

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2015–16

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) BILL (ADDITIONAL PROVISIONS)

Against – on Merits – Praying to be heard By Counsel, &c.

To the Honourable the Commons of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled.

THE HUMBLE PETITION of TRANSPORT FOR LONDON and the MAYOR OF LONDON acting on behalf of the GREATER LONDON AUTHORITY

SHEWETH as follows:-

1. A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your honourable House intituled "A bill to make provision for a railway between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes."
2. The Bill is presented by Mr Secretary McLoughlin (referred to in this petition as "the Promoter").

THE ADDITIONAL PROVISION

3. An additional provision to the Bill was deposited in Parliament on 15 September 2015 (referred to in this petition as "the Additional Provision") making amendments to the original proposals within the Bill.
4. The Additional Provision amends clauses 16, 57, 58 and 63 of the Bill and Schedule 1, Schedule 4, Schedule 5, Schedule 8, Schedule 12, Schedule 15 and Schedule 17 to the Bill.
5. The Additional Provision contains new works and changes to the Bill of interest to your Petitioners under the following headings:
 - 5.1 Amendments to accommodate the changes to the design of Euston Station in the London Borough of Camden; and
 - 5.2 Amendments to accommodate the requirements of landowners and occupiers and changes to the design of the works authorised by the Bill in the London Borough of Camden.
6. The Additional Provision is accompanied by a Supplementary Environmental Statement 2 and Additional Provision 3 Environmental Statement which have been produced as one combined volume, reporting on both:
 - 6.1 the likely significant environmental effects of updated environmental information, changes to the scheme assumptions and changes within the existing powers and limits of the Bill; and
 - 6.2 the likely significant environmental effects of the amendments in the Additional Provision.

YOUR PETITIONERS

7. Your Petitioners are:
 - 7.1 *The Mayor of London acting on behalf of the Greater London Authority*

7.1.1 Your first Petitioner is the Mayor of London ("the Mayor") acting on behalf of the Greater London Authority (hereinafter called "the Authority") as established under the Greater London Authority Act 1999 ("the 1999 Act"). The Authority comprises the Mayor of London and the London Assembly. The Act conferred significant powers and duties upon your Petitioner, and subsequent enactments have further increased the scope of these powers and duties, the majority of which are exercisable by the Mayor on his own behalf or by him on the Authority's behalf. The Authority is a strategic authority, with a strategic role in London's economy, housing and regeneration, policing, transport, planning, environment, culture and health improvement. Through the four functional bodies currently established under the Act, the Mayor has powers over the provision of transport, policing, economic development, and fire and emergency planning in Greater London generally.

7.1.2 The Mayor acting on behalf of the Authority petitioned against the Bill in May 2014 ("the original GLA petition") and further details of your Petitioner and its role, powers and functions (including its power under section 77 of 1999 Act to oppose any local bill in Parliament which affects the inhabitants of, or any part of, Greater London) are set out in the original GLA petition

7.2 *Transport for London*

7.2.1 Your second Petitioner is Transport for London, a body corporate established under section 154 of the 1999 Act. Section 141 of the 1999 Act imposes upon the Mayor a general duty to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. Transport for London is tasked with facilitating the discharge by the Mayor of his duties under section 141 of the 1999 Act, with responsibility for most aspects of London's public transport, managing London's main roads and planning and building new infrastructure. Your Petitioner is also

responsible for delivering the Mayor's transport policies and strategy for London, as set out in the Mayor's Transport Strategy, a statutory document and a key part of a strategic policy framework to support and shape London's social and economic development.

7.2.2 Transport for London together with its subsidiaries, currently manages London's buses, the London Underground railway network, Docklands Light Railway, Overground and Tramlink. Transport for London also runs Santander Cycle Hire and Cycle Superhighways, London River Services, Victoria Coach Station, the Emirates Air Line and London Transport Museum. As well as controlling a 580km network of main roads (known as the "Transport for London Route Network" or "TLRN") and all of the city's 6,000 traffic lights, Transport for London also runs London's Congestion Charging scheme and is responsible for the regulation of taxis and private hire vehicles on London's roads.

8. This petition is submitted jointly to reflect the fact that the Transport for London and the Greater London Authority (together "your Petitioners") have shared concerns about the Additional Provision which will have interrelated effects on amenity, development and transport provision in London.
9. Your Petitioners, their subsidiaries and their respective rights, interests and property are injuriously affected by the Additional Provision, particularly the new works and changes referred to above, to which your Petitioners, acting on behalf of themselves and their subsidiaries, object for reasons amongst others, hereinafter appearing.
10. Your Petitioners each petitioned separately against the Bill in May 2014 ("the original petitions") and in July 2015 ("the AP2 petitions") and this petition is further and supplemental to the original petitions and the AP2 petitions.

YOUR PETITIONERS' CONCERNS

11. Your Petitioners have been engaged in detailed discussions with the Promoter in respect of the issues raised in the original petitions and the AP2 petitions and, as

reported to the Select Committee by Counsel for the Promoter, your Petitioners have agreed undertakings in respect of proposals (contained within the original Bill) affecting Old Oak Common and Crossrail.

12. Your Petitioners have also deferred a number of issues raised in the original petitions pending the publication of further additional provisions by the Promoter, including issues relating to Euston and the Code of Construction Practice that is to apply to the carrying out of works under the Bill. These issues remain outstanding and, following the publication of the Additional Provision (which relates to or affects these issues), are elaborated upon and updated below.

13. While progress has been made in discussions with the Promoter, your Petitioners are disappointed that concerns raised in those discussions in relation to the Bill have not been reflected in the Additional Provision, which contains the Promoter's revised proposals for the HS2 terminus station at Euston ("the HS2 Euston Terminus"). Your Petitioners seek reassurance that these concerns will be resolved through proper commitments and undertakings to ensure that the works authorised under the Bill are in the best interests of the UK, London and the local Euston area.

14. Your Petitioners' concerns are set out in detail below and can summarised by the following topic headings:

14.1 *Euston Station site: need for a comprehensive rebuild;*

14.2 *Design and Operational Issues at Euston;*

14.3 *Interaction with Crossrail 2;*

14.4 *Construction Impacts:*

14.4.1 *Construction Impacts on London Underground;*

14.4.2 *Construction Impacts on Network Rail Station;*

14.4.3 *Construction Impacts on Surface Network;*

- (a) *Replacement of Hampstead Road Bridge;*
- (b) *Volume of Heavy Goods Vehicle (HGV) Traffic;*
- (c) *Taxi Pick Up and Drop Off During Construction;*
- (d) *Impacts on Bus Services;*
- (e) *Construction Traffic Routes;*
- (f) *Impacts on Highway; and*
- (g) *Impacts on Cycling Provision and Cyclists;*

14.4.4 *Code of Construction Practice; and*

14.4.5 *Amenity – Noise, Vibration & Air Quality.*

15. These concerns highlight the need for additional commitments from the Promoter in respect of both new and existing issues. In particular, your Petitioners are seeking a commitment from the Promoter as Secretary of State for Transport that he will separately fund and deliver a comprehensive rebuild of the existing Network Rail station ("the NR Station") such rebuild to be constructed in parallel to the HS2 Euston Terminus and an undertaking from the Promoter, as undertaker of the HS2 works, that it will work with Network Rail ("NR"), the London Borough of Camden and your Petitioners to develop a common masterplan and timetable to support the NR Station rebuild alongside HS2.

