



R0121

Network Rail



Via email:
planningpolicyconsultations@cityoflondon.gov.uk

06 June 2024

Dear Planning,

NETWORK RAIL RESPONSE TO CITY OF LONDON LOCAL PLAN CONSULTATION (REGULATION 19)

Thank you for providing Network Rail the opportunity to make comment on the Regulation 19 version of the City of London Local Plan. This response should also be read with the submission by DP9 on behalf of Network Rail (Eastern, Anglia route) and should all be treated as one response from Network Rail covering the various areas outlined within the representations.

It is important that opportunities to promote the use of the railway as a more sustainable modes of transport are identified and taken forward. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Network Rail's comments are set out below in relation to the soundness of the Regulation 19 version of the Local Plan within areas of relevance. For this, Network Rail have

considered the main points of soundness as required through the National Planning Policy Framework (NPPF) at para 35:

(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Strategic Policy S18 – Blackfriars

NR support the City’s aspirations in identifying Blackfriars as a Key Area of Change within the proposed Draft City Plan 2040. NR consider the area represents an exciting opportunity to develop a key part of the City that can transform this prominent site on the river. NR are committed to working with the City of London in their capacity as landowners to bring forward transformational change to the area. NR will also collaborate with other key stakeholders to bring forward a comprehensive masterplan to underpin the Key Area of Change.

NR support Part 1 of the Policy S18 which seeks to make the area’s buildings, streets and public spaces more ‘inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the River Thames and Riverside Walk for all’. To fully realise this policy objective, NR believe that consideration should be given to tunnelling the remaining parts of Upper Thames Street and the pedestrianisation of Puddle Dock. This would allow for a podium to be created above with an opportunity to include below ground servicing off the tunnel, delivering a high quality fully pedestrian environment and seamless linkage to the Riverside Walk. There is also scope to open up the heart of the site to deliver a large public open space which could terrace down onto the River Thames and connect to the Riverside Walk, opening up views out of the area towards south London, the Tate Modern and St Paul’s Cathedral. NR would support reference to this potential within the supporting text to Policy S18.

NR consider that there is the potential to deliver high quality office floorspace in the area that can make a significant contribution to City’s office supply. Therefore, Part 2 of Policy S18 is supported, which promotes a mixture of refurbishment and redevelopment to allow for high quality office and commercial space to come forward and the space to be reimaged. The provision of commercial floorspace will support the delivery of the objectives under Part 1 and will be essential as a part of an overall re-configuration of the buildings and enhanced public realm.

Part 3 of Policy S18 is supported which aspires to create a high quality new area of public realm at Blackfriars Bridge foreshore. The policy refers to ‘Bazalgette Embankment’ as an area for public realm improvements. It is considered that there is opportunity to include

the remaining stretch of the foreshore for public realm improvements within the Key Area of Change.

Part 4 of Policy S18 seeks to enhance pedestrian permeability via the riverside walk and north to south. NR support the policy objective but consider that the policy should also reference enhancing cycle accessibility, as this will maximise active travel connectivity. As per the comments in relation to Part 1, NR consider there is the potential to fully tunnel Upper Thames Street with below ground servicing to maximise the opportunity to enhance and deliver the maximum amount of public realm at grade. This would provide the opportunity for north-south connection from St Andrew's Hill down towards the Riverside Walk and shoreline.

Part 5 of Policy S18 identifies the potential for a new entrance to the east of Blackfriars Station, which is supported. It is considered that there could be greater ambition with this part of the policy by identifying the potential to include the station as part of a comprehensive masterplan approach which seeks to improve the access and permeability around the station as it connects into the Key Area of Change. NR will be undertaking a strategic study that considers Blackfriars Station and the rail routes running through the Station. This study could allow for optioneering to explore a suitable entrance location and would be able to feed into a masterplan for the whole site, to ensure this is fully integrated. Opportunities to fund improvements to the station and other parts of the railway from development coming forward in the City should be sought through s106, CIL and any other suitable mechanism. NR would support reference to this being included within the supporting text to Policy S18.

Part 6 of Policy S18 is supported which seeks to preserve, enhance and celebrate the area's heritage and historic assets and give careful consideration to protected views. NR consider that the rich history of the site can play an important role in establishing an identity for the area. The provision of below ground servicing and the tunnelling of Upper Thames Street, provides opportunity for more relief at ground floor level. This will enhance views of St Pauls from the Bankside looking northwards in line with Strategic Policy S13 of the Draft City Plan. The heights of the buildings around the public realm will also respect the St Pauls Heights code.

Part 7 of Policy S18 encourages new cultural, leisure and recreation facilities in addition to the provision of events, arts and play in public spaces. NR support this part of the policy and note that the City of London School provides an opportunity for collaboration and the provision of new facilities for its operation.

NR support Part 8 of Policy S18 but consider that additional text should be added to recognise the opportunity to provide urban greening at roof and terrace levels in addition to the public realm at street level.

Strategic Policy S9: Transport and Servicing

Network Rail supports part 1 of the draft Policy to safeguard land for the delivery of increased public transport capacity.

Network Rail supports part 2 of the draft Policy for improvements to street-level interchange at Fenchurch Street. Opportunities to secure these improvements should be sought through development and developer contributions from sites coming forward within the City.

