

1415

IN PARLIAMENT  
HOUSE OF  
COMMONS  
SESSION  
2013 - 2014

HIGH SPEED RAIL (LONDON TO WEST MIDLANDS) BILL

Against – On Merits – Praying to be heard in person, &c.

TO THE HONOURABLE THE COMMONS OF THE UNITED KINGDOM OF  
GREAT BRITAIN AND NORTHERN IRELAND IN PARLIAMENT ASSEMBLED.

THE HUMBLE PETITION of **NORTH BRIDGE HOUSE SCHOOL**

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. 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 (“the Authorised Works”) are specified in clauses 1 and 2 of and Schedule 1 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 the Bill.
7. Your Petitioner is North Bridge House School Preparatory School, 1 Gloucester Avenue, London NW1 7AB. North Bridge House Preparatory is part of a group of five North Bridge House Schools in Camden and Islington catering for different age groups from two to eighteen. The Preparatory School teaches children from seven to thirteen. It currently has 470 pupils on its roll.

This petition has been prepared by Noah Warwick at the request of Brodie Bibby, the Head Teacher of North Bridge House Preparatory School.

## 8. **Traffic**

**8.1** Your Petitioner is concerned about the potential adverse impacts on traffic as a result of the construction of the high speed railway line and associated development. It fears that HS2’s plans will have a significant detrimental impact

on traffic congestion in Gloucester Avenue, where Northbridge House is the most southerly building, and in Parkway, from where the main entrance to the school is now accessed.

During term time, 470 children are brought to school and collected each day. The majority of them are brought and collected by car and our private coach service. As there is no parking available at the school, which is on a constricted inner-city site, this daily operation is only possible with great difficulty. Any increase in traffic or congestion would make this difficult operation even more difficult and might jeopardise the timely and safe arrival of the children.

Your Petitioner fears that the increase in construction traffic along Delancey Street, Gloucester Avenue, Oval Road and Parkway, together with road closures, including that of Park Village East, will cause such congestion.

While your Petitioner recognises that North Bridge House School is particularly vulnerable to traffic increase and to congestion, your petitioner requests your honourable House to take into account the effect of traffic increase and congestion on all the schools in the North Bridge House group and on all the schools in Camden.

8.2 Although it fears the immediate impact of road closures and construction traffic on Gloucester Avenue and Parkway, your Petitioner submits that the threat posed HS2's plans cannot be limited to the immediate area around its school. HS2's plans for Camden as a whole threaten to cause traffic chaos throughout the borough of Camden and beyond. Gloucester Avenue, the area around it and Camden as a whole will all suffer.

8.3 Your Petitioner asks your honourable House to:

To limit the scale of development at Euston and the area around it. A double-deck station provides the obvious benefit of maintaining or even reducing the footprint of Euston Station rather than enlarging it;

To remove spoil and bring in construction materials by rail rather than by road. A platform at Euston dedicated to spoil removal would mean many fewer lorries on the streets of Camden;

To examine the impact of increased traffic and congestion on the arrival and collection of children to and from all schools in Camden.

## 9. Air Quality

- 9.1 Your Petitioner is concerned about the potential adverse impacts on air quality as a result of the construction and operation of the high speed railway line and associated development.
- 9.2 Your Petitioner fears that any increase in air pollution will have a serious adverse impact on the health and lives of the pupils of Northbridge House School.
- 9.3 While it fears the impact of any increase in air pollution on the pupils of Northbridge House in the first instance, your Petitioner fears the impact of increased levels of air pollution on all the pupils of schools in Camden.
- 9.4 Your Petitioner is concerned about the risk that construction will lead to a significant increase in the major air pollutants Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>) in Gloucester Avenue, the area nearby and across Camden. It submits that this will endanger the health and lives of the pupils and staff of the Petitioner's school. There is now a scientific and medical consensus linking air pollution to serious health problems, including asthma, cancer and heart disease. Pollutant levels on major roads in Camden, measured in 2010, were well in excess of the legal limits imposed by Directive 2008/50/EC. These levels are unlikely to have decreased since then. The UK is already in breach of this directive and, in terms of its current compliance to this directive, rates twenty-eighth out of the twenty-eight members of the EU.
- 9.5 Your Petitioner submits that construction will impact air quality in Gloucester Avenue and the area around it from:

Construction traffic on Adelaide Road, Bayham Street, Camden High Street, Chalk Farm Road, Delancey Street, England's Lane, Gloucester Avenue, Haverstock Hill, Jamestown Road, Oval Road, Parkway, Primrose Hill Road, Prince Albert Road and Regent's Park Road.

Traffic congestion due to road closures and additional construction traffic.

- 9.6 Your Petitioner requests that before construction there should be an air quality baseline monitoring study benchmarked against the Air Quality Standards Regulations 2010 and a copy of this report should be made public. Your Petitioner submits that thresholds for air quality and an air quality mitigation plan should be produced for each Community Forum Area, to apply both during construction and operation of HS2
- 9.7 Your Petitioner requests that the local authority should be provided with powers to monitor air quality in accordance with binding mitigation plans and, in the event air quality thresholds are breached, your Petitioner submits that the Bill should be amended to enable the local authority to require the cessation of construction activities until such point as air quality thresholds are complied with.
- 9.8 Your Petitioner prays your honourable House to:

Limit the number of HGV journeys during construction by the removal of spoil and provision of material by rail rather than road;

Ensure that vehicles used in construction meet the latest European Emission Standard;

Ensure that construction does not lead to congestion in Gloucester Avenue, in nearby roads or in Camden as a whole;

Ensure that the health and lives of all pupils in schools in Camden are protected from the risk of increased air pollution.

10. **Compensation**

- 10.1 Your Petitioner submits that the compensation provisions in relation to property that is not compulsory acquired and other matters are not sufficient to compensate your Petitioner adequately for the loss and damage it may incur as a result of construction and operation of the high speed railway and associated development.
- 10.2 Your Petitioner requests that the Bill should be amended to ensure your Petitioner and other persons outside the safeguarding area who are injuriously affected and adversely affected by loss of value should be entitled to claim compensation.

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 such of the clauses and provisions of the Bill as affect the property, rights and interests of your Petitioner 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