EUSTON STATION SITE – NEED FOR A COMPREHENSIVE REBUILD

16. Your Petitioners' comments are framed not only by a need for the HS2 Euston Terminus to integrate into the existing transport network and a desire to mitigate construction impacts, but also by the Mayor's wider ambitions for growth and development in the Euston area and a pressing requirement for rebuild of the NR Station. Your Petitioners believe that the carrying out of the works authorised under

the Bill give rise to a once in a lifetime opportunity to revolutionise not just the NR Station but a whole area at the heart of London.

17. The Mayor's wider ambitions for the area are reflected in the Euston Area Plan ("the EAP"), which has been jointly prepared by London Borough of Camden, the Authority and Transport for London (with input from the Department for Transport, HS2 Ltd and NR) to support that growth and redevelopment at Euston, taking account of the proposed Euston HS2 Terminus. The EAP was adopted in January 2015 and takes forward the objectives and aspirations for delivering a comprehensive transport and development framework for the Euston area, building on the London Plan 2011 and other strategic policy documents which identify Euston as an Opportunity Area with the potential for 14,000 jobs and 3,000 homes. The Mayor's 2020 Vision also flags up the potential of Euston – King's Cross – St. Pancras as the UK's largest mega rail hub, creating an area with the potential to contribute significantly to London's growth
18. The EAP land use strategy proposes a grid of new east-west and north-south pedestrian routes across the station and station track approach. It also identifies opportunities for over-site development ("OSD") above the entire station site and the approaching tracks (including both the NR Station and the HS2 Euston Terminus) including the provision of homes and open spaces. A key component of the EAP vision is the future rebuild of the NR Station as part of a commitment to deliver a world class station fully integrated with local development.
19. While your Petitioners are well aware that the rebuild of the existing NR Station is intended to be delivered separately by NR and that projects of this scale need to be delivered in phases with different organisations playing their part, your Petitioners are concerned that the Additional Provision's failure to address the planned rebuild of the NR Station in any way has resulted in an incomplete construction solution which will undermine rather than promote growth. Further, your Petitioners are concerned that the poorly integrated design for the HS2 Euston Terminus risks exacerbating existing problems in the area.

20. Your Petitioners consider therefore that a commitment from the Secretary of State to commence and deliver the rebuild of the NR Station in parallel with the delivery of the HS2 Euston Terminus is essential. The Promoter's subsidiary, HS2 Limited, has stated that the redesigned HS2 Euston Terminus is intended to make travelling through Euston easier for all passengers, regardless of whether or not they use HS2 train services. However, the Additional Provision provides no improvement to the NR Station, undermining the successful achievement of that stated objective. The reasons behind your Petitioners' position can be expanded upon as follows:

20.1 The existing NR Station does not have sufficient capacity to accommodate increases in projected passenger demand. The concourse space at the NR Station is already under significant pressure today and close to inoperable at the busiest times. This issue is not expected to improve over time, even with the construction of the Euston HS2 Terminus. At no point in time (pre or post HS2 operation) are passenger numbers at Euston expected to drop below current passenger flows, and yet the Additional Provision proposes to remove part of the NR Station, reducing its size. The Euston HS2 Terminus and the NR Station can operate safely and efficiently together but only if they are redeveloped in parallel and are designed to complement one another.

20.2 The existing NR Station is poorly designed in terms of wider public realm and has a large footprint which prevents cross site connectivity, acting as a barrier between development in the east and development in the west. The importance of long term permeability of the Euston complex is explored in more detail at paragraphs 27 to 32 below, but even today the NR Station has little interface with the local environment, and the eastern and western perimeters in particular are devoid of activity due to a lack of active frontages. This problem risks being exacerbated by the addition of the Euston HS2 Terminus, which is essentially being fixed onto the side of the NR Station and will widen the footprint of the existing barrier making east-west movement more difficult, rather than improving this problem.

- 20.3 Your Petitioners accept that the ability of the Promoter to take a more coherent approach is constrained by the current lack of certainty around delivery timelines and funding in respect of the NR Station rebuild. A clear commitment from the Secretary of State to deliver the NR Station rebuild within an agreed timeframe would allow the Promoter to adopt their design and timetabling to ensure a joined-up approach to design and construction programming for both projects. This would result in costs savings, reduced disruption and more efficient, coherent transport solutions.
- 20.4 The construction of the Euston HS2 Terminus alone will have a major impact on the surrounding area and community over a phased build which is expected to last 16 years from 2017 to 2033. This build period is 7 years longer than the proposal contained within the Bill and yet the Additional Provision includes no improvement to the NR Station. By the time the Euston HS2 Terminus is complete, rebuild of the NR Station will be long overdue meaning that disruption in the area would have to recommence immediately. Opportunities to combine construction worksites and coordinate works will be lost and impacts on other transport infrastructure (including the London Underground ("LU") network, bus station and strategic road network) will be extended and exacerbated. Failure to deliver a joined-up approach to design and construction programming will therefore extend the disruption to the local and wider area, causing unacceptable impacts for local people and London travellers. Your Petitioners consider that the disruption that will be caused by the Promoter's proposals for the Euston HS2 Terminus cannot be justified if the rebuild of the NR Station is not also delivered during this time period.
- 20.5 Your Petitioners are concerned that the scale of these construction impacts combined with exacerbated east-west severance will undermine the long economic benefits of HS2 and redevelopment around the new Euston HS2 Terminus will be delayed. The area around the station site risks being blighted by both uncertain timelines for the replacement of the ageing NR Station infrastructure and the extended disruption that a subsequent NR Station upgrade would bring, undermining the Promoter's case for the benefits of the HS2 network and station.

