

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013–14

HIGH SPEED RÁIL (LONDON – WEST MIDLANDS) BILL

Against the Bill – 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 PAN CAMDEN HS2 ALLIANCE.

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, supported by the Prime Minister, the Deputy Prime Minister, Mr Chancellor of the Exchequer, Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill.
- 3 Objection is taken to the works proposed to be undertaken in Camden (High Speed Rail (London - West Midlands) Bill (Volume I) Schedule 1 — Scheduled works)(Page 31 on) construction of a railway and reconfiguration and enlargement of Euston Mainline Station; and in London Boroughs of Brent and Hammersmith and Fulham (Page 36 on): form of construction of HS2 interchange station at Old Oak Common.
- 4.1 Your Petitioners are a volunteer and non party-political group of Camden residents. The group was formed in May 2010 after a public meeting called by local Councillors. It has some 1200 affiliates. The group aims to ensure that should the routing of HS2 to Euston continue to be favoured then the interests and quality of life of residents in Euston, Camden and Primrose Hill are preserved and enhanced.
- 4.2 Over the past four years your Petitioners have organised a number of public meetings. They have presented at many other discussions arranged by various political parties and community organisations in Camden and have been interviewed on radio and television about the likely impacts of the projects on the Borough.
- 4.3 Your Petitioners have examined the underlying technical, environmental, practical and business arguments advanced by HS2 Limited for its choice of route and for spending some £50 billion of public money.

- 4.4 Your Petitioners have researched various aspects of HS2 and have developed and submitted a number of written proposals to HS2 Limited suggesting how the project could be improved and the massive disruption to Camden reduced.
- 4.5 These proposals cover for instance alternative routing, making best use of Old Oak Common and providing a two-level new Euston station contained within the existing footprint of both Euston Station and the Camden rail cutting to the north. Since 2010 your Petitioners have held a considerable number of meetings with HS2 Limited and its consultants, with Transport for London and with Network Rail to explore these proposals.
- 4.6 Your Petitioners have provided responses to the various consultations undertaken by HS2 Limited - most recently the London-West Midlands Environmental Statement November 2013.
- 5 Your Petitioners and their rights, interests and property are injuriously affected by the Bill, to which your Petitioners object for reasons amongst others, hereinafter appearing.
- 6.1 Redevelopment of Euston station will be a protracted process and inevitably highly disruptive to many residents and businesses of (and visitors to) Camden.
- 6.2 The version of Euston Station contained in the Bill, and known as "Option 8" is considered by your Petitioners to be unsatisfactory in most respects. The Promoters are now advocating a new scheme in the "HS2 Plus" document presented by the Chairman of HS2 Ltd in March 2014. This new scheme is termed "Level Deck". A common feature of Option 8 and Level Deck is a widening of Euston Station by some 50% to the west that would require the demolition of some 250 homes and businesses.
- 6.3 The Promoters suggest that the timescale for the construction of a new station will be around a decade. Your Petitioners note that the subsequent redevelopment over and around the station, could, on the evidence of similar scale schemes, take a generation or more. In contrast to other major redevelopment sites such as the Kings Cross Railway Lands and Canary Wharf, there is a substantial living and functioning residential and business community at Euston.
- 6.4 Your Petitioners suggest that the provisions of the Bill, taken with the scale of development now being proposed by the Promoter represent a fundamental threat to the quality of life for residents within the area affected by the works and the servicing thereof, that is to say, by the noise, pollution traffic and other impacts. Either Option 8 or Level Deck would involve much demolition of sound residential and commercial buildings near the station as well as a reduction in public green space. A very settled and cohesive community would be displaced.
- 6.5 Drummond Street itself is renowned for its many Bangladeshi restaurants. These are typically individually owned enterprises and represent important sources of stable employment, an attraction to visitors, and an invaluable social resource to the many enterprises in the vicinity that include a world-class university and hospital, and wide variety of businesses in the area. It is a key element in the Euston/North Bloomsbury cluster. Your Petitioners maintain that it is not credible that the businesses in Drummond Street and its vicinity could be sustained in the face of the construction of a wider station. Widespread loss both of employment and of amenity would be inevitable.

- 6.6 Your Petitioners discern three discrete aspects of a redevelopment of Euston Station. The first is the requirement to operate a railway terminus. The second is what might be needed to secure community benefits that might flow from such a reconstruction, for example, permeability across the site, the provision of open space, or the development of the west side of Eversholt Street so as to create active frontages. The third is what is required for speculative development in and around the new station.
- 6.6 Your Petitioners contend there is a need for clarity and transparency concerning these requirements. Any proposal to increase the width of the station footprint for railway operating purposes should be scrutinised very closely to ensure it is justified and is not a pretext for the acquisition of land for commercial purposes.
- 6.7 For historic reasons, there has been little pressure on railway undertakings to use the Euston site and approach tracks in a manner commensurate with current perceptions of the opportunity cost of the land. Your Petitioners and others have demonstrated that the current land take is significantly greater than that needed at a "clear site" for the efficient conduct of today's railway operations (even were the West Coast lines into the station running at the maximum capacity achievable using currently available signalling technology). There are proposals in "HS2 Plus" to divert certain services onto Crossrail 1, further reducing the space required at Euston.
- 6.8 Accordingly your Petitioners respectfully submit that if the Promoters wish to acquire land for development purposes, existing Compulsory Purchase powers are available and that therefore there is no need for the provisions of S47 of the Bill, which should be struck out.
- 6.9 Your Petitioners submit that the Promoter's revised proposals must seek to deliver a world-class station and that in pursuit of this objective they must have proper regard to the need to deliver a high quality public realm and the need to minimise the construction and other impacts on both the immediate local community and the wider Camden community. Your petitioners are concerned that an express goal of any sound project should be to keep an affected community whole both financially and in terms of quality of life.
- 6.10 Your Petitioners are particularly concerned about the health, road safety, emergency services, omnibus services and environmental impacts on Camden and other areas of North and West London that are implicit in the Promoters' plans for the movement of very large quantities of spoil and materials by road.
- 6.11 Your Petitioners understand that a number of the roads that would be affected by the Promoters' plans have been shown by recent studies to already have levels of air pollution far in excess of the legal limits imposed by Directive 2008/50/EC of the European Parliament on ambient air quality and cleaner air that entered into force on 11th June 2008.
- 6.12 Your Petitioners ask your honourable House to require that the Promoters adopt the principle that rail haulage is used for the delivery and removal of all construction related materials, spoil and equipment unless transport by rail is manifestly impractical in particular circumstances. Should be impractical to use rail then all the road vehicles and site plant used in construction should conform to the latest European Emission Standard.

