

**IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013–14**

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL

PETITION

Against the Bill - 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 FRANCES HERON (known as FRAN)

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.

Camden Town District Management Committee

7. Camden Town District Management Committee (hereinafter referred to as 'the DMC') is an umbrella group comprising elected representatives from the Tenants and Residents Associations (TRAs) from within its boundary and elected local councillors. The DMC meets five times a year, is clerked by the London Borough of Camden Committee Services and is one of the five DMCs covering the borough. The remit of the DMC is to work in partnership with the London Borough of Camden and its Housing Department to improve the delivery of housing services and enhance quality of life of residents.
8. The area covered by Camden Town DMC is roughly contiguous with the now defunct HS2 Euston Community Forum. St Pancras & Somers Town and Regents Park wards are entirely within its catchment area. These two wards are likely to be the two most adversely impacted along Phase One of the HS2 route to Birmingham. It is also accepted that some 80% of negative impacts will accrue to Camden (although this percentage will have dropped slightly as a result of the exclusion of the HS1-HS2 link, it is not felt that this will alter the percentage significantly).
9. Property tenures within the DMC and CF1 Euston Community Forum catchment area are mixed. The largest area of owner-occupation is concentrated between Camden High Street and the eastern boundary of the railway cutting mostly comprising Victorian housing. Tenanted properties are mainly, but not solely, located in discrete well-maintained social housing estates in Somers Town and Regents Park wards and are largely owned by the London Borough of Camden. Origin Housing Association, in particular, also provides affordable accommodation mainly in the Somers Town area. Adjacent to the Regents Park Estate, there are properties in and around the Cumberland Market that were owned by the Crown but which have in recent years been divested to alternative ownership. Purpose-built student accommodation now forms a growing proportion of newly-built residential accommodation. Between the large open space that is Regents Park itself and the railway cutting south of Parkway lie the impressive Nash properties of Park Village East.
10. The DMC became engaged with the issues and threats posed by HS2 when its members became aware that several hundred homes, mainly social housing, were to be

demolished on Regents Park Estate to accommodate expansion of Euston station. Given the acute shortage of affordable housing in Camden such destruction of perfectly good homes was viewed by DMC members as social vandalism. Scepticism was compounded by the significant 'land grab' that was integral to HS2 Ltd's plans. There also existed a growing concern that there was an element of 'social cleansing' involved in the Euston station redevelopment similar to that which has accompanied infrastructure construction and regeneration elsewhere, for example the experience in London Borough of Newham prior to the construction of the Olympic Park and Westfield Centre. To some extent any such aspirations have been nobly thwarted by the London Borough of Camden through its insistence that homes demolished must be replaced on a like-for-like basis by HS2 Ltd in the local area if tenants so wish.

11. During the last DMC meeting in March 2013 attendees received an update on the then current position with regard to HS2. Members were advised of the forthcoming parliamentary vote on the Second Reading of the Hybrid Bill in your Honourable House in April. They were further advised that this vote would almost certainly give authorisation for High Speed Two to progress. The Chair informed the meeting that this would be followed by a lengthy process of petitioning your Honourable House via the specially constituted Select Committee. Furthermore, the Chair expressed the opinion that the petitioning process would provide the single genuine opportunity local people will have to influence any aspect of its route and to seek necessary mitigation. The Community Forums that were held in Euston were widely seen as a farce in terms of exchange of information since little if anything fruitful emerged from these meetings much to the frustration of participating community representatives. It was concluded that the HS2 Ltd forums were merely a "box ticking" exercise to comply with legislation to 'consult' local communities.
12. During the aforesaid DMC meeting, a motion was unanimously passed giving authority to the Petitioner, the current DMC Chair, to submit a petition to your Honourable House on behalf of the DMC membership. It was emphasised that such a petition did not disbar other groups or individuals from the petitioning process and they were encouraged to engage with the process.

