# **Transport for London**

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Our ref: LBC.LR.05

LPA Application Ref: 2019/4700/HS2

Transport for London Surface Transport Network Management

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13th November 2019

Dear Sir/Madam.

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017- Schedule 17 – Lorry Route Application

London Borough of Camden: Euston Approaches and Adelaide Road Worksites

Thank you for including Transport for London (TfL) in the planning application process, the aim of which is to ensure that the application is successful in transport terms and in accordance with the HS2 Phase I Act.

Our response below outlines the TfL position on this Schedule 17 Lorry Route Application and proposes two informatives.

# Proposals affecting TLRN

HS2 Ltd is seeking consent for "Lorry Route" approval in line with paragraph 6 of schedule 17 of the **High Speed Rail (London – West Midlands) Act 2017** 'Conditions relating to road transport' transport and Planning Forum Note 6: Lorry Route Approvals.

Under paragraph 6 of Schedule 17, where large goods vehicle (LGV) movements exceed 24 per day to and from a given construction site, the lorry route must be approved by the relevant Qualifying Authority, which for the purpose of this application is the London Borough of Camden.

As the TLRN was not specifically mentioned within the HS2 Phase I Act the nominated undertaker is also applying to London Borough of Camden for the entire TLRN to be designated as a main lorry route to access the trunk road network.

Based on the information contained within this application, the Local Traffic Management Plan (LTMP) for Camden (IMC03-SCJ-HW-PLN-S001-000002) and the Route Management, Improvement Safety Plan (ROMIS) (IMC03-SCJ-HW-PLN-S001-000001\_C03) we understand that works relating to this application are predicted to generate a significant amount of LGV traffic but still less than was assessed in the HS2 Environmental Statement (ES).

**MAYOR OF LONDON** 

VAT number 756 2770 08

#### Site context

This application relates to the lorry routes associated with main works activities associated with the Euston Approaches and Adelaide Rd Worksites. On site activities will include construction of retaining walls, removal of excavated material from the station approach, tunnel portal and headhouse works, reconstruction of Hampstead Road Bridge as well as associated utilities and highway work and other ancillary works within the London Borough of Camden.

### Our position

We recognise the role of the TLRN, alongside other road networks and movement via rail, in facilitating the construction of HS2. However it must be acknowledged that there are unique challenges presented to construction traffic in London.

Therefore use of the TLRN must reflect and take account of road safety, environmental and network impact issues, which will vary depending on specific locations and local conditions. HS2 must also continue to consider how these lorry routes impact on the Mayor's Transport Strategy policies including Vision Zero and Heathy Streets proposals.

In line with the Mayor's Transport Strategy and as described in the Local Traffic Management Plan for Camden we expect that:

- Vehicles related to this application avoid entering central London in the AM peak. This will help to meet the Mayor's aim to reduce freight traffic in Central London during the morning peak and contribute to the target of reducing the number of Lorries and vans entering central London during the morning peak by 10 per cent by 2026
- The routing of vehicles to and from construction sites covered by this application will be as set out in the Local Traffic Management Plan for Camden
- HS2 Ltd will adopt a vehicle management strategy as set out in HS2's Route
  Wide Traffic Management Plan (RTMP) These measures, plus other control
  mechanisms outlined in the Environmental Minimum Requirements (EMRs) and
  Code of Construction Practice (CoCP), seek to reduce the risk to vulnerable
  roads users and the environmental impact from the proposed lorry routes
- HS2 Ltd will comply with the Heavy Goods Vehicles (HGV) Safety Permit
  Scheme for London (DVS). The Scheme's objective is to address London's
  particular problem with collisions between HGVs and vulnerable road users
  such as pedestrians and cyclists by improving the safety standards of the HGVs
  coming into the capital
- Discussions continue regarding the reduction of vehicle numbers and use of alternative freight strategies such as material by rail

Owing to the dynamic and evolving nature of the HS2 project, the TLRN, and London generally, we wish to keep the suitability of the TLRN and HS2 lorry routes under constant review in the lead up to and during the works. A review point of particular importance will be when the lorry route application for the Euston Station site is

developed. Here TfL expects HS2 Ltd to undertake a thorough review of lorry routes for all construction sites that will be operating concurrently. My team will be available at all times to continue this dialogue.

# **Proposed Informatives**

To strengthen this position we would also encourage the local Planning Authority to apply the following informatives to the application:

# Adherence to the EMRs

In accordance with assurances given by the Secretary of State, the applicant is reminded that HS2 Phase I Environmental Minimum Requirements must at all times be fully complied with in undertaking the works.

# Construction traffic management

In accordance with the Phase I Code of Construction Practice, the applicant must adhere to the control measures set out in the HS2 Phase I Route-wide Traffic Management Plan and the Camden Local Traffic Management Plan. The measures contained in the Local Traffic Management Plan must be kept under review during the execution of the works, in consultation with TfL, London Borough of Camden and other relevant stakeholders.

## Summary

In summary, whilst we accept that the TLRN has a role in facilitating access to and from the sites during the works described in this application, we wish to continue working closely with HS2 Ltd, relevant contractors, the London Borough of Camden and other impacted London Boroughs to ensure the suitability of proposed lorry routes and how they are being used. In addition HS2 vehicle movements must be considered alongside other network activities to reduce the impact of the routes on road users and local residents.

TfL must also ensure that we and all the Boroughs affected continue discharge our respective statutory network management duties contained in the Traffic Management Act 2004.

