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Dear Sir/Madam,

TRANSPORT FOR LONDON / NETWORK RAIL CONSULTATION ON CROSSRAIL 2 – LONDON COUNCILS' RESPONSE

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

Our response to the Transport for London/Network Rail consultation on Crossrail 2 has been developed following consultation with London boroughs. It is divided into the following sections:

- The case for Crossrail 2
- The proposed routes
- Accessibility at stations
- Links to aviation
- Links to regeneration
- Freedom Pass cost implications
- HS2 and construction works

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- Funding
- Annex A Proposed routes: specific concerns

Crossrail 2 is at initial stages and more work will need to to be done to secure funding and design a scheme that maximises benefits across London. We are looking forward to cooperating with you.

Yours faithfully,

Cllr Catherine West

Chair of the London Councils Transport and Environment Committee



TfL/Network Rail consultation on Crossrail 2 London Councils' response

The case for Crossrail 2

- London Councils welcomes the joint consultation on Transport for London (TfL) and Network Rail's options for Crossrail 2. We have always supported the development of the safeguarded Chelsea-Hackney line, now Crossrail 2. We see this as a necessary transport infrastructure project to support London's population growth and economic development.
- 2. London's population grew by more than one million people between the censuses in 2001 and 2011 and is projected to increase again to nine million by 2021, and almost 10 million by 2031. This scale of growth cannot be accommodated on the existing transport network even with the delivery of Crossrail, Thameslink upgrades and Underground improvements. As highlighted in the Mayor's Transport 2020 vision, there is a need for a long term strategy to support growth in London and Crossrail 2 should be a key part of it.
- 3. London Councils is supportive of Crossrail 2 because it is a large scale intervention which adds capacity across the network, relieves pressure on key lines and supports growth and regeneration along several corridors. In particular, this new line will significantly reduce overcrowding levels on Victoria, Northern and Piccadilly Lines and suburban rail services. We also welcome the change in route to mitigate future passenger growth at Euston generated by High Speed 2.
- 4. London Councils recognises the significant, positive economic benefits an infrastructure project of this scale will have for London, if planned well. As with Crossrail, there will be capacity and connectivity benefits for the whole of London when Crossrail 2 is delivered. However, work will need to be undertaken to make sure that those London boroughs which only receive indirect benefits are engaged throughout the project. For example, Crossrail did not proceed on the original basis but was successful when it resurfaced as a broader scheme meeting many criteria, and achieving consensus across London. A pan-London consensus should be the aim in moving forward with Crossrail 2.
- 5. At this initial stage, we would like to emphasise the importance of linking large infrastructure projects to opportunities for skills development and employment. Crossrail 2 will offer those Londoners currently working or being trained by Crossrail the opportunity to continue using and developing their expertise in another major transport infrastructure project. As with Crossrail, Crossrail 2 should prioritise



employing and training the local workforce and sponsor apprenticeships during the various phases of the project planning and development. The procurement process should also create opportunities for London-based contractors and sub-contractors.

