

Les Waters
Head of Licensing
Email: les.waters@orr.gov.uk



Company Secretary
Network Rail Infrastructure Limited
Waterloo General Office
London
SE1 8SW

8 December 2023

Network licence Condition 17 (land disposal): Holborn Viaduct, London

Decision

1. On 10 October 2023, Network Rail gave notice of its intention to dispose of land at 61-65 Holborn Viaduct, London EC1A (“the land”), in accordance with Condition 17 of its network licence. The land is described in more detail in the notice (copy attached).
2. We have considered the information supplied by Network Rail including the responses received from third parties consulted. For the purposes of Condition 17 of Network Rail’s network licence, ORR consents to the disposal of the land in accordance with the particulars set out in its notice.

Reasons for decision

3. We are satisfied that Network Rail has consulted relevant stakeholders with current information and that no objections were left unresolved.
4. In considering the proposed disposal, there was no evidence that current or future railway operations would be affected adversely.
5. Noting the possibility that the proposals – which would involve the construction of foundation piles and columns below 61-65 Holborn Viaduct – may potentially affect the emergency evacuation of passengers in the tunnel, we sought further explanation from Network Rail as to how it would ensure a clear and suitable evacuation route from the tunnel, should the need arise. We were satisfied with the information provided which can be found at Annex A.
6. Based on all the evidence we have received and taking into account all the material facts and views relevant to our consideration under Condition 17, we are satisfied that there are no further issues for us to address.
7. We have had regard to our decision criteria in *Land disposal by Network Rail: The regulatory arrangements, October 2019*,¹ and balanced our section 4 duties given to us under the Railways Act 1993. In doing so we have given particular weight

¹ Available from https://orr.gov.uk/_data/assets/pdf_file/0007/1996/land-disposal-regulatory-arrangements.pdf.



to our duty to exercise our functions in a manner which we consider best calculated to “protect the interests of users of railway services”.

8. We have concluded that the proposed disposal is not against the interests of users of railway services. In light of that and our understanding of the transaction as set out above, we grant our consent to the proposed disposal of the land.

08/12/2023

X 

Les Waters

Head of Licensing

Signed by: S-1-12-1-966673442-1316586399-15867803-3367161311/6cf3732f-04be-44fd-8530-4edcf25f8629/1

Duly authorised by the Office of Rail and Road

Property Disposal – Specific Consent

Application by Network Rail Infrastructure Limited to dispose of land in accordance with the Land Disposal Condition of the Network Licence.

Type of disposal	The disposal will be by way of a supplemental lease, demising areas to be used for five foundation piles, columns and the airspace they take up. This supplemental lease will be attached/coterminous to the original 999-year lease granted in 1958 for the surface land and will last until 2957.		
Rationale for disposal	There is an opportunity for Network Rail to receive a capital receipt via shared value for granting rights in an area of tunnel that is unused.		
Clearance Details	Business	CR/54846	Granted: 31/10/2022 Expires: 31/10/2024 Certificate No: 71313
	Technical	CR/54846	Granted 18/05/2023 Expires: 18/05/2025 Certificate No: 70011
Description of property for disposal	<p>We are disposing of the areas to be used for foundation piles and columns and the airspace these columns take up. This is within the tunnel known to Network Rail as FTL-420. The tunnel also hosts the running lines between Farringdon and City Thameslink station.</p> <p>The supplemental lease is being granted to the owner of the land above the tunnel. The land above the tunnel was sold by Network Rails predecessor via a 999-year leasehold in 1958.</p> <p>The address of the surface land is 61-65 Holborn Viaduct, London EC1A. Please see the documents attached for an accurate location of the piles.</p> <p>We are only disposing of the area taken up by the columns as indicated in blue on the 'Plan 4 Column Location Diagram' attached.</p>		

Attached plans and photographs: (all site plans should be in JPEG format, numbered and should clearly show the sites location approximate to the railway)	Attached plans and photographs: <ul style="list-style-type: none"> ○ Plan 1 0293982 – Holborn Viaduct Site Plan ○ Plan 2 1958 Lease Boundary ○ Plan 3 Access Plans ○ Plan 4 Column Location Diagram ○ Plan 5 Illustrative Pile Location
Ordnance survey coordinates	X: 531664.36767 Y: 181499.92380
4. Proposal	
Proposed party taking disposal	Dominus Holborn Limited (Number: 11507084), whose registered office is at 1 London Street, Reading, Berkshire, RG1 4QW (“Dominus”)
Proposed use / scheme	The proposal is to insert five pile foundations and columns into an unused part of tunnel Network Rail owns. These will support a building which is part of a development scheme above the tunnel.
Access arrangements to / from the disposal land	Smithfield Ramp is used to get into the tunnel.
Replacement rail facilities (if appropriate)	N/A
Anticipated rail benefits	Capital receipt to be reinvested into the railway. Granting the supplemental lease for the pile foundations allows Network Rail to insert modernised additional Asset Protection related clauses that bring operational and safety oversight up to today’s standard.
Anticipated non-rail benefits	Student accommodation from the completed development.
5. Timescales	
Comments on timescales	This disposal is anticipated to be completed as soon as all relevant regulatory approvals are achieved. Autumn 2023.
6. Railway Related Issues	

History of railway related use	<p>The area of the disposal is in the general vicinity of long redundant Snow Hill Station which closed in 1916 and has not been used by passengers since then.</p> <p>The land on the surface was sold by Network Rail's predecessor on a long lease in 1958. The land was developed once before following the 1958 lease and since then has been demolished in anticipation of a new scheme which this disposal can facilitate.</p>
When last used for railway related purposes	<p>The tunnel remains in operational use for the Thameslink service.</p>
Any railway proposals affecting the site since that last relative use	<p>No</p>
Impact on current railway related proposals	<p>No</p>
Potential for future railway related use	<p>None</p>
Any closure or station change or network change related issues	<p>Station Change is not required.</p> <p>Network Change is not required.</p> <p>Business Clearance granted: 31/10/2022</p> <p>Technical Clearance granted: 18/05/2023</p>
Whether disposal affects any railway (including train operator) related access needs, and how these are to be addressed in future	<p>An indicative plan for access beside the piles is shown in attached 'Plan 3 Access Plans'. The final design and access plan is to be confirmed and approved by Network Rail Asset Protection during the final design reviews of the piles which will comply with Network Rail Standards.</p>

<p>Position as regards safety / operational issues on severance of land from railway</p>	<p>The disposal does not include and requirement for new fencing of the railway boundary, as sufficient fencing already exists.</p> <p>The disposal does not include any requirement for new fencing of the boundary, because its location or the nature of the disposal is such that the boundary demarcation is not needed.</p> <p>The disposal is on a basis under which Network Rail has had due regard (where applicable) to impact of the disposal on lineside works, including railway troughing, signalling and their maintenance. The disposal is without prejudice to Network Rail's safety obligations, with which Network Rail will continue to comply. Network Rail's network licence requires compliance with Railway Group Standards. These set out requirements for – amongst other things – fencing, access and signal sighting. In addition, the Railways and Other Guided Transport Systems (Safety) Regulations 2006 require Network Rail to have a safety management system and safety authorisation in respect of its mainline railway system and its railway infrastructure. These, in turn, require Network Rail to comply with Railway Group Standards as well as its own internal standards; and also continually to monitor changes to the risks arising from its operations and to introduce new control measures as appropriate.</p> <p>The works will be conducted under the terms of the agreed and signed 2023 Asset Protection Agreement.</p> <p><u>Safety Issues Identified:</u></p> <p>The disposal documentation shall include Network Rail's usual safety provisions appropriate to this disposal site and type of disposal.</p> <p>The disposal includes a requirement to enter into an Asset Protection Agreement in the Network Rail templated form as applicable at the time of the disposal and subject to such reasonable modification as appropriate to the disposal site and its intended use.</p> <p>The Technical clearance referenced in Part 2 above additionally stipulates certain bespoke site-specific conditions related to safety as outlined below</p> <p>Additional disposal site specific safety conditions identified in the Clearance Certificate in addition to those usually referenced for any disposal:</p> <ul style="list-style-type: none"> - 2.10 Before construction commences, the Promoter shall ensure that maintenance agreements are in place with the developer that define ownership and responsibilities for inspection, repair and renewal throughout the site to ensure that both Network Rails commercial interests and safety responsibilities are protected. - 3.0 a) Putting pillars in the cess may impede positions of safety, this would be against NR standard now so will need to be derogated.
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	<ul style="list-style-type: none"> ○ The final designs are to be reviewed and approved by Network Rail Asset Protection which will be to NR Standards. - 6.0 a) Works above live OLE are prohibited without mechanical protection in place, any required changes to OLE (including aerial earth return wire) must be designed and signed off prior to works commencing. b) All works in tunnel within 2.75m, where no physical protection/separation is in place, will require appropriate isolation. c) Temporary non-conductive hoarding enclosures will be installed on the platform under isolation to separate foundation works from the railway. - 7.5 Ensure that all necessary National and Network Rail standards are adhered to. <p>(N.B. The safety conditions described above are a requirement of the Technical Clearance Certificate and are relevant at the disposal stage of the transaction. These requirements are subject to change e.g. by development of subsequent detailed designs that may necessitate amended safety requirements subject to consultation and agreement by the railway engineer)</p>
7. Planning History and Land Contamination	
Planning permissions / Local Plan allocation (if applicable)	Planning Reference Number: 21/00781/FULMAJ.
Contamination / Environmental Issues (if applicable)	N/A
8. Internal Consultation	
Internal consultation	<ul style="list-style-type: none"> - The Lead Strategic Planner for this part of the network states there is nothing planned in the long term from a strategy point of view. - Infrastructure Maintenance Manager: "This [scheme] should not change any engineering access opportunities in this corridor".
9. Local Authorities	
Names & Email Addresses:	City of London Planning

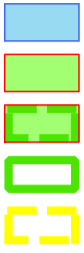
Local Transport Authorities:	Transport for London
Other Relevant Local Authorities:	N/A
Recommendation:	<p>By proceeding to consult I am:</p> <ul style="list-style-type: none"> • recommending that Network Rail consults on the terms of disposal • confirming that I have read and understood Network Rail's Code of Business Ethics and policy on Interests in Transactions • confirming that I have secured internal written approval to consult in accordance with Network Rail's policy on Authorising Application Forms.