General Overview

13. There is widespread belief that HS2 Ltd has grossly under-estimated, not only the financial but also the social and environmental costs of bringing HS2 into Euston. The Institute of Economic Affairs comments that the last 5 miles from Old Oak Common to Euston being just 4% of the total route will cost in the region of £5bn which is a disproportionately high slice of the budget set aside for Phase One. The Social and Environmental costs remain un-quantified but are clearly enormous.

14. To date, HS2 Ltd have grossly underestimated the practical difficulties of bringing HS2 into a densely populated high value area such as Euston. The construction of HS1 into St Pancras and redevelopment of that station and Kings Cross Stations are not comparable as these were largely constructed from open access brown-field sites
15. The inequity and manifest unfairness in the compensation afforded to rural and urban areas is of great concern to your Petitioner and Your Petitioner urges your Honourable House to explore on behalf of seriously impacted persons a suitable package of recompense commensurate with the level and duration of losses experienced.
16. No household or business in the DMC areas will completely escape the impacts of HS2 but these impacts are greater the closer they reside to Euston Station, the station approach and cutting. The degree and extent of cumulative adverse impacts facing many households is such that they will lose all quiet enjoyment of their homes to which they are reasonably entitled. Your Petitioner wishes to draw the attention of your Honourable House to the plight of those households in such close proximity to demolition, excavation and construction works of up to several decades duration that life could well become intolerable and their homes uninhabitable. These include, but are not necessarily limited to, a number of housing blocks on Regents Park Estate and Amptill Square Estate and a range of properties to the west of Euston Station including, but limited to, Cobourg Street, Starcross Street, Drummond Street and Mews. Few of these properties are entitled to any statutory compensation.
17. Your Petitioner seeks to highlight to your Honourable House the range of adverse impacts facing various communities of interest of unprecedented duration around the epicenter of Euston Station but these impacts radiate out across the London Borough of Camden. The former Director of Public Prosecutions, Kier Starmer, has put on record his belief that because no detailed impact assessment of the cumulative losses faced by those living and carrying out business in Euston, HS2 Ltd have breached their fundamental human rights under European Union legislation.
18. Your Petitioner is greatly exercised and wishes to draw the attention of your Honourable House to the fact that no attempt has been made to balance the interests and needs of HS2 Stakeholders. The needs of the Approved Undertaker, HS2 Ltd staff and employees and Network Rail are viewed as of paramount importance whereas the genuine needs of the reluctant 'host' communities are virtually ignored. The determination of Network Rail that disruption to existing and future rail passengers will be kept to a minimum regardless of social and financial cost to other stakeholders is one example of many. Your Petitioner asks that Your Honourable House recognise the scale of discrimination and seek to mitigate this blatant inequity and in so-doing establish a more equitable balance between differing competing interests
19. There has been no attempt by HS2 Ltd to recognize and quantify the cumulative adverse impacts of their plans not limited to but including those on local communities, businesses, travel and amenity nor the cost to the London Borough of Camden and impacts on community charge rates and benefits.

20. Your Petitioner is also greatly dismayed by disparaging and inaccurate portrayal of the Euston area and communities that are most significantly impacted by HS2 who reside mainly on the Regents Park Estate where most of the demolition will occur. They are emphatically not an homogenous group of socially deprived tenants who need 'rescuing from poor quality Council homes' as characterised by Sir David Higgins. On the contrary our communities comprise those individuals, groups, voluntary and statutory organisations, education establishments, health facilities, private and council tenants, leaseholders and property owners, local small traders and businesses and such other parties comprising the richly diverse and vibrant communities surrounding Euston station all of whom face unparalleled social, environmental and economic impacts of several decades duration. To these should be added the requirements and convenience of commuters and visitors to the London Borough of Camden other than those travelling on the West Coast Main Line into Euston. Together we face an unprecedented development in scale, cost and duration and of dubious benefit for the vast majority of rail travellers.
21. Your Petitioner considers that the rights, interests, quality of life and in some cases property of residents are injuriously affected by the Bill, to which Your Petitioner objects for reasons, amongst others, hereinafter appearing.

