

IN THE MATTER OF THE CROXLEY RAIL LINK TRANSPORT AND WORKS ORDER

CLOSING SPEECH ON BEHALF OF THE PROMOTERS

1. This is a scheme with very clear transport and regeneration benefits and overall low negative environmental impacts.

Development Plan and other policy support

2. Mr. Adams' proof sets out the relevant DP policies in detail. The DP policies giving specific support to the CRL are;

- a. Three Rivers DC Core Strategy adopted October 2011 policy S7

- b. Watford DC District Plan 2000 policy T16 and T20 (showing the longevity of support of the project)

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- c. Watford draft Core Strategy policy T1

3. There is general support for the provision of improvements to the provision of sustainable transport in the NPPF paras 29 and 30;

4. There is strong support through national, regional and local policy for schemes that support economic regeneration in a sustainable manner.

- a. RSS identifies Watford as a key centre for development;

- b. Watford Core Strategy Strategic Objective 3- employment growth in Watford

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- c. Ditto – special policy areas at

- i. Ascot Road station

- ii. WatfordHospital

- iii. Watford High st

- iv. Watford Junction

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Transport Case

5. It is easy to see that Watford, particularly West Watford has a significant existing problem with the ease of movement west to east, whether by public transport or private car. A number of local residents have themselves confirmed this in their evidence to the inquiry. There is considerable traffic congestion and no west-east rail connection. Obviously the traffic congestion also has the effect of slowing up existing bus services and making them less reliable. The benefit of the CRL is that it introduces easy and quick public transport connection across the area, much improving access to jobs and services and to interconnections at Watford Junction.
6. This will allow existing local residents to take up employment opportunities not just across Watford but further afield, either by travelling on the Met Line or by interconnecting at Watford Junction. It will allow existing employers and new employers at the regeneration sites to attract employees much more easily from a wider area; and it will much improve access to existing services, such as the retailing at Watford town centre thus allowing those services to compete more effectively with other centres. There is a real benefit to people across north west London who will now be able to gain easy access to jobs and opportunities in Watford, as well as Watford residents gaining access to stations down the Met Line.
7. The ability to provide a station close to Watford Hospital is particularly important. The hospital serves a wide area and is also a very major local employer, with 2500 staff. Mr Dobrashian explained how important the CRL scheme was for the hospital and its redevelopment proposals. The CRL will greatly assist patients, visitors and staff.
8. SH's evidence is that CRL will result in a forecast net increase in Met Line annual trips by 2016 of 730,000.
9. Watford is an area which has underperformed economically in recent years, and CRL will make a contribution to reversing this trend. RG's evidence makes quite clear that CRL, particularly the two new stations, primarily serves an area which has relatively high social deprivation and low car ownership. Enhanced transport opportunities are an important way of seeking to assist with the problem of social deprivation.

10. So the scheme has a strong transport and business case, which is ultimately why HCC is prepared to invest both money and considerable officer resources into bringing it forward. As SH has explained it has a strong business case, with a BCR of 2.61 which comfortably falls into the “high” category in DfT rating. This business case has been sensitivity tested against a number of variables, and the central case remains the best option.

Closure of Watford Met

11. The main disadvantage of the scheme raised by objectors is the closure of Watford Met. One can see that for a resident who currently lives close to the Met station and commutes into London, or in that direction, the closure will be a personal inconvenience. However, that inconvenience is massively outweighed by the much larger number of people who will now be served by the new line. It should be stressed that existing users of the station will not be deprived of access to the Met Line. They will have the choice of walking any additional distance to Ascot Road or one of the other CRL stations (a maximum additional time of 15 minutes). Many existing users actually live closer to the new stations than to Watford Met, such as people who live near the football stadium and currently walk to Watford Met.

12. There will be a small group of passengers who currently use Watford Met and whose nearest CRL station will now involve a higher fare zone, i.e. those who live closest to Watford Junction or Watford High St. If these passengers are unwilling to pay the higher fare they will have the choice of walking to Watford Hospital or Ascot Road stations, which will be in the same fare zone as Watford Met.