Summary of position as regards external consultations	<p>Most industry stakeholders had no comment.</p> <p>Transport for London had queries related to the works due to the close distance to the Central Line tunnels. The party carrying out the work had already spoken to and gained approval from the 'Principal Engineering Leader - Outside Parties'. A letter from them satisfied the Transport for London LC17 Consultee (consultee #33 response in consultation report attached)</p> <p>Govia Thameslink Railway, who have their running lines and operational assets in very close vicinity of the disposal needed some questions answered. Details of these questions and answers are in Section 16. of Appendix 1. Their queries were satisfied after responses were provided by the party intending to carry out the works (consultee #16 response in consultation report attached)</p> <p>The City of London had a question about whether any public highways would be impacted. They were assured there would be no impact on public highways (consultee #34 response in consultation report attached)</p> <p>London TravelWatch wanted assurances that passengers would not be impacted. This was assured (consultee #31 response in consultation report attached)</p> <p>Details given in accompanying consultation report.</p>

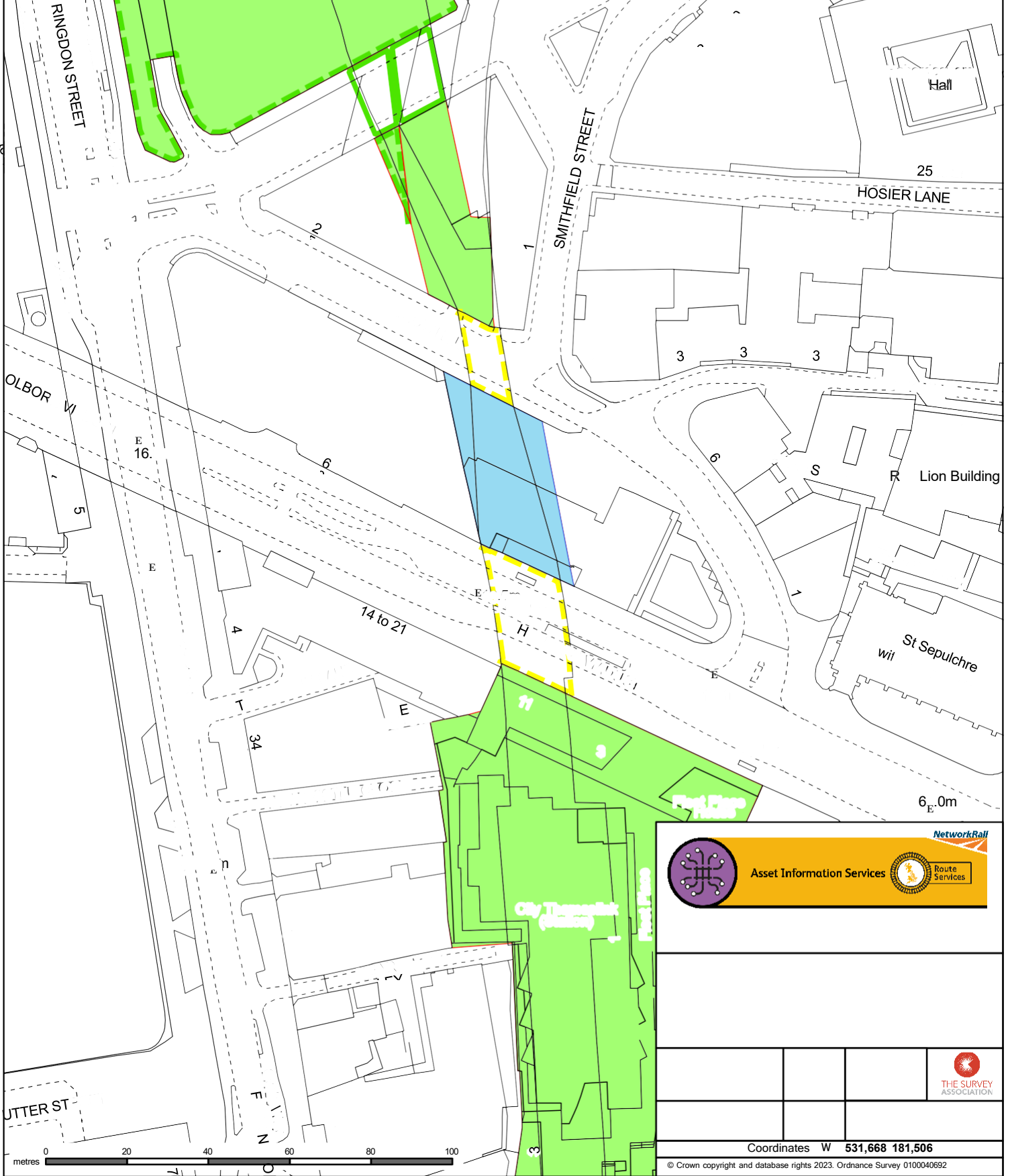
<p>Analysis of any unresolved objections together with recommendation by Network Rail as regards a way forward</p>	<p>No unresolved objections.</p>
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12. Internal approval to dispose	
Recommendation:	Based on the above, I recommend that Network Rail proceeds with the disposal.
Declaration:	I have read and understood Network Rail's code of Business Ethics and Policy on Interests in Transactions
Proposers Name:	Proposers Job Title: Graduate Development Surveyor
Signed:	Date: 29/08/2023
Proposers Name:	Proposers Job Title: Principal Development Manager
Signed:	Date: 01/09/2023
Proposers Name:	Proposers Job Title: Director, Development.
Signed:	Date: 29/09/2023

Plan 1 - Site Plan



1 to 300
Local Market



NetworkRail
Asset Information Services
Route Services





City Transport (bus stop)
The Survey Association

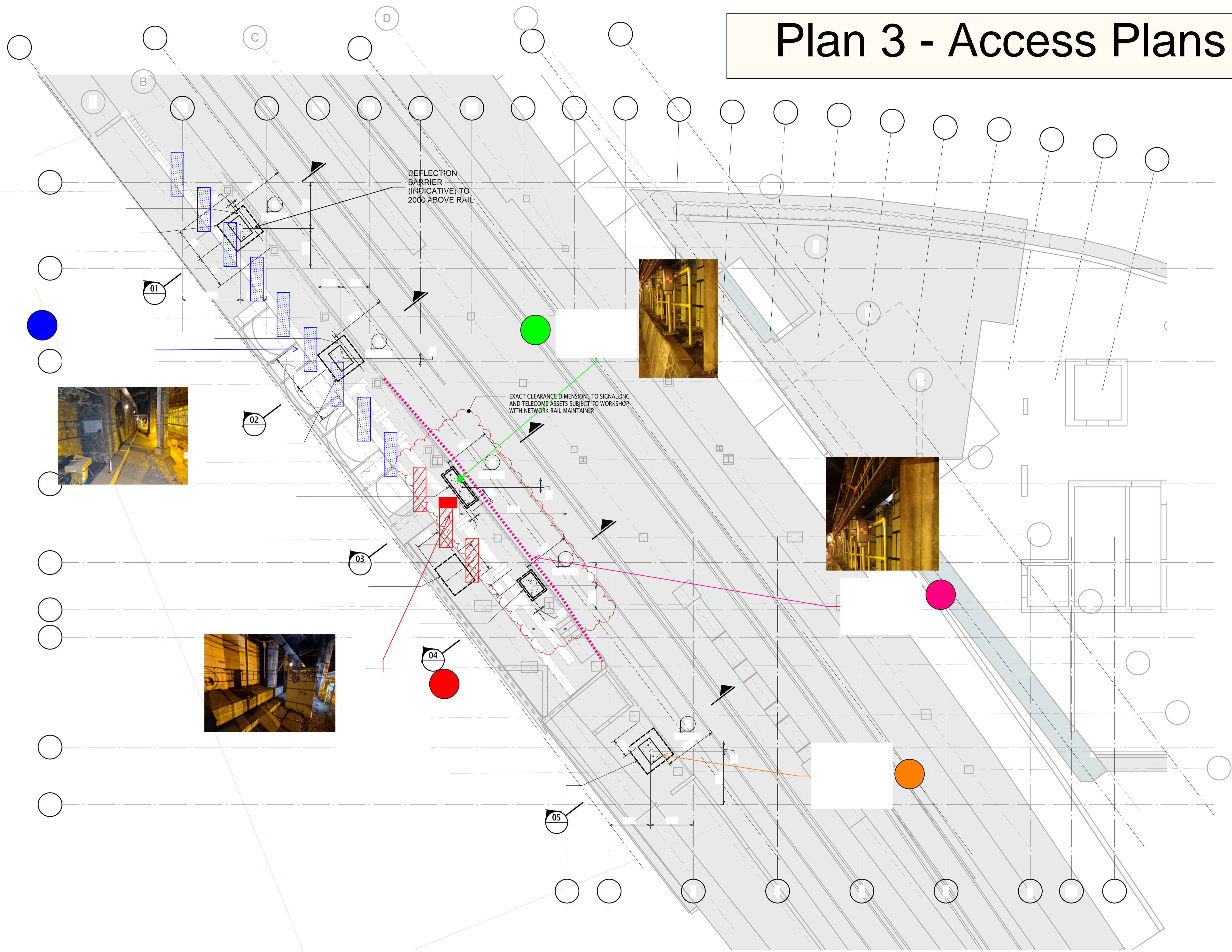
Coordinates W 531,668 181,506

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Plan 3 - Access Plans

HEALTH AND SAFETY SYMBOLS LEGEND

-  -INDICATES A RESIDUAL RISK REQUIRING A COMPULSORY ACTION
-  -INDICATES A RESIDUAL RISK REQUIRING A PROHIBITIVE ACTION
-  -INDICATES A RESIDUAL RISK AS A WARNING
-  -INDICATES A RESIDUAL RISK FOR INFORMATION



