

London Borough of Camden
Development Management,
2nd Floor, 5 Pancras Square,
c/o Town Hall, Judd Street,
London
WC1H 9JE

For the attention of: Ben Farrant

Our Ref: 1MCo3-SCJ-IN-CRO-SSo1-000002

9 January 2020

Dear Sirs,

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017
LONDON BOROUGH OF CAMDEN: EUSTON APPROACHES AND ADELAIDE ROAD WORKSITES
SUBMISSION No. LBC.S121.LR.01: LORRY ROUTES (LPA Ref: 2019/4700/HS2)

We are writing to you in response to your emails dated 4th December 2019 (B. Farrant) and 20th December 2019 (J. Nicholls). This letter also summarises the SCS post application approach to date and proposes a staged timeline / programme of actions as a basis to a feasible extension to the determination period. This extension has been agreed with HS2 the nominated undertaker.

Background / Summary

A Schedule 17 Lorry routes approval request was submitted on the 16th September 2019. A programme of fortnightly post applications meetings and actions was agreed to prior to the said submission in order to assist LBC in the expeditious handling of this request within the statutory 8 weeks (Schedule 17 paragraph 22(4)) and in line with Section 7.3 of the Planning Memorandum. This approach targeted at the 14th November Committee Meeting.

On the 8th November LBC sought mutual agreement on an extended determination period to the 20th December. This was accepted by SCS on the 21st November. On the 4th December, LBC requested a further mutual agreement to a further extension of the determination period to the 23rd January 2020.

SCS Post Application approach (to date)

To date 3no. post applications meetings have taken place on the 16th and 24th October and 4th December. The first meeting on the 16th October culminated in an issues log (attached) that detailed all issues raised by LBC Officers. SCS issued responses to all the logged issues on the 22nd October for LBC comment. LBC comments were received on the 21st November. An alternative route to the Adelaide Road worksite was identified at the 2nd meeting (24th October). This proposed alternative route was agreed to by SCS at the 3rd

meeting (4th December). Meeting notes from the meetings on the 21st November and the 4th December are attached.

Summary of key issues raised by LBC and their current status

Key Issue	Action to date	Status
TfL agreement on the use of the TLRN	On the 5 th November, HS2 reached agreement with TfL on the use of TLRN (TfL Letter ref: LBC.LR.05 dated 13 th September 19 submitted to Camden)	Closed
Mitigation measures for Regents Park Estate	Clarification on the use of the Euston Approaches access points and mitigation to the Stanhope street access point was clarified by SCS on the 22 nd October and 24 th October and 4 th December. LBC identified possible conditions on the right turn onto Hampstead Rd and route restrictions during school pick up and drop off.	SCS to update the LTMP by the 20 Jan 2020 LBC to formally propose conditions for HS2 consideration by 13 Jan 2020.
Mitigation measures for the Grafton Loop	Clarification given on the use of the Osnaurgh Loop on the 4 th December and the use of the vehicle management system	SCS to update the LTMP
LBC proposed alternative route for the Adelaide Road Worksite	SCS agreed to the alternative on the 4 th December	LBC to propose condition for viable alternative with reference to ongoing TfL consultation on left hand turn restriction.
Time limited approval	SCS has clarified on the Issues Log and in the post application meetings that this approach would result in an unreasonable programme and cost impact.	LBC to propose a condition
Scope limit i.e. Application split to 2no. applications	SCS has clarified on the Issues Log and in the post application meetings that this approach will negatively impact the construction programme.	SCS response included in this letter under ref: Paragraph 4&6 (Page 3) and ref: Extension of time (Page 4).

Email dated 4th December 2019 (B. Farrant)

Ref: Paragraph 1 - Line 1

The Schedule 17 Lorry route application was submitted to Camden on the 16th September 2019 not 16th November as referred to in the email.

Ref: Paragraph 2- Implications on decision timescales

The spreadsheet (Issues Log) to which you refer was issued to Camden (by SCS) for comment on the 22nd October. Camden comments were received on the 21st November.

SCS required the 7 day turn around (21st Nov to 3rd Dec) to carry out and complete a logistics review of the Adelaide worksite in order to evaluate the Camden suggested alternative route.

Ref: Paragraph 4 & 6 - size and scope of the application

The size, scope and time period covered as part of this application are not grounds for refusal under Schedule 17 (6) para 5.

Ref: Paragraph 5 - Access Points / worksite logistics

The worksite logistics are not a matter for Schedule 17 approval, however the use of worksite access points will be clarified further in the LTMP update in line with the ECRG slides and submitted to Camden on the 20th January 2020. SCS is not seeking approval for any contingency routes, all roads listed for approval are intended for use to and from the worksite. Section 7.11.10 of the RTMP provides that LGV construction traffic will follow the diversion signing, if the closure is a planned closure; and follow emergency services directions, if the closure is an emergency closure.

Ref: Adelaide Road

The meeting on the 4th December clarified that the Batching Plant is an HS2 supplier (not a worksite) therefore SCS will not seek approval for the Torriano Avenue loop and Yorkway (refer to attached meeting notes). SCS therefore agreed to the LBC suggested alternative route i.e. B509/Adelaide Road - Chalk Farm Rd - Castlehaven Rd - Hawley Rd - Camden St - A503 (TLRN). The submitted document titled List of Roads for Approval provides that *'...in the event that there are suppliers/businesses located between the special /trunk road network and the HS2 sites the subject of this submission, they will use the most appropriate route from the supplier/business in accordance with Planning Forum Note 6'*

In the event that the SCS revise the request for approval to reflect the LBC suggested alternative route then conditions restricting the use of Camden High Street are not relevant.