Euston Station

22. Your Petitioner understands that the Hybrid Bill is premised on "Option 8". Your Petitioner considers this proposal unacceptable and this 'Cheapskate' option only emerged because HS2 Ltd had underestimated the cost of their Baseline Scheme (Option 1) by £800m (£2bn as opposed to their original estimate of £1.2bn). Your Petitioner considers Option 8 to be 'the worst of all worlds' causing maximum damage and disruption to communities in and around Euston Station while providing minimal opportunity for delivery of much needed affordable homes and employment for local people promised via regeneration of the station which would provide a small 'crumb of comfort' for the decade and more of adverse impacts that cannot properly be mitigated.
23. It now transpires that the Promotor of the Bill intends to abandon the proposals set out in the Hybrid Bill in favour of a "level deck option" as proposed by Sir David Higgins. It is mooted that this option will take longer to construct and cost significantly more than Option 8, both cost and time restrictions being the criteria cited by Mr. Secretary McLaughlin for abandoning 'Option 1.
24. Your Petitioner further understands that it is not possible for Euston Station to cater for onward travel of forecast increased passenger numbers safely without commitment to the further costs of building Crossrail 2 anticipated to be in the region of £15-20bn with unknown consequences for local communities.
25. Of great concern to your Petitioner is the proposal that the costs of constructing the station will be recouped by allowing untrammled property development above the newly constructed Euston station and 'slabbed over' railway approach and cutting as far north as Parkway. Not only would this add many years of further construction misery but it

confuses the principle of 'national need' to build a railway with the desire to generate profit and in so doing totally undermines local democracy and sets a dangerous precedent.

26. The provision of vitally needed low-cost housing as well as employment opportunities and affordable space for local enterprise to develop, a significant proportion of which should be reserved for local people, must form a major component of any station development.
27. If the Promoters of the Bill insist on Euston as the main London terminus for HS2, your Petitioner urges your Honourable House to instruct the Promoter to design a station within the current footprint of Euston station. HS2 Ltd have conspicuously not explored sufficiently in their own designs a plan to restrict expansion outside the confines of Euston Station and have failed to properly appraise such alternatives, including the emerging Double-Deck Down design generated by concerned professionals from within the community.
28. The Petitioner has discussed with the DMC the merits of proposals contained in the 'Pan Camden HS2 Alliance' (PCHS2A) submission to your Honourable House [Ref no: 408] and the Petitioner fully endorses arguments and reasoning contained in the 'PCHS2A' petition and in particular the powerful arguments articulated to locate the southern terminus at Old Oak Common on a temporary or permanent basis and the stress put upon the need to consider Old Oak Common Station and Euston Station as mutually dependent.
29. Given the uncertainty with regard to future plans for Euston Station and proposals for a 'level deck' option which would extend the period of disruption from one to almost two decades and the desire to recoup costs from real estate development that could conceivably last a further decade, your Petitioner urges your Honourable House to support the proposals outlined in paragraph 28 above until properly costed and acceptable plans for an alternative London terminus have been devised.
30. Assurances have been provided that the London Borough of Camden will retain ultimate planning control. However much scepticism exists that planning decisions will be wrested from democratic control and invalidated via appeals from vested interests in the pursuit of profit. The function of local authority planning control is to balance the needs of all stakeholders and is crucial if any confidence in the process is to be accomplished. Whether and how this might be achieved is uncertain, but your Petitioner urges your Honourable House to search for a solution that meets with local approval.
31. Until your Petitioner has better understanding of future proposals, it is difficult to determine precisely what should be petitioned against. This lack of knowledge within communities and by individuals who will be significantly adversely affected has been compounded by the unwillingness of HS2 Ltd to share material information of great import to residents. This would include, but is by no means limited to, the dearth of information provided to those whose homes will be demolished, both tenants and leaseholders referred to below in paragraphs 36,, 37 and 38 below.