Rev	Revision Description	By	App	Date
01	ISSUED FOR INFORMATION	CM	GH	23.05.22

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Client

Project

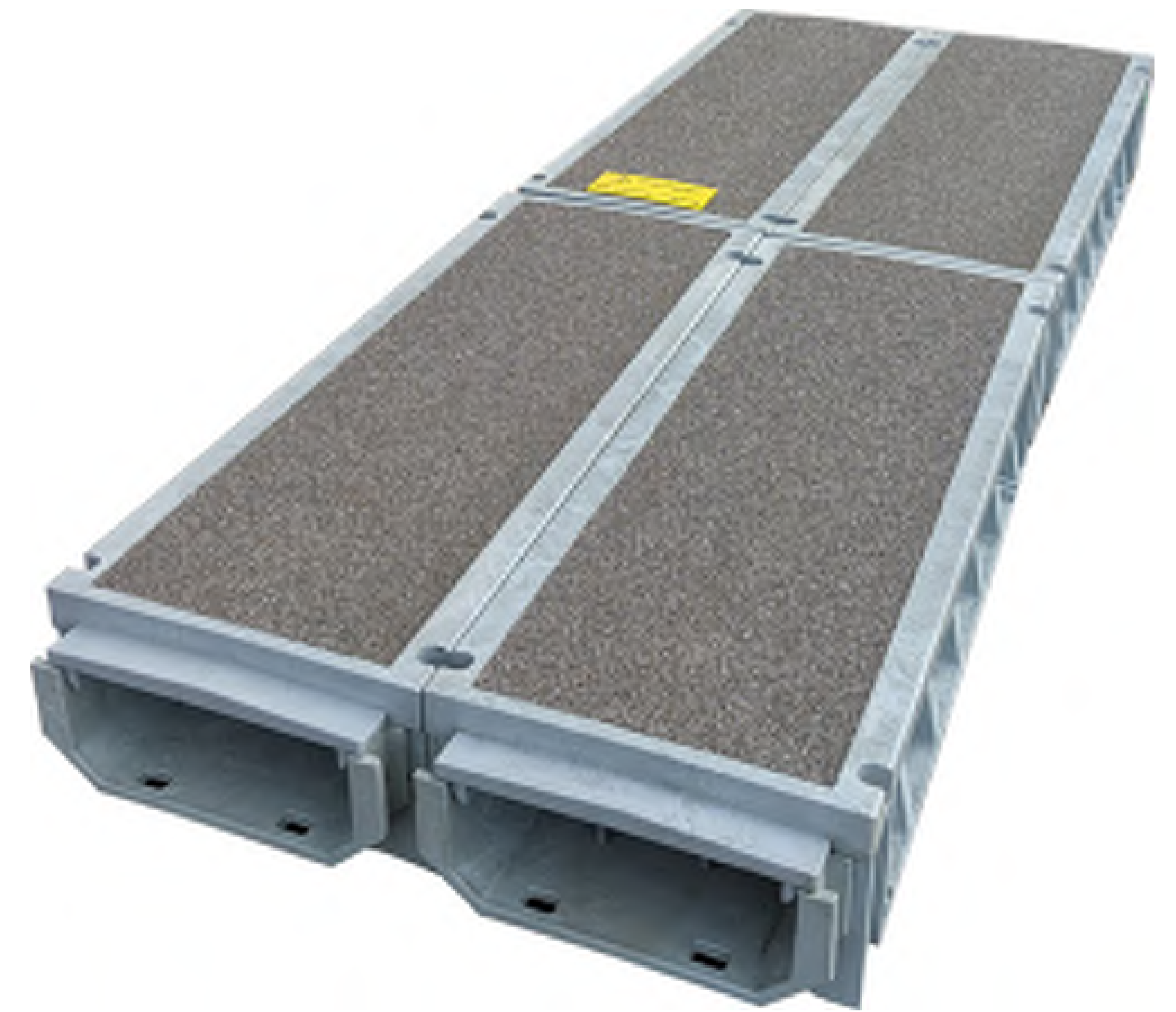
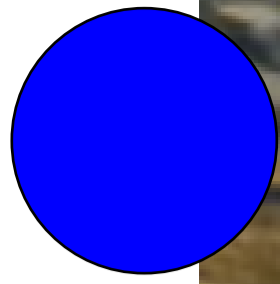
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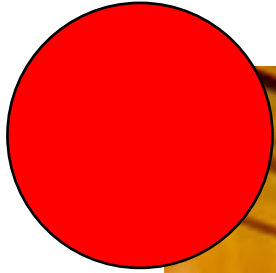
Date	05/11/22	Drawn	CM
Scale	at A1	Designer	GH
Suitability Code	S2	Design Checker	Approved
Job Number	4959		

Drawing Number	Revision
SK002	P1

FOR INFORMATION

23/05/2022 12:01











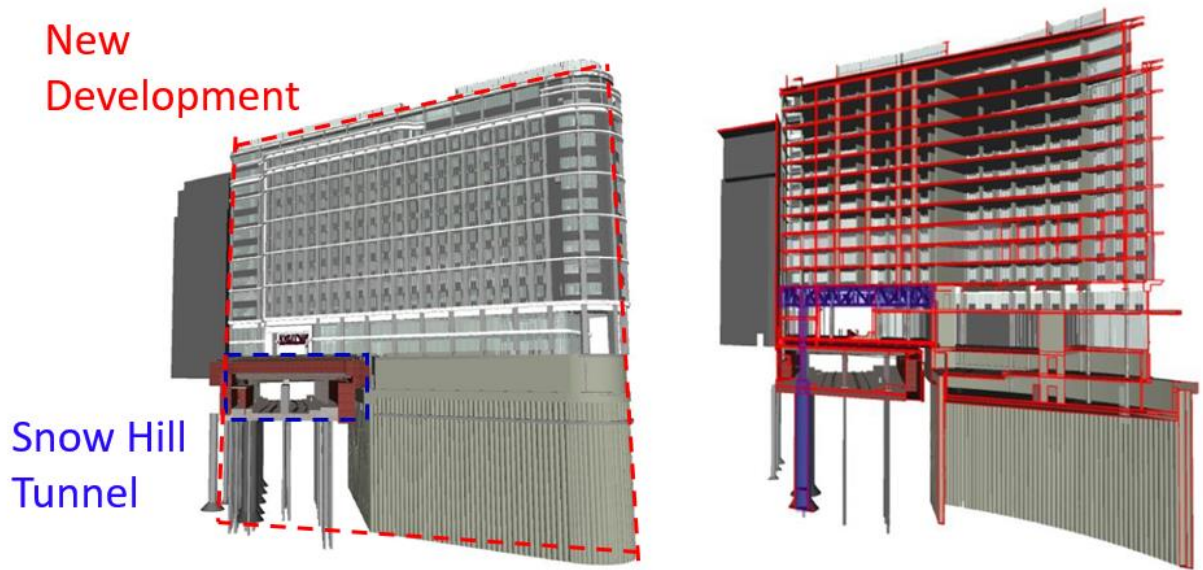


Figure 1 – Proposed Scheme with Railway Tunnel Interface. RIGHT- Transfer Truss, Columns and Caisson Piles in BLUE