Network Rail supports part 3 of the draft Policy to improve step free access at mainline stations. It is important that this is reflected throughout the policy wording and reference

to mainline stations should be included within para 10.1.6 of the supporting text, additionally reference to working with Network Rail to deliver these improvements should also be included.

Policy VT1: The impacts of development on transport

In part 2 of the draft Policy, Network Rail supports the need for development to demonstrate how adverse impacts on the transport network will be mitigated however this then refers only to the road network. It is important that public transport, especially rail, is recognised as any adverse impacts on the rail network and its capacity would have to be mitigated through planning contributions or legal agreement. Further, reference should be made to Network Rail in para 10.2.7 of the supporting text to the Policy, to ensure that collaboration takes place to mitigate any cumulative impacts on mainline rail stations.

Policy VT2: Freight and Servicing

Network Rail is supportive of the Policy in seeking to reduce motor vehicles through the City. Where possible, moving these movements, both in terms of passengers and freight, to the railway is one of the most effective ways of reducing emissions and promoting sustainable transport.

Network Rail supports para 10.3.4 and its reference to working with us to encourage inward freight at mainline stations. This is reflected within the draft Policy at part 5 and this is also supported. Network Rail suggest that the following wording (in italics) be added to this part of the Policy to further strengthen the promotion of rail freight.

Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support *and maximise* deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate *and these should be actively promoted as the first means of transporting goods.*

Policy AT1: Pedestrian Movement, Permeability and Wayfinding

Network Rail supports the Policy and its promotion of pedestrian movement and enhanced permeability through the City. In order to encourage the use of sustainable transport modes, opportunities to provide wayfinding to the mainline stations within the City should be actively encouraged. Opportunities to fund improvements to permeability from development coming forward in the City should also be pursued. To support this, Network Rail suggest the following wording below in part 9 of the Policy:

c. Opportunities to enable improved and new connections through to mainline railway stations to promote use

Network Rail supports reference in para 10.8.6 to securing financial contributions through s106 planning obligations towards improvements to the wider public realm. For clarity, Network Rail suggest that reference be added to this to state improvements in the wider public realm *and pedestrian routes.*

Policy CE1: Sustainable Waste Facilities and Transport

Network Rail supports the Policy and its intention to promote the movement of waste by sustainable transport including rail. Network Rail would suggest that similar wording from

Policy VT2 be applied in relation to this Policy. Reference within the supporting text for the Policy to working with Network Rail to encourage the movement of waste by rail, where appropriate would be supported.

Strategic Policy S21: City Cluster

Figure 27 identifies Fenchurch Street station as Cannon Street and should be amended.

Cannon Street station is a key priority requiring upgrades to provide step free access for users. Development within the City Cluster would provide a sound basis for securing funding towards improvements at Cannon Street station, given its importance in connecting to south London and into Kent. Whilst the Elizabeth Line provides improved access to this Cluster, it is important to recognise the connectivity offered by Cannon Street also. Reference to this should be made within the supporting text to the Policy. Additionally, opportunities to secure improvements to Cannon Street should also be included within the Policy.

Network Rail support the proposal within part 9 of the draft Policy as this will allow for improved connections through to Cannon Street station. Opportunities to enhance connectivity through to the station should also be pursued.

Strategic Policy S22: Fleet Street and Ludgate

Network Rail would like to see acknowledgement of City Thameslink within the Policy. Reference should be made within the supporting text to the Policy of the connections offered by the station north and south enhancing connectivity from the south midlands to the south coast. The station offers excellent transport opportunities to encourage workers and others to travel significant distances into the City within reasonable travel time frames. Capacity at the gate line should be monitored as part of the Strategic Policy to ensure capacity is able to sustain demand or if improvements are required.

Strategic Policy S26: Planning Contributions

Network Rail is supportive of the Policy and the identification of funding the City's Transport Strategy through CIL. Supporting improvement to sustainable transport modes such as rail should be a key focus to deliver reduced reliance on motor vehicles and encourage the mass transit of people into and out of the City to boost the economy through workforce and leisure travel.

I hope the above is of use and please do not hesitate to contact me if anything further is required at this point.

Network Rail wish to be kept informed of the progress of the Plan and reserve the right to appear at the Examination in Public.

Kind Regards,

Craig Hatton MRTPI
Senior Town Planner

Felgate, Gavin

From: Craig Hatton [REDACTED]
Sent: 06 June 2024 14:29
To: Planning Policy Consultations
Subject: Network Rail response to City of London Local Plan (Reg 19)
Attachments: Network Rail response to City of London (Reg 19).pdf
Categories: CONFIRMED

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OFFICIAL

Good afternoon,

Please see attached Network Rail's response to the Local Plan consultation

Do let me know if anything further is required at this point.

Best,
Craig



Craig Hatton MA MRTPI

Senior Town Planner

[REDACTED]
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For Town Planning advice, please complete this [Instruction Form](#) and submit to TownPlanningSouthern@networkrail.co.uk, following which your project will be assigned to a Town Planner who will be in contact.

Advance Notice of Leave: 7 – 14 June 2024

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