewisham and Hayes. The route will transform connectivity within our borough, enable delivery of an estimated 7,000 additional homes and have an economic impact over 10 years of approximately £2.6 billion.*
- *The Council believes there is a strong case for the extension to Hayes to be delivered as part of the core scheme to achieve cost synergies and enable earlier realisation of these benefits.*

Route alignment from Elephant & Castle to Lewisham

- *The Council is fully supportive of the route alignment through the borough, including the principle of the proposed station location at New Cross Gate and Lewisham, ventilation shaft on Lewisham Way, and tunnel portal at the Wearside Council Depot.*
- *The BLE's arrival at Lewisham Station will need to be closely coordinated with Network Rail to ensure delivery of a high-quality interchange station and to mitigate space constraints for construction.*

Preferred construction worksite locations

- *On balance, the Council supports the proposal to use the New Cross Gate/Hatcham Works site as the project principal worksite. The Council understands the site to be fundamental to delivering the scheme beyond Lewisham to Hayes.*
- *The Council has strong reservations about the use of the alternative worksite proposals at Hither Green and Catford.*

Use of Wearside Council Services depot

- *The Council accepts the need for Wearside Council Depot to be used during construction, and for train stabling and a tunnel portal once the line is operational*
- *We would urge TfL to work together with the Council on the design of sub-surface train stabling to ensure it is compatible both with future uses and the continued delivery of the council's statutory and other services currently based there.*

Further extension to Hayes and Beckenham Junction

- *The Council strongly supports the further extension to Hayes and Beckenham Junction which will, for a modest additional cost, unlock 4,500 new homes, £1.7bn in local economic benefits, and help tackle high levels of deprivation in the south of the borough.*
- *The Council believes there is a robust case for the extension to Hayes to be delivered as part of the core scheme to achieve logistical and cost synergies and enable earlier realisation of these benefits.*

2 Overall comments on the Bakerloo Line Extension

Summary

- *The Council is strongly supportive of the BLE scheme to Lewisham and Hayes. The route would transform connectivity within our borough, enable delivery of an estimated 7,000 additional homes and have an economic impact over 10 years of approximately £2.6 billion.*
- *The Council, working with Southwark Council, has been actively promoting and campaigning for the scheme under the 'Back the Bakerloo' banner.*
- *The Council believes there is a strong case for the extension to Hayes to be delivered as part of the core scheme to achieve cost synergies and enable earlier realisation of these benefits.*
- *Given the strategic nature of the BLE and associated upgrade, the Council would reiterate its call for Mayoral CIL (MCIL2) to form part of the funding package for the scheme.*

A. Ongoing collaboration

The Council's support for the BLE to Lewisham and Hayes is clearly outlined in its Corporate Strategy, Transport Strategy and Local Implementation Plan (LIP3), and planning policy.

The Council has worked closely with LB Southwark to promote the scheme. Working under the banner of 'Back the Bakerloo' we have run an active campaign and engagement programme targeting residents, councillors, business groups, other London boroughs, MPs and homebuilders. The scheme has been almost universally popular with our residents and businesses, 20,500 of whom have signed our petition. At cross-London level, the campaign has built a coalition of six London borough leaders, nine MPs and business groups including London First, the Southeast London Chamber of Commerce, and London Chamber of Commerce and Industry.

B. Policy framework

Corporate strategy

The Council's 2018 Corporate Strategy includes a corporate commitment to work with TfL to secure delivery of the BLE. The BLE will support various of the Council's priorities, including: tackling the housing crisis; building an inclusive local economy; and making Lewisham greener. The Council has established a dedicated BLE Programme to coordinate the delivery of this commitment.

Transport Strategy and Local Implementation Plan 2019-2041 (LIP)

The Council's support for the Bakerloo Line Extension is clearly articulated within its Transport Strategy and LIP3, as well as its Rail Vision document.

The Transport Strategy is supportive of the Bakerloo Line Extension, considering it to

be a crucial project to achieve the borough's ambitious target to see 81% of all journeys made by sustainable modes by 2041. The Strategy includes the position that the BLE should be delivered to Hayes in a single phase to unlock substantial transport, housing and regeneration benefits (outlined in section 6).

The Transport Strategy highlights that the core BLE proposal would result in an additional 18,000 passenger interchange movements at Lewisham Station per peak period. This would elevate the importance of Lewisham Station on the transport network and further strengthen the case for the BLE to be delivered alongside a comprehensive redevelopment of the station (commensurate with a Strategic Interchange described in the Mayor's Transport Strategy). Further explanation of this can be found in section 3D.