32. Given the uncertainty regarding future anticipated significant changes to plans for Euston Station, your Petitioner reserves the right to further petition your Honourable House in the light of such alterations.

Main Impacts

33. HS2 Ltd has conspicuously failed to properly assess cumulative impacts of demolition, excavation and construction work on local communities. These include, but are not limited to route-wide impacts, such as noise, vibration, air pollution, road closures/diversions, traffic congestion, removal of waste, re-routing of utilities, HGV traffic levels, Code of Construction Practice and Working Hours.

34. To date, no details have been forthcoming to mitigate the host of adverse impacts generated by HS2 so that it is impossible to assess the effectiveness or otherwise of mitigation proposals. HS2 Ltd have simply provided a matrix of possible mitigation measures. Your petitioner urges your Honourable House to ensure that any such mitigations to reduce impacts are carried out to a high standard and specification in line with best practice and that measures to ameliorate harmful impacts are not compromised by cost incurred by HS2 Ltd in seeking solutions.

35. Your Petitioner fears the extent and duration of multiple adverse impacts resulting directly from the construction of Euston Station and related necessary associated works to railway track within the station approach and cutting. These works also require a more than doubling of the span and lifting by 4 metres the level of the bridge crossing the railway on the A4000 Hampstead Road which is a major north/south arterial 6-lane highway in/out of the West End and to/from destinations north of London.

36. Some 223 homes (including 136 units of social housing) are scheduled for demolition and the London Borough of Camden considers that more than double that figure will be at risk of becoming uninhabitable. Among those unfortunates who will lose their homes are two significant cohorts; those of London Borough of Camden Leaseholders and secure tenants of the same authority.

37. Although it has been impossible for many, if not all, leaseholders to obtain valuation figures or details of any compensation package that will apply to their circumstances by HS2 Ltd, it is believed that losses could be very substantial compared with non-blighted market valuation. Leaseholders who face demolition are greatly concerned that the disparity between compensation offered and that which will be required to purchase like-for-like accommodation in the vicinity could be as much as a six-figure sum thus forcing them out of the area. Many, if not all, want to remain living locally and it is manifestly unjust that they may be forced out of a neighbourhood where they have roots and social networks

38. Your Petitioner draws the attention of your Honourable House to the manifest injustice that is being perpetrated on leaseholders and other property owners who face considerable financial loss as a direct result of constructing HS2. In line with growing public

opinion, your Petitioner considers that if the decision of your Honourable House is that it is unable or unwilling to provide full and fair compensation to those facing significant financial loss in the national interest, then the nation cannot afford to construct HS2.

39. In December 2012 the Rt. Hon Philip Hammond MP, the then Secretary of State for Transport stated: 'When a project that is in the national interest imposes significant financial loss on (an) individual, it is right and proper that they should be compensated fairly for that loss ...' Such uncompensated losses said to be 'unaffordable' by the government must translate into direct subsidy extracted from individual personal loss in order to construct HS2.
40. Your Petitioner would welcome the intervention of your Honourable House is assessing the financial losses that will ensue to individuals by commissioning an independent study to provide an analysis of the extent to such losses. The figures are likely to be very substantial and do not appear in published Cost Benefit Analyses as far as your Petitioner can ascertain. These sums will be over and above the average contribution to HS2 by every house-hold in the UK of around £3,000.
41. Although tenants will not lose market value on their accommodation, no account is taken of emotional upheaval and the derisory amount they will receive is unlikely to cover the cost incurred in moving home
42. Uncertainty about their future has been hanging like the Sword of Damocles over the heads of both tenants and leaseholders from a stable multi-ethnic harmonious example of social cohesion
43. Many of those being displaced have lived in their homes for many years and some are the original tenants. Of note is the fact that the Promoter has been offered the opportunity to purchase alternative accommodation nearby in a mixed development above Netley Primary School and HS2 Ltd have significantly failed to take up the offer which may not be repeatable.
44. Your Petitioner is concerned that spoil, waste and materials for the construction of HS2 and Euston Station is being transported by road. The network of roads across Camden identified by HS2 Ltd for the use of their contractors is significant and include some identified which are clearly unsuitable for HGV traffic which in variously estimated at between 600-1000 trips per day. It is manifestly ridiculous that rail is not the default mode for such bulk transport.
45. The impacts on other road users caused by this additional construction traffic is likely to be considerable and impacts will include widespread delays to all other traffic in particular public transport.
46. The sheer number and physical length of proposed utility diversions will cause further significant delay and re-routing of road traffic.