13. Much emphasis by objectors is put on the impact on the Grammar School for boys but (a) there is no reason the pupils cannot walk an extra roughly 8 minutes; (b) HCC will do appropriate work to ensure the route is safe; (c) the School itself has not objected and (d) the extra distance is clearly offset by the benefits, for example, to the Girls Grammar School and users of the Hospital, both of which will now have the advantage of easy access to the Met Line.

14. In terms of keeping Watford Met open the following points can be made;

a. Every option for keeping the Met station open results in a materially lower BCR, and therefore a poor use of public funds;

b. The DfT have made clear that if there is any requirement to keep the Met station open then the business case and funding will have to be revisited. Therefore this would lead to considerable delay and could lead to cancellation of the project. Any option which results in a BCR of less than 2 is very unlikely to gain DfT funding.

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c. The Met station is already lightly used with about 2500 passengers per weekday. If CRL is built then a high proportion of existing users will transfer to the new stations in any event, so the level of usage will become extremely low. It is a very poor use of public funds to keep open a station for such a low number of passengers, particularly when those passengers have an easily accessible alternative station.

d. There is a considerable operational cost in keeping the Met station open, especially in terms of staff costs.

e. Even for the small number of "losers" in SH's table, their maximum additional walk time is 15 minutes. There was a slight inconsistency about some of the objectors' evidence on walk times to Ascot Road, as opposed to walk time to the town centre. It is undoubtedly the case that the newly served station at Watford High St will be much closer to the retail heart of the town centre.

f. The new areas served by the CRL are more densely populated ; are more socially deprived and have lower car ownership. Therefore the overall public interest in serving these areas rather than keeping Watford Met open is clear.

g. Objectors have argued that LUL could simply send the 4tph post Upgrade trains to Watford Met (i.e. the 10tph minus the 6 that will go to Watford Junction). But

i. For all the reasons set out above there is simply no transport case for doing so, and it would be a very poor use of public funds.

ii. KF has explained the operational problems of sending these trains to Watford Met i.e.

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1. The disadvantages of having to manage the Met Line with an additional terminus station, on what is already a very complicated Line;

2. Insufficient time to reverse trains at Watford Met and have sufficient recovery time to ensure that the delays that occur to the overall timetable on the Met Line are minimised;

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3. The far greater disbenefits which could flow across the Met Line, and all its interlinked lines (Circle, District, Chilterns etc) from jeopardising the smooth running of the LUL operation of the Line. Ultimately it has to be remembered that the number of people using the Met Line through Finchley Road (let alone all the users of the interlinked lines) massively outweigh the number of people who would continue to use the service at Watford Met.

4. Therefore from LUL's operational perspective it is far preferable to reverse the 4tph at another location, possibly Rickmansworth, both in terms of operational performance and overall passenger benefit.

5. Mr. Fish and Cllr Derbyshire put a great deal of effort into attacking the possibility of reversing trains at Rickmansworth. LUL have made no decision about where to reverse the 4tph, and will make that decision on the basis of optimal service efficiency and customer benefits to the entire line. It is not a matter for this inquiry. What is clear for this inquiry is that there is simply no transport case for keeping Watford Met open, and any requirement to do so would seriously jeopardise the scheme.

6. If the trains did reverse at Rickmansworth the public benefit would undoubtedly be greater than at Watford Met because of the higher number of users. This benefit is a matter not covered in the BCR for the CRL, but would obviously be a consideration for LUL.

15. The London Travelwatch report recommended a number of courses of action. On buses and pedestrian links these are matters HCC has clearly in mind, and is taking action upon. The urban realm study is being undertaken and appropriate improvements will be put in place. On buses there will be full consideration of appropriate bus routes with the CRL closer to the opening of the railway.