- 20.6 Your Petitioners are concerned that the design fails to support the EAP's vision to unlock the full regeneration of the area. The HS2 project has significant potential to enable high levels of growth not just related to the station, but in the wider area, and in particular presents an opportunity to achieve both regeneration objectives in surrounding estates and wider environmental improvements. The delivery of this growth, and in particular OSD, will be significantly undermined if a comprehensive rebuild is not delivered and opportunities to provide works to support future development (such as enhanced utilities provision and access) and reduce later disruption are not taken. The Kings Cross St Pancras redevelopment, for example, included within its design parameters the additional utilities capacity needed to support the additional development expected around the new station site. Doing so reduced future disruption and costs and therefore expedited the delivery of the new development. Failure to forward plan for Euston in this way by delivering a coordinated redevelopment will mean opportunities are missed and redevelopment is stunted; and
- 20.7 Finally, as explained more fully below, a number of your Petitioners' concerns in relation to the Promoter's design for Euston HS2 Terminus cannot be addressed without comprehensive rebuild of the NR Station. For example, the provision of sufficient replacement open space and adequate taxi drop-off and collection provision can only be delivered if the solutions are incorporated into a coordinated rebuild of the entire station site, including the NR Station. Further, with the Promoter unable to take account of the requirements of the future NR Station, retro-fit and sub-optimal design solutions are more likely and the possibility of cost reductions from coordinated design will be lost.
21. The total separation of the design and delivery of the Euston HS2 Terminus from a rebuild proposal for the NR Station therefore poses a number of significant risks to the future planning of the area which your Petitioners consider are unacceptable.
22. Your Petitioners therefore seek a commitment that the Promoter will expedite the rebuild of the entire Euston station site by funding and securing the delivery of the

rebuild of the NR Station and the primary works envisioned in the EAP (such as structures to support future OSD, utilities works and new links across the station site), outside of the NR standard processes to allow that rebuild and works to be commenced and delivered in parallel with the works for the Euston HS2 Terminus.

23. To deliver this commitment your Petitioners believe that the Promoter, as undertaker of the HS2 works, must also commit to:
- 23.1 working closely with your Petitioners, NR and the London Borough of Camden to agree jointly the key requirements for the comprehensive rebuild of the NR Station. The rebuild should take into account the various projects forming part of the EAP vision: the HS2 Euston Terminus, the NR Station rebuild, the proposed CRL2 station (as to CRL2 see below at paragraph 50 and OSD across both the HS2 Euston Terminus and the NR Station);
- 23.2 establishing as a single entity and participating in a joint programme integration board or similar body to (a) agree the overall design remit for and monitor progress across each project and; (b) ensure that each project is being delivered in a robust and coordinated fashion;
- 23.3 producing, before HS2 works at Euston commence, an integrated design taking into account the various projects referred to in paragraph 23.1, on the basis of the key requirements agreed above;
- 23.4 producing, before HS2 works at Euston commence, an integrated programme for the rebuild of the NR Station and the primary works envisioned in the EAP referred to in paragraph 22, in particular including the enabling works for future OSD, so as to deliver them in parallel with the delivery of the HS2 Euston Terminus; and
- 23.5 procuring the commitment of HS2 and NR to the integrated programme produced pursuant to paragraph 23.4.
24. Your Petitioners consider that these matters need not delay Royal Assent of the Bill, as any consenting and funding gaps identified in relation to those other projects could

be corrected through the authorisation process for the NR Station (and authorisation for Crossrail 2 would be sought separately in due course).

25. Your Petitioners consider that this approach is necessary given the unique location and role of the Euston Station complex at the heart of central London, and the need to ensure the possibility to deliver the EAP vision without causing disruption for unprecedented periods of time. The HS2 Euston Terminus works cause significant disruption at Euston and as such bring forward the need to rebuild the existing NR Station and the implementation of the other EAP projects referred to above. Your Petitioners consider that it is vital that the Euston station rebuild is designed and constructed in parallel with the HS2 Euston Terminus as a project of national importance.

DESIGN AND OPERATIONAL ISSUES AT EUSTON

26. In addition (and should the Select Committee not agree that the parallel rebuild of the NR Station and other matters in the EAP are vital, in the alternative, where possible, to the comprehensive rebuild of the NR Station), your Petitioners request a number of specific changes to the Additional Provision to rectify what are in your Petitioners' view serious inadequacies with the current proposals. Your Petitioners believe the changes they seek will significantly reduce construction impacts, improve transport benefits and enhance the local area.

Permeability

27. The EAP proposes new east-west and north-south pedestrian streets routes across the station and its approach. The current station and approach does not allow this movement through the Euston station site, frustrating access to The Regents Park and Somers Town areas by requiring pedestrians and cyclists to travel north or south to Euston Road and Mornington Crescent in order to make this movement. The effect of this is evidenced by the pattern of development around the existing station as the eastern and western perimeters, in particular, are devoid of activity due to a lack of active frontages.

28. Under the Promoter's revised designs for Euston these problems are exacerbated, with the narrow spine building proposed to join the Euston HS2 Terminus with the NR Station providing insufficient open space and walking routes for local residents, visitors and passengers using Euston station easily to connect to areas east and west of Euston station.
29. An east-west link overbridge connection at the northern end of the station which had been included in the original Bill scheme has also been removed from the revised scheme which is set out in the Additional Provision. The Additional Provision does not provide any alternative infrastructure solution to create this east-west link. Failure to provide an alternative east-west link will leave Euston Road and busy streets further north in Camden Town centre as the only east-west routes for cyclists and pedestrians in this area. This change is exacerbated by the removal of the HS2-HS1 link, with HS2 passengers being required to disembark and to transfer onto HS1 services at Kings Cross St Pancras station on foot, along a route which has not been provided for in the Additional Provision designs.
30. Exacerbation of east-west permeability problems will mean the new hub of activity on the western side of Euston Station will remain poorly connected to the major new developments of the Francis Crick Institute and Kings Cross on the east side which will house major multi-national companies such as Google. These hi-tech, science and research organisations are likely to generate considerable demand for the high-speed services in terms of both staff and visitors. The value of time needs to be recognised. Direct, convenient links between the west side of Euston (which itself is likely to house high-value jobs) and the hub of activity to the east are crucial to maximising the agglomeration benefits of all the new development in this part of London. Community severance will be also be exacerbated by the relocation of an existing local secondary school from the west of the station to the east in order to provide space for the construction of the Euston HS2 Terminus, with children and parents being required to take a much longer route along the busy Euston Road.

31. To alleviate these problems your Petitioners consider that, as a part of a commitment to review the design of the Euston HS2 Terminus and its integration with a redeveloped NR Station, the Promoter should make improved provision for connectivity between the NR Station and the HS2 Euston Terminus. In particular, your Petitioners believe that the spine building should be 'unblocked' and provide an open connection in the NR Station as part of Stage A of the Euston HS2 Terminus build.
32. Improved connectivity can be best delivered by the construction of an east-west pedestrian and cycling bridge along the northern end of the NR Station and across the existing tracks ("the overbridge") as part of 'Stage A' of the HS2 Euston Station development. Your Petitioners consider this could be undertaken by rebuilding the existing emergency access bridge at the northern end of the existing NR Station similar to the existing bridge at Paddington Station. Your Petitioners consider that the costs of providing this link would be vastly outweighed by the connectivity benefits it would provide, including improved access from the existing Euston station to the proposed taxi rank at the north end of the HS2 Station, with such access is not adequately provided for as part of the current designs (see paragraphs 88 to 90 below). Your Petitioners seek a commitment from the Promoter to make improved provision for connectivity as set out in paragraph 31, in particular by providing the overbridge, amongst other things.

