

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 HERO GRANGER-TAYLOR

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, Hero Granger-Taylor, lives at 22 Park Village East, NW1 7PZ. Park Village East (PVE) is a quiet residential street which runs along the western side of the cutting carrying the North

West Main Line in and out of Euston. PVE is at the northern end of the "Community Forum Area (CFA) 1 – Euston – Station and Approach" as defined by the Promoter of HS2 in May 2010. Your Petitioner will be directly and specially affected by the proposals in the bill in particular because, according to the Environmental Statement of November 2013, the road immediately in front of her house will be excavated in order to broaden the cutting and greatly increase its depth. Her house, like the other houses on the west side of PVE, is just outside the boundary drawn for the Safeguarding zone though the ground beneath it at a depth greater than 9 m is safeguarded. Her house, along with the other houses in PVE, lies just within the Limit of Deviation as marked on the map published with the Hybrid Bill. Provisions within the Bill allow the Promoters to demolish the listed boundary walls, pillars and railings in PVE without applying for Listed Building Consent.

8. 22 PVE, one half of a semi-detached Italianate villa, was probably built in 1829 and is individually listed grade II*. Like the other original houses in the street, all also individually listed II*, it is part of John Nash's Park Village scheme. This development and its woodland setting, of great historical importance and charm, has been described more fully in the Petition of the Park Village East Heritage Group. The railway itself cannot be seen from the street or from inside number 22. The trains are audible but residents quickly learn to ignore them and notice them much less than the heavy vehicles which occasionally drive along the street. Like her neighbours, your Petitioner would be very glad if members of Your Committee could visit her house and garden, to make an assessment for themselves of their relationship to the proposal and of the physical and environmental jeopardy the proposals places them in.

9. Your Petitioner is 59 years old and has lived at 22 PVE since birth (1954). She currently lives here with her 17-year-old son Roland Abbott and a lodger under the Rent-a-Room scheme, Felix Tanner, a musician aged 32. Since her mother's death in 1976 she has been the sole owner of the lease of 22 PVE. The lease is from the Crown Estate and has approximately 29 years left before it expires and reverts to the Crown. Due to the comparatively short remaining lease term, its value in relative terms is diminishing on a yearly basis.

9. Your Petitioner is a widow, her estranged husband Timothy Ingle Abbott having died unexpectedly on 18 October 2010 aged 55. (He had worked as a Psychiatric Nurse for various NHS Trusts.) Her son Roland was diagnosed with Attention Deficit Hyperactivity Disorder (ADHD) in October 2011. Between 2005 and early 2012 he was "removed" three times from his then schools, and his schooling since then has included a year at home; he is now a pupil at UCL Academy School. She was herself diagnosed with a milder form of ADHD in July 2013. Due to Roland's disability, over the years she has needed to expend significant sums of money to educate and care for him. The combined effect of their disability has greatly restricted her earning capacity. By profession she is an historian of early textiles. She is currently self-employed, mainly working at home. She has no work pension.

10. In May 2010 your Petitioner reluctantly put 22 PVE on the market; her intention was to move to a smaller house in the neighbourhood in order to invest the additional equity in her 22 PVE lease so as to increase her regular income sufficiently to cover her living expenses. At the time of her husband's death in October that year she had accepted an offer for her lease of just over 85% of the asking price. But, realising that she could not cope with moving home on top of dealing with her husband's estate and her son's difficulties at school, she decided not to sell the house at that point.

The HS2 scheme had been formally published already in March 2010 and she believes that the relatively modest interest in her house while it was being marketed was an early symptom of "HS2 blight".

11. There is no doubt that all the houses in Park Village East are now severely blighted by HS2. Savills have advised that in order to sell 22 PVE on the open market a discount in the order of 20%-25% below the market value would need to be offered in light of the highly disruptive works proposed by HS2 along PVE. Neighbours in the street who have had their house on the market now for over a year have in fact not received a single offer over this period. Your Petitioner, still needing to sell her house in the relatively near future, now sees no prospect of doing this except at a very large discount: but selling her home at such a discount is not something she could now afford if she were to buy something else within the same general area, even if now smaller, and indeed it would negate the most urgent reason for leaving. Meanwhile the only form of compensation offered to residents of her street by HS2 has been the very limited Exceptional Hardship Scheme, soon to be replaced by the Need to Sell Scheme. She has been advised that because of the very narrow way these schemes have been drawn up, and the fact that they are not independently assessed, she would not be successful in applying for either.