Planning policy

The route runs through or is adjacent to the Borough's two London Plan Opportunity Areas (New Cross, Lewisham and Catford, and Deptford Creek/Greenwich Riverside) and aligns with the borough's Regeneration and Growth Areas (RGAs), which are located in an arc extending from New Cross and Deptford over Lewisham and Ladywell to Catford. If the Bakerloo line were extended beyond Lewisham along the Hayes line, it would unlock the possibility of an additional Opportunity Area centred on the Bell Green/Lower Sydenham area.

The Council has also been working in a Growth Partnership with the Greater London Authority, TfL and LB Southwark to plan housing delivery and regeneration along the Bakerloo Line Extension route in a coordinated and coherent way.

Spatial strategy

The Council's spatial strategy, which is contained within the Core Strategy document of the current Local Development Framework, promotes growth in the RGAs. The policies, whilst noting the need for additional infrastructure, pre-date the specific proposed BLE. The Council's 'Direction of Travel' document makes clear that the existing spatial strategy remains sound and will facilitate growth at the scale that the BLE has the potential to deliver.

New Local Plan

The Council is currently developing a new Local Plan, with the intention of publishing a Draft Regulation 18 document for consultation in Spring 2020 with adoption in 2022. The new Local Plan will put forward options for the Borough's future spatial strategy

The Council intends to put forward a preferred option which takes a character-led approach, drawing on a base of evidence to understand the existing character of the neighbourhoods and places of Lewisham. Using this approach, the preferred option identifies several places along the BLE corridor as appropriate for character-led intensification and change, including Lewisham, Catford and Lower Sydenham. This would provide a policy framework within which the BLE would support the delivery of good growth, commensurate with the additional connectivity which it provides.

It is intended that the spatial strategy will also look to provide a coordinated approach to investment in transport infrastructure and the public realm, alongside the provision of a better connected network of high quality town centres and local destinations to reduce the need to travel by car.

Site specific planning

Growth and housing delivery along the BLE corridor is supported by various other emerging planning policy documents:

- At **New Cross Gate** and as part of the evidence base for the new Local Plan the Council has produced an Area Framework and Station Opportunity Study, which seeks to coordinate growth and change in the area to maximise the value of the BLE while ensuring that growth and regeneration benefits existing, as well as new, residents. The Council is currently consulting on a draft Supplementary Planning Document (SPD) based on the Station Opportunity Study part of the framework which will guide development in the immediate vicinity of the station. The SPD Area includes two key development sites in New Cross which sit either side of New Cross Gate Station. Adoption of the SPD is expected in Spring 2020.
- In **Catford**, the Council is currently developing a masterplan framework for comprehensive regeneration of the town centre to provide an improved and increase town centre and employment offer, alongside 3,000 new homes. The additional connectivity and perceptions of accessibility that the BLE provides will support the delivery of regeneration in Catford.
- In **Lower Sydenham**, the Council is initiating plans to develop a masterplan framework to support growth and regeneration in the Bell Green area, with the potential for 4,000 new homes to be unlocked by the BLE .

C. Economic Impact of the BLE

The Council has commissioned a Local Economic Impact Assessment with the aim of demonstrating the transformational impact of the scheme on the local area (taking into account any disbenefits during and beyond construction). Emerging key findings from this study identify £2.6bn of economic benefits to the Lewisham economy with components including:

- **Employment:** It is estimated that the BLE could support an average of 6,325 jobs during the lines construction and 2,000 more in construction of new homes unlocked by the line (in Lewisham). In the long term, the line would generate almost 2,200 permanent jobs in new employment and retail sites in the borough.
- **Housing:** The BLE could unlock over 7,100 new homes along Lewisham's BLE growth corridor, particularly at Lower Sydenham, with over 18,000 new residents injecting £467m into the local economy over a ten year period.
- **Places:** The BLE could support Lewisham Town Centre's ambitions to achieve metropolitan centre status, contribute to the Council's transformational proposals for Catford Town Centre, and unlock employment opportunities at Lower Sydenham and Bell Green, helping to tackle high levels of deprivation in the south of the borough.

D. Funding the BLE

The Council recognises that the issue of capital funding for the scheme is moving closer on the critical path, and looks forward to working with TfL to ensure that a funding package can be secured in advance of TWAO proceedings. The Council has made representations to the MCIL2 Examination in Public stating our view that this funding pot should be made available to the BLE given that it is a strategic cross-London project, particularly considered together with the Bakerloo Line Upgrade.