Operational Provision for Cyclists

33. Your Petitioners consider that provision for cyclists in the revised proposals are inadequate and undermine the Mayor's commitment to increasing cyclist numbers and improving cycle safety.
34. Although the proposed north-south 'primary cycle route' is welcome, it represents poorer cycle provision than was in the Bill, which had provided for improved cycle connectivity north-south and east-west, removing the need for cyclists to use busier

roads in the area. The Additional Provision now only makes the north-south cycle route available from 2033, seven years later than the proposal contained in the Bill.

35. A number of existing north-south cycle connections identified within the Central London Cycle Grid, including Cardington Street and Melton Street, are also being removed in the 2026-2033 period to make way for 'Stage B1' of the Euston HS2 Terminus development. This will result in no safe north-south cycle connection between Euston Circus and St Pancras Way between 2026 and 2033, which your Petitioners consider is an unacceptable impact.
36. Your Petitioners therefore seek a commitment from the Promoter that it will ensure adequate alternative north-south routes are in place in the Euston area between 2026-2033, for example along Arlington Road. Combined with the provision of the overbridge (see paragraph 32, above) and wider commitments from the Promoter to improve permeability of the station site and investigate improvement of east-west pedestrian and cycle links between Kings Cross and Euston, this undertaking will support Transport for London and the London Borough of Camden's plan to improve cycling in line with the Mayor's Vision for Cycling and will mitigate the impacts of the HS2 development in the area.
37. Your Petitioners are also concerned that the Additional Provision does not clearly set out how the cycle parking requirements already agreed between Transport for London and the Promoter will be provided.
38. The Promoter has committed to provide a minimum of 2000 cycle parking spaces in Phase 1 of the scheme and a minimum of 5000 cycle parking spaces in Phase 2 of the scheme focused at a number of hubs across the station.
39. Your Petitioners also seek greater clarity as to how the existing cycle parking spaces at Euston will be relocated during the construction of the HS2 Euston Terminus.

Operational Provision for taxis

40. Your Petitioners are concerned that revised proposals within the Additional Provision indicates that the taxi facility for the station will move to the north side of the station buildings which, without any changes to the design, would require passengers leaving the NR Station to walk up to 800m to reach the taxi rank, a walk that is nearly 10 times longer than the existing route. The length of the walk from parts of the station to the taxi pick-up is a particular concern for disabled passengers and those with large amounts of luggage.
41. Movement of taxis away from the taxi ranks is also restricted, which will increase journey times and fares for those passengers travelling east or to the south. The combined effect of additional fares and the additional walking distance makes it likely that NR passengers will seek to avoid a long and indirect route to the designated taxi rank to the north, preferring instead to hail a cab from other locations around the station. This will in turn create problems for other road users.
42. While the reinstatement of the overbridge (see paragraph 32 above) would go some way to improve pedestrian access to the taxi area, your Petitioners consider that it is not possible to significantly improve operational taxi provision without the comprehensive and joined up rebuild of the NR Station alongside the HS2 Euston Terminus, including the provision of an east-west road link at the north of the Euston site.

Provision for Open & Green Spaces

43. Open space is a hugely valued community amenity around Euston. Your Petitioners are concerned that, although the replacement green space proposed in the Additional Provision represents an improvement when compared with the original Bill, the impacts of the Bill and the Additional Provision on green and open space (which include the complete removal of St James' Gardens) remain inadequately mitigated.
44. The Bill will create an open space shortfall (when comparing the current position with the 2033 position) of around 3,000 sqm, the majority of which (Euston Square Gardens) will not be reinstated until 2033. The remainder of the replacement open

space is not equivalent, as it will be situated next to or around busy roads, in effect rendering the spaces large traffic roundabouts. These spaces will also have poor pedestrian access. In addition, the Additional Provision describes more trees being removed than are being replaced, which is not compatible with London Plan Policy 7.21 which states that existing trees of value should be retained and any loss as the result of development should be replaced.

45. As a result of the restrictions of the site, your Petitioners believe it is not possible to provide sufficient replacement open space without a comprehensive rebuild of the NR Station that would allow the Promoter and other relevant bodies to plan for open space, for example within a decked area above the station throat. Your Petitioners consider that the anticipated intensification of development in this area, which will create further demand for open space, cannot be properly catered for without a cohesive approach, to be led by the EAP proposals, to provide open and green space at Euston. This would also allow the currently proposed replacement space to be improved or relocated, which may in turn assist the re-provision of other facilities, in including the taxi rank.

46. However, notwithstanding whether a broader commitment to the rebuild of Euston is forthcoming, your Petitioners seek an undertaking from the Promoter that it will work with your Petitioners and the London Borough of Camden to:
 - 46.1 ensure that high quality and accessible replacement green and open space is provided for as part of the final HS2 scheme at Euston ;

 - 46.2 identify with the local community adequate mitigation for the open space that is lost throughout the HS2 construction works; and

 - 46.3 ensure that the retention of existing trees of value is maximised and that any loss as the result of development should be replaced. (An existing tree's value should be derived using a combination of amenity assessment (BS5837) and a recognised tree valuation method (CAVAT or i-tree)).

Designing for growth in the area

47. Significant background growth is expected in the local area and in London more widely which your Petitioners feel has not been adequately provided for by the Promoter.
48. While your Petitioners welcome the improvements in the revised design to allow the onward dispersal of passengers, the designed capacity has been capped at current railway capacity constraints (based on today's rolling stock capacity with no consideration of changes such as the longer term introduction of double deck trains for which the HS2 infrastructure has been designed) and with no consideration of the local area intensification and the wider London growth. This approach is contrary to standard practices adopted by both Transport for London and NR and will result in unsatisfactory solutions which will undermine rather than promote redevelopment and regeneration. This concern should be addressed whether or not a broader commitment on the rebuild of Euston is forthcoming. This issue can be illustrated through two specific examples set out below which demonstrate the possible future impacts of a failure to plan adequately for growth.

a) Capacity at NR Station

- 48.1 Your Petitioners are concerned that the design and construction details for the Euston HS2 Terminus set out in the Additional Provision fail to adequately address impacts on the existing NR Station or passively provide for the future rebuild of the NR Station, in respect of both track and concourse capacity during operation.
- 48.2 It is not clear how much capacity the NR Station will provide from December 2026 onwards (after the opening of Phase 1) after the amendment proposed in the Additional Provision and whether it will be able to support projected growth in demand for non-High Speed services using the station. Failure to support this projected growth will undermine one of the key objectives of the HS2 network which is to open up capacity on the conventional network to respond to demand (currently suppressed by overcrowding) for commuter services.