47. Over and above delays to traffic from utility works, they will add to difficulties businesses will have to retain trade.
48. It is of concern to your Petitioner that the very existence of the street market in Chalton Street will be threatened and local small traders anticipate a drop in footfall that will translate into loss of trade. The Market is particularly used by the large Bangladeshi community.
49. The plight of businesses and their ability to survive the adverse impact and lack of footfall is of great concern to your Petitioner. While promising employment opportunities via HS2, little mention is made by the Promoter to the loss of business that will be caused. Sixty-two businesses will be forced to close or relocate due to demolition and a further 242 businesses are located within the safeguarded zone. HS2 Ltd themselves estimate in excess of 3500 job losses as a result of constructing the terminus of HS2 in Euston.
50. Of particular concern to your Petitioner and a growing number of patrons and visitors to their premises, is the plight of the Drummond Street traders. This cluster of curry houses is renowned across London and further afield. It is unique and a long-standing attraction for diners seeking delicious low-priced AsianAsian meals. There are other traders in Drummond Street some of whom supplement the Asian market for food. In its own way Drummond Street is a treasure that must be protected. Current plans make its survival far from certain.
51. The six years of works to remove and reconstruct the Hampstead Road Bridge on the A400 will cause enormous traffic disruption when six lanes are reduced to two – one in each direction. Together with diversions in and around Euston it is not impossible that the whole road network could grind to a halt and a terminal gridlock scenario is not unrealistic. All delays caused by congestion will also generate more pollutants in an area already heavily contaminated by poor air quality.
52. Of great concern to your Petitioner is the potential delay congested roads will cause to emergency service vehicles and their call out times which have been exacerbated by the recent closure of two Fire Stations within the borough and the consequent impacts on said call-out times.
53. Drivers faced with the frustration of delays caused by congestion will seek to reduce that delay and some are likely to attempt to bypass obstructions to progress by seeking ways to avoid these. It is of concern that residential areas will be used as 'rat runs'. Not only is this inappropriate but is potentially dangerous especially in Regents Park and Somers Town where many schools are located.
54. While it is inevitable that in a project of this magnitude construction compounds will be required for the support of works, nevertheless the sheer number and size of construction compounds and their location is of significant concern together with the cumulative loss of amenity they will cause.

