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Consultation Response
Proposed Extension of the Northern
Line to Nine Elms and Battersea

Our ref: LG
Date: 08.08.11

Dear Sir/Madam,

Thank you for the opportunity to respond to TfL's re-consultation on the proposed extension of the Northern Line to Nine Elms and Battersea. I am responding to the consultation on behalf of the London Assembly Liberal Democrat Group as our Transport Spokesperson.

I was very surprised to see in the re-consultation that there were still four options, as I had been informed at the recent exhibition and public meeting that option 3 and option 4 had both been ruled out. Option 3 because Vauxhall Station cannot cope with the extra capacity it would bring, and option 4 as the line would travel underneath the new US Embassy site. Despite engineers saying that options 3 and 4 are technically possible, this does not make the consultation honest to Londoners and Stakeholders. I therefore do not believe this consultation has been completely transparent, as two of the options have effectively been ruled out by TfL.

I know there has been long term support for an extension of the Charing Cross branch of the Northern Line south through Lambeth to Streatham and onwards. This proposal could have an effect on the possibility of extending the tube to Streatham which is a concern. Between the options provided we would prefer **Route 2 in the consultation**, as it would better ensure a station in the Nine Elms area serving local people who will be affected by the construction of the new line extension. It would improve accessibility for people in the surrounding area, and would also aid in relieving pressure at Vauxhall Station and the Victoria Line.

However, I would like to raise a few concerns with the overall scheme:

Overall Density of the Proposed Development and Infrastructure

I am concerned about the overall density of development in the Vauxhall/Nine Elms area, and in addition to the developments at Nine Elms there are also a number of other major developments being proposed around Vauxhall.

Given the scale of funding required which will be needed for the tube extension, I have concerns that other important community facilities such as schools, GPs and other health services will lose out. I am also concerned that the proposed developments will not build enough affordable and social housing to meet the much-needed local demand.

There must also be significant investment through planning gain in education, play, youth and health services/facilities, as well as transport infrastructure.

Proposed Tunnels and Noise

I would like to raise the issue of the new tunnels. The new tunnels need to be built sufficiently deep below homes in the Oval, Kennington and Vauxhall areas to prevent any disturbance to local residents and potential blight to property. I would like a minimum depth guarantee for the line.

I am concerned about the noise levels you propose to work to according to the consultation document “Noise and Vibration – Our Design Approach.” I have recently been contacted about this and would be grateful if you could consider the appendix below [Appendix 1] outlining concerns about the document, which suggest it would seem more appropriate to be working towards a **30dB LAmax**.

Kennington turning circle currently causes disturbance to local residents, especially in the basements of many homes. As part of the works, can you look into retrofitting this loop using modern noise and vibration reduction design techniques, such as floating slabs, booted sleepers and highly resilient track fasteners?

Kennington Station

There are many local residents near Kennington station who will suffer considerable (but temporary) inconvenience due to this scheme. It is imperative to ensure that these residents are kept well informed at all times, and that robust contingencies and careful planning are put in place for noise limitation, guarantees against subsidence, working hours, lorry movements, air quality checking, underpinning monitoring and replacement of pavements and roads. It is also important to make considerations for those local residents who work from home.

Station capacity at Kennington would need to be massively improved to cope with extra capacity, and this needs to be included in any private funding arrangements made. The ticket hall needs restoring, and serious consideration is needed for additional lifts to the new platforms to allow for step free access.

Nine Elms Station

The Nine Elms station must open before or at the same time as the Battersea station – it must not be left to the end of the project when private funding could potentially run out, and those local residents in Lambeth lose out.

Forward thinking in terms of future extensions of the Underground to the southern parts of the Borough of Lambeth, such as Streatham, must be under constant review, subject to funding. Likewise, the Bakerloo Line extension to Camberwell and beyond must also continue to be considered.

Ventilation and Intervention Shafts

I am very concerned about the proposed ventilation and intervention shafts which have to be constructed, which would have serious adverse impacts on London’s green spaces in the proposed affected areas, especially at Claylands Green, Kennington Green and Kennington Park.

I am encouraged, however, that the consultation suggests there will be silencers fitted to shafts if they emit too much noise. I would ask that you look to minimise the visual impact of these structures and design something in keeping with the surrounding area.

We trust you will take on board our views and suggestions, as you consider your consultation responses.

With best wishes,

Yours sincerely,



Caroline Pidgeon AM
Leader, London Assembly Liberal Democrat Group

Appendix 1

1. British Standards Institute "recommendations for good internal sleeping conditions: 30dB(A) L Aeq, 45dB LAmax':

There isn't adequate guidance in the UK for ground borne sound which reacts entirely differently to sound created by road traffic being impossible to insulate as it passes through the structure of buildings to all floors and every room. The BS standards do not appear to be designed for ground borne sound nor are they current.

2. Crossrail: 'Impact has been considered significant if ground borne noise levels exceed 40dB LAmax'

This does not appear to be true, as Crossrail itself states, it is working NOT to 40db LAmax **but 35dB LAmax** for resident properties

Clauses 2.13 & 2.14 of D10 document (

<http://www.crossrail.co.uk/assets/library/document/d/original/d10groundbornenoiseandvibration.pdf>>) indicate that the contractor must analyse any residential property where noise of the trains will be above 35dB and to use extra measures to reduce the sound levels (ie a combination of resilient track support and floating slab track.

I understand that this follows complaints by local residents

(Property Week article <<http://www.propertyweek.com/news/crossrail-agrees-to-keep-noise-down-with-%C2%A32m-rubber-track/3105797.article>>).

This has resulted in the use of floating slab track for a third of the central London zone.

At the meeting of 25 May 2011, the Northern Line team said that they were looking at extra mitigation measures that will be applied in the more affected areas. I am concerned that there is no commitment or obvious process which will ensure this will actually be done.

3. World Health Organisation: To ensure that there is no sleep disturbance during night time: 30dB LAeq, 45 dB LAmax

The reference to "international standards" is frankly misleading. The standard today is **35dB LAmax or below**. LAeq is not used as it is not relevant for punctual sounds such as trains.

The proposed Northern Line Extension maximum noise standard for residential properties does not compare well to other countries in the developed world or other projects in England.

The best standard is 30dB and 32 dB in Dublin and Norway respectively. The Northern Line Extension proposed level of 40dB is 100% louder .

Listed here are some examples in reverse chronological order of their use (all values are LAmax for ground-borne noise):

Northern Line Extension: 40dB (June-2011)
Dublin: **30dB** (Application Oct. 2010) (30dB night and 35dB day)
document <<http://www.dublinmetronorth.ie/Downloads/Further%20Info%20Request%20Reports/Item%201%20Impact%20Assessments/Item%201%20Part%206%20Corpus%20Christi.pdf>>
Australia: **35dB** (June 2010) (35dB night and 40 dB day)
document <http://www.lga.sa.gov.au/webdata/resources/files/Draft_guidelines_for_the_assessment_of_noise_from_rail_operation.pdf> p. 8
Crossrail: **35dB** (April 2008)
document <<http://www.crossrail.co.uk/assets/library/document/d/original/d10groundbornenoiseandvibration.pdf>>
Norway: **32 dB** (prior to 2005)
document <<http://www.sciencedirect.com/science/article/pii/S0003682X06000892>>
USA: **35dB** (since April 1995)
document <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf> (day and night)

The picture that is emerging is an international alignment towards a value between 30 and 35dB LAmax for ground borne noise lead by the USA from 1995.

In light of the international trend and growing consensus it would seem more appropriate to be working towards a **30dB LAmax**.