

**TRANSPORT AND WORKS ACT 1992
TOWN AND COUNTRY PLANNING ACT 1990**

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

**PROPOSED LONDON UNDERGROUND
(NORTHERN LINE EXTENSION) ORDER**

TRANSPORT FOR LONDON'S REBUTTAL

OF

THE EVIDENCE OF CHARLES ALLEN (OBJ103)

ON

**THE NEED FOR THE NLE, TRANSPORT IMPACTS, NOISE AND VIBRATION
AND THE DRAFT ORDER**

December 2013

1. INTRODUCTION

- 1.1.1 This rebuttal proof of evidence has been prepared on behalf of Transport for London to address Mr Allen's Proof of Evidence on the following matters: transport impacts, noise and vibration and the draft order.
- 1.1.2 It is not intended that this rebuttal should address further points that witnesses for TfL have previously covered in their evidence; however, cross-references to relevant paragraphs of those witnesses' proofs of evidence will be made where appropriate.
- 1.1.3 It is intended that this rebuttal should be a composite response to those issues raised by Mr Allen and set out above. In this respect, for cross-examination purposes the name of the TfL witness who is responsible for each aspect of this rebuttal proof will be given at the beginning of each section below.
- 1.1.4 This rebuttal is organised into themes and sub-themes (numbered and shown in bold font) related to noise and settlement. In each section, the objector's point is summarised in plain font, with any quotations shown in italics. This is followed by TfL's response in bold font, preceded by the name of the witness making that part of the rebuttal. Within each sub-theme, there may be several points, each of which is dealt with separately in turn, and with the witness identified as described.

2. NLE need, modal alternatives and alignment issues

2.1 *Depth of the step-plate junction works*

2.1.1 Mr Allen states (in Section 2 - 4th paragraph) that based on a simple measurement using the plan scale, at the point the step-plate junction connects with the Kennington Loop, the depth is around 13m and that this is far short of the 20-25m stated elsewhere in the NLE proposal.

Expert witness: Jonathan Gammon

2.1.2 **The Northern Line Extension connects to the existing Kennington Loop at an approximate depth of 14m, as the Objector correctly identifies, and this is shown on the Deposited Sections [NLE/A14/1] and thus TfL has been clear about the depth of the step-plate junction works.**

3. OTHER TRANSPORT IMPACTS

3.1 Train frequency on the Kennington Loop

3.1.1 In Section 1 of his evidence, Mr Allen sets out that he believes that the proposed NLE makes use of a substantial section of the Kennington Loop. In his conclusion, Mr Allen claims that should the NLE go ahead as currently outlined, a substantial section of the Kennington Loop will see increased train numbers.

Expert witness: *Richard de Cani*

3.1.2 **Mr Allen is incorrect in his statement that the NLE trains will use a substantial section of the Kennington Loop – with the NLE the number of trains using the entire loop would actually be reduced as most trains would be routed along the NLE (see Figure C5 in Appendix C in the Economic and Business Case [NLE/D1]). Only a small section of the Loop would be used by trains destined for/originating from Battersea. This is shown in Figures 21 and 27 in Appendix 2 of Mr Gammon’s Proof of Evidence [TFL2/B].**

3.1.3 **In addition, the NLE will not increase the frequency of trains on the Loop or the Northern line more generally. Rather, the frequency of trains on the Northern line will increase due to Northern line Upgrade 2 as described in paragraph 3.4.5 of my Proof of Evidence [TFL1/A]. This upgrade is scheduled to be complete by 2022 and would allow up to 33 trains per hour to run on the Bank branch and 30 on the Charing Cross branch.**

3.1.4 **This upgrade is independent of the NLE.**

4. OPERATIONAL AND CONSTRUCTION NOISE AND VIBRATION

4.1 *Kennington Loop*

4.1.1 Utilising the Kennington Loop as planned without resolving existing problems and making further improvements is likely to cause increased disturbance to the 400 people who live and work above this section of track.

Expert witness: Rupert Thornely-Taylor

4.1.2 **As a consequence of the NLE many fewer trains will use the Kennington Loop than is the case at present. Those that do will cause no greater noise or vibration than do trains using the Loop at present. There will therefore be no increased disturbance.**

5. THE DRAFT ORDER

5.1 *Kennington loop and noise and vibration*

5.1.1 The objector, in the final line of his Proof of Evidence, seeks commitments that:

- i. existing problems with the Kennington Loop are resolved;
- ii. track improvements are made to the Kennington Loop to ensure that the increased number of trains and train loading does not cause an increase in noise and vibration; and
- iii. monitoring of the noise and vibration of the Kennington Loop is established and binding commitments are made to resolve any increase in noise/vibration.

Expert witness: Richard de Cani

5.1.2 **As already stated in this rebuttal, the NLE will result in fewer trains using the Kennington loop. As stated in TFL53 it is not therefore necessary in order to mitigate the impacts of the NLE scheme to require works to the trackform of the loop.**

5.1.3 **TfL is also currently considering an additional draft planning condition to ensure that groundborne noise on the stretch of track between Kennington station and the step plate junctions will be no worse with the NLE than the position without it. Such a planning condition is in the process of being discussed with the local authorities and would be likely to include an appropriate monitoring regime.**