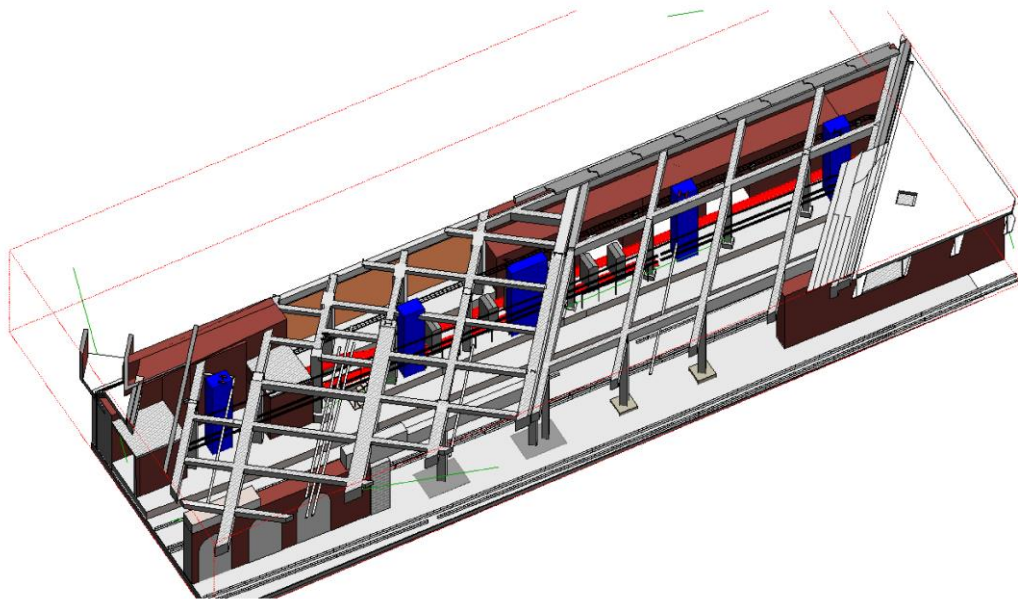


Figure 2 – Railway Tunnel with Columns in BLUE adjacent Up Snow Hill

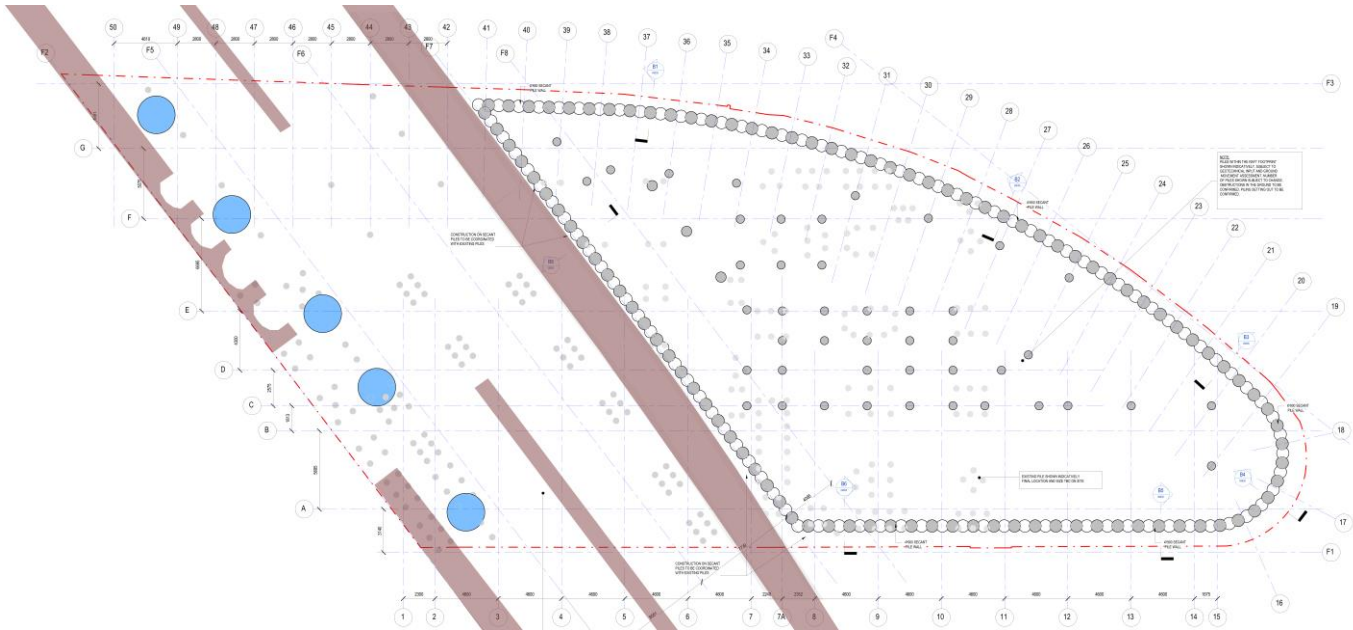


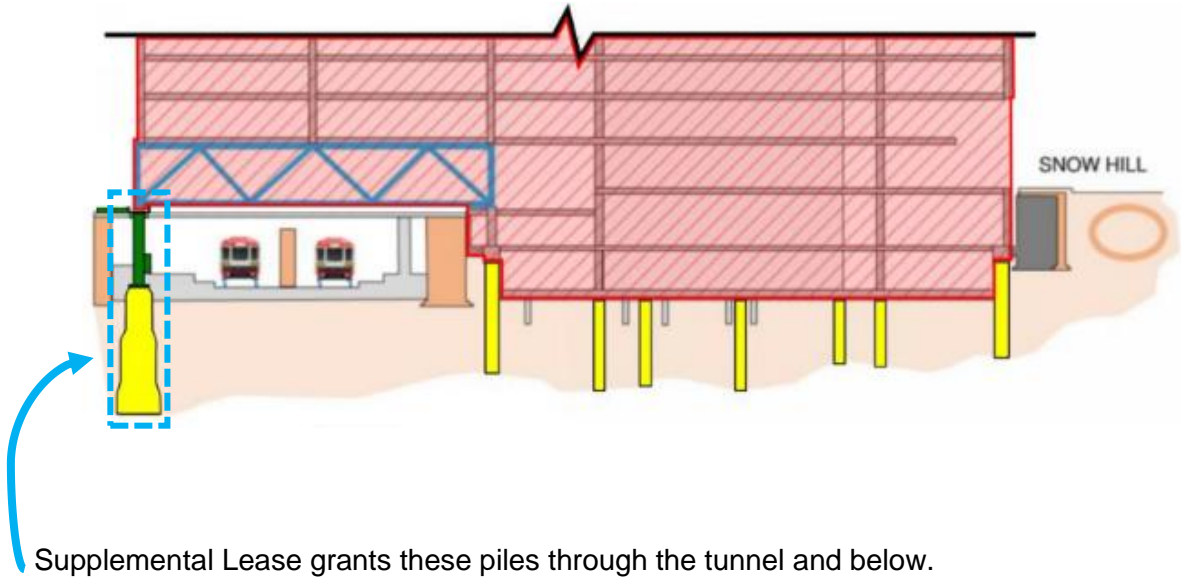
Figure 3 – Existing and New Piles including New Basement Secant Wall and Caisson Piles (BLUE). Existing Abutments (BROWN).



Figure 4 – Site Location Plan

Plan 5 - Illustrative Pile Location

Illustrative Pile Location:



Supplemental Lease grants these piles through the tunnel and below.

CONSULTATION REPORT

relating to

PROPOSED LAND DISPOSAL

This report is provided as a supplement to our forms for the proposed disposal of land at:

Site location and description: We are disposing of the airspace and subsoil that five columns and pile foundations will take up via a long leasehold. This is within the tunnel known to Network Rail as FTL-420.

The tunnel is beneath a parcel of land owned (via a 999-year leasehold granted in 1958 by Network Rail's predecessor) by the group which the supplemental lease is being granted to.

The tunnel also hosts the running lines between Farringdon and City Thameslink station. The address of the surface land is 61-65 Holborn Viaduct, London EC1A. Please see the plans attached for an accurate location.

We have consulted in relation to this evaluation, and summarise the results of this as follows:

Summary of position regarding responses:

- Most industry stakeholders had no comment.
- Transport for London had queries related to the works due to the close distance to the central line tunnels. The party carrying out the

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work had already spoken to and gained approval from the Principal Engineering Leader - Outside Parties. A letter from them satisfied the Transport for London LC17 Consultee.

- Govia Thameslink Railway, who have their running lines and operational assets in very close vicinity of the disposal needed some questions answered. Details of these questions and answers are in Appendix 1. Their queries were satisfied after responses were provided by the party intending to carry out the works.
- The City of London had a question about whether any public highways would be impacted. They were assured there would be no impact on public highways.
- London TravelWatch wanted assurances that passengers would not be impacted. This was assured

The full list of external consultees is set out below:

No.	External party (name)	Contact name, email address and telephone	Whether response received (y/n)	Date of response	Details of response (e.g. “no comment”), with reference to any accompanying copy representation in annexes to this report	Comments (e.g. as regards endeavours to obtain response where none given)
1	Department for Transport		Y	21/08/2023	'DfT have no objections and officials have informed me that NR can proceed'.	

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2	Transport for North		Y	15/08/2023	'Happy to confirm that we have no comments to make on this issue.'	
3	Transport for London Engineering		Y	09/07/2023	'No objection to this disposal'.	
4	Arriva Train Cross Country		Y	18/07/2023	'No comment on this proposed disposal.'	
5	c2c Rail Limited		Y	17/07/2023	'No objection'	
6	Chiltern Railway Company Limited		Y	17/07/2023	'No comment from Chiltern.'	
7	Eurostar International Limited		Y	18/07/2023	'No comment from EIL.'	
8	Great Western Railway		Y	17/07/2023	'No objection.'	
9	Southern (GTR)		N/A	N/A	N/A	Southern/GTR response through – see Consultee response #16 below – no objection confirmed
10	Grand Central Railway Company Limited		Y	16/08/2023	'GC has no comment'	
11	Greater Anglia		Y	17/07/2023	'No comment.'	
12	London Overground Rail Operations Limited		Y	04/08/2023	'No comments.'	

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13	London & South Eastern Railway Limited (Southeastern)		Y	21/07/2023	'No comments on the proposed land disposal.'	
14	Merseyrail Electrics 2002 Limited		Y	18/07/2023	'We have no objections.'	
15	MTR Crossrail		Y	07/08/2023	'MTR Elizabeth line has no objections.'	
16	Govia Thameslink Railway (Southern)		Y	16/08/2023	'No further comments to make'	
17	Northern Rail Limited		Y	18/07/2023	'We do not have any comments to make on this matter.'	
18	Avanti Trains First Trenitalia West Coast Trains Limited (Avanti) and West Cost Partnership Development		Y	03/08/2023	'I am happy to confirm that we have no objections to this land disposal as it is off route on the Thameslink route.'	
19	COLAS Rail Limited		Y	10/08/2023	'No comments'	
20	Nuclear Transport Solutions		Y	28/07/2023	'NTS have no comments.'	
21	DB Cargo UK Ltd		N	----	----	1 Chase (03/08) 2 Chases (09/08) Delivered (09/08)

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						3 Chases (15/08) Deemed not a key consultee.
22	Logistics UK		Y	10/08/2023	'No comment'	
23	Freightliner Limited		Y	17/07/2023	'No comment from FL.'	
24	GB Railfreight Limited		Y	18/07/2023	'No issues from GB Railfreight.'	
25	Rail Freight Group		Y	17/07/2023	'Ok with RFG.'	
26	West Coast Railway Company		Y	09/08/2023	'No comments'	
27	W. H. Malcolm		Y	17/07/20023	'No comments.'	
28	Association of Community Rail Partnerships		Y	08/08/2023	'No comments or concerns from CRN'.	
29	British Transport Police		Y	04/08/2023	'No further comments.'	
30	East West Railway Company		Y	18/07/2023	'EWR does not have any comments to make on the proposed land disposal.'	
31	London Travelwatch		Y	17/07/2023	Initial comments regarding impact on passengers. Following reassurances there were 'no other	Passed onto new consultation email.

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					comments on this proposal so no objections'.	
32	Transport Focus		Y	21/07/2023	'No comment from us.'	
33	Transport for London		Y	10/08/2023	'Aligned with Malcom Payne's response, we can confirm that this disposal would not appear to directly impact any LU, RfLI or TLRN assets or operations although each of these do have assets in the vicinity.'	
34	City of London Planning Department		Y	23/08/2023	'The City Corporation as Local Planning Authority does not object to the proposed disposal.'	1 Chase (03/08) 2 Chases (09/08)

Copies of responses are given in the Annex 1 to this report, as indicated above.

A copy of the consultation request is given in Annex 2.

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Annex 1 - Consultation Responses

1. Department for Transport**From:****Sent:** 21 August 2023 17:24**To:****Cc:****Subject:** FYI: RESPONSE REQUIRED FW: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Good afternoon

I can confirm that DfT have no objection and officials have informed me that NR can proceed. Apologies for the delay in getting back to you.

Many thanks.

Cheers

**Briefing and Correspondence Manager, Communications and Briefing Team, Operations, Rail Infrastructure Group, Department for Transport, Department for Transport
Second Floor**

Post to: Great Minster Hse, 33 Horseferry Rd, London, SW1P 4DR

2. Transport for North**From:****Sent:** 15 August 2023 16:14**To:****Cc:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Dear

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Thank you for your email. As you say, this location is well outside the Transport for the North area and its use has no direct impact on rail services in our area. I'm therefore happy to confirm that we have no comments to make on this issue.

Regards

Strategic Rail Lead

3. Transport for London Engineering**From:****Sent:** 09 August 2023 10:53**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

FORMAL RESPONSE:

Having reviewed this application I can confirm that the proposed disposal will not have any direct impact on existing TfL assets or operations or affect any current proposals. I therefore have no objection to this disposal.

I note that NR's tenant is already consulting with London Underground over their currently proposed scheme and potential impacts on the nearby Central line tunnels. With this in mind it would be appreciated if NR could include an obligation in the Lease for the Tenant to consult with LU on the impacts of any future redevelopment.

Principal Engineer Infrastructure Protection Strategy

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4. Cross Country

From:

Sent: 18 July 2023 08:15

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

XC Trains Ltd has no comment on this proposed disposal.

Regards

Stations Contract Manager, CrossCountry

Mobile:

Address: 5th Floor, Cannon House, 18 The Priory Queensway, Birmingham, B4 6BS



5. c2c Rail Limited

From:

Sent: 17 July 2023 14:44

To:

Subject: Re: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Good afternoon

Land disposal consultation report

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No objection from c2c for this proposal.

Regards

Facilities Management Manager

Floor 7, Centennium House,
100 Lower Thames Street,

EC3R 6DL

6. Chiltern Railway Company Limited

From:

Sent: 17 July 2023 16:36

To:

Subject: Re: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

No comment from Chiltern.

Kind Regards,

Client Relations & Strategic Delivery Manager
Chiltern Railways

Great Central House, Marylebone Station, Melcombe Place, London, NW1 6JJ

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7. Eurostar International Limited

From:

Sent: 18 July 2023 13:22

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

No comment from EIL,
Thanks

PA to Chairman, Strategy
Director & People Director

EUROSTAR GROUP



8. Great Western Railway

From:

Sent: 17 July 2023 13:12

To:

Subject: Re: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

We have no objection thank you

| Network Access Manager | Great Western Railway
1 Milford Street | Swindon | SN1 1HL

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9. Govia Thameslink Railway***Response shown at Number 16.**

10. Grand Central Railway Company Limited**From:****Sent:** 16 August 2023 11:17**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Apologies for the delay. GC has no comment.