48.3 In relation to capacity at the NR Station, the loss of part of the ticket hall in the NR Station to provide for the Euston HS2 Terminus is of particular concern. The concourse space at the NR Station is already under significant pressure and close to inoperable at the busiest times with emergency operational measures often in place. Even with today's passenger numbers, the loss of this space would make the NR Station potentially inoperable in busier periods. Your Petitioners are deeply concerned that the Promoter has failed to assess the impact of this reduction in the NR Station concourse space in combination with the projected increase in passenger numbers using the NR Station (which are derived from industry growth forecasts).

48.4 At no point in time pre or post HS2 operation are passenger numbers at the NR Station expected to drop below the current passenger numbers at the NR Station. To ensure that the NR Station and the Euston HS2 Terminus can continue to function safely and efficiently together, the Promoter must design for growth. The most efficient and comprehensive way of achieving this is for the two stations to be developed in parallel and designed to complement one another. Doing so would allow the NR Station to meet growing demand and to support the operation of the Euston HS2 Terminus, both in terms of space and also in respect of onward connections and demand management. Without a commitment from the Secretary of State to fund and deliver a cohesive NR Station rebuild in parallel with the build of the HS2 Terminus, the Promoter risks providing an incomplete solution which would fail to function adequately in its opening year.

b) Capacity for increased demand at the LU station

48.5 Your Petitioners welcome the proposed Additional Provision design for the LU station at Euston ("LU station") but are concerned that its capacity has been capped at 2041+20% levels (which is a figure based on current railway capacity constraints). This is likely to significantly increase the pressure on Transport for London's assets and operations which the Additional Provision is supposed to mitigate.

- 48.6 Additionally, your Petitioners are concerned that Additional Provision has failed to take account of expected changes affecting demand, including the impact of Northern Line Full Separation, CRL2 and the proposed OSD in the wider area, not included in the 2041 base scenario.
- 48.7 Finally, your Petitioners have been given no reassurance that the proposed design will perform under pressure (including service disruptions or when part of the asset is under maintenance) or when operational approaches change (for example through the use of double-decker trains). The Promoter has not adopted standard assessment criteria tools used by Transport for London, NR and other organisations.
- 48.8 Your Petitioners therefore request that the Promoter:
- 48.8.1 develop with the support of Transport for London, additional modelling evidence to demonstrate the capacity of the Additional Provision design proposal (including assessing the impact of Northern Line Full Separation, CRL2 and the proposed OSD within the HS2 development area on the LU station demand);
 - 48.8.2 apply Transport for London standards used to design for growth, which require stations to demonstrate capacity for 2041 levels + 30% or any higher level as is identified by the modelling referred to at 48.8.1; and
 - 48.8.3 agrees with Transport for London any design changes to the LU station proposed that are required to provide increased capacity.
49. This applies, for example, but without limitation, to the underground pedestrian link connecting the HS2 Euston Terminus to the Euston Square LU station, known as the Euston Square Link.

EUSTON HS2 TERMINUS - INTERACTION WITH CROSSRAIL 2

50. With the HS2 services in operation, there will be a significant increase in passengers passing through Euston. Your Petitioners welcome the proposed upgrade in the LU station to cope with the additional demand. However, if the benefits of the scheme are

to be fully realised post Phase 2 completion, additional capacity will be required to guarantee passengers travel with ease beyond Euston to locations across London and the surrounding region. Transport for London analysis shows that major new capacity will be required to relieve severe overcrowding and long queues for onward journeys on the LU Victoria and Northern Lines southbound from Euston. Hence the HS2 scheme will rely heavily on Transport for London's Crossrail 2 ("CRL2") proposals for a new regional or metropolitan rail route linking south west London to north east London and beyond, which will include a station at Euston-St Pancras.

51. While CRL2 is not yet a fully committed project, CRL2 will have significant benefits for London as a whole but also the Euston-St Pancras area in particular by further enhancing the area's development potential.
52. As a result of the complex transport infrastructure interfaces in this area, the design and delivery of the Euston HS2 Terminus and the NR Station would both have a significant impact on the potential for the CRL2 station. Your Petitioners therefore consider that a commitment to deliver a coordinated design for the HS2 Euston Terminus and the NR Station as part of a cohesive redevelopment is also the best way to ensure that the CRL2 benefits at paragraph 51 above can be delivered.
53. Unless changes are made, this is very likely to result in a missed opportunity to integrate CRL2 fully into Euston station and to result in unnecessary additional land take to build the CRL2 scheme (should it be authorised), leading to additional cost and unnecessary demolition, an unacceptable loss of homes, businesses and community facilities and further significant disruption to the local area. All those impacts would be avoided if the whole Euston station site was planned at the same time.
54. In practice this coordination would ensure:
 - 54.1 adequate passive provision for the CRL2 station in the HS2 and NR Station designs;
and

- 54.2 a reduction in the overall cost and disruption to passengers and residents by coordinating construction timelines and worksites between the three projects.
55. As it is in the interests of both parties that the HS2 works and the CRL2 proposals are aligned as far as possible in order to save cost, duplication and disruption, your Petitioners have been taking part in meetings between CRL2, NR and the Promoter for some time to discuss these issues. Your Petitioners are therefore disappointed to note that only but a small number of the solutions agreed have been presented in the Additional Provision.
56. In respect of design, your Petitioners consider that the Promoters' design for Euston station could do more to take account of the proposed CRL2 station proposed for Euston-St Pancras. In particular, a key design concern for your Petitioners is that the operability of the CRL2 Euston-St Pancras station will be affected by the Promoter's failure to deliver adequate east-west connections towards HS1 and Kings Cross St Pancras, resulting in the sub-surface area that would house the CRL2 station becoming the only efficient east-west thoroughfare for HS2/HS1 passengers.
57. Additionally, a shorter connection between the new HS2 and the CRL2 stations under the existing NR Station would provide easy interchange between the three major transport hubs. However, the feasibility of this solution is dependent on the NR Station rebuild.
58. In respect of construction compatibility, your Petitioners have identified a number of areas where project delivery could be coordinated, for example in the provision of shared worksites.
59. Your Petitioners are therefore seeking an undertaking from the Promoter that it will design and construct the Euston HS2 Terminus so as not to inhibit the CRL2 station proposal and that it will discuss and agree with your Petitioners practical solutions to ensure efficiency; avoid forcing sub-optimal design on the CRL2 station; avoid duplication of works; limit disruption to the transport infrastructure; and avoid any unnecessary disruption for residents.

