

<b>Address:</b>	<b>Euston Approaches Worksite and Adelaide Road Worksite</b>	
<b>Application Number(s):</b>	2019/4700/HS2	Officer: Ben Farrant
<b>Ward:</b>	Belsize, Haverstock, and Regent's Park	
<b>Date Received:</b>	16/09/2019	
<p><b>Proposal: Lorry routes to and from the Euston Approaches and Adelaide Road worksites associated with works for HS2.</b></p> <p><b>Main works activities include: Construction of the Park Village East retaining wall, portal and high-speed dive unders including the installation of ground anchors; Removal of excavated material from the station approach, tunnel portal and headhouse works; Construction of the decks over the high-speed dive under and railway south of Mornington Street Bridge; Construction of the west and east side retaining wall around Hampstead Road Bridge; Extension of Hampstead Road Bridge as well as associated utilities and highway works; Support the movement of plant and material down into the Euston approach railway cutting; Support the removal of excavated material generated in the railway cutting; Construction of Adelaide Road vent shaft and single storey headhouse building; and all other activities for the purposes and in connection with the scheduled and ancillary works.</b></p> <p><b>Incorporating lorry routes detailed in 'List of Roads for Approval' document.</b></p>		
<p><b>Background Papers, Supporting Documents and Drawing Numbers:</b></p> <p><u>Documents submitted for approval</u>  Schedule 17 Lorry Route Approval - List of Roads for Approval (Document Ref: 1MC03-SCJ-IN-SCH-S001-000015_C01); Lorry Routes Plan (Document Ref: 1MC03-SCJ-IN-PLN-S001-000009Rev.C01 dated 12/09/2019).</p> <p><u>Documents submitted for information only</u>