Regards,

Chief Operating Officer | **Grand Central Rail**

11. Greater Anglia**From:****Sent:** 17 July 2023 14:06**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

You don't often get email from [redacted]. [Learn why this is important](#)

No comment

12. London Overground Rail Operations Limited

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From:**Sent:** 04 August 2023 09:48**To:****Cc:****Subject:** FW: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.**Importance:** High

Hi

No comments from Arriva Rail London.

Please direct future land disposal proposals to copied.

Thanks

HS2 Project Interface Manager

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13. London & South Eastern Railway Limited (Southeastern)

From:

Sent: 21 July 2023 12:03

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

No comments on the proposed land disposal.

Thank you.

Major Contracts Commercial Manager

Southeastern

14. Merseyrail Electrics 2002 Limited

From:

Sent: 18 July 2023 09:41

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Morning

We have no objections . thanks a lot

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Legal & Compliance Officer

15. MTR Crossrail

From:

Sent: 07 August 2023 09:23

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Hi

MTR Elizabeth line has no objections

Thanks

Head of Contract Management

MTR Elizabeth line

63 St Mary Axe, London, EC3A 8NH



Land disposal consultation report
16. Govia Thameslink Railway (Southern)

V 1.1

Confirmation of no further comments:

From:

Sent: 16 August 2023 14:16

To:

Cc:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Good afternoon

I can confirm we have no further comments to make, GTR responds in favour of this consultation providing the railway operations are not to be impacted in any way by this proposal or by the associated works.

Please accept this email as our formal response.

I hope this helps, have a good day.

Regards,

Access Contracts Assistant Manager (Stations)

First Questions from GTR (Questions in black, responses in red and green):

From:

Sent: 27 July 2023 12:29

To:

Cc:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

OFFICIAL

Land disposal consultation report

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Afternoon

I have had a response from the developer. Please see their answers in red. I have added my points in green.

- What impact is in case of an emergency evacuation? *The current emergency evacuation strategy is along the tracks as per N922-NRT-PLN-EG-100009. There is no impact on these current emergency evacuation plans. The reference to N922-NRT-PLN-EG-100009 relates to the standard/regulation for how passengers and staff escape from broken down trains.*
- Planned closure of the railway during works? *None. Project is currently utilising piggybacking on planned possessions. Co-ordinated via NR ASPRO team.*
- Impact (during/after the works) on the ability to maintain the railway? *None. As per above Project is currently utilising piggybacking on planned possessions. Co-ordinated with maintenance team via NR ASPRO. Changes to railway assets have been designed to ensure no impact on NR maintenance & construction activities co-ordinated via ASPRO.*
- Impact on the driver walking routes to/from Smithfield Sidings. *No designated walking routes identified – confirmed by ASPRO.*
- RE: potential future Station Change – overall we believe there might be some impact on the railway operations so we need to understand what type and what for and what will be included in this station change (if any issued)? *No planned impact – Any risks are mitigated and managed through ASPRO via agreed technical submissions and activities.*
 - o *NR: Could you clarify the Station Change point? We don't think this has an impact on a TOC lease at either Farringdon or City Thameslink so wouldn't require Station Change?*
- Just out of interest, what is the commercial value of this sale?
 - o *NR: We are still in negotiations but it is looking like [redacted]*

Any further questions do let me know.

Thanks,

Second Questions from GTR (Questions in black, response in blue):

From:

Sent: 09 August 2023 09:05

To:

Cc:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Morning

Response:

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There is still a concern around the emergency evacuation and future impact on the railway operations. A stronger confirmation is required that there will be no impediment on attaching emergency ladders against the side doors of the trains in case of any crucial situations *Note that new columns above existing platform level do not project any further than current tunnel support columns or the edge of the existing disused platform and therefore does not restrict clearances between the train and proposed new structure, the temporary enclosures and/or impact barriers will project slightly further than the new permanent structures to enable the placement of the columns during construction phase – any impact to sight signalling and restriction to clear distance requirements from train envelopes will be reviewed by the project & via IDC as part of assurance approvals process with NR ASPRO to ensure there is no impact on the operational railway. **and assurance that there will be no impact during work (drilling process)** No drilling will take place the caisson pile foundations have been selected due to the hand dug construction of these which does not lead to vibrations and minimises ground movements. Ground movement assessments are being undertaken and will undergo rigorous CAT 3 checking. Monitoring Action plan for the tunnel structure and Track Monitoring Action plans are being developed by the design team which will be reviewed and approved by Network Rail ASPRO team prior to commencing construction works which have any potential to affect the rail way – monitoring targets in line with the specification approved by NR ASPRO have already been placed within the tunnel and along the track in advance of the construction to obtain baseline readings **and after the columns are installed on the railway operations.** In addition to the above a list of relevant design assurance documentation have been agreed with NR ASPRO team for which various IDC's will be arranged as part of the approval process – GTR will be invited to participate in these IDC's and are encouraged to engage in an online introduction to the project presentation in advance to these IDC's to gain background to the full context of the project*

Please pass this onto the relevant teams.

Thanks,

17. Northern Rail Limited

From:

Sent: 18 July 2023 09:52

To:

Subject: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Good Morning

I hope you are well, thank you for your email. We do not have any comments to make on this matter because it does not impact our network.

I would be grateful if you could forward any further emails to me because I am covering my colleagues, maternity leave.

Land disposal consultation report

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If you have any queries please do not hesitate to contact me.

Many thanks

Franchise Compliance Manager

Mobile:
George Stephenson House, Toft Green
York
YO1 6JT

18. Avanti Trains (First Trenitalia West Coast Trains Limited (Avanti) and West Cost Partnership Development)

From:

Sent: 03 August 2023 13:47

To:

Cc:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

I am happy to confirm that we have no objections to this land disposal as it is off route on the Thameslink route.

This response represents the views of both First Trenitalia West Coast Rail Limited and West Coast Partnership Development.

Many thanks

Land disposal consultation report

V 1.1

19. COLAS Rail Limited

From:

Sent: 10 August 2023 12:48

To:

Subject: FW: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Importance: High

Hi – no comments.

KR,

20. Nuclear Transport Solutions

From:

Sent: 28 July 2023 11:32

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Good

NTS have no comments.

Kind regards,

Procurement Manager
Property & Infrastructure
Nuclear Transport Solutions

Land disposal consultation report**V 1.1****21. DB Cargo UK Ltd****No response provided.****Final email chase:**

From:**Sent:** 15 August 2023 16:09**To:****Subject:** FW: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.**Importance:** High

OFFICIAL

Dear

This is the **final opportunity** to make any comments on the disposal detailed in the attached files.

Please respond 'no comment' if you have no queries or conditions.

I will have to put 'no response' for DB Cargo on the consultation form.

Thanks,

Land disposal consultation report

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22. Logistics UK

From:

Sent: 10 August 2023 11:42

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

Apologies for the delay in getting back to you.

Logistics UK's response is no comment.

Thank you.

Kind Regards,

23. Freightliner Limited

From:

Sent: 17 July 2023 13:29

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

No comment from fl.

Thanks.

Land disposal consultation report

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24. GB Railfreight Limited

From:

Sent: 18 July 2023 11:34

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

No issues from GB Railfreight.

Regards,

GB Railfreight

Head of Strategic Access Planning

3rd Floor, 55 Old Broad Street | London | EC2M 1RX

25. Rail Freight Group

From:

Sent: 17 July 2023 12:57

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Ok with RFG

Director General
Rail Freight Group

Land disposal consultation report**V 1.1****26. West Coast Railway Company****From:****Sent:** 09 August 2023 15:54**To:****Subject:** Re: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

No comments

WCR

27. W. H. Malcolm**From:****Sent:** 17 July 2023 13:44**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

No comments.

Regards

Business & Estate Manager | W H Malcolm Ltd

Malcolm Group, Block 20, Edinburgh Road, Newhouse Industrial Estate, Newhouse, Lanarkshire ML1 5RY

28. Association of Community Rail Partnerships

From:

Sent: 08 August 2023 14:32

To:

Subject: RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Hi

Apologies for the delayed response on this.

No comments or concerns from CRN

Thanks

Director of Member Support & Development



Land disposal consultation report

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29. British Transport Police

From:**Sent:** 04 August 2023 10:42**To:****Cc:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

You don't often get email from [redacted] . [Learn why this is important](#)

Dear

Thank you for the opportunity of reviewing the documentation, it is noted that there is no impediment on the railway boundary. It needs to be assured that the integrity of any railway boundaries are maintained, hence there are no further comments from this office at this stage.

Regards

Design Out Crime Officer
Designing Out Crime Unit (DOCU)
British Transport Police

30. East West Railway Company

From:**Sent:** 18 July 2023 16:03**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Land disposal consultation report

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Dear

Thank you for getting in touch with the team here at East West Rail.

With regards to your consultation, EWR Co does not have any comments to make on the proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A, at this time.

Kind regards,
EWR Co Team

31. London Travelwatch**From:****Sent:** 17 July 2023 13:58**To:****Subject:** FW: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Hi

Thanks for sending this through. I can see that this area has not been used by passengers for many years. However, can you confirm whether or not any proposed work will affect passengers on any mode of public transport?

Best

Head of Casework**From:****Sent:** Monday, July 17, 2023 2:03 PM**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

OFFICIAL

Land disposal consultation report

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Hi

No, the proposed work will affect passengers on any mode of public transport.

Please let me know if you have any other questions/concerns. Otherwise please respond with a 'no objection'.

Thanks,

From:**Sent:** 17 July 2023 14:23**To:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Thanks

London TravelWatch has no other comments on this proposal so no objections.

Best

32. Transport Focus**From:****Sent:** 21 July 2023 12:48**To:****Subject:** Re: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

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Hi

Land disposal consultation report

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Thanks - no comment from us.

Best regards

33. Transport for London**From:****Sent:** 10 August 2023 14:23**To:****Cc:****Subject:** RE: Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

Hi

Aligned with response, we can confirm that this disposal would not appear to directly impact any LU, RfLI or TLRN assets or operations although each of these do have assets in the vicinity.

Therefore, could we ask for the Outside Party Developer to maintains contact with from TfL's Infrastructure Protection Team (cc'ed), through their design and construction phase.