3 Route alignment from Elephant & Castle to Lewisham

Summary

- *The Council is fully supportive of the route alignment through the borough, including the principle of the proposed station location at New Cross Gate and Lewisham, ventilation shaft on Lewisham Way, and tunnel portal at the Wearside Council Depot.*
- *Continued engagement will be required with TfL on the detailed design of above-surface structures, and measures to mitigate the impacts of construction on nearby residents and businesses.*
- *The design and construction of Lewisham Station will need to be very closely coordinated with Network Rail to ensure delivery of a high-quality interchange station and to mitigate a highly constrained space for construction logistics.*
- *The Council recognises the risks posed by development pressures at sites along the corridor, and is strongly supportive of efforts to secure statutory safeguarding for the BLE alignment.*

A. Below ground structures

The Council recognises and appreciates efforts to avoid direct impacts on residential buildings at surface level. The Council also notes that tunnelling will occur beneath a large number of residential buildings. Our understanding from officer discussions is that the risk of damage to residential buildings above would be minimal, particularly in light of the proposed Tunnel Boring Machine (TBM) construction methodology. Nevertheless, it will be important to ensure that appropriate monitoring and stakeholder engagement is in place both before and during tunnelling works.

B. New Cross Gate Station

The Council supports the tunnel alignment at New Cross Gate. Our detailed response can be found in section 4A.

C. Lewisham Way Ventilation Shaft

Further to the Council's responses to the 2017 consultation, the Council accept the necessity of a ventilation shaft between New Cross Gate and Lewisham, and supports the principle of this being sited at the location of Big Yellow Storage on Lewisham Way. This is considered preferable to residential properties or green space. As the scheme progresses, it will be important for the Council to have opportunity to consider the design detail of the ventilation shaft in order to minimise its visual impact and ensure that it is aesthetically integrated into the surrounding urban realm.

D. Lewisham Station

The Council supports the alignment of the tunnel routing through Lewisham Station, and proposed location of the station box on Thurston Road. To this end, the Council

has worked with TfL officers to ensure that the pilings for the recently consented redevelopment of the adjacent Lewisham Exchange (formerly Carpetright) site are compatible with tunnelling below.

Coordination with Lewisham Strategic Interchange

The Council, working with TfL officers, has also made provision for a BLE station entrance and ticket hall on the ground floor of the Lewisham Exchange development, ensuring that the station is well integrated into the public realm and providing access to Lewisham Interchange from the northern side of the station. It is important that the station entrance proposal is taken forward and incorporated into station designs.

As previously expressed in its response to the 2017 response, the Council will require that the design and delivery of the BLE station at Lewisham is done in an integrated way with the upgrade of the existing National Rail, DLR and bus services, and to a standard commensurate with the station's Strategic Interchange status.

This work should draw on the vision developed in the 2017 Lewisham Interchange Study jointly commissioned and delivered by Lewisham Council, TfL and Network Rail. The Council considers that this upgrade is a pre-requisite to the opening of the BLE at Lewisham, considering the impact the BLE will have on interchange usage on an already overcrowded station.

Construction

The Council is also conscious of the limited space available for construction adjacent to the station. It will be important that development of the BLE station proposal here is done in close coordination with Network Rail and TfL's DLR sponsorship teams to ensure that both of these critical projects can be constructed concurrently.

E. Wearside Road Council Depot

The Council accepts the principle of using Wearside Council Depot for the tunnel portal and stabling. Please see section 5 for our full response.

4 Preferred construction worksite locations

Summary

- *On balance, the Council supports the proposal to use the New Cross Gate/Hatcham Works site as the project principal worksite.*
- *The Council understands this to be important to the business case for the core BLE scheme to Lewisham and fundamental to the strategic case for a further extension along the Hayes line.*
- *The Council has strong reservations about the use of the alternative worksite proposals at Hither Green and Catford.*

A. New Cross Gate proposal

The council understands that the use of the preferred worksite proposal supports the Council's strategic objective to secure the BLE to Catford, Ladywell and Lower Sydenham. This further extension would be capable of unlocking 4,500 additional homes and generating local economic benefits of approximately £1.7bn which will be fundamental to tackling high levels of deprivation in the south of the borough. The Council also understands that use of this site would reduce the tunnel length and cost relative to other sites, enable spoil removal by rail, and provide access directly to the Transport for London Road Network.

The Council acknowledges that the closure of the Sainsbury's supermarket during construction will impact upon those employed there and on local shopping patterns during the construction period. This would be a temporary closure and we would support the principle of a temporary store being located elsewhere during construction if feasible. The Council accepts that, in the long term, New Cross does need a large grocery store which meets local needs. This could be provided in a future redevelopment of the Hatcham Works site after BLE construction. How this could happen is set out in the draft New Cross Gate SPD.