The proposed routes

- 6. Of the two options defined in the current consultation, London Councils considers that the Regional option offers greater potential for increased connectivity, higher capacity and additional journey time savings over the Metro option.
- 7. While we recognise that the Metro option might be cheaper, have a higher frequency and operate as a separate line, the Regional option has higher capacity and therefore not only warrants greater support but is able to reduce overcrowding levels for a longer period than the Metro option, until further capacity will be required. Once built, the Metro option could not be upgraded to allow for larger or longer trains and it is unlikely that the proposed frequency could be increased beyond that proposed given likely station dwell times. Further advances in signalling technology could result in increased frequencies for the Regional option, which makes this option more 'future proof'.
- 8. The Regional option will provide more frequent, faster journeys at many suburban rail stations in London which currently have an infrequent service. It also frees up capacity at Waterloo, which in turn allows for more fast services to run from outside London where high growth passenger volumes are predicted.
- 9. However, councils in East London are disappointed that a request to TfL to include in the consultation the option of an eastern branch as a 'spur' off the main Crossrail 2 line (via Hackney Wick station, then Stratford International, Barking, London Riverside, including Dagenham Dock and Beam Park, and then to Grays stations eastwards) was not acceded to. Previous studies from TfL suggested that the eastern option would have 5 per cent more benefits and would carry 10 per cent more passengers than the others. While stating that the eastern option would be 15 per cent more expensive in total cost, no detailed cost information was provided. In the interests of transparency, such detailed information would be welcomed.
- 10. The two proposed alignments for Crossrail 2 no longer serve the Central Line and the overground rail routes in East London, where overcrowding levels are expected to be among the highest by 2031. A Crossrail 2 eastern branch would relieve these overcrowding levels and also offer a direct link to regeneration and growth areas in east London such as Stratford, the Fish Island area (located in the Olympic Legacy fringe) and the Thames Gateway. These areas are projected in councils' local plans and in the London Plan to accommodate the highest population growth and among the highest employment growth.
- 11. In previous assessments, TfL had estimated that the eastern branch could be the catalyst for over 50 per cent of the population growth and over 70 per cent of employment growth resulting from all the options taken together. In view of that, TfL should undertake further work on both long term capacity improvements on the Central Line and a possible Crossrail 2 branch to Stratford and the London Thames Gateway. This option should be included in the feasibility study for which the Mayor of London has received funding from the Chancellor, as announced in the 2013 Spending Round.
- 12. Also, councils in South East London are concerned that none of the large transport infrastructure investments are taking place in their area. While recognising that the routes proposed for Crossrail 2 specifically review the safeguarded Chelsea-Hackney route, these councils would like TfL to deliver an investment programme for those areas with poorer connectivity in South East London.

13. Finally, London Councils is reserving its position in respect of any future consultations and impact assessments on particular stations or infrastructure locations for Crossrail 2, while details surrounding costs, benefits, impacts and funding are undeveloped. Nonetheless, some local concerns on the proposed routes are included in **Annex A**.

Accessibility at the stations

- 14. Crossrail 2 is at too early a stage of development to apply fully the lessons learnt from Crossrail. However, the Crossrail Interboroughs Group has developed a document about lessons learnt which has also been submitted to this consultation. One of the issues raised in their report concerns accessibility.
- 15. On several occasions, London Councils has expressed its disappointment that only 29 out of 37 Crossrail stations will have step-free access from street level to platforms in both directions. While recognising the difficulties and additional costs that step-free stations create, London Councils would like to see all Crossrail 2 stations to be fully accessible, including existing stations currently serving other lines. The Mayor of London should guarantee that Crossrail 2 proposals will not be reduced in scope though 'value engineering' as occurred with Crossrail, impacting on the number of fully accessible stations.
- 16. Further, stations should be designed to be 'future proof' to handle expected future pedestrian flows in station walkways and platforms. 'Future proof' in this sense is different to that currently used in the Crossrail Interboroughs 'lessons learnt paper' in which the term relates to allowing passive provision for such features, for example as a result of value engineering.

Links to aviation

- 17. London boroughs are concerned that the current consultation on Crossrail 2 does not seem to take into consideration the current debate about aviation capacity in London.
- 18. For example, the three options for airport expansion currently proposed by the Mayor to the Airports Commission (Isle of Grain, outer Thames Estuary and Stansted) include direct rail links and airport express rail services between these airports and central London. These options foresee changes to the current transport network, in particular, Crossrail, Crossrail 2 and High Speed rail, and also have the potential to bring significant transport and economic benefits for key regeneration areas such as London Riverside, in Havering and Barking and Dagenham.
- 19. On the other side of London, if Gatwick is to be expanded, Crossrail 2 could eventually deliver a much improved surface access link to this airport. And if Heathrow Airport is to be maintained, Crossrail 2 proposals will have to tie in with any successor scheme to Airtrack and Airtrack-Lite and other transport links to Heathrow.
- 20. Therefore, Crossrail 2 plans should be considered within an integrated transport strategy that also takes into account aviation. The Crossrail 2 Regional option should be assessed with regards to the options for expanding aviation capacity considered by the Airports Commission in December 2013 and with the chosen option recommended in May 2015.

