

CHARGE Objection to HS2's Sch 17 application 2019/4700/HS2

General Commentary

CHARGE believes that this S17 should be withdrawn, as there remain too many aspects of the current application that have not been adequately described, and therefore justified and mitigated. This S17 application covers too long a period with far too little detail to enable adequate oversight, understanding and monitoring of impacts. The use of ES numbers is completely unacceptable for such an important and long-lasting document, and the description of the works to be carried out is already out of date. The transfer of some EWC works into the MWC package, along with continuing delays, should present an opportunity to re-programme in order to further mitigate impacts. There is no evidence that this opportunity has been taken, and as it stands there appears to be no recognition within this document that these changes have even been taken into account.

CHARGE fundamentally opposes any intensification of the use of residential streets designated as construction routes under the Act, including roads which were already significantly adversely affected and where additional impacts will therefore not trigger a worsening of impacts. HS2's methods for dealing with the intensification of construction routes is not transparent and will allow uncapped increases in specific locations as long as the impact across a wider area is not above the original worst case scenario. This is unacceptable and will negatively affect residents' lives as set out in more detail in part 2 below.

HS2 has not currently provided adequate justification for its choice of any route which is not via the TLRN and straight into a worksite. The use of residential roads for high numbers of HGVs cannot be justified in any event. The use of the loops to turn HGVs around should be removed. The reporting of numbers of HGVs from compounds and not on specific roads, and only as a single peak figure is opaque and unacceptable.

Proposed mitigations for using residential streets are not clearly set out and must be prior to the S17 being approved.

CHARGE fully supports the objections from the many and varied residents', traders and other organisations affected by this application as outlined in part 2 of our submission below.

Specific Support

We support the holding objection from University College London Hospitals. Many of our residents are regular users of UCH and we are concerned about increased pollution levels on the 'Grafton loop' roads surrounding the hospital.

We are also concerned about how an increase in HGV traffic on these roads will affect physical safety for patients crossing to/from the hospital, and delays to ambulances from increased congestion.

We endorse the objections from residents who have highlighted research from King's College showing the increase incidents on stroke and heart attacks on days with higher pollution in central London.

We support the objections from Netley School parents who are worried for their children's health and safety going to and from school. We agree with them that the health and wellbeing of children in the area is lower than the national average and that many are living in deprivation and in overcrowded housing. We support their view that whilst they have been doing everything to reduce pollution by walking kids to school wherever possible they are appalled that this good work will be undermined by HS2 and its lorry routes. We join Netley staff in their despair that much of their recent £10,000 grant from the Mayor of London to help improve children's air quality will have been for nought with these HS2 lorry routes.

We support the concerns of older children from Netley who have been learning to scoot and cycle, and are now worried that they won't be allowed to and their health will suffer. We draw attention to the many police led cycle safety events on the Regent's Park Estate, and wonder what the point was.

We support the view from parents and teachers of children attending the Centre for Autism that the proposed lorry routes along Stanhope St/Robert St will impinge on the ability of the school to maintain a safe environment for its pupils. We understand the concerns staff from Robson House (centre for children with emotional and mental health needs) have on the impact of additional lorries on children under their care. We can only imagine what the parents of 'disabled children with a tendency to run out into roads' must think of HS2 adding '100-200 more opportunities for an accident to happen'.

We agree that HS2 should not be allowed to inflict an 'easy option' to run hundreds of lorries through the Regent's Park Estate because they are not prepared to find the resources to put in proper logistics arrangements to build the Euston approaches for HS2.

We agree with year 5 and 6 pupils from Netley who have researched the problem and think a dedicated haul road direct from the HS2 works onto Hampstead Road will stop most of the pollution and danger.

We support the many residents who don't normally comment on planning applications but have felt the need to remark on this one that as the work is taking place on the railway much of the spoil from, and material for that work should be transported by the railway. We reiterate their views that many of the roads in this application are wholly unsuitable for mass HGV traffic.

We support residents in their objection to making these roads 'HGV ready' by undermining traffic calming measures, and dismantling traffic management measures designed to stop through traffic and reduce pollution. We support their objections to having parking bays removed for the convenience of these lorries, trees lopped and felled, for the convenience of these lorries.

We agree with organisations on the Regent's Park Estate that lorries running through the middle of the estate with the frequency of a tube line will create a barrier to people, preventing the elderly from getting to day centres, children from getting to school and the housebound from getting relief from isolation.

We support residents from Park Village East and Mornington Terrace concerned about the impact such volumes of HGV's will have on the local conservation area, and quality of life. We share their concerns that these lorry routes will only add to existing pollution, dust and noise emissions from works in the Cutting and the nearby demolition of council flats.

In our view this application is premature for the simple reason that no mitigations have been presented. There are adaptations to make roads 'HGV ready' but no attempt to consider the health of residents, the safety of children or to alleviate the economic stress to businesses.

We repeat the views of many residents of the Regent's Park Estate and other nearby neighbourhoods, that the Council has a duty of care to residents and workers in the area and we support the council in defending our policies designed to reduce traffic, improve safety and create healthy neighbourhoods.

We hold to the view that despite HS2 Ltd being granted considerable powers to build this railway, those powers do not include the right to pollute our neighbourhoods or threaten the safety and wellbeing of our children. They do not confer a right to dismantle physical safeguards on our roads or to subject us to lower health outcomes than those of other communities in London.

CHARGE