55. In urban areas, access to open space and the natural environment is of primary importance. Your Petitioner is extremely concerned about the extent of public open space that is being requisitioned by the Promoter. Such losses include, but are not limited to the entire St James Gardens and burial site, as well as Euston Square Gardens which will be permanently lost while Ampt Hill Square Open Space and a significant part of Harrington Square will be lost on a temporary basis.
56. With the loss of public open space multiple habitats, flora and fauna area are lost. Your Petitioner is particularly incensed by the number and loss of mature trees estimated by the Promoter to be up to 200 mature trees in a relatively small area. Apart from the esthetic beauty, trees also play a role in the provision of habitats for a range of creatures; provide shade and microclimate benefits and play a vital role in reducing CO₂ in the polluted environment around Euston. To many local people this is a heartbreaking loss that cannot be adequately mitigated. HS2 Ltd has posited the opinion that the cutting down of trees will somehow prove an asset by 'opening up views' when it is nothing less than environmental vandalism and should strongly opposed.
57. Not only does the community face the loss of the restful and tranquil St James Gardens but also the permanent loss of a purpose-built playground and multi-use games areas (MUGA) located within the gardens but also the attractive playground on Hampstead Road will be permanently lost. Other such amenities will be lost on a long but temporary basis examples of which include, but may not be restricted to, the temporary loss of the MUGA and potential access difficulties to a playground located on Ampt Hill Square Estate and playgrounds in Churchway and possibly Ossulston Estates are also at risk. All are scarce commodities and vitally needed for the health and recreation of young people
58. The amenity of several community halls are at risk with one on Regents Park Estate being lost permanently through demolition while another located on Ampt Hill Square Estate is likely to face access difficulties which may potentially be insurmountable for the duration the construction compound remains on the Estate.
59. Immediately west of Euston Station concourse lies Churchway Estate, a mix of housing from various eras, with various access routes, one of them Lancing Street from Eversholt Street. Lancing Street will be completely closed for six years and used for a satellite compound site close to residential housing with consequent nuisance and loss of direct access from the west.
60. Severe disruption will be faced by those communities on either side of the cutting between Granby Terrace Bridge and Parkway due to track widening on the west side of the cutting to allow significantly more trains to pass through the throat as well as reconstruction of retaining wall and these are likely to be complex and protracted. This is causing concern about structural damage to homes and will also entail the closing of Park Village East road to traffic for long periods, including preventing vehicular access to homes. These works will be further complicated by the demolition and reconstruction of Mornington Street Bridge across the cutting.
61. Throughout the Euston area parking space for residents is at a premium and demand outstrips supply in most areas. Plans by the Promoter of the Bill will demolish two

underground car parks and significantly reduce both estate parking and resident on-street parking bays. Lack of parking in the area will cause great difficulties for residents who require their vehicles to access employment and deter visitors with implications for small traders.

62. The Petitioner reserves the right in the light of expected significant changes to the plans for Euston station to highlight to your Honourable House such changes and the implications thereof to communities within the DMC catchment area.

Mitigation Measures during the Construction Phase

63. The Environmental Statement was premised on the duration of works being over a ten year period between 2016 and 2026. The more likely scenarios suggested by HS2 Ltd are that this is likely to be extended for a further eight years to 2034 causing 18 consecutive years of severe disruption.

64. To date no specific mitigation measures have been proposed. HS2 Ltd have merely published a matrix of possible mitigations measures. When queries are addressed to HS2 Ltd by concerned individuals they are told that sufficient information has been provided in the Environmental Statement 'for this stage of the project.'

65. Your Petitioner requests your Honourable House to require the Promoters to adopt an evidence based approach to mitigation.

66. Your Petitioner does not have the expertise necessary to recommend appropriate mitigation measures but urges your Honourable House to ensure that such measures that are agreed are commensurate with the impacts generated and that adequate mitigation and best practice is not sacrificed for cost reasons.

67. Your Petitioner is greatly concerned that HS2 Ltd continually use a modifier when referring to mitigation measures that might be employed, that of 'where reasonably practicable'. This phrase is widely considered to be a 'Get Out of Jail Free Card' which seeks to absolve HS2 Ltd from providing adequate mitigation. Your Petitioner asks your Honourable House to more clearly define the term 'reasonably practicable', who will be final arbiter of 'reasonableness' and to whom this 'reasonableness' applies

68. Your Petitioner requests your Honourable House to require the Promoters to carry out ongoing monitoring of all pollutants for the duration of the construction including noise, dust, air pollution and vibrations levels which should be independently verified. Current air pollution levels are known to breach EU legislation and thus already threaten the health and well-being of those living and working in highly polluted areas around Euston Road. Breaches of agreed levels should be heavily penalized because of wide spread health risks.