Kind regards

Land disposal consultation report

V 1.1

34. City of London Planning Department

Environment Department

Executive Director Environment

Network Rail
Attn:
Waterloo General
Offices London
SE1 8SW



Telephone 020 7332

Fax 020 7332 1806

Email

Your ref

Our ref 23/00893/OBS

Case Officer

Date 23 August 2023

Town and Country Planning Act 1990

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

In response to your notification received on 9 August 2023, Please see our comments below:

SCHEDULE

Application Number: **23/00893/OBS**

Location: **61-65 Holborn Viaduct London EC1A**

Proposal : **Request for comment by the Local Planning Authority on the disposal of areas to be used for piling and columns, and airspace above the columns, in the Network Rail tunnel between City Thameslink and Farringdon stations, passing under 61-65 Holborn Viaduct, in respect of development granted under 21/00781/FULMAJ.**

CONDITIONS

1 The City of London Corporation as Local Planning Authority makes the following comments in regard to the disposal of airspace and subsoil rights in the Network Rail tunnel underneath 61-65 Holborn Viaduct:

- The disposal would not have an impact on archaeology as the archaeology under 61-65 Holborn Viaduct as already been removed.

City of London PO Box 270, Guildhall, London EC2P 2EJ
Switchboard 020 7606 3030
www.cityoflondon.gov.uk

www.cityoflondon.gov.uk/plans

Land disposal consultation report

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Page 2 of 2

- The proposals presented would not adversely affect the Highway in any way, as confirmed by Network Rail by return email dated 22.08.2023.

As such, the City Corporation as Local Planning Authority does not object to the proposed disposal.

We would like to bring to Network Rail's attention the possible impact of the removal of the vent from the tunnel on site in terms of overall venting arrangements. This is not related to the request for comments on the disposal of rights directly, but Network Rail should consider these comments in respect of safe operation of the railway going forward with any proposals to remove the vent.

Planning and Development Director
Date of issue: 24 August 2023

Land disposal consultation report

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Annex 2 - Consultation Email Sent

From:**Sent:** 17 July 2023 12:13**Subject:** Consultation on proposed land disposal: Airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A.

OFFICIAL

Dear Consultee,

We are currently seeking views of relevant parties on our proposed land disposal at airspace and subsoil in a tunnel underneath 61-65 Holborn Viaduct London EC1A by way of a supplemental lease, demising areas to be used for the piling and columns and additional airspace. This supplemental lease will be attached to the original 999-year lease granted in 1958 for the surface land and will run till 2957.

We attach a draft application form which together with the related plans explains the proposed land disposal in detail. Following this consultation and having considered any comments that are received, a decision will be made whether to submit a formal application to ORR for consent to dispose under the terms of our network license.

It is therefore important that we have your views as to whether you believe that the proposed disposal site has any foreseeable railway, or other public transport, use which may lead us to consider that it is inappropriate to dispose of that site. Please be aware that any comments relating to Station Change, Network Change or Planning processes will be dealt with separately as part of their respective consultations.

Any application made will be based on this draft Property Disposal form and updated in light of consultation responses. It is therefore important that we have your views on the proposed disposal.

Please could any comments be provided to me via email by **Wednesday 16th August 2023 (16/08/2023)**

If a formal application to ORR is made we will, in accordance with ORR's regulatory arrangements for land disposal, send you notification of our application in due course.

If you have any queries regarding our proposal do not hesitate to contact me. If future consultations of the nature should be directed elsewhere within your organisation please advise us of the appropriate contacts details so that we may amend our records.

Yours sincerely

Annex A

Network Rail's response to ORR's query on safety evacuation

- *ORR consent of 2014 disposal & evacuation: ORR attached conditions that were related to the safe evacuation and passenger emergency evacuation walkway. We note that right of access to the basement property adjacent to the disused Holborn station platforms was presented as a viable option for safe evacuation (as noted in the N000-NRT-LET-EA-000001 document-section 3), we do not believe that you have sufficiently addressed this. While the conditions still stand the responses are out of date and it would be prudent for them to be reassessed, owing to the passage of time. ORR would expect a more detailed response to point B (an appropriate passenger emergency evacuation walkway to evacuate passengers from a failed train in the tunnel, of sufficient length and height and which is compliant with relevant standards and legislation and, can be accommodated at the location) - **our scheme (2023) is slightly different from the 2014 application, as specified below:***

2014 – proposed 6No. standard columns to be positioned inside the Snow Hill tunnel, 3No. each side of the live railway tracks, supported on piled foundations of standard construction.

2023 - 5 No. Structural support columns proposed which will be positioned within the disused platform on the UP Side of the tracks only, supported on caisson piled foundations utilising hand dug construction methodology to reduce ground movement/vibrations impact on live running tracks via access heading shaft for 2No. of the caisson. Column positions selected to minimise impact to existing electrical & signalling services within the platform area but will require modification to existing foundations supporting the tunnel roof structure. Provision of impact barriers to columns now proposed to maximise robustness of supporting columns. Formation of penetrations and modification to the tunnel roof structure still required but in revised positions in line with the new column positions.

Although the principles are the same, existing evacuation routes are different from 2014. I have attached the pictures from existing redundant platform and a superimposed image of our columns with the evacuation route.

The NR Team (Asset Protection) have reviewed the Tunnel Emergency Plan Document which shows that the current EE route is along the tracks and via the platforms at Farringdon and/or City Thames link Ref: N922-NRT-PLN-EG-10009, dated June 2015, which demonstrates that the evacuation routes will not be affected by the projects proposals. The area of the tunnel of which the columns planned to be placed is between Evacuation Routes 09 and 10 shown on page 18 and described on page 19 of N922-NRT-PLN-EG-10009. Evacuation Routes 09 is described as: "In the northern direction: use the ballasted track towards Platforms 3 and 4 of Farringdon Station." Evacuation Route 10 is described as: "In the southern direction use the ballasted track towards Platforms 1 and 2 of City Thameslink Station." Due to the proposed columns being adjacent to the tracks, they do not interfere with the adopted routes evacuation plan N922-NRT-PLN-EG-10009 to "use the ballasted tracks".

If we are to provide an access route from the tracks, through our site, it would mean we interfere with existing evac route approved by various stakeholders at NR, GTR and ORR. Therefore, please provide an update regarding the 2014 negotiation and if NR has been able to obtain access right to the disused Holborn station platforms. -

- *There needs to be a clear evacuation route from the tunnel, which needs to be suitable for use during an emergency. Please detail and provide an up to date evacuation plan, as this may need to be reassessed. **Please see attached ORR response and N000-NRT-LET-EA-000001 Snow Hill Tunnel (Holborn)***
- *Pile installation: NR has confirmed to ORR the foundation that will support the pile installation will be hand-dug and not drilled to ensure that no damage is caused to the existing infrastructure. We note that though the foundation will be hand-dug, we would suggest that a requirement for monitoring equipment should be used during the process. – **movement monitoring is in place as approved by the ASPRO team.***
- *ORR would expect the applicant to reach out to Network Rail ASPRO team for comment on the proposal and to engage with the team at Network Rail during the planning and construction process. – **we have signed an APA to carry out these works and submitting forms for each element of work for approval from ASPRO. Brian Marles is the project manager on this.***
- *Air rights: while the air rights at this location forms part of the disposal area, it is understood to only be for the extent of the tunnel. Please confirm if this is a correct assessment. – **correct***
- *Supporting columns: The placement of the new supporting columns must not interfere with existing railway assets, such as signalling and telecoms. Required signalling siting must be undertaken to ensure the safe running and operation of the line. Please confirm. – **confirmed, no hindrance to existing assets.***
 - *In the 2014 decision we also attached the following condition (the placement of the new supporting columns resulting from the redevelopment at 65 Holborn Viaduct, London EC1A, will not hinder the means of evacuation through the tunnel beneath the development). Please confirm that the placement of the columns will not hinder the evacuation process.*

The new columns above existing platform level do not project any further than current tunnel support columns or the edge of the existing disused platform and therefore does not restrict clearances between the train and proposed new structure, the temporary enclosures and/or impact barriers will project slightly further than the new permanent structures to enable the placement of the columns during construction phase – any impact to sight signalling and restriction to clear distance requirements from train envelopes will be reviewed by the project & via IDC (Inter-Disciplinary Check) as part of assurance approvals process with NR to ensure there is no impact on operational railway.
- *Tunnel lighting: NR details the installation of tunnel lighting; this must be agreed with NR RAM. To ensure it is suitable, maintainable and will not interfere with railway assets (i.e. signalling). Please confirm.’ – **all in discussion with ASPRO.***



HM Inspector of Railways
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

Network Rail
Thameslink Programme
James Forbes House
27 Great Suffolk Street
London SE1 0NS
☎ +44 (0)203 023 3000

Date: 5 August 2015
Ref.: N000-NRT-LET-EG-000001 v01

Snow Hill Tunnel (Holborn) - Emergency tunnel access/evacuation from stranded Class 700 trains.

This response is submitted on behalf of Network Rail Infrastructure Ltd. and does not necessarily represent the views of the other parties that contribute to Thameslink Programme and have separate contracts with the Department for Transport (DfT) for this purpose, specifically:

- Govia Thameslink Railway (GTR).
- The Train Manufacturer and Maintainer (TMM): Siemens plc.

My engineers and GTR have met with you on a number of occasions to discuss many of the points captured in this response. You will recall from these discussions that our priority has been to target safety investment to eliminate safety risks at source and avoid so far as is reasonably practicable any need to evacuate trains in tunnels. Further to our last meeting on this subject on 22 January 2015 and your letter of 23 July 2015 (yr ref. 2014 03 04 Snow Hill) I can advise against each of the points that you raised, adopting the same numbering, as follows:

1. Regarding the update on status of the emergency access to, and egress from, infrastructure comprising the Thameslink Core Area tunnels, with specific reference to the Snow Hill tunnel, that:
 - 1.1. Each station within the Core Area has its own bespoke 'local emergency plan' (LEP) prepared and updated by the operators concerned. London Underground (LU) in conjunction with GTR for Farringdon and GTR for City Thameslink station, being the stations immediately adjacent to the Snow Hill tunnel. These stations have had considerable investment in fire safety and evacuation systems including at Farringdon provision of lifts to aid evacuation of the mobility impaired.
 - 1.2. Network Rail Infrastructure Ltd. (NRIL) has its companywide '*Network Rail National Emergency Plan*' (Ref. [NR/L2/OCS/250](#)) and applies applicable modules of the Rule Book GE/RT8000 in response to any incident within these tunnels.
 - 1.3. In addition to the above provisions NRIL (Thameslink Programme) is in the final stages of re-issuing and briefing out a new LEP for all the Core Area tunnels (Ref. [N922-NRT-PLN-EG-100009](#) – *Thameslink Inner Area Emergency Plan: Information to support existing agency plans and procedures*). This has been produced after extensive consultation with NRIL Operations, TOC representatives, NRIL Emergency Planning specialists, Emergency Services, local authorities, etc., circa 60 individuals, with copy of the document issued for authorisation by the routes enclosed with this letter for your information.
 - 1.4. Specific detail regarding the studies into providing for improved emergency escape is provided in section 3 of this response. It includes for an update on the status of the negotiation with the developer of the proposed hotel and office development adjacent to the disused Holborn station

platforms. His negotiation is attempting to secure rights of access to potentially utilise a emergency escape stair from the basement of this property.

