

**PETITION AGAINST A PRIVATE BILL
IN PARLIAMENT HOUSE OF COMMONS SESSION 2013-14**

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL

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 CAMDEN CYCLING CAMPAIGN
SHEWETH as follows:-**

1. A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your honourable House entitled "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. Clauses 1 to 36 set out the Bill's objectives in relation to the construction and operation of the railway mentioned in paragraph 1 above. They include provision for the construction of works, highways and road traffic matters, the compulsory acquisition of land and other provisions relating to the use of land, planning permission, heritage issues, trees and noise. They include clauses which would disapply and modify various enactments relating to special categories of land including burial grounds, consecrated land, commons and open spaces, and other matters, including overhead lines, water, building regulations and party walls, street works and the use of lorries.
4. Clauses 37 to 42 of the Bill deal with the regulatory regime for the railway.
5. Clauses 43 to 65 of the Bill set out a number of miscellaneous and general provisions, including provision for the appointment of a nominated undertaker ("the Nominated Undertaker") to exercise the powers under the Bill, transfer schemes, provisions relating to statutory undertakers and the Crown, provision about the compulsory acquisition of land for regeneration, reinstatement works and provision about further high speed railway works. Provision is also made about the application of Environmental Impact Assessment Regulations.
6. The works proposed to be authorised by the Bill are specified in clauses 1 and 2 of and Schedules 1 and 2 to the Bill. They consist of scheduled works, which are described in Schedule 1 to the Bill and other works, which are described in clause 2 of and Schedules 2 and 3 to the Bill.
7. Your petitioner is the Camden Cycling Campaign, the local borough group of London Cycling Campaign. Jean Dollimore is the coordinator and is writing on their behalf. Your petitioner represents more than 600 members and the interests of many

thousands of cyclists living or working in the borough of Camden. Your petitioner works to improve the roads for the safety and comfort of people who cycle and to promote cycling as a sustainable and healthy method of travel. The London Mayor plans to spend significant sums of money on the central London cycling grid and quietways in Camden in the next three years. The aim is to provide better routes so that many new people will feel safe to cycle. It appears from the environmental statement that the HS2 works will ruin some routes with additional HGV traffic and remove others altogether.

During construction, the closing of main roads will divert traffic onto the more minor roads that are used by cycle routes. In addition, construction vehicles, mostly Heavy Goods Vehicles (HGVs), will be added to these roads – it is not safe to mix cyclists with HGVs. Your petitioner considers it is directly and specially affected by this use of the roads.

8. Your Petitioner and the interests of the group represented are injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others, hereinafter appearing.
9. The Bill includes powers for the Secretary of State and the Nominated Undertaker to carry out construction works that will cause havoc over a wide area in Camden for a period of up to ten years, followed by the loss of a large area of land around the station.
10. The number of construction vehicles, mostly HGVs, will greatly increase on roads that are used by existing cycle routes. It has been established that it is dangerous for cyclists to share road space with HGVs. Statistically, HGVs pose a significantly higher risk to cyclists and other vulnerable road users than any other type of vehicle. In 2013 more than half of cyclist fatalities in London involved a heavy goods vehicle and hundreds of extra HGVs per day concentrated around the Euston Road site will inevitably result in lethal risks to cyclists in London. The demonstrable serious dangers for cyclists are shown in a study by Transport for London (TfL) which concluded that cyclists involved in collisions with HGVs are 78 times more likely to be killed than those hit by a car.
11. Air pollution levels on the Euston/Marylebone Road where the work is to be concentrated are among the highest in London and already breach EC directives, technically exposing the UK to a potential £300 million fine. Saturation levels of traffic with hundreds of extra HGVs per day will cause heavy congestion and add to air toxicity with further lethal risks to cyclists as exposed road users. The solution is for all freight to be transported by rail since this is a railway project. If the carriage of freight by rail is currently not possible, the scheme should include provision for doing so.
12. During construction, the closure of main roads will divert traffic onto minor roads used for safety reasons as cycle routes.
13. Cycle routes of particular concern from (CFA1) Euston Station and Approach:
 - *GNS1* : north-south quietway route that runs along Park Village East, Stanhope Street, Varndell Street, Cardington Street, Melton Street, Gordon Street where it will cross the Tavistock Place cycle track and continue south via Malet Street and Newton Street and on over the Westminster border.
 - *GNS2*: Arlington Road, Mornington Crescent, Hampstead Road, Cardington Street, Melton Street, Gordon Street and then join GNS1.
 - *QW 31*: follows the old LCN route on Elsworthy Road, King Henry's Road, Gloucester Avenue, Regents Park Road to the Delancey/Parkway/Prince Albert Road junction.