- 6.13 Your Petitioners hold that the Promoters must consider properly a range of station designs that could be accommodated between Eversholt Street, Melton Street and Cardington Street. Your Petitioners have become increasingly confident that a station on two levels is feasible and desirable. Your Petitioners submit that the involvement of the local community throughout the design and construction process is crucial to its success.
- 6.14 As can be seen from the above, there are very many issues that are as yet unresolved in relation to the reconstruction of Euston Station, and the timescales will be very long. Your Petitioners recognize that the Promoters wish to commence work on the proposals in the Bill as soon as possible, and therefore urge that the Bill be amended to allow for a temporary terminus at Old Oak Common.
- 6.15 Your Petitioners fear that the Promoter has given far too little consideration to the matter of the accessibility of the proposed railway from within Greater London and more generally, the South East. Old Oak Common is one of the best-connected sites in Europe and there are abundant regeneration possibilities in the surrounding districts.
- 6.16 Your Petitioners suggest a station at Old Oak Common should be used to the maximum possible advantage to relieve passenger demand at Euston in the long term. Very many destinations in London can be reached faster via Old Oak Common as compared with Euston. In 2013 your Petitioners provided to HS2 Limited a comparison of Old Oak Common and Euston as interchange stations with London Transport lines. This comparison demonstrated that for most final destinations overall journey times would be shorter by changing trains at Old Oak Common.
- 6.17 Your Petitioners welcome proposals for a new interchange station at Old Oak Common for London Overground services, a Crossrail station, a station on the Great Western lines and for the link to the Overground services in the Euston Watford corridor known as "Option K2". However these are not the only services that could be connected into HS2 at Old Oak Common. The Central Line runs nearby and a connection into Old Oak Common would be possible. There are existing lines linking to the District Line.
- 6.18 Your Petitioners urge that the Promoters be required to fund an independent study of these links and of possible links to other parts of the conventional railway network. These might be similar, or identical to, Lord Berkeley's proposals for a tunnel to Queens Park which could be used inter alia to provide a link between HS2 and HS1 at North Kings Cross, to provide resilience to HS2 by means of another route for classic-compatible trains into Euston, or to provide a facility for through services to destinations to the east and south-east of London.
- 6.19 Your petitioners note with regret that HS2 seems to offer little or no benefit to South London and urge that ways be explored to remedy this, for example by enabling some high speed services to originate and terminate south of the Thames or further out. Your petitioners urge further that passive provision for such future modifications be incorporated in the design of any transport hub at Old Oak Common.
- 6.20 Your Petitioners have maintained a database of the punctuality of individual high-speed (TGV) services operating on the French national railway system. It is apparent from this that significant perturbations to services occur from time-to-time: on average around one in twenty services can be expected to run more than ten minutes late. The Promoters have assumed in their planning of Euston Station and of HS2 that a high intensity of service can be

achieved over lengthy time periods. Your Petitioners fear that the Promoters have not been entirely realistic in their assumptions and that measures are likely to be required to provide greater resilience within their scheme. One such measure is to provide adequate facilities at Old Oak Common for reversing trains that run materially out of course. Platforms at Old Oak provided to enable the station to function as a temporary terminus for the first stage of HS2 could still have a long-term function in helping provide resilience.

6.21 Your Petitioners urge therefore that the prospective roles of Euston and Old Oak Common be considered together rather than in isolation.

6.22 Your Petitioners suggest that building a landmark station at Old Oak Common (rather than the "Stratford box" design currently envisaged by the Promoters) would underpin the regeneration of the surrounding area (in particular Park Royal) that is particularly sought by the London Borough of Hammersmith and Fulham. Constructing a major station at Old Oak Common would be relatively straightforward task compared to that at Euston, as the site is an extensive tract of railway land far less constrained by the surrounding properties: time for construction could be significantly shorter.

6.23 Your Petitioners note that should the performance of Old Oak Common as an interchange station prove positive it could relieve the pressure upon Euston to such an extent that Euston redevelopment could progress at a pace little constrained by the need to maintain an intensive pattern of rail services and in a way that is far less disruptive to residents, businesses and visitor of Camden.

7 For the foregoing and connected reasons your Petitioners respectfully submit that, unless the Bill is amended as proposed above, clauses in Schedule 1 so far affecting your Petitioners, should not be allowed to pass into law.

8 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, interests and property and for which no adequate provision is made to protect your Petitioners.

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 Petitioner in the premises as your Honourable House shall deem meet.

AND your Petitioners will ever pray, &c.

[Signature of Petitioner]

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PETITION OF PAN CAMDEN HS2 ALLIANCE

AGAINST, By Counsel, &c.

Timothy John Stockton

Chair, Pan Camden HS2 Alliance

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