16. As is set out above there is simply no transport case for trialling a split service. The split that LTW were proposing, i.e. 4 to Watford Jcn and 2 to Watford Met would actually disadvantage the majority of passengers because those on the CRL would lose 2 tph. As Mr. Foley (7.3.9)

explained the comparison with the reduction in service off peak in Winter 2011 is not valid, because the Watford Met passengers whose service was reduced had little choice but to wait for the next train, whereas with the CRL they would have the choice of walking to a new station. Mr. Hunter also explained (7.3.6) that the BCR of a split 4/2 service would be 1.68, i.e. below the high category and poor value for money.

17. Mr. Leibling's position was clear at the inquiry, LTW was totally in support of the scheme, and if trialling the split service placed the scheme in jeopardy, they would support the Order scheme, and not a trial.

Regeneration Benefits

18. These can be divided into two parts. Firstly, there are the overall increased opportunities for journeys into and out of the parts of Watford served, which will help the relatively deprived areas which have been economically underperforming.
19. Secondly, and more specifically the CRL has an important role in assisting the regeneration of sites along the route. MA has set out the special policy areas in the Watford, and for these areas having a quality public transport route which improves accessibility right across the area will be a huge boost to the future viability of these regeneration areas. Mr Dobrashian referred to the Watford Hospital scheme, which is not just to provide a new health campus, but also about 600 new dwellings. This is an exceptionally important scheme for Watford.

Site specific issues

20. MM explained the need to build the viaduct from the existing Croxley viaduct across the Watford Road, canal and River Gade to join into the disused Croxley Green line at the new Ascot Road station. The configuration of this viaduct is closely constrained by the fixed points at either end, the need to rise a number of metres between those two fixed points and the need to provide sufficient clearance across the two roads.

Croxley Cars and Mrs. Field

21. The viaduct has to cross Mrs. Field's land in order to avoid the cottages to the north and to provide a more acceptable curve on the line than was the case with the previous alignment. The

current alignment is clearly preferable both because it avoids the cottages and because the alignment much reduces any potential for wheel squeal. Both Mrs. Field and Croxley Cars will be compensated in accordance with the statutory compensation provisions.

Mr Cinnamond

22. Similarly some impact on Mr.Cinnamond's land is inevitable given the fixed points of the scheme. MM explained the need to keep the piers at equal spacing, both for the appearance of the viaduct but also to ensure that we do not need to provide expansion joints across the length of the viaduct. It is particularly important not to have a design which means there have to be expansion joints over the A412 with the maintenance and health and safety concerns that would arise.

23. The project has gone to some lengths to reprovide Mr.Cinnamond with an acceptable (and indeed improved) access off the roundabout. This has been subject to a safety audit by HCC and they do of course have a duty to ensure highway safety. It is notable that the number of vehicles, and particularly HGVs using Mr. Cinnamond's access is very low. The impact on the land itself has been minimised and we do not see any reason why Mr.Cinnamond's business cannot continue during the works.

Playground and Sea Cadets

24. There will be an impact on the Watford Road playground and on the Sea Cadets/Morris Minors. The main impact will be during the construction phase when the playground will be out of use. However once the viaduct is constructed the only actual land which cannot be used will be the foot of the piers. The Promoter is required to provide a full reinstatement scheme which will include landscaping the playground and reproviding the play equipment.

25. In respect of the Sea cadets/Morris Minors a scheme has been agreed which ensures no reduction in car parking space during construction and a completely safe method of entry and exit for construction vehicles. It has also been agreed to limit the time of noisy working to try to ensure that the piling will take place in July and August, unless there is an overrun on the works. Only a very small area of land will be purchased from the Sea Cadets. In respect of the POS there

is potential to improve the current layout in the final scheme. If there is any impact on the value of their land by reason of the scheme then this would again be compensated.