1.5. NRIL (Thameslink Programme) have upgraded the infrastructure within the Snow Hill tunnel to improve the provision for fire safety and evacuation including for:

- A fire-fighting water main to latest standards with a capability and capacity as detailed in the Thameslink Inner Area Emergency Plan: Information to support existing agency plans and procedures.
- GSM-R (railway) radio coverage, including the provision of hand-held portable radios for the 'mobile operations manager' (MoM) operating in this area.
- LFB UHF channel 5 emergency radio coverage to the sub-surface station and through-out these tunnels, including Snow Hill tunnel.
- Additional means of escape and emergency services access, is provided with the new 'road rail access point' (RRAP) located at Snow Hill sidings, to provide for NRIL (Thameslink Programme) construction access that will remain on works completion (with additional intervention points and emergency exits provided to Belle Isle junction – for Canal tunnels, St Augustines Way – for Kings Cross tunnel north and Kings Cross Thameslink disused).
- New signaling and telecommunications circuits for the re-signaling works all installed with cabling compliant to fire safety standards, for both fume (LSZH) and fire resistance, with redundant cabling removed according to NR standards, applicable at the time of installation (circa five years ago).
- A tunnel lighting system compliant to latest standards also installed with cabling compliant to fire safety standards, for both fume (LSZH) and fire resistance, applicable at the time of installation (circa five years ago).
- Both the radio system (both GSM-R and LFB emergency radio) and the tunnel lighting system are configured to be resilient to damage in that both are 'dual end fed', from diverse electrical supplies, to diverse circuits, so damage or a break in the circuit at any single point would not incapacitate the whole system, with the design configurations complying to applicable standards and 'good practice' engineering principles.
- Improved resilience to the electric traction power supply has been achieved with the provision over the length of the Snow Hill tunnel of both:
 - AC 25kV OHL traction power supply, that has had its resilience to failure further enhanced by electrically segregating the feeds to the 'northbound' and 'southbound' lines (these terms have been changed as the 'up' and 'down' description of line direction changes in the Core Area at present) with independent feeding to electrical sections 598 and 599.
 - DC 750 V 3rd rail provision that is maintained over the length of the Snow Hill tunnel.
- NRIL and GTR (as the incumbent operator) have collaborated (to take benefit from the improved electric power supply provision) by locating a 'side to side' train-to-train trans-boardment ramp at key stations and for the 'mobile operations manager' (MOM) to deploy from their vehicles attending any incident; although both parties recognise that this would only be of utility in a 'cold incident', i.e. one not involving a fire scenario of whatever severity.
- Dis-used rooms or equipment rooms and similar voids in the operational infrastructure have been blocked-off or had suitable doors provided to prevent 'self-evacuees', staff or emergency services personnel becoming trapped in a 'dead-end' location.
- The Holborn station platforms are 'cut-back' a distance of circa a meter (to provide for low level troughing routes) so this means of egress from the train is no more attractive than disembarking to the tracks on the other side of the train.

2. GTR is acting on behalf of Thameslink Programme client (DfT) to provide for the introduction into passenger service of the new Class 700 trains. The safety provision that has been considered and made to cater for this event falls into two areas:

- 2.1. The infrastructure provision and emergency planning provision that has been provided as described in the response to item 1. This infrastructure upgrade has provided for improved walking routes and exits from this tunnel and is intended to be the final solution such that currently no interim provisions are considered necessary.
- 2.2. The following information has been provided by GTR and is correct to the best of my knowledge. If further clarification or more detail is required then GTR should be contacted directly.

The provisions made with respect to fire safety and resilience of the train to fault and failure has provided for a safety improvement compared to the current rolling stock operating on Thameslink routes. The new Class 700 trains conform to BS6853 Category 1b, BS476 6 and 7 - Fire testing, GM/RT2130 Part 2 (fire) Category A and SRT TSI. In accordance with these standards fire partitions and barriers compartmentalise and segregate hazardous traction systems from passenger compartments and protect the safety critical systems protecting all saloons comprising:

- Smoke & heat detection.
- Smoke exhaust system.
- Emergency lighting.
- PA system.
- 2 x 6 litre AFFF extinguishers per car.
- 2 litre AFFF extinguisher in each cab.
- Metal Litter Bins.
- Avoidance of hiding places.
- Electrical protection.
- Protection against power arcs.
- Protection against High Current Circuit Breaker Output.
- 'Pass-com' in each car and toilet.
- Emergency egress handles at doors.
- Driver Information Screens HMI panel.
- CCTV throughout the salons.

3. NRIL (Thameslink Programme) risk assessment and analysis with respect to improving the safe evacuation of, or access to passengers from a stranded train or trains, is described below. In addition to the completed works described previously detailed consideration has been given to three additional intervention options illustrated on the drawings in the attached documents, namely:

- Do minimum (essentially just correcting 'snags' or minor improvements that became apparent on completion of KO-1)
- The 'medium' intervention option, i.e. the one where an escape route into a basement adjacent to the Holborn station (southbound) platform is included and provision made to utilise it.
- The 'high' intervention option, where all constraints on evacuating any train are eliminated.

[N420-GIF-REP-EG-000001 Snow hill Tunnel Evacuation Route Options Study - drawings](#)

The technical analysis from which the above options were derived is in the attached 'desk-top' study, using as-built 'truview' laser scanned survey data:

[61031893-AEG-R01A Snow hill Tunnel Evacuation Route Options Study](#)

The above report informed the following:

[Snow hill Tunnel - Train Fire Risk Assessment and CBA](#)

In summary, the risk assessment concluded: *“Based on the analysis undertaken ... this study concludes that none of the options identified to provide for improved fire evacuation arrangements in the Snow hill Tunnel is economically viable. The above results are mainly due to the extremely high cost of providing additional preventative measures and the low probability of occurrence of the hazardous event in question. It has to be noted that the safety measures analysed in this study are mitigating the consequences of an incident at one specific location, and therefore they would result in a localised benefit. However, the risk of fire will be mitigated by the provision of trains with a very high resistance to fire ignition and spread (the new Class 700) and with an 8-minute running time if a fire breaks out (allowing the train to reach the next station). This is believed to combat the risk ‘at source’ and to provide a safety benefit over the whole network, rather than at a specific location.”*

However, notwithstanding the above, in response to ORR intervention in a proposed change of lease to railway land over and immediately adjacent to Snow Hill tunnel, NRIL are taking steps to secure the rights of access through a basement to a property adjacent to the disused Holborn station platforms. With structural adaptations this could enable the railway to utilise a proposed emergency escape stair that exits to the street at ground level. Whilst the costs of securing this agreement could be considered modest; NRIL would have to make a significant investment to construct the fire hardened exit door into the basement, reconfigure the infrastructure and provide walkways to take advantage of this facility, funds that the safety risk analysis suggests would be better expended elsewhere to provide for a safety improvement.

4. NRIL (Thameslink Programme) validation of the risk assessment and analysis in item 4 has comprised:
- Consultation with the parties involved in the emergency planning arrangements for the Core Area when compiling the emergency plan (see 1.3 above).
 - Instruction of an appropriately skilled independent consultant and competent engineering staff with experienced operators compiling the technical evaluation(s), risk assessment and cost benefit analysis.
 - Involvement, consultation and review of the outputs above with the train operators concerned so as to fulfil both our ‘duty of care;’ and the explicit regulatory provisions for consultation with agreement as to safe infrastructure or operational change, with both GTR and NRIL comfortable with the conclusions of the risk assessment and studies presented.

In consideration of the last point however, it has been agreed that both NRIL and GTR should re-visit the provisions in this area to see if other additional reasonably practicable provision could be made to deter passengers ‘disembarking’ in the area of the disused Holborn station platforms.

5. Formerly, when these issues were being considered under the ‘Transport and Works Act’ (TWA) process both the London Fire Brigade (LFB) and ‘Her Majesty’s Railway Inspector (HMRI) lodged objections concerning the proposed operation through the Thameslink Core Area tunnels. These objections were removed by agreeing a scope of works in the ‘*Outline Proposals and Concept - a submission to HMRI*’, (Ref. [MPD/TL2/SAF/020](#), dated 02-Jun-00). Acceptance as to this scope of works was received in the HMRI ‘letter of no objection’ (Ref. [RI 7/29/05 PR98724](#) dated 15 June 2000). All of the fire safety provision in the Core Area tunnels required by the ‘*Outline Proposals and Concept Submission*’ (and more) have been addressed and achieved as detailed in items 1 and 2 of this response with an additional evacuation routes from Snow Hill tunnel never having been specified as one of these provisions. Whilst conforming to the infrastructure provision agreed with LFB and HMRI at the time, the scope and extent of railway services remains unchanged from that originally proposed under the TWA.

The ‘London Fire Brigade’ (LFB) are not required to formally accept any aspect of the infrastructure fire safety provisions, via a fire certificate or otherwise, as these requirements were removed with the Fire Safety Order 2005. In lieu of these arrangements the LFB have powers to issue in effect

'advice', 'improvement' or 'prohibition' notices, so as a consequence of this NRIL (Thameslink Programme) took steps to consult with LFB at the time issuing the *Inner Area Tunnels GRIP 4 Fire Safety Strategy*, [N284-HGL-PT-000001-02](#) dated December 2008 to the Brigade for review and comment. As a consequence of the close working with LFB in a structured fire safety management framework following the principles of '*BS7974 Application of fire safety engineering principles to the design of buildings*', no comments or observations were returned from LFB as they were content with the approach described.

In conclusion NRIL (Thameslink Programme) believe that in the particular circumstances arising all reasonably practicable provision has been made to improve the facilities for emergency access and evacuation from the tunnels. Extensive measures have been implemented to improve the fire safety provisions, with the emphasis being on taking steps to prevent combustion in the first instance and limit fire spread or fume in the event of fire, so as to prevent so far as is reasonably practicable the need for evacuation of trains in tunnels (or any other hazardous environment for that matter).

NRIL (Thameslink Programme) have done all that is reasonably practicable in the circumstances within the constraints presented by this Victorian infrastructure but constantly keep this matter under review. I would therefore be happy to meet with you to discuss this matter further once you have had time to review the documents I have supplied under this correspondence.

Yours faithfully,

Acting Head of Engineering
NR Thameslink Infrastructure Programme

Copied to:

Company Secretary
Network Rail Infrastructure Limited
2nd Floor, One Eversholt Street
London
NW1 2DN

Current obstructions from train for Emergency Passenger Egress & options that NR might have if they wanted to upgrade to allow EE.



Platform "cutback" would need to be reinstated up to safe egress level in line with train carriage and kinematic envelope. Width to front of existing column lines potentially wide enough?