CONSTRUCTION IMPACTS

60. In addition to the issues raised above regarding the design and operation of the Euston HS2 Terminus, your Petitioners have significant concerns about the construction impacts of the works. At present your Petitioners consider that, without further mitigation, the disruption predicted to affect the wider Euston area during the 16 year phased construction period for the Euston HS2 Terminus cannot be justified for delivery the current design. Furthermore, even after the proposed long period of construction of the Euston HS2 Terminus, Euston will still not be fully completed and considerable additional works will be required to complete the regeneration of the area.
61. Your Petitioners are concerned that HS2 Limited's current proposals envisage that all demolition and excavation spoil removed from the Euston site, together with all the material imported to the site, will be moved by road. Rail movements have been largely discounted.
62. Your Petitioners consider that the local road network does not have enough capacity to handle significantly increased HGV traffic movements (particularly during the long periods when the Promoter is proposing to close lanes on the Strategic Road Network to enable utilities or infrastructural works).
63. Your Petitioners therefore seek a commitment from the Promoter to reconsider the proposed construction logistics activities by using rail for construction, in order to relieve pressure on the local road network; reduce safety risks for vulnerable road users and passengers; and produce a more environmentally acceptable and sustainable construction methodology.

CONSTRUCTION IMPACTS ON LONDON UNDERGROUND

64. The construction works at Euston will impact the operation of the LU in this area. While the additional provision design and delivery proposal represents an improvement on the Bill proposals, there remain a number of potentially unacceptable

impacts on LU (set out below) which your Petitioners consider the Promoter must address.

LU Service & Station Availability

65. The construction proposals contained in the Additional Provision continue to assume that some LU services will not stop at Euston for specified periods during construction, instead carry on to the next station. This is known as 'through- running'.
66. Your Petitioners consider that through-running on any of the lines serving Euston is not acceptable. To do so would put excessive pressure on the remaining lines serving the station (which would not cope with this diverted demand) and could prevent the safe operation of the LU station itself and have a consequent impact on the NR Station above.
67. There is not adequate capacity at nearby LU stations (Euston Square, Warren Street, Mornington Crescent, King's Cross) to accommodate the onward dispersal of commuters using Euston. For example, at Warren Street station the number of passengers exiting the station in the morning peak means that it would be unable to receive passengers diverted from Euston attempting to enter the LU network.
68. Your Petitioners also consider that through-running is not required to the Euston HS2 Terminus works. Your Petitioners have (in delivering Crossrail 1 and the Victoria Station upgrade) encountered more challenging construction programmes where through-running has been avoided by using alternative construction methodologies. Such methodologies have been discussed with the Promoter and would reduce the amount of works carried out within public areas and avoid the need for through-running, and your Petitioners are disappointed that this has not been adopted within the Additional Provision designs.
69. Your Petitioners are seeking a commitment from the Promoter that it will, using appropriate techniques, design and timetable construction works so as not to require the through-running of any LU services at Euston.

70. The construction programming and modelling must also take into account other planned interventions and operational changes already planned by Transport for London. For example:
- 70.1 the working hours assumption should reflect the operation of Night Tube services on the Victoria and Northern (Charing Cross Branch) lines continuously from Friday morning until close of traffic on Sunday evening; and
- 70.2 the construction programming and modelling must also take account of interventions already planned by Transport for London, including (but not limited to) the partial closure of the Bank branch of the Northern Line (between Moorgate and Kennington) in 2020 required to facilitate the Bank Station upgrade, which will reduce services into Euston for 6 to 12 weeks.
71. Your Petitioners seek an undertaking from the Promoter that:
- 71.1 it will work with your Petitioners to factor into the construction programme planned Transport for London and LU construction works such as those referred to at paragraph 70 and to take account of other similar planned operational changes;
- 71.2 detailed station construction plans will be developed and agreed with Transport for London to guarantee the safe and reliable operability of the LU station; and
- 71.3 asset protection agreements will be entered into according to the agreements in place between the Promoter and Transport for London to guarantee safeguarding of key LU infrastructure, for example the LU vent shaft at Euston.
72. Your Petitioners seek a commitment from the Promoter that it will develop a clear enabling works programme for relocating LU assets, identifying clear dependencies and guaranteeing key critical dates.

EUSTON NR SERVICE ALTERATIONS DURING CONSTRUCTION

73. The Promoter's assessment of the Proposed Provision makes no statement on the impact of the construction works on the operational capacity of London Overground

services operating into Euston, notwithstanding the fact that the number of platforms at Euston will be reduced during the construction phase.

74. It also fails to assess the impact of the extended proposed closures of Euston Station at weekends and bank holidays on Transport for London services. To guarantee NR services into London, some LU stations (Queen's Park, Wembley Central and Harrow & Wealdstone) are intended to serve as temporary termini for the existing Virgin Train and London Midlands services. While your Petitioners understand that such measures are required, your Petitioners are concerned that the impacts at each station and on the local Transport for London services have not been adequately assessed with suitable mitigation identified and agreed with your Petitioners.
75. Your Petitioners seek an undertaking that these impacts will be assessed to inform the feasibility of the plan.

EUSTON CONSTRUCTION IMPACTS - SURFACE

Replacement of Hampstead Road Bridge

76. Your Petitioners have a number of concerns about the reconstruction of Hampstead Bridge which is required in order to provide access for trains to the new HS2 Terminus.
77. As stated in the original requirements agreed between the Promoter and Transport for London in June 2014, your Petitioners consider that the width of the bridge should be reduced to better reflect the existing road layout in the area. The construction of a smaller bridge, with 4 vehicular lanes plus segregated cycle lanes and pedestrian walkways would reduce construction impacts, shorten the construction period and also have a positive long term environmental effect.
78. Another reason the reconstruction of the bridge requires such significant works is the apparent need to raise the bridge above its existing height. The increased height of the road will result in: severance of roads abutting the approach to the bridge which must now be stopped up; increased levels of noise for nearby receptors; more significant landscape and visual impacts; longer construction times; and drainage

concerns. Your Petitioners understand this originates from route-wide height tolerances required to allow passage for the new trains travelling at a high speed. However, as the trains are approaching a terminus at Euston, speeds will be significantly lower. Your Petitioners understand that this in turn should be reflected by a reduction in required minimum tolerances, in line with standard railway practice.

79. Your Petitioners seek from the Promoter commitments to: (a) reduce the height of the bridge by at least one metre; (b) work in collaboration with your Petitioners and the London Borough of Camden to reduce further the impact of the bridge on the local area; and (c) agree with your Petitioners effective construction plans for the bridge.