Cassio Wharf

26. The viaduct passes over Cassio Wharf and there will be an impact on Mr. McDonald's business at the Wharf. This is simply unavoidable. The project has explored mitigation both during construction – in terms of moving boats into the marina immediately to the north, or doubling up boats. Mr. McDonald would like to extend the wharf to the south and the promoters are happy to talk to Three Rivers DC about this. However, the land is in the Green Belt and there would be considerable impact on the landscape by extending the moorings. There is therefore considerable doubt over whether this would be an acceptable solution.
27. We do appreciate that none of the other options are ideal, but given that there is an inevitable impact, we have sought to explore all possible options which might be acceptable for a short period.
28. On permanent impacts there will be shading over one additional boat and there will be some impact in terms of noise. If these impacts diminish the value of Mr. McDonald's business then this will be compensatable. The existing bridge is not within the limits of the Order, and we have no powers over it in the Order, and it is not required to be removed for the project.
29. Individual boat owners, who do not have any interest in the land, will be not eligible for compensation save for disturbance compensation. This is in accordance with the statutory compensation scheme and has been the case on all CPOs which effect canal house boat owners.
30. The impact of the scheme on the freeholder and leaseholders at Holm Oak Park will be minimal. This will be an emergency access only, which will be used incredibly infrequently. The gate will be locked and only be activated in the case of an emergency by LUL staff. It is very difficult to see why it should have any negative impact on the value of the Estate or the amenity of local residents. The alternative locations suggested by Mr. Etherington are clearly not preferable.

Tolpits Lane would involve people who are by definition being evacuated during an emergency having to walk another 200m along the embankment, as well as additional tree clearance. There is no public benefit in this. The other proposals involve evacuation routes through people's gardens, which is a far greater inconvenience to them than is the route through Holm Oak Park; or taking public open space land at Harwood Recreation Ground.

31. The amenity objection has no objective basis, given that Holm Oak Park is over 200m from the station.
32. The area of land taken at the Harwood Recreation Ground is both small and mostly not in any current active use. The small area of landtake at the Holywell Allotments does not require the loss of any allotment plots.
33. Laurence Haines School has now withdrawn its objection. It should be recorded that this is on the basis that an acceptable solution will be drawn up for traffic management on Vicarage Road. An agreement has been reached to provide an environmental screen along the line of the railway in order to minimise any disturbance and distraction to the children whether by reason of noise or visual disturbance.
34. Sanctuary Housing Association was concerned about the noise and visual impact on 42-44 Stripling Way. The promoters have agreed to provide a screen between these houses and the railway. All along the railway line LUL has applied its Noise Design Guidance and identified those locations where there will be an increase of 5dba or more.
35. The Neal street residents do appear to have a genuine problem with existing noise from the London Overground service. However, there is no reason to believe that this will be exacerbated by the CRL. The CRL track joins the Network Rail DC lines on a virtually straight section of track, and the problems with wheel squeal from the tight gradient on the DC lines will not be replicated on the CRL. The ES assessed noise at Neal St and found that the increase in the Laeq would be very slight. Even assuming that the current problems mean that the background noise levels have gone up this does not mean that there would be any increase in the difference

caused by the CRL. Indeed as Mr. Reid said, it might well be the case that the difference would fall because of the higher background.

36. Mr. Morris referred to the very slight squeal close to the Watford High St station, but this is not of the same type or scale as that further south, and can be entirely mitigated by appropriate maintenance of the track. The way forward for the Neal st residents is to open a dialogue with Network Rail about the current problems.

37. Mr. Tremayne and Councillor Giles- Medhurst referred to noise close to Watford Junction but again this has been measured and the increase caused by the CRL is minimal. This is unsurprising given the trains on the WCML and the numerous other noise sources in the area. It is simply unrealistic to suggest that noise barriers should be placed along the route even when the predicted noise impacts are less than plus 5dba, as the benefits would be so small and the costs quickly become prohibitive.

Conclusion

38. The transport and regeneration benefits of the scheme are manifest. The project team have gone to great lengths to listen to objectors' concerns along the route and mitigate them wherever reasonably possible. Overall the disbenefits are very slight. We strongly commend the Order to you and the Secretary of State.

NATHALIE LIEVEN

LANDMARK CHAMBERS

18 OCTOBER 2012