Links to regeneration

- 21. The Crossrail 2 Regional Option will provide a vital rail link for areas which currently have limited public transport connectivity. In particular, the line has the potential to support regeneration plans and improve access to employment opportunities.
- 22. While capacity and frequency improvements underpin the overall business case, Crossrail 2 should be developed with full regard to the opportunities it provides for regeneration and public realm improvements in the areas adjoining stations along the route. The funding programme for station improvements and public realm enhancements linked to Crossrail 2 should be built into the scheme from an early stage rather than added to it, as appears to be the case with Crossrail, otherwise there is a risk that the funds allocated will be insufficient. These funds should be safeguarded to avoid any loss as a result of any 'value engineering' of the scheme undertaken at a later stage.
- 23. In North London, one of the major drivers for the branch via Tottenham Hale and along the Upper Lee Valley is the regeneration and growth potential that this will unlock. The Upper Lee Valley Opportunity Area Planning Framework (OAPF) estimates that, with suitable infrastructure, by 2031 there could be at least 15,700 new homes and 15,000 new jobs in the largest opportunity area in London. Currently this growth is limited by gaps in the transport network, including low service frequencies at the key sites of Northumberland Park and Meridian Water.The Crossrail 2 Regional Option and the four tracking of the Lea Valley mainline, which is required for the branch along the Upper Lee Valley, will hopefully address these issues. Also, in Camden, Crossrail 2 will boost the local economy, especially the London Plan Areas of Intensification at Euston, Tottenham Court Road and Holborn.
- 24. In South London, the Crossrail 2 Regional Option offers a potential for improved connectivity and regeneration opportunities linked to the aspirations for the tram (Sutton to Wimbledon) and increased service frequencies on the Wimbledon Loop.
- 25. To optimise regeneration benefits, it will be important to have close borough involvement in the detailed planning stages of the route. Crossrail 2 planning proposals should take into account boroughs' views as they are best placed to understand and explain local circumstances, for example with regard to the development and design of station facilities and enhancements.

Freedom Pass cost implications

- 26. The Freedom Pass is London's concessionary travel scheme, the costs of which are met by London boroughs. These costs will already increase as a result of Crossrail as the Freedom Pass will have to be offered for the first time on trains using the Heathrow Express/Connect route into Heathrow Airport and beyond London to Shenfield/ Maidenhead.
- 27. The Regional option for Crossrail 2 will also have Freedom Pass cost implications for the boroughs as stations which are currently outside the Freedom Pass boundary, such as Shepperton or Epsom, will be included.
- 28. These new service routes and the West Anglia route, recently announced to be devolved to the Mayor of London, will have major implications on boroughs' budgets. Boroughs will need some protection against increased costs for Freedom Pass especially in relation to concession on services which go outside Greater London.

HS2 and construction works

- 29. It is important that Crossrail 2 is developed alongside any HS2 proposals to ensure that London's infrastructure can support predicted passenger numbers. Should HS2 proceed, the joint work programme for HS2 and Crossrail 2 at Euston will need to be coordinated to minimise the impacts of construction works. If the projects are not constructed in the same timeframe then passive provision should be made such that works can be fitted together reciprocally.
- 30. Also, communications and utility diversion works should be explicitly taken into account in developing work programmes, and the need to account for utility diversions should be explicitly stated at the Bill stage. Urban realm improvements to enable access/egress to station should also be explicitly part of the programme and included at the Bill stage.