On balance, the council fully supports the use of the New Cross Gate site as a construction site for the BLE, subject to appropriate mitigation of the amenity impacts during construction. We look forward to working with TfL on this at a later date.

B. Future New Cross Gate Station

The resulting New Cross Gate Station will be a major rail interchange. It is important that this is designed to a high quality standard and that the interaction between the station and local public realm is considered holistically. This includes key desire lines between the New Cross Gate station and Goldsmiths, New Cross Town Centre, Route 1 and New Cross Station.

The Council would also support discussions between TfL and Network Rail to incorporate an additional National Rail platform at a future New Cross Gate station to enable interchange between the Bakerloo Line and semi-fast trains to West Croydon and Gatwick Airport.

C. Alternative proposed site at Catford

The Council understands that this proposal would increase tunnel length construction duration, and project cost relative to the preferred worksite. This would reduce the overall scheme business case for the whole scheme and, at best, delay the realisation of the transport and economic benefits that the BLE would bring.

On a strategic level, if delivered as a standalone scheme, this option would not fulfil the objective of delivering the Bakerloo line to Lower Sydenham, in doing so undermining efforts for housing delivery and regeneration.

Conversely, were a tunnel portal at Catford to subsequently connect to the Hayes Line, the interface would be problematic given that the tunnel portal would be beyond the existing Ladywell and Catford Bridge station. The Council would not support any loss of connectivity at either of these two stations.

Based on the information currently provided, the Council would also have reservations about this site in terms of its environmental impact on the Ravensbourne River, use of Metropolitan Open Land, amenity impact on the town centre, local residents and students of St Dunstan's School. Whilst not necessarily a reason for objection in isolation, there would also be an impact on the future redevelopment of Catford Retail Park.

The Council therefore views this proposal as clearly unfavourable to TfL's preferred option both strategically and in terms of its suitability for construction purposes.

D. Alternative proposed site at Hither Green

The Council understands that this proposal would increase tunnel length construction duration, and project cost relative to the preferred worksite. This would reduce the overall business case for the whole scheme and, at best, delay the realisation of the transport and economic benefits that the BLE would bring.

The resulting tunnel portal at Hither Green does not support the strategic objective of delivering the BLE to Catford and Lower Sydenham and would put at risk the delivery of an estimated 4,500 homes and £1.7bn in local economic benefits.

The Council has concerns around the amenity impacts to local residents of construction traffic and environmental impacts of the loss of a Site of Importance for Nature Conservation and a nature reserve.

The Council therefore has strong reservations about this site as a principal worksite, viewing it as clearly unfavourable to TfL's preferred option.

E. Route safeguarding

The Council is supportive of efforts to secure statutory safeguarding of the land required to deliver the line, and has made representations to government in this respect both directly and through the 'Back the Bakerloo' coalition.

5 Use of Wearside Council Services Depot

Summary

- *The Council accepts the need for Wearside Council Depot to be used during construction, and for train stabling and a tunnel portal once the line is operational.*
- *The Council requests that this stabling is located below surface, to ensure that the site can be re-used once construction work is completed.*
- *We would urge TfL to work together with the Council on the design of sub-surface train stabling to ensure it is compatible with future uses and the continued delivery of the Council's statutory and other services based at the site.*

A. Use for construction

The Wearside site contains the Council's waste collection service, street cleansing, passenger services, animal welfare and other environmental services, as well as the council's salt store and storage for all the vehicles associated with these services and Lewisham Homes' fleet of vans. Therefore it has a particularly critical role in the delivery of Council statutory and other services to the borough's residents and businesses.

Given its current non-residential use and proximity to the Hayes line, the Council accepts that the site is appropriate in principle for use during construction, and supports our objective of seeing the delivery of the further extension to Hayes. The feasibility of using the site is, however, subject to TfL working closely with us moving forward to make appropriate alternative arrangements for delivery of the services currently based at the site during this period.

B. Alternative provision for Council service delivery

The loss of the Wearside Council Depot, either temporarily or permanently, will result in a significant financial impact for the relocation and, potentially, operation of the Council's statutory and other services. It will be important for TfL to work with the Council to ensure that appropriate arrangements are put in place to be able to continue to deliver the statutory and other services currently being delivered from Wearside depot, and that they are affordable and represent value for money.