12. The principal home of Your Petitioner's estranged husband Tim Abbott during the ten years before his death was a nearby flat, 23 Ainsdale, Harrington Street, NW1 3SD. Ainsdale is one of the blocks on Camden's Regent's Park Estate scheduled for demolition to make way for HS2 and consequently is within the Safeguarding zone (it lies approximately at the centre of the "Community Forum Area (CFA) 1 –Euston – Station and Approach"). The lease of the flat is owned by a Trust of which the sole beneficiary since her husband's death has been their son, Roland Abbott, 17 years old at the time of writing (your Petitioner is one of the Trustees of this Trust, along with two others). The lease, from the London Borough of Camden, has approximately 100 years remaining.

13. The flat in Ainsdale is well planned and very pleasant, with two spacious bedrooms and views to east and west. It is on the 3rd floor of a three-storey block built in 1949 which was double-glazed and insulated by Camden approximately ten years ago. Overall the Regent's Park estate is a quiet and spacious area, with many mature trees: despite remarks made by representatives of HS2, it is not in Your Petitioner's view in need of "regeneration" (David Higgins, reported in the Camden New Journal 20/3/2014), and very few of the flats there "overlook directly six or eight [railway] tracks" (David Prout, reported in the CNJ 10/4/14); the terms "intense and vibrant" (again David Prout, reported in CNJ, 10/4/14), which only truly apply to very limited areas within the London Borough of Camden, are no more relevant to Camden's Regent's Park Estate than to Park Village East.

14. After the death of Your Petitioner's husband, she was not in a position to sell the Ainsdale flat immediately because of the deceased's large music-related collection: this took some time to sort and sell. But in January 2013 she put it on the market through Chesterton Humberts. The history of the marketing of the flat has been given in the Blight Notices served on HS2: in brief, the asking price of £275,000 was pitched at level understood from the start to be without doubt competitive; against a background of already rapidly rising prices, £275,000 quite quickly became considerably lower than prices obtained for very similar flats also on the Regent's Park estate but further from the railway; during the six months the flat was on the market she received no offers which matched the asking

price; the Trust therefore decided in July 2013 to withdraw the flat from the market and to try to sell it directly to HS2.

15. On 5 February 2014, via Savills, the Trust served a Blight Notice on HS2 (effectively the equivalent of applying to sell the flat to HS2 under the Advance Purchase Scheme). But the Notice was rejected by HS2 who gave the reason that Your Petitioner's husband had died before Safeguarding had been put in place in July 2013. Your Petitioner and fellow Trustees do not understand why the date of Safeguarding is relevant when the scheme itself had already been announced in May 2010 and maps published showing the tracks running effectively through the flat also before October 2010. After the announcement by HS2 in April this year that the compensation schemes were going to be applied more generously, the Trust served a second more detailed Blight Notice on 23 April 2014 requesting HS2 to take the "special circumstances" of the owner into consideration under the recently released Express Purchase Scheme. Whilst HS2 have not accepted the application under the Express Purchase scheme, they have corresponded with Savills explaining that they may be willing to purchase the property voluntarily reflecting the "special circumstances" cited. A date is being arranged for the District Valuer to value 23 Ainsdale but the Trust has not received any firm commitment from HS2 as to how they will proceed from then on.

16. If the published scheme goes ahead, Ainsdale as a block will eventually be compulsorily purchased by the Government. But your Petitioner and her son for financial reasons are not able to wait for Compulsory Purchase at some unknown date to sell the flat. The Trust has no assets other than the flat and Your Petitioner's son is in need of part of the equity to fund his onward education: currently hoping for a career in engineering, he is unlikely to become fully qualified before he is 25, that is in eight years from now. Absence of earnings together with his disability also makes establishing himself in his own flat unlikely over this period.

17. In brief, since her husband's death, your Petitioner herself has had to pay the ongoing expenses of the flat out of her own money, plus all the costs involved in her son's education, medical treatment and legal affairs, altogether a very substantial sum covered by a personal loan currently standing at approximately £108,000. Your Petitioner has no realistic prospect of paying off this loan unless the flat is sold and her outgoings are repaid to her by the Trust. In a similar manner she has no realistic prospect of covering her own expenses in retirement (she becomes a pensioner officially on 1/1/2020) unless she can sell the lease of 22 PVE at full market value. In addition, the fact that her Crown Estate lease on 22 PVE is a diminishing asset, with less than thirty years to run, means that the sale of this lease is now pressing if she is to avoid further unnecessary loss.