Volume of HGV Traffic

80. Your Petitioners consider that the daily volume of HGVs currently predicted to be using routes in around the Euston worksite is unacceptable and that the road network in this area will not be able to support this amount of additional HGV traffic.
81. The Additional Provision will increase the forecast number of HGV movements during the busiest period from 740 (in the Bill) to 800. Additionally the extension of the construction period to 16 years will result in this the peak of HGV traffic reoccurring multiple times. The Promoter has not provided in its assessment the information required to at all satisfy your Petitioners that the impacts can be supported.
82. Your Petitioners are therefore concerned about the lack of resilience in the Promoter's traffic management proposals. Your Petitioners consider that the current proposals risk causing regular gridlock on some important arterial routes, safety issues for pedestrians and cyclists and delays for buses, taxis and other road users.
83. In addition, your Petitioners consider that the noise, vibration and air quality impact of this volume and concentration of traffic on the local population would be entirely unacceptable over the extended period that forms the construction phases.
84. Your Petitioners are therefore disappointed and concerned that the Promoter has failed to provide for or commit to any transportation of spoil and construction materials

by rail or canal in this area. Your Petitioners consider that alternative transportation of a significant proportion of spoil and other construction materials and waste by alternative methods is the only way in which the Promoter will be able to reduce construction traffic using the road network to an acceptable level.

85. Your Petitioners have undertaken work and investigations to review the options for non-road transport of materials, including review of canal and rail options, for which there are a number of possible solutions at Euston. Your Petitioners consider that with the correct solution HGV movements could be reduced by up to 75%.
86. Accordingly, your Petitioners seek a commitment that the Promoter will agree with your Petitioners and NR a strategy for the removal of construction materials and waste by rail freight to ensure that HGV movements are reduced by 75% over the construction period.
87. Similar commitments have been provided by Promoters for other recent, large London infrastructure projects, including the Northern Line Extension and the Thames Tideway Tunnel. As set out in the AP2 petitions, your Petitioners consider that this commitment must form part of a wider strategy to remove construction traffic from roads in order to reduce London-wide cumulative impacts on key routes, such as the A40.

Taxi Pick Up and Drop Off During Construction

88. Your Petitioners consider that provision for taxi pick-up and drop-off during the 2023-2026 construction phase is inadequate, being limited to a facility on Eversholt Street. Your Petitioners consider that the proposals during this period are:
- 88.1 too far from the locations where passengers will require the service;
- 88.2 have insufficient capacity; and
- 88.3 will require passengers to use passages traversing numerous construction sites.

89. Given the importance of the taxi service (particularly for disabled and elderly customers and those with children or luggage), your Petitioners request that the Promoter works closely with your Petitioners and NR to agree a workable solution for taxi provision during construction.
90. Your Petitioners consider that, as part of that strategy, the Promoter must provide taxi marshalling to ensure the safe and efficient use of taxis around the construction site.

Impacts on Bus Services

91. The Additional Provision proposes that bus services will continue to operate adjacent to Euston Gardens, notwithstanding that a large part of the Gardens are also being used as a construction compounds and that major demolition works will be taking place nearby. Your Petitioners also understand that HGVs will also use the bus station.
92. Your Petitioners consider that these assumptions have been inadequately provided for and will require further investigation in terms of impact on bus operations; passenger journey times; passenger safety; and the effect of cumulative traffic impacts on Eversholt Street and Euston Road.
93. Your Petitioners seek a commitment from the Promoter that it will work closely with Transport for London to identify an acceptable solution for bus provision for the duration of the construction works and require an undertaking from the Promoter that HGVs will not use the bus station access without the consent of Transport for London buses and that a wider framework for such use must be agreed with Transport for London.

Construction Traffic Routes

94. Your Petitioners are concerned about a number of the construction traffic routes and lorry holding areas identified by the Promoter.
95. The use of a larger number of local roads is a particular concern, as these routes are not designed to accommodate this volume and frequency of HGV traffic. In particular

your Petitioners are concerned about the designation of streets such as Robert Street, Arlington Road and Harrington Road as construction traffic routes as these are residential streets.

96. Increased traffic flow is expected to result in increased pedestrian severance at Albany Street, Park Road and Parkway, which will make it more difficult for pedestrians to cross the road, including the pupils of nearby Primary Schools, which exacerbate concerns about pedestrian safety.
97. Your Petitioners seek a commitment from the Promoter that it will minimise the use of residential routes for construction traffic and develop alternative options, where possible.
98. In addition, your Petitioners seek a commitment from the Promoter to enter into an agreed Sustainable Construction Transportation Plan which will set out agreed specific routes for lorry movements associated with demolition, construction and utilities works (to be coordinated between the various work sites and construction compounds), lorry holding areas and will require the provision by the Promoter of a network of safe pedestrian, school and cycle routes with penalties applied for non-compliance.

Impacts on Highway

99. Your Petitioners are also concerned about the highway impacts resulting from the Additional Provision's proposals at Euston which will require the closure of lanes on the key strategic roads of Euston Road and Hampstead Road for long periods of time.
100. Your Petitioners seek a commitment from the Promoter to:
 - 100.1 further develop, with your Petitioner, construction proposals for Euston so as to minimise the disruption experienced on the highway network; and

- 100.2 comply with existing highways and streetworks legislation, in particular the Traffic Management Act 2004 to ensure that activity on the road network, and in particular the Inner Ring Road, can be managed to minimise disruption to all road users.

Impacts on Cycling Provision and Cyclists

101. At present, HGVs in London are involved in a disproportionate number of fatal collisions involving cyclists and pedestrians. In 2014, HGVs accounted for 4 per cent of all traffic but 55 per cent of cyclist deaths and 12 per cent of pedestrian deaths. Your Petitioners are concerned that the Promoter has failed to take account of this and the implications for the safety of cyclists around Euston during the works.
102. In particular, your Petitioners are concerned that the impact of the authorised works on Cycle Superhighway 11 (CS11) has not been accounted for. CS11 is subject to a final consultation in November 2015 and is a committed part of the Mayor's Cycling Vision. It is expected that CS11 will be fully complete in 2016. Once complete, CS11 will run along the Outer Circle of Regent's Park and Park Crescent East.
103. Your Petitioners are concerned that:
- 103.1 the strategic traffic modelling which has been carried out by the Promoter into the traffic impacts of road closures associated with works at Euston does not take account of the CS11 proposals to restrict access to the Outer Circle or motor vehicles during peak hours. HS2 Limited's modelling shows traffic reassigning onto the Outer Circle as an alternative route, which will not be possible if CS11 goes ahead as peak hour access restrictions are planned for North Gate, Park Square West, Park Square East and York Gate;
- 103.2 the location of the proposed HGV holding area on Park Crescent East is an inappropriate and potentially dangerous proposal as this road forms part of CS11 and high volumes of cyclists are expected to use this road once CS11 has been built in 2016; and

- 103.3 the location of the proposed HGV holding area in the Gloucester Gate/London Zoo car park would only be acceptable in safety terms if HGV access to this car park were limited to access from Prince Albert Road, with access from the Outer Circle being prohibited. The Outer Circle will become part of CS11 and the large volume of cyclists already using this route is expected to increase when CS11 is complete.
- 103.4 key benefits of the CS11 scheme will be lost if the Outer Circle is opened to general traffic;
- 103.5 HGVs may also use Gloucester Gate to access the London Zoo Lorry Holding Area and as Gloucester Gate forms a link between CS11 and a Cycle Quietway along Pratt Street/Delancey Street (on which the London Borough of Camden is currently consulting) the number of cyclists at this location will be particularly high.
104. Your Petitioners accordingly submit that the Promoter should be required to:
- 104.1 undertake further strategic modelling to include the CS11 Outer Circle proposals and verify, in agreement with your Petitioner, whether impacts will be acceptable and, if not, what changes are required;
- 104.2 commit to an alternative location for the Park Crescent East HGV holding area on a road where large volumes of cyclists are not expected; and
- 104.3 commit to preventing access to the Gloucester Gate/London Zoo car park holding area from the Outer Circle and CS11 in order to reduce safety risks.