C. Future uses

The Council would request that TfL provides train stabling underground, recognising the residential nature of the local area and the challenges of finding alternative permanent sites for the services based at Wearside without severe impacts on the cost of delivering Council services.

The Council's strategy for relocating the services contained at Wearside will be heavily influenced by the duration (temporary or permanent) for which the site is required, and the approximate site area which can be returned to the Council post completion. We would request that TfL works to urgently provide clarity on this issue.

6 Further extension to Hayes and Beckenham Junction

Summary

- *The Council strongly supports the further extension to Hayes and Beckenham Junction which will, for a modest additional cost, unlock 4,500 new homes, £1.7bn in local economic benefits, and help tackle high levels of deprivation in the south of the borough.*
- *The Council believes there is a robust case for the extension to Hayes to be delivered as part of the core scheme to achieve logistical and cost synergies and enable earlier realisation of these benefits.*
- *The Council would seek early engagement with TfL on the conversion of stations along the line to ensure that they maximise their connectivity benefits and potential to unlock new homes.*

A. Transport benefits

Ladywell, Catford and Lower Sydenham all suffer (to varying degrees) from infrequent and unreliable rail services to central London, and severe overcrowding at peak times. Their absence from the TfL rail services map also contributes to the perception of them being poorly connected to central London.

These issues mean that the BLE along the Hayes line is essential to provide the transport capacity to accommodate housing growth in the south of the borough and to mitigate the impacts of growth further down the line upon stations in our borough.

More broadly, the LIP articulates that extension to Hayes is necessary to provide a step-change in public transport provision for the south of the borough and would unlock opportunities for a stronger orbital bus network, essential to achieving mode share shift in these more suburban areas.

B. Economic, housing and regeneration benefits

In addition to the transport benefits, the BLE to Hayes underpins the Council's ambitious plans for housing delivery (including affordable housing), employment creation and town centre regeneration in the south of our borough. Additional rail capacity and perceptions of connectivity associated with Underground services would elevate the area's potential for development and regeneration.

- In Catford, the BLE would support ongoing Council-led regeneration efforts which include 3,000 new homes, a transformed town centre and additional civic and employment uses.
- The area around Bell Green/Lower Sydenham is particularly poorly connected, and the BLE may enable a future London Plan Opportunity Area centred around what is currently an out of town centre style retail park. It is estimated that the BLE has the potential to unlock 4,000 additional homes and approximately 23,000sqm of additional employment and town centre uses at the site and surrounding areas. The proposal would create a district centre which includes a significant level of employment space which would support efforts to tackle high levels of deprivation in

wards such as Catford South, Bellingham and Downham, which are identified as future areas in need of regeneration. The location of a station close to the existing Bell Green Retail Park would assist in the delivery of these aspirations (see section C).

C. Station specific opportunities

The Council understands that the details of stations beyond Lewisham will be designed in a future work package. The upgrade of these currently open and permeable stations to Underground standards will require a careful and considered approach. Key issues and opportunities include:

- **Ladywell Station**

Ladywell Station serves as a gateway to the local centre (to the west) and Lewisham Hospital and Ladywell Fields (to the east). While the main station entrance is to the west, there is access from either side with an internal footbridge within the station footprint. The station conversion should provide customers with easy access both from the east and west sides of the station to cater for these user groups.

- **Catford Bridge**

This station currently functions as a gateway station to Catford town centre, as an interchange with Catford (Thameslink) station and a transport link for the adjacent Catford Green development. Its multiple entrances and absence of a gateline mean it is a permeable and accessible station. Care will need to be taken when converting the station to London Underground operation to ensure that these functions are incorporated. Given the location of the station within the Catford Town Centre Masterplan, we would welcome early engagement on plans for the station as they are developed.

- **Lower Sydenham**

The current station location is within an industrial area with a new residential development to the eastern side. The station does not, however, serve the nearby community or planned growth centred on Bell Green (500m to the north).

The Council's draft Rail Vision (2019) sees the station being moved towards Southend Lane, where it would act as an interchange hub and better serve the existing community and future development. The Council would also support the provision of an additional station at Bell Green as an alternative. Given the improved performance of Underground trains in terms of dwell times and acceleration/deceleration, we expect that this could be achieved without increasing journeys times compared to today. The Council would seek to work with TfL to develop plans for this in more detail, linked to masterplanned growth and regeneration plans for the area.

The rail bridge over Southend Lane has height and width restrictions at which restricts local bus services to single-deck buses and generates a congestion bottleneck. This may impact deliverability of the vision Lower Sydenham as a local transport hub. The Council would also ask TfL to review the feasibility of addressing these issues as part of scheme development.