18. Another urgent concern of your Petitioner is the stability of her home, 22 PVE, and of the other houses in the street. 24 PVE, the other half of her semi-detached villa, developed very serious cracks in the spring of 2012. Gradually-widening cracks, though not so dramatic, first became obvious in her house around the same time and she made an insurance claim in August 2012. It appears that the problem is "movement" rather than "subsidence", with number 24 effectively dragging 22 southwards. She is hopeful that the underpinning of number 24, which is expected to take place this summer, will stop the movement of both 24 and 22. But another house, 30 PVE, which suffered approximately 15 years ago from a similar southwards movement, was only eventually stabilised

after very considerable work. An additional house currently suffering serious cracks and movement is 8 PVE.

19. Without doubt the old houses in Park Village East are delicate and vulnerable structures. Unless already underpinned, their only foundations are shallow brick footings. They sit on what is now effectively a peninsula of clay, bounded on the west by the trough of an old canal, filled in with bomb rubble during WWII, and on the east by the cutting retaining wall and its backfill, dating from the cutting widening of 1900-1906. Your Petitioner understands that the Crown Estate is not currently of the opinion that the movement of the cutting retaining wall is directly connected to the movement of the houses. Nevertheless, in the past, both these problems were considered together. For example, in a memorandum to the Crown Commissioners dated 13th February 1967 (File 19841 "22 PVE"), N.H.Ash, Crown Estate Surveyor, wrote "There is a long history of movement in Park Village East. Apart from the sudden and serious settlements that have, I believe, occurred at about 20 year intervals i.e. in about the years 1920, 1940 and 1960, as a result of the movement of the retaining wall, there has been an almost continuous but slight movement of the subsoil, which has evidenced itself by the appearance of small cracks in the external stucco and internal plaster [of the houses]." It is also possible that work to the retaining wall carried out from the carriageway of Park Village East, which took place in the early 1960s, when the road was closed for about 18 months and large machines were sited outside the houses, caused its own problems. Your Petitioner's mother in 1964 received an ex gratia payment from British Rail of £440, half what she had herself had paid for the repair of settlement damage to boundary walls and external cellars at 22 PVE. (Memorandum of N.H.Ash, Crown Estate Surveyor, 20.11.64, File 19841 "22 PVE").

20. Your Petitioner's concerns for the stability of the houses in PVE and for PVE's special character as a street are not simply pecuniary and would continue even if she herself were to move away. Her parents were pioneer campaigners for the preservation of old buildings following WWII and moved to Park Village East in particular because of their appreciation of Nash's architecture. She has followed their lead and from 1988-1995 was Secretary of the Regent's Park Conservation Area Advisory Committee, represented the Camden Civic Society, and from 1995 has been a member of the committee of the Civic Society itself (with a break 2010 to 2013). With another Civic Society member and neighbour in Park Village East, Marian Kamlish, she led the Civic Society's campaign for the preservation of Nash's York and Albany Tavern at the northern end of Park Village East and commissioned on the Civic Society's behalf the restoration scheme which was eventually put into place there.

21. Your Petitioner and her interests are injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others, hereinafter appearing.

22. The effects the published scheme will have upon PVE and its residents have been described by the Park Village East Heritage Group (PVEHG) in their petition. In brief HS2 have stated of Park Village East, at 9.4.74 in vol 2, CFA1, of their Environmental Statement (ES): "The high magnitude of change, assessed alongside the high sensitivity of the receptor, will result in major adverse effect." The ES does not state clearly the total length of time works in PVE will take but residents understand the following to apply: construction and other activity will continue at a significant level during the whole 11-year period at present envisaged for the completion of the scheme (due originally to take

place 2016-2026); the length of the period of "major adverse effect" will be 2 ¼ years (ES vol 2, CFA1, 5.4.36); the road itself will be closed to vehicles on and off over a period of four years (ES "Transport assessment (tR-001-000), Part 3: London Assessment - Traffic and transport", Table 6-46: Long period temporary road closures).