69. Your Petitioners ask your Honourable House to require the Promoters to implement the following mitigation measures, all of which are essential if any semblance of quality of life is to be maintained during the eighteen years currently estimated for any 'level deck design' which it is said will replace the design currently residing in the Hybrid Bill:

- (i) Your Petitioner respectfully submits that the Bill should be amended or undertakings required so that the construction strategy for the project is reviewed in the in the light of its impact on our communities.
- (ii) In particular, your Petitioner asks that the station plans should be redesigned to keep the western station boundary within its existing footprint. This would constitute a major reprieve for all those communities west of the railway.
- (iii) A number of alternatives have been proposed, including a Double Deck Down option, which your Petitioner does not believe have been adequately explored.
- (iv) Yours Petitioner further requests that consideration be given to terminating HS2 at Old Oak Common as its southern terminus should HS2 go ahead.
- (v) Your Petitioner requests your Honourable House to ensure that adequate monitoring of noise and air pollution levels in and around Euston are carried out over a suitable period of time prior to commencement of any work to assess background noise and air pollution levels in order to establish a recognized baseline against which future monitoring can be reasonably judged.
- (vi) Your Petitioner requests that agreed limits should be negotiated with independent advice on noise, dust, air pollution, vibration, loss of safe access, loss of amenity and daylight, construction traffic, congestion, hours of work, overall time taken to complete the project, etc., and that HS2 should be liable to pay compensation at agreed levels for breaches of those limits.
- (vii) Your Petitioner requests that all Emergency Services must be satisfied that their requirements with regard to Health and Safety legislation are identified, agreed and enshrined in a comprehensive Health and Safety plan that must be agreed by the Promoter well in advance of commencement of any construction. Such plans should be publically available. In particular, call-out times must not exceed pre-construction levels.
- (viii) Your Petitioner asks that, in so far as is practical, only rail will be used for the delivery of materials and the removal of waste. The practicality of so doing should be independently evaluated and balanced against impacts generated by removing spoil and other materials by road and on other interested parties.
- (ix) Your Petitioner requests that HGV traffic should be kept to a minimum and restricted to non-peak hours.
- (x) Your Petitioner urges that a package of property modifications for those residents most seriously impacted by proximity to the railway works, station construction and Hampstead Road Bridge works to include, but not limited to, assessed risk of subsidence, triple glazing, air filtration systems and sound proofing.
- (xi) Because of the extent and duration of cumulative adverse impacts, a sizeable number of properties may well become uninhabitable. In such

cases your Petitioner urges that HS2 Ltd must be required to offer alternative accommodation to householders thus impacted, agreed by individuals and commensurate with their need, for as long as this is required. Residents must be offered a guarantee of return to their original homes if they so wish.

- (xii) The construction compound planned on the Regent Park Estate and the amount of nuisance in terms of noise, dust, air and light pollution, as well as risk from HGV trips through residential streets will be enormous. Plans for 3.6m hoarding around its periphery will cause a loss of visual amenity to many residents. Cumulative impacts would render housing nearby uninhabitable.
- (xiii) Your Petitioner asks that HS2 Ltd be required to give an undertaking that working hours be restricted to normal day time working hours except in very exceptional and limited cases, agreed with the London Borough of Camden, and that clear advance notice on working hours should be provided at all times during construction works.
- (xiv) Your Petitioner urges that security measures should not be compromised and any reduction of security to households or businesses would require HS2 Ltd to provide 24/7 security personnel who must be immediately available to mitigate potential problems.
- (xv) Your Petitioner urges that plans for rerouting of utilities are reviewed and consideration is given to reducing the number of routes identified, particularly within estates
- (xvi) Alternative routes for relocation of utilities away from the Estate should be carefully examined because of the very significant additional disruption and potential compromise of the comprehensive security system these utilities works would entail to an already severely affected community.
- (xvii) Any accidental damage to services will be remedied immediately and timely financial penalties made payable to all residents who endure loss of any service. LB Camden may also impose additional H&S restrictions given the inherent dangers of trenches being dug across the Estate.
- (xviii) The number and size of construction compounds should be restricted and kept away from residential property in so far as is possible. The Promoter should be required to make a specific case for each location and size of each rather than safeguarding so much land to itself for this purpose.
- (xix) The location and size of the compound within Amptill Square should be reassessed and relocated to ensure adequate emergency evacuation of Gillfoot tower block.
- (xx) Your Petitioner is concerned that the Promoter has identified any green open space within 1km of Euston Station and laid claim to it by safeguarded these areas for their own use irrespective of the impacts locally. HS2 Ltd must make an irrefutable case for locating each construction compound in terms of necessity, size and placement
- (xxi) Loss of parks, gardens, green space should be kept to an absolute minimum and alternative replacement of any such loss should be provided locally.