Ref: Euston Approaches

Under Schedule 17, SCS is seeking approval to and from a worksite not to an access point / gate. The worksite access points are indicative and provided for information only. The access points will be the subject of a Schedule 4 application.

The programme scope of this application is not a ground for refusal under Schedule 17 (6) para 5. Furthermore, SCS has demonstrated that the construction sequence does not lend to limiting the application to phases as construction of the assets is simultaneous therefore, a time limited approval would result in an unreasonable risk to the construction programme. The phases presented in the ECRG slides relate to the use of the access points not to the construction of the assets.

The SCS construction programme has matured since the preparation of the LTMP. SCS will update the LTMP to address Schedule 17 related issues raised in the post application meetings. Please note that the logistics statement / plan discussed during the post application meetings is not a defined document within the Schedule 17 documents for information or approval and therefore it is considered that inclusion of this information within the body of the LTMP provides LBC with a more formal response to the questions raised.

Ref: Further extended determination period to the 23rd January

SCS does not consider the proposed date to be feasible taking into account the holiday season. SCS therefore proposes that the extended determination period is to the 21st February based on the programme of actions set out below and with a view to a slot in the 20th February Committee Meeting. Please confirm your agreement.

Extended Determination Period (EDP) to 21st Feb 2019

Milestone Description	Action by	Progress	Calendar (December to February 2019)																																							
			December							January														February																		
			16	17	18	19	20	23	2	3	6	7	8	9	10	13	14	15	16	17	20	21	22	23	24	27	28	29	30	31	3	4	5	6	7	10	11	12	13	14	17	18
Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri	Mon	Tue	Wed	Thu	Fri			
IPLT agreement to proceed EDP to 21st Feb 19	IPLT	100%																																								
Prepare and submit staged timeline to EDT to LBC	LN	100%																																								
Agree staged timeline with LBC	LN	90%																																								
Revise LTMP	AR	0%																																								
Prepare Written Statement Clarification letter	LN	0%																																								
SCS / HS2 LTMP Review / Comments	SCS/HS2	0%																																								
Issue revised LTMP & Clarification letter to LBC	CB/LN	0%																																								
Post Application Meeting	SCS	0%																																								
Receipt of LBC Conditions proposals	LBC	0%																																								
SCS / HS2 Agree / Reject Conditions	SCS/HS2	0%																																								
Committee Report (Prepare and complete)	LBC	0%																																								
Planning Committee	LBC	0%																																								
Decision Notice	LBC	0%																																								

Figure 1

The programme of actions is based on the following:

- LBC impose a condition to modify Adelaide route (if required) or issue a decision notice with approval of alternative routes so routes to all sites approved. (pursuant of Schedule 17 of the HS2 Act)

Email dated 20th December 2019 (J. Nicholls)

Ref: Meeting Notes (4th December)

Meeting notes are attached for your reference. Please note that SCS did not agree to provide LGV numbers using the worksite access gates, SCS agreed to consider the provision of percentage usage per gate in relation to the overall (cumulative) LGV numbers to the Euston Approaches worksite.

Similarly, there was no agreement to a further LTMP meeting, however SCS will update the LTMP (submission to Camden by 20-1-20) to address all Schedule 17 related issues raised in the post application meetings.

Ref: Extension of time – Adelaide re-consultation / alternative route / amending the application

The SCS position is that the Camden suggested alternative route i.e. B509/Adelaide Road - Chalk Farm Rd - Castlehaven Rd - Hawley Rd - Camden St - A503 (TLRN) can be agreed as part of a condition pursuant to Schedule 17 (6) paragraph 6 which seeks to modify the route to the Adelaide worksite. Re-consultation of the alternative route is not a HS2 Act requirement therefore, if Camden wish to reconsult then this can be carried out by Camden at any time.

With reference to the TfL consultation on restricting the left hand turn from Camden Street into Camden Road, it should be noted that this would render the suggested alternative route not a viable HS2 lorry route and as such not a ground for refusal under Schedule 17 (6). If Camden wish to agree another alternative route to egress the worksite then this can be progressed as a condition pursuant to Schedule 17 (6) paragraph 6 which would seek to modify the route to the Adelaide worksite access.

Ref: List of Roads

The Schedule 17 document application pack is in accordance with Planning Forum Note 6. The document titled List of Roads for approval (ref:1MC03-SCJ-IN-SCH-S001-000015_C01) provides a list of roads

pursuant to Schedule 17 (6) paragraph 2, which requires LPA approval for 'routes to a worksite' not a dedicated route to a worksite access point. A map showing the HS2 lorry routes is also included for information. This is not a basis for non-determination.

Ref: Other legislative matters

The HS2 context report for London Borough of Camden has been submitted to Camden. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/654913/hs2_planning_context_report_for_camden.pdf

Ref: Final paragraph

SCS does not agree that the issues listed warrant an extension beyond the 20th February as demonstrated in the programme (See figure 1) and the SCS responses to Camden various matters. An extension beyond 20th February 2020 is contrary to section 7 of the Planning Memorandum.

We trust that that the above proposal meets with your agreement. Should you wish to discuss this matter further, please contact Claire Beedle clairebeedle@scsrailways.co.uk

Yours faithfully,



Claire Beedle
SCS Consents Manager (On behalf of HS2)