THE CODE OF CONSTRUCTION PRACTICE

105. Your Petitioners continue to seek a draft Code of Construction Practice ("CoCP") from the Promoter which reflects the up to date, best practice standards now expected for major infrastructure projects in London. Examples of these standards can be seen in the CoCP for the Northern Line Extension and the Thames Tideway Tunnel. Discussions with the Promoter on the need to adopt standards accepted by other projects have not resulted in any substantive changes to the Promoter's draft CoCP.

106. For example, the introduction of Ultra Low Emission Zone (ULEZ) in central London was confirmed by the Mayor on 23 March 2015. ULEZ will come into force in 2020 and thereafter all cars, motorcycles, vans, minibuses, buses, coaches and HGVs (including buses and coaches) will need to meet exhaust emission standards (ULEZ standards), or pay an additional charge when travelling in central London. ULEZ will bring about a step change in London's air quality, but more needs to be done to bring all of London within legal limits for Nitrogen Dioxide (NO₂) concentration levels and further drive down concentrations of fine particles as soon as possible. Euston Station is just outside the ULEZ area and in a location where air pollution and human exposure to that pollution is high.
107. To ensure air pollution in that area is not exacerbated, Your Petitioners believe that the Promoter should commit that all vehicles associated with the construction of HS2 will meet ULEZ emission standards as far as possible, with a view to minimising exemptions to this requirement. Your Petitioners are working with London Boroughs to encourage the adoption of cleaner vehicles throughout London as soon as possible to minimise the damage to human health and the risk of the current EU infringement proceedings resulting in fines in the order of £300m per year being imposed on the UK Government. Your Promoter has a role in helping London achieve this goal.
108. Your Petitioners consider that a single Code of Construction Practice for all of the Phase 1 Route is not appropriate and that a 'London Addendum' is required to address the unique challenges faced in London, where 70% of people living within 1km of the HS2 route are located. London has unique challenges, particularly in respect of provision for cyclists, which cannot be adequately addressed without specific consideration. Your Petitioners seek assurances within the CoCP on a number of areas, including but not limited to:
- 108.1 a commitment to reduce vehicle emissions through the use of zero / ultra-low emission (ULEZ) vehicles;

- 108.2 a commitment to monitor air quality emissions before and during the construction period;
- 108.3 a commitment to sign up to industry wide HGV safety standards and to update these throughout the life of the project;
- 108.4 the provision of a detailed "Transport & Rail Plan" to address the transportation of materials and spoil by rail instead of road;
- 108.5 a commitment to provide a dedicated 'schools liaison officer' to liaise with London schools affected by HS2 construction traffic;
- 108.6 a commitment to comply with the requirements of Non-Road Mobile Machinery Low Emission Zone which will come into force in September 2015;
- 108.7 a commitment to comply to the CLOCS standard and to achieve the FORS Silver Standard, as a minimum; and
- 108.8 a commitment to comply with the enhanced Safer Lorry Scheme, which came into force on 1st September and a commitment to require the highest HGV Vision Standards in the HS2 construction contracts. This could be achieved by mandating modern, low cab / direct vision construction vehicles and by requiring worksites to be accessible by on-road HGVs (as opposed to being only accessible to larger / off-road vehicles).

AMENITY – NOISE, VIBRATION AND AIR QUALITY

- 109. The extended construction period now proposed will have even more significant impacts than originally thought on the amenity of the area around Euston station, in respect of noise, vibration, dust and air quality. The Euston area is situated within an Air Quality Management Area in respect of NO₂ and PM₁₀.
- 110. In particular, there will be amenity impacts relating to increases in HGV movements and air quality on roads outside Christ Church CE Primary School on Albany Street,

Francis Holland School on Park Road, and North Bridge House Preparatory School on Parkway.

111. Your Petitioners are seeking further engagement from the Promoter in respect of the amenity impacts, and in particular on air quality impacts expected. For example, it is requested that the number of sensitive receptors that experience an "improvement" in air quality and the number that experience a "worsening" are provided, so that the overall impact can be seen. In this regard the number of HGV movements is key and this is part of the reason why your Petitioners seek the commitments set out at paragraphs 80 to 87.

112. Your Petitioners are concerned that no information is provided in the Environmental Statements as to how the impact of the construction phase will be mitigated aside from reducing dust emissions and that no air quality management plan is proposed. There is no indication or commitment as to how traffic will be managed to reduce the air quality impact as far as possible. Your Petitioners consider that further mitigation or offsetting should be considered by the Promoter and seek an undertaking that the Promoter will agree mitigation for the worst affected residents and community facilities.

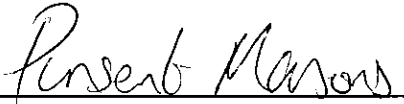
CONCLUSION

113. For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, the Additional Provision, so far affecting your Petitioner, should not be allowed to pass into law.

114. There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights and interests and for which no adequate provision is made to protect your Petitioner.

YOUR PETITIONERS therefore humbly pray your Honourable House that the Bill may not be allowed to pass into law as it now stands and that they may be heard by their Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Bill as affects the property, rights and interests of your Petitioners and in support of such other clauses and provisions as may be necessary or expedient for their protection, or that such other relief may be given to your Petitioners in the premises as your Honourable House shall deem meet.

AND YOUR PETITIONERS WILL EVER PRAY, &C.



PINSENT MASONS LLP

Parliamentary Agents

**IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2015-16**

**HIGH SPEED RAIL (LONDON – WEST
MIDLANDS) BILL (ADDITIONAL
PROVISIONS)**

PETITION

of

**TRANSPORT for LONDON and the
MAYOR OF LONDON acting on behalf of
the GREATER LONDON AUTHORITY**

Against, the Bill – On Merits –

Praying to be heard by Counsel, &c.

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**Parliamentary Agents for Transport for
London and the Mayor of London on
behalf of the Greater London Authority**

(Ref.: RO04/652242.07001)