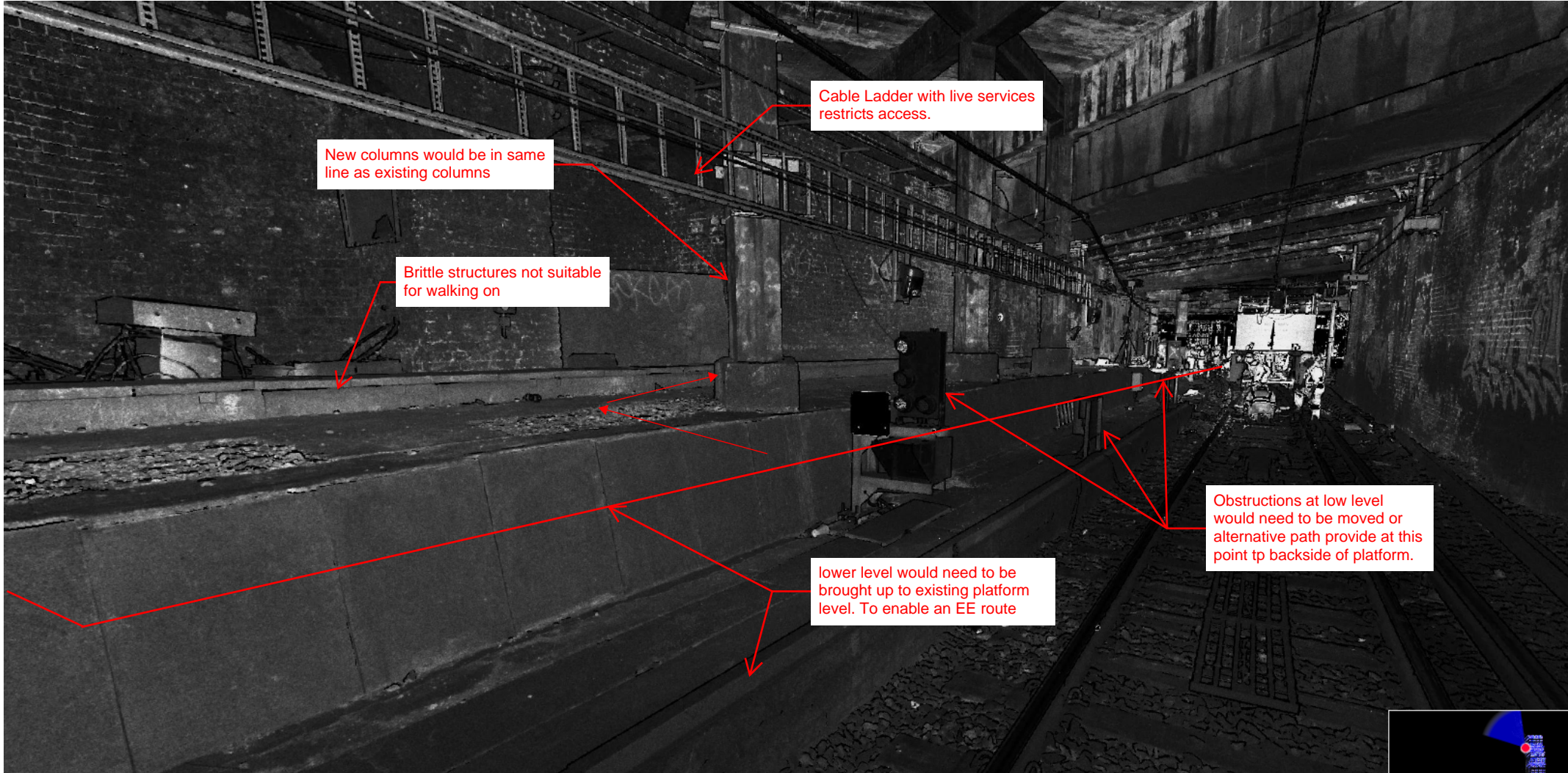
Hand Rail & Cable Ladders - would need to be removed.



STEPS in existing platform & brittle structures not suitable for walking on.



Significant steps and obstructions due to cabinets etc



New columns would be in same line as existing columns

Brittle structures not suitable for walking on

Cable Ladder with live services restricts access.

Obstructions at low level would need to be moved or alternative path provide at this point tp backside of platform.

lower level would need to be brought up to existing platform level. To enable an EE route



N922-NRT-PLN-EG-100009 V01
AS
DK

- INDICATES A RESIDUAL RISK REQUIRING A COMPULSORY ACTION
- INDICATES A RESIDUAL RISK REQUIRING A PROHIBITIVE ACTION
- INDICATES A RESIDUAL RISK AS A WARNING
- INDICATES A RESIDUAL RISK FOR INFORMATION

NOTES:

1. THE FOLLOWING RAILWAY SYSTEMS RELATED ENABLING WORKS ARE ANTICIPATED:
 - i) ACCESS DEROGATIONS TO SIGNALLING EQUIPMENT.
 - ii) RELOCATION OF SIGNALLING POST TELEPHONE.
 - iii) NEW / UPGRADED ACCESS WALKWAYS AND LOWERING/REPLACEMENT OF CABLE TROUGH WITH WALKING ROUTE COMPLIANT VERSIONS.
 - iv) SLEW OF HIGH LEVEL CABLES TOWARDS TRACK.

GENERAL ARRANGEMENT LEGEND:

- MASS CONCRETE
- DENOTES INSITU CONCRETE ELEMENT OVER
- DENOTES LOAD BEARING ELEMENT UNDER
- DENOTES LOAD BEARING ELEMENT UNDER AND INSITU CONCRETE ELEMENT OVER
- ALL NEW WORKS
- ENABLING WORKS REQUIRED TO MODIFY RAILWAY ASSETS
- DENOTES PRECAST ELEMENT OVER
- DENOTES PENETRATION
- DENOTES SLAB STEP
- DENOTES SLAB THICKNESS
- DENOTES COLUMN NUMBER AND SIZE
- DENOTES WALL NUMBER & DIRECTION ELEVATION IS VIEWED
- DENOTES SPAN DIRECTION
- DENOTES SAWN JOINT
- DENOTES TOOLED JOINT
- DENOTES KEYED JOINT
- DENOTES DOWELLED JOINT
- DENOTES CONSTRUCTION JOINT
- DENOTES EXPANSION JOINT

NOTE: REFER ARCHITECTS DRAWINGS FOR ALL STEPS AND FALLS IN SLABS

P03	ISSUED FOR REVIEW AND COMMENT	AD	GH	10.02.23
P02	ISSUED FOR WORK IN PROGRESS	CM	GH	15.12.22
P01	ISSUED FOR INFORMATION	CM	PW	23.05.22

Rev	Revision Description	By	App	Date
1				
2				
3				
4				
5				
6				
7				
8				

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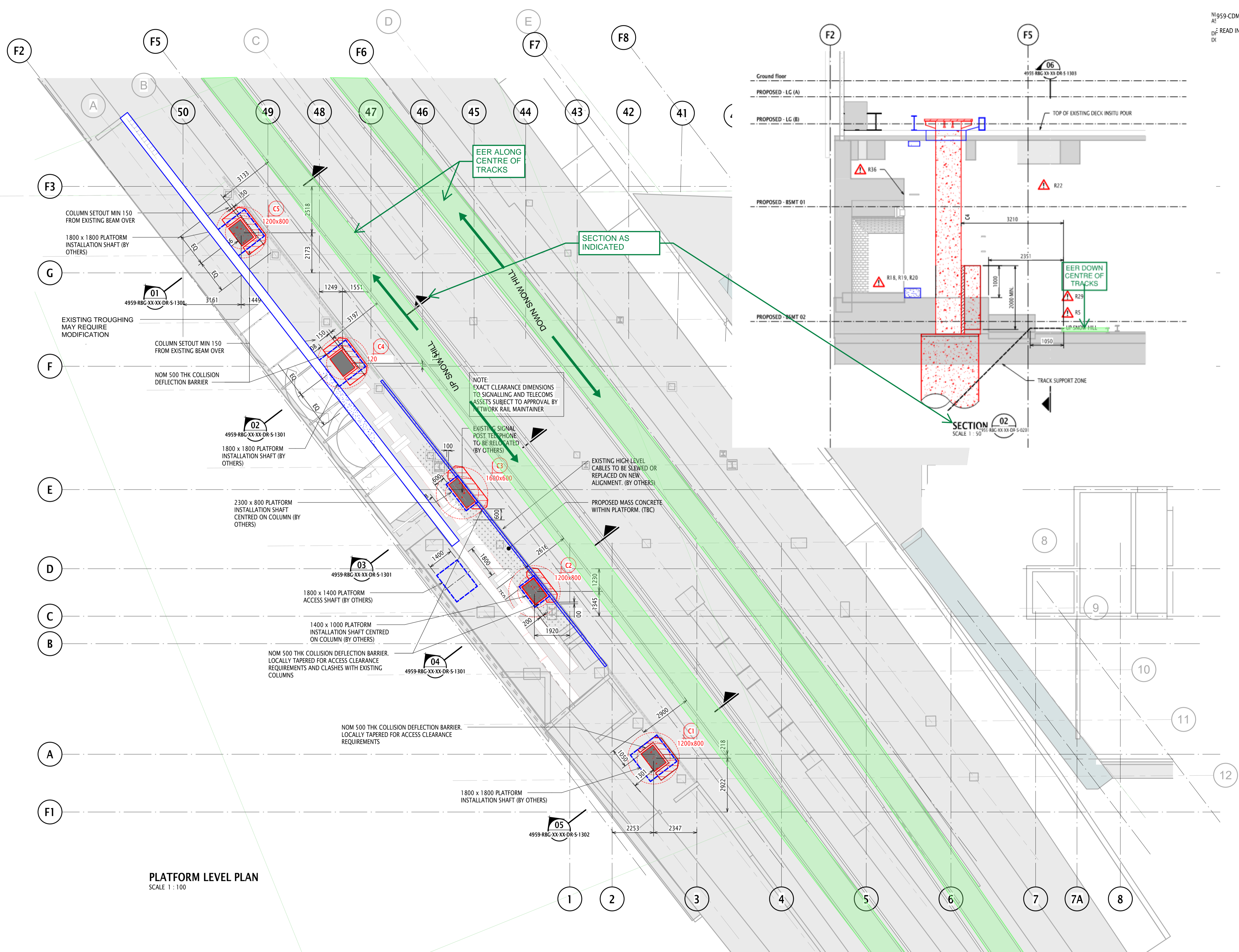


Client

Project

Title

MARKUP - SHOWING EXISTING COLUMNS, PROPOSED COLUMNS & PROXIMITY TO EER IN RELATION TO N922-NRT-PLN-EG-100009 V01



PLATFORM LEVEL PLAN
SCALE 1 : 100