23. The major undertaking in the stretch of PVE where your Petitioner lives will be the creation of a barrette retaining wall to the cutting: this is to be constructed much closer to the houses than the present cutting retaining wall and will require in addition a cantilevered extension in order to restore the road to its original width. Other particularly noisy work will be the demolition and rebuilding of Mornington Street Bridge (due also to be a cause of significant vibration) and the moving of utilities, including a deep level 42" water main. Work within the cutting will no doubt also be very disturbing, in particular the creation of a cutting-within-a-cutting for the HS2 trains themselves; this will be made half directly under the PVE carriageway but at an additional depth of c.16 m, giving a total depth of c.27 m (ref. drawing 220-ARP-CV-DSK-01A-432006). When not closed off, PVE will be a major route for construction traffic, much of this no doubt making its way to the large construction compound to be created at the southern end of this short street.

24. Estimated sound and vibration figures given in volume 5 of the ES confirm that this work will cause "major adverse effect". (Your Petitioner is happy to accept the figures given relating to work in the street itself, but believes the figures for more extended work in the cutting may be an underestimate.) The estimated "typical" and "highest" figures for noise directly outside nos 22 and 24 PVE (ID 528856) during the period of most intense activity, are given in Decibels in Table 3 of ES vol 5, Appendix SV-003-001, as follows:

Day, 80/89 decibels [C], Evening, <40/49 decibels[>C], Night 66/74 decibels [>C].

Activity at these levels will occur as "9 months" of daytime work and "7 months" of night-time work. As far as your Petitioner can gather, along with the very similar set of estimates for outside 26 and 28 PVE (ID 700386), these noise figures are the highest for the whole length of the proposed London to Birmingham Phase 1 construction. At the same time, like many of the noise estimates for other contexts in the Euston Forum Area, they contain a very high proportion of night-time work.

25. These very high noise levels fit in what can be established of the extent of the work on the ground. Because of the curve in street, of the various houses in PVE it is Your Petitioner's house which lies closest to the current cutting and to the proposed barrette wall: on the basis of a drawing given to her by HS2 (a more detailed version of unpublished drawing C220-ARP-RT-DPP-01A-580006), the new barrette wall will come within 4.5 m of her front gate and 6.5 m of her house (in the ES, vol.2, CFA1, at 9.4.73, it is stated, "Works for the Proposed Scheme will be located less than 10m from the dwellings along Park Village East"). Because of the small scale of the published maps, it is not easy to check distances for other locations, but your Petitioner strongly suspects that, with the exception perhaps of demolitions, the distance of 6.5 m is the smallest between a dwelling and a major HS2 structure along the whole length of the line. Savills have advised her as follows: "Unfortunately, the residents of Park Village East are amongst the worst affected residents along the entire route of HS2 who do not have access to an HS2 purchase scheme." She suspects that the four houses 22, 24 26 and 28 PVE, may actually be the worst affected dwellings along the entire route, even including many of those inside the Safeguarding zone.

26. As to the stability of the houses, the truth is that no-one knows how serious the impact will be on them of the very deep excavations required for the barrette wall. Echoing the concerns of the Crown Estate Surveyor nearly fifty years ago, English Heritage have written in their response to the ES (p.10) as follows: "There are risks associated with the widening of Euston Cutting, above which sit the Grade II* listed paired villas of Park Village East. These properties may be vulnerable to ground movement caused by construction of the expanded cutting." In an e-mail message of 15 January 2014 to HS2, the Georgian Group wrote similarly: "As you are aware the current condition of the retaining railway wall has resulted in the movement of some of the houses on Park Village East. There is concern that the current HS2 proposals, combined with a lengthy political process behind delivering them, will have further detrimental impact on these houses." (The Georgian Group are the statutory consultees for work to all grade I or II* Georgian buildings and their settings.)

27. Residents have been told by HS2's engineer Robert Young that he has provided our landlords, the Crown Estate Commission, with details of the estimated "settlement" of the houses following on from the construction of the barrette wall: he has apparently estimated the maximum settlement at the front of the houses as 45 mm and 25 mm at the back. These figures, although in millimetres, are not insignificant: damage to houses being monitored for insurance claims is customarily measured to the nearest 0.1 mm. They are also differential, with greater expected settlement at the front of the houses than at the back, something which in itself is more likely to create cracks.