- (xxii) Loss of flora and fauna should be kept to a minimum and any losses replaced.
- (xxiii) No tree should be felled without an independent technical view that this is absolutely necessary. Replacement on a two to one basis of adequate sized trees should be agreed.
- (xxiv) Loss of amenity including but not limited to community halls, play facilities and games pitches should be immediately relocated nearby.
- (xxv) Across the area pedestrians and cycle diversions should be kept to a minimum. Pedestrian and cycle access routes from east/west and north/south should be maintained as currently available as far as is possible.
- (xxvi) Because of diversions, road closures, detours and risks of road traffic accidents, the Promoter must provide safe transport to schools for all affected children.
- (xxvii) For similar reasons the Promoter must provide a Courtesy Bus particularly for the elderly and those with mobility problems in order that they may carry out the daily tasks of life such as shopping and socializing.
- (xxviii) It is widely felt that HS2 Ltd have laid identified any green open space within 1km of Euston Station and laid claim to it by safeguarded these areas for their own use irrespective of the impacts locally. HS2 Ltd must make an irrefutable case for locating each construction compound in terms of necessity, size and placement.
- (xxix) Adequate pest control measures must be put in place and monitored.
- (xxx) An effective plan to ensure the eradication, prevention and spread of Japanese knotweed prevalent locally arising from the railway cutting is required. Lack of safe handling and prevention of spread of this invasive plant species has important ramifications for current and would-be property owners
- (xxxi) There should be no overall loss of resident parking in the area and the Promoter must identify alternative parking bays within an acceptable distance from those lost.
- (xxxii) An alternative site for the proposed bus stand on the junction of Barnby Street and Eversholt Street must be found as current plans pose a risk of road accidents as well as additional unnecessary traffic congestion and fuel consumption.
- (xxxiii) There will be weekly Local Environmental Management Planning Meetings between contractors, residents and businesses.
- (xxiv) All construction areas should be kept in a good state of cleanliness and any damage caused by contractors should be made good in a timely fashion
- (xxv) Consideration should be given to setting up site specific Neighbour Agreements with contractors and other parties impacted by work on the Estate.
- (xxvi) A Community Fund should be set up and made available on which residents should be able to call to fund as yet unknown purposes to help alleviate the impacts of HS2 in ways to be determined by community agreement.

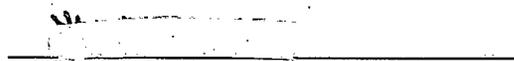
70. Your Petitioner would welcome the willingness of the Hybrid Bill Select Committee appointed by your Honourable House to hear evidence and arrange site visits in Camden in order to assess for themselves the extent of likely impacts.

71. There are other clauses and provisions in the Bill which, if passed into law as they now stand will prejudicially affect your Petitioner and their rights, interests and property and for which no adequate provision is made to protect all residents living on the Amphill Square Estate.

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 themselves, 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:



Frances M Heron

MAKE SURE DRUMMOND ST, CHALTON ST, LANCING ST and WEST EUSTON ARE INCLUDED

**IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013-14**

**HIGH SPEED RAIL
(LONDON - WEST MIDLANDS) BILL**

PETITION OF FRANCES M HERON

AGAINST, by Counsel, &c

FRANCES M HERON

Home: [REDACTED] 317
Mobile: [REDACTED]

Against the Bill - On Merits – Praying to be heard by Counsel, &c.