OBJ212/5

Closing Statement

Alan Francis, MK Green Party

1. During his cross-examination of me NR's QC Mr Mould asked me if I was familiar with the phrase "the best is the enemy of the good". I confirmed that I was familiar with it. Mr Mould then suggested that our submission was asking for the best and thus jeopardised the good. I disagreed.
2. The changes to the order proposed in our submission would not make it the "best". The "best" would be double-track throughout, full electrification, higher speed at all junctions, longer platforms and more level crossings replaced by bridges. What we are proposing is far less than that. Our proposed changes, mainly re-instating things cut from the original NR and EWR Consortium plans during the Value Engineering process, would make it "fit for purpose".
3. What is proposed in the order is not the "good". It is the "barely adequate". It is not resilient, has very little capacity for any extra services, it cannot accommodate longer trains on busy services, it may delay services on the WCML and it will cause longer hold ups on the road network at level crossings.
4. So the choice is not between the "best" and the "good" but between the "fit for purpose" and the "barely adequate". We think that EWR should be "fit for purpose" not "barely adequate".

5. In our main proof we argued that Denbigh Hall South Jn, should be upgraded to 40mph for the diverging route and as well as increasing the speed the layout of the junction should also be changed from a switched diamond to a ladder type junction. Amongst other things this increases its resilience.

6. NR has recently upgraded Balcombe Tunnel junction on the Brighton Main Line. It increased the line speed on the diverging route from 20mph to 40 mph and converted it from a switched diamond to a ladder type junction. In the April 2019 edition of Modern Railways on page 64 it is stated, “The S&C at Balcombe Tunnel jn was life-expired …. Also a diamond crossing, a maintenance-heavy and vulnerable element in the track design was removed and replaced by by two separate crossovers.”
7. The article also quotes Adam Kotulecki, Project Manager working for the S&C Alliance of NR, AECOM and Colas. He said, “The purpose of the work was to make this junction more resilient.” This supports our contention that Denbigh Hall South Jn should be treated similarly to increase its resilience.
8. Mr Croft stated that increasing the line speed at Denbigh Hall South Jn would require another span and an extra track on the rail bridge over Watling St. We accept that a 40mph ladder type junction would require more space than the current junction but there is plenty of space on NR land to extend it to the south rather than the north, ie not over Watljng St.
9. The current junction is about 60m long. Two new double junctions were created as part of EWR Phase 1, at Gavray junction and Bicester South junction. These were both ladder type junctions with a speed of 40mph for the diverging route. Each is about 200m in length. So a 40mph ladder type junction at Denbigh Hall South Jn would require about 200m.
10. The distance between the Watling St bridge and the Spenlows Rd footbridge is about 200m. Immediately to the south of the current junction the Bletchley Flyover lines run parallel to and at the same level as the WCML Slow lines for about 400m. So a 40mph ladder type junction could easily be fitted in at Denbigh Hall South Jn without having to build an extra span on the bridge over Watling St.