Funding

- 31. London Councils welcomes the £2 million in funding for the Mayor of London, announced in the 2013 Spending Round, to undertake a Crossrail 2 feasibility study. This demonstrates the government's continued commitment to investment in large scale transport infrastructure projects in London. This study should identify potential options for the funding and financing of Crossrail 2 with at least 50 per cent of the overall costs coming from the private sector. This is likely to lead to a strong focus on the development opportunities and regeneration benefits that Crossrail 2 could potentially deliver.
- 32. Private sector financing will have to be matched by substantial tax-payers' funding. Given the significant benefits arising from the full regional scheme (i.e. including branches in the south-west and north-east) it is imperative that all local authorities benefitting from Crossrail 2, particularly where this benefit is direct, contribute to the funding of the final scheme, in particular authorities on the routes outside London. London Councils would welcome initial discussions with the Mayor and TfL on possible funding schemes, in particular revisiting any arrangements for the use of a Community Infrastructure Levy. Other financial mechanisms such as Tax Increment Financing and Bonds should also be considered.
- 33. Finally, it is important that the funding boroughs receive from TfL for programmes, such as Local Improvement Plans (LIPs), is maintained and not compromised by any changes in TfL's overall funding. Funds should not be diverted away from these areas to support Crossrail 2.

Annex A - Proposed routes: specific concerns

- 34. London Councils recognise that this is the first stage of a long process and there will be more development and design work before the route, service patterns, stations, vent locations, depots etc for Crossrail 2 are finalised. However, a number of councils have already raised concerns regarding the impact for their area. These should be addressed at the early stages of project design:
 - a. Enfield welcomes the proposed route for the regional option as it runs alongside the Lee Valley corridor and could provide the additional transport necessary to serve the new Meridian Business Park, designed to generate significant economic growth in the Upper Lee Valley. However, they are concerned that there are no stops at the business park shown on the proposed route and consider the distance between Tottenham Hale and Cheshunt is too far. They would welcome further discussions with TfL on locations for stations within their borough.
 - b. Hammersmith and Fulham's view is that the line should be routed between Clapham Junction and King's Road Chelsea via Imperial Wharf, with an interchange with the West London Line there. This will both facilitate regeneration in the South Fulham Riverside area and help relieve pressure on interchange facilities at Clapham Junction. Interchange with the West London line will take on greater importance as and when the West London line is connected into the Old Oak Common HS2/Crossrail station, which is the aspiration of boroughs and TfL.
 - c. Hackney would like to seek assurances that the stations at Dalston Junction and Hackney Central will be core stations and that they will be delivered as early as possible. Interchange arrangements at these two stations should be improved.
 - d. Islington does not support the loss of a Crossrail Interchange at Essex Road, as included in the original Chelsea-Hackney Line proposals and believes that the regeneration case could be improved by serving City Road, Old Street and Finsbury Park.
 - e. Kingston-upon-Thames and other boroughs in south-west London are concerned about the ability of Clapham Junction to cope with the volume of passengers Crossrail 2 will generate. Given the scale of the regional option, it is important that TfL analyses the impact on the National Rail network and rail strategies outside London. Further, the council has an additional concern regarding the capacity and service planning levels and frequencies at Surbiton, where it is currently difficult to board a train during the morning peak period.
 - f. Richmond is concerned that any new scheme does not lead to any more "down time" at level crossings in the borough. During the development of the Airtrack and Airtrack-Lite, before it was abandoned, this issue was always a contentious one. Wandsworth has begun investigating a successor scheme to the Airtrack proposals and again Richmond has emphasised the issue of no more down time at level crossings. Wandsworth has also acknowledged Richmond's concerns in taking forward its current review. It is very important that the new station at Twickenham is able to cater for any Crossrail 2 scheme and work must be done with the developers of the new station to that end.
 - g. Wandsworth would like to seek assurances that a future extension of the Northern Line to Clapham Junction is accommodated in any detailed plans for Crossrail 2 serving Clapham Junction in order to avoid as far as is possible major construction again in the future. Passive provision for a further extension of the Northern Line could significantly reduce costs of a further extension between Battersea Power Station and Clapham Junction. Indeed, TfL should provide evidence that supports the proposed Crossrail 2 route between Clapham Junction and Victoria serving Chelsea, rather than the Opportunity Area.