28. Given that a large proportion of the PVE houses are already showing damage of some sort, more worrying than gradual settlement is the possibility that the proposed work will set off another "sudden and serious settlement" like those recorded by the Crown Estate Surveyor in his memorandum of 1967. A 2003 COST publication dealing with "Damage caused by soil-structure interaction" warns of such excessive ground movement: "Construction of excavations, even where stability is satisfied, can still lead to excessive ground movements causing damage to adjacent buildings and networks". (*Avoiding damage caused by soil -structure interaction: lessons learnt from case histories*, ed. R.Kastner, O.Kjekstad and J.R.Standing, London 2003, para 4.2.)

29. It is particularly worrying that there is no evidence that HS2 have considered the stability of the houses when drawing up their plans. The ES gives very little information about advance site investigations and surveys (only it seems vol. 1, sections 6.3.51 to 6.4.17). It appears that such work is going to be left to the "nominated undertakers" and residents have been told that it will not happen until six months before the work is due to begin. This is far too late: assessments such as these should have been made before the route was finalised. In their e-mail to HS2 of 15 January 2014, the Georgian Group wrote additionally: "There is growing concern that the proposals are being developed without due regard for the historic significance of this street. The Group therefore recommends that the long-term future of these buildings be of primary concern both now and during the proposed works and that further information as to how they, and the attached cast-iron railings, walls and pilasters (listed by default), are to be safeguarded be provided to us and the residents of Park Village East in the very near future." But at the time of writing, as far as your Petitioner is aware, no information on how or if the PVE houses are to be protected has been provided by HS2 to the Georgian Group or to residents.

30. The ES itself, rather than inspiring confidence, is full of errors, about PVE along with many other matters. The ES at Vol. 2—CFA 1 para 5.3.12 materially misdescribes the Park Village as “characterised by Georgian terraced housing” when all the housing in PVE is in fact in the form of well-spaced villas; on the map CT-01-01, only one of the houses in PVE (coincidentally 22 PVE) is marked as listed when all the original houses are in fact individually listed II* (under planning law, they are not a “group asset”); in Table 3 of Volume 5, Technical Appendices, CFA1 (SV-003-001): “Sound, noise and vibration”, the current noise level for all the IDs in “Park Village East – N” is given as “High”, defined as a daytime level more than 75dB, whereas HS2’s sound expert has told residents that the measured current daytime levels are in reality very much less, at around 65dB.

31. Your Petitioner and her neighbours are also very concerned about the health risks associated with this work. A particular worry is dust: she and her son two years ago both suffered a three-month long bout of *mycoplasma pneumonia* and as result have an increased tendency to chest infections. A negative health effect already being experienced by her and many others in this part of Camden is prolonged stress. This stress has become particularly acute since April when we were forced back into a state of ignorance when it was announced that plans for Euston station and environs were being radically rethought; the revised plans will not be announced until the autumn but we have already seen in our local papers images of draft proposals of megalomaniac proportions.

32. It is hard to make an assessment of the effects the scheme will have on PVE when operational. Maps indicate that noise from the new trains themselves as experienced in the northern half of PVE may be acceptable, but the modelling may not have taken into account the reflective properties of the cutting walls referred to above. Also relevant to noise levels is the loss of the shrubbery that runs along the east side of PVE; this will disappear when the present retaining wall is demolished. Residents believe that the shrubbery absorbs sound both from the railway and the street itself. Although it may be considered to be scruffy, it is also an important contributor to the street scene and a precious wildlife habitat; it is home in particular to a variety of small birds, including warblers. The proposed replacement, a sealed trough built into the new concrete cantilever, will not be able to support such a quantity of trees and shrubs and will be in danger of drying out completely during periods of drought.

33. Like much else in the ES, the information given about future traffic is hard to find and even harder to understand. Your Petitioner gathers that no baseline measurements for traffic have been taken in PVE and she can find only one estimate for future traffic levels; this is in Table 6-612 of ES Vol 5, Transport Assessment, TR 001-000, “London Assessment”, where it is estimated that northbound traffic in PVE during 2026 will be at the rate of 57 vehicles per hour during the morning rush hour, a 128% increase on the estimate for the traffic for the same location during 2026 if HS2 were not to be built (the 2026 “baseline”, estimated as 25 vehicles per hour). A more complete impression can be gained by looking also at estimated figures for Mornington Street Bridge (Tables 6-612 and in table 6-613). Since the northern half of PVE is one way, westbound traffic on the bridge must turn left into PVE at the T-junction, i.e. from this point it must travel southwards along the southern half of PVE. In the tables, morning rush hour traffic on Mornington Street Bridge during 2026 is estimated as 221% above the 2026 baseline if travelling westward and by 25% above if travelling eastward; the equivalent evening figures are 406% and 19% above. If a southbound figure

had been given for PVE it follows that this would have closer to the 221% and 406% estimated increases published for westbound traffic on Mornington Street Bridge rather than the 128% increase given for northbound traffic in PVE.