- *GEW1*: Delancey Street-Pratt Street, also uses the Delancey/Parkway/Prince Albert Road junction.
 - *Barnby Street link*: in the absence of any link from Eversholt Street to Hampstead Road between Euston Road and Mornington Crescent, an informal link through Barnby Street is essential for accessing the route *GNS1*.
14. Cycle routes of particular concern from (CFA3) Primrose Hill to Kilburn:
- *QW 31*: follows the old LCN route on Elsworthy Road, King Henry's Road, Gloucester Avenue, Regents Park Road to the Delancey/Parkway/Prince Albert Road junction.
 - *GNS2*: Arlington Road, Mornington Crescent, Hampstead Road, Cardington Street, Melton Street, Gordon Street (on the alignment of the LCN+ route 6a and mentioned in the report §12.5. , joining *GNS1*)
 - *GEW1*: Delancey Street-Pratt Street, also uses the Delancey/Parkway/Prince Albert Road junction.
15. Your Petitioner's main concerns about HGV traffic on cycle routes are as follows:
- Quietway *GNS1* on Stanhope Street and *GNS2* on Hampstead Road affected by satellite compounds Mornington Terrace and Mornington Street overbridge.
 - The Barnby Street link will be compromised by the above activities associated with satellite compounds at Royal Mail NW1 delivery office and at A400 Hampstead Road overbridge (south).
 - Gordon Street satellite compound used for ten years from 2016 to 2026, with vehicle entrance and exit via Euston Road, Endsleigh Gardens or Gordon Street or Gower Place
 - Your Petitioner is extremely concerned that the safety of students and others cycling to UCL will be compromised on all of these roads.
 - Your Petitioner has serious concerns regarding the safety of the *QW 31* and *GEW1* routes from HGV access to the Camden carriage sidings.
16. Your Petitioner's main concerns about closure of roads with cycle routes:
- The possible loss of two-way cycle access in Park Village East (on the route *GNS1*) during the closure.
 - The loss of access by cycles and pedestrians would affect travel to UCL when Gordon Street is permanently closed to vehicles.
 - The loss of access by cycles via the A400 Hampstead Road Bridge will affect *GNS2*.
 - The loss of access by cycles via the Mornington Street Bridge would affect a useful link between *GNS1* and *GNS2*.
 - It is unclear whether pedestrian and cycle access will be maintained via the eastern end of Varndell Street – an essential link in route *GNS1*.
 - Closure of Adelaide Road (due to Adelaide Road vent shaft Main compound). Drivers wanting to travel between Swiss Cottage and Chalk Farm are likely to use Eton Avenue or Fellows Road. Both of these are popular quiet routes for cyclists.
 - Consequent changes in traffic flows will lead to congestion, increasing delays at Gloucester Avenue/Oval Road, and will affect non-motorised users: in Regent's Park Road and Gloucester Avenue.
17. Your Petitioner's main concern about the permanent damage is from the loss of Cardington Street. The alignments of cycle routes *GNS1* and *GNS2* on Cardington Street, Melton Street and Gordon Street will be permanently lost if Euston Station is built on the proposed footprint. With the closure of Gordon Street a very safe cyclists'

crossing could be made over Euston Road from Meltón Street. Cyclists will be forced onto Hampstead Road across Euston Circus, whose new design fails to cater for safe north-south crossing by cyclists.

18. Your Petitioner objects to the powers that are proposed to be provided by the Bill to the Secretary of State and the Nominated Undertaker and respectfully submit that the Bill should be amended or undertakings should be required so that HS2 Limited, the Secretary of State and/or the Nominated Undertaker must review the construction strategy for the project and its related works by considering their cumulative impacts on people who travel by cycle both during the construction stage and after completion of the project.
19. In order to avoid cyclist casualties, all diverted traffic should avoid cycle routes. HS2 is a railway project and all freight should be transported by rail rather than HGVs for the duration of construction work.
18. For the convenience of cyclists their routes (including contraflow cycling) should be maintained with the shortest diversions.
19. To keep HGVs and additional motor traffic off cycle routes:
 - Access plans should be modified to avoid the use by HGVs of Stanhope Street to protect GNS1. In the case of Hampstead Road, special arrangements must be devised to protect cyclists.
 - To ensure the safety of students and others cycling to UCL access to the Gordon Street satellite compound should be restricted to Euston Road, leaving Endsleigh Gardens, Gordon Street and Gower Place unaffected.
 - Access plans should be modified to ensure the safety of cyclists on Gloucester Avenue by removing the dangers associated with HGV access to the Camden carriage sidings.
20. To maintain cycle routes, the following need to be ensured:
 - Two-way cycle access on Park Village East and Varndell Street (on the route GNS1).
 - Availability of the *Barnby Street link* and protection of cyclists until the new bridge over the railway is ready for use.
 - Continuous cycle and pedestrian access through the closure of Gordon Street.
 - The safety of cyclists on the A400 Hampstead Road Bridge via the temporary utilities bridge.
 - The safety of cyclists on the temporary shared utilities, pedestrian and cycle bridge at Mornington Street Bridge.
 - Two-way pedestrian and cycle access via the eastern end of Varndell Street for use by GNS1.
21. To protect cycle routes from the side effects of road closures:
 - During the closure of Adelaide Road, motor vehicle drivers must be prevented from using diversions via Eton Avenue, Fellows Road and King Henry's Road.
 - Measures should be taken to allow cyclists on a variety of Quietways to bypass the jams at Gloucester Avenue/Oval Road.
 - Traffic management plans must be modified to ensure that disruptions are kept away from the QW 31 route in Regent's Park Road and Gloucester Avenue.
22. In order to preserve the cycle routes GNS1 and GNS2 on Cardington Street, Euston station should be built on its current footprint as well as retaining the promised east-west access via a bridge linking Robert Street to Phoenix Street. This bridge should be constructed to the highest standards, providing an attractive throughfare for pedestrians and cyclists.

23. Adequate and secure cycle parking should be provided for commuters at Euston Station.
24. If this project goes ahead, Your Petitioner asks you to contact Camden Cycling Campaign to discuss how to limit the resulting major impact on Camden's cycle highways and significantly increased risks to Camden's cyclists.
25. 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 PETITIONER therefore humbly prays 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.

Signed Jean Dollimore