34. At present, while some (southbound) traffic joins PVE at Mornington Street Bridge, the majority of all traffic in PVE is southbound, most of it following a direct course right along PVE from the Parkway junction at the northern end of the street. However, in the map book which accompanies the volume 5 Traffic Assessments, map TR-04-001 gives two different indicators for Park Village East, a purple flag at T01-32a-Ma in the southern half of PVE and a blue flag T01-107-Mo in the northern half. Blue flags represent "Beneficial Permanent Effects" and purple flags "Adverse Permanent Effects", but it is extremely doubtful that traffic in the northern half of PVE would have lessened when it is due to become so much heavier in the southern half, and your Petitioner can find no figures relevant to the northern half to support this claimed benefit. This false division between the two halves of PVE seems to be behind the bafflingly contradictory results which appear in Table 29 and Table 31 of the main ES volume (vol 2, CFA1, pp.233 and 235). In the first of these tables, "Park Village East" without further definition is listed as having "Major Adverse" traffic effects during mornings in 2026 and again in 2041. But in the second table "Park Village East" is listed as having "Moderate Beneficial" traffic effects during mornings in 2026, "Moderate Beneficial" traffic effects during afternoons in 2041, and "Major Beneficial" traffic effects during afternoons in 2026. On the evidence of the estimated figures discussed above, these "beneficial effects" are not possible.

35. The published scheme involves moving the main vehicle entrance to Euston station from Melton Street via Euston Road to St. James's Gardens via Hampstead Road. This new entrance will be close to the southern end of Park Village East and will be very easily reached from here: at present one needs only to turn left into Granby Terrace and then right into Hampstead Road. It therefore seems logical that the published scheme, if implemented, will bring about greatly increased traffic in PVE. If a major redevelopment of Euston takes place, the increase in traffic is sure to be even greater. The houses in Park Village East, if they survive the construction work, will be threatened once again by the vibrations caused by this increased traffic. Perhaps even more seriously, what is currently an unusually quiet and green street enjoyed by many people on foot and on bicycles in addition to its residents, because of the increase in traffic and reduction in greenery, will acquire the character of a typical city centre street.

36. As to actual benefits, apart from expensive but faster train journeys becoming available at some distant point in the future (the trains *out* of London in the morning are not full at present), your Petitioner can see nothing in this scheme which will be of benefit to her, or to her neighbours, or to the wider local environment.

37. The Petition of the Park Village East Heritage Group (PVEHG) calls for many aspects of the scheme to be mitigated. Your Petitioner is fully in support of these requests but believes that in one important respect the petition of the PVEHG does not go far enough: at paragraph 33, the PVEHG demands "binding assurances from the Promoter that arrangements will be put in place to monitor ground movement and repair any damage to the properties in PVE at the Promoter's cost." But with buildings of such importance as the villas in Park Village East it is not enough to ask for repairs. Conservation theory does not accept that a repaired building is as valuable as a building that has not been damaged in the first place, retaining as much as possible of its original fabric and detail.

Furthermore, the proposal to build a new barrette wall so close to the houses risks not just minor but catastrophic damage to PVE's historic buildings. The only mitigation that your present Petitioner would consider acceptable is the abandonment of the proposal to build a new and very deep wall very close to the houses. Instead the existing retaining wall should be repaired or a new one built in the same position.

38. When the HS2 Phase one scheme was first published there was no proposal to undercut PVE and build a new retaining wall further west. Residents have been told that the barrette wall as currently proposed will allow the HS2 tracks to run straighter and so cut 4 to 6 seconds or so off the overall London to Birmingham journey time. Yet we are now given to understand that speed is not the main aim of the project, but capacity.

39. Your Petitioner feels certain that by moving the classic Intercity tracks in the cutting further to the east, and by diverting some of the local services currently using Euston to Crossrail 1, ample space can be created for the HS2 tracks and trains within the cutting at its current width.

40. Various studies, in particular two produced by volunteers, the Double Deck Down proposal and the Euston Cross proposal, have shown that there no need to widen the cutting or to broaden the footprint of Euston station. The scheme for Euston presented in the bill, the so-called "cheapskate" Option 8, proposes tacking on to the western side of Euston station what is effectively a new terminus. Yet no-one now says that this is a good or well-thought out proposal. Bringing trains into this tacked-on station, and so greatly increasing the area covered by the tracks as they approach Euston, will result in extensive and quite unnecessary destruction and disruption of communities. These effects will begin in the cutting with the rebuilding of the retaining wall further west, causing PVE residents and residents on the eastern side of the cutting enormous disturbance and undoubted damage to their dwellings, will continue on through Camden's Regent's Park Estate, rendering the inhabitants of four blocks homeless and causing perhaps even more stress and financial loss to the tenants and leaseholders in the adjacent blocks left standing, and will disrupt and permanently cripple a well-preserved area of late Georgian housing and small businesses centred on Drummond Street; all this will happen apparently for no good reason.

41. Mitigation would surely ensue if the true monetary cost of all this unnecessary disturbance and destruction were properly assessed. If fair and accessible compensation schemes were made available to the residents of the areas affected as just described, your Petitioner respectfully submits it would become quickly apparent that the published scheme is far more expensive than previously admitted and that, as far as the Euston Forum Area is concerned, this cost far outweighs any gains.

42. If the actual cost of building what is essentially a new railway and terminus to the west of the current tracks and station does not bring about the cancellation of this part of the scheme, residents of Camden are likely to come to the conclusion that Option 8 was just a means of softening us up in preparation for a more thoroughgoing land grab, the yet-to-be-published proposals for the complete redevelopment of Euston.

43. Looking ahead to the operation phase of HS2, your Petitioner believes there are some matters not fully covered by the Petition of the PVEHG. In particular, despite the poor quality of the

information provided by HS2, it is clear that the greatest long-term effect on the residents and users of PVE will be the very much increased quantity of road traffic. Your Petitioner asks that the decision to bring the vehicle entrance to Euston station as far north as St James's Gardens be re-examined. This threatens to bring vehicle levels typical of central London into an area which is still largely residential and free of heavy traffic. Overall, measures are required to prevent unnecessary increases in long-term traffic. Additional traffic should also be kept to the main roads as far as possible; quiet residential roads like PVE should not be made to bear the brunt.

44. Although compensation is not covered in the bill, the acceptance of the HS2 project by the public depends on fair compensation being available to everyone affected. Where properties are covered by voluntary compensation schemes, such as the flat in Ainsdale owned by the Trust of which the Petitioner's son is a sole beneficiary, these schemes should be applied in an open and straightforward manner, without quibbling and without forced negotiations. As for properties not currently covered by Safeguarding but nevertheless within areas where "major adverse effects" are due, here the same compensation schemes should be made available as are offered outside the M25. It is a grossly unfair to treat city dwellers and country dwellers differently in this matter and this disparity has no basis in law. Examination of the tables of estimated noise in the ES shows that in this aspect at least Camden residents will suffer measurably more than people living along the country sections of the line; in the Euston Forum Area there will be exceptionally high levels of daytime noise, combined with much night working, followed by much increased levels of traffic once the scheme is operational.

45. If there is a delay in bringing HS2 into Euston, these compensation schemes should nevertheless be made available straightaway: our homes are already severely blighted. Your Petitioner needs to sell her lease in 22 PVE for the full market value in the reasonably near future and would like to do so under the Advance Purchase Scheme. Because she would nevertheless be reluctant to leave her family home, she would also be interested in the Rent Back provision.

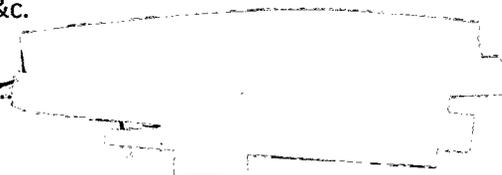
46. For foregoing and connected reasons your Petitioner respectfully submits that, unless the clauses of the Bill referring to the widening of the cutting in front of Park Village East are removed or amended, the Bill should not be allowed to pass into law.

47. 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 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 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.

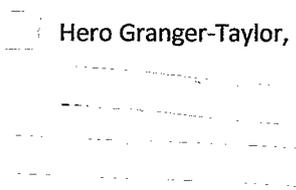
Signed Hero Granger-Taylor



IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013-14

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

PETITION OF HERO GRANGER-TAYLOR
AGAINST, By Counsel, &c.

 Hero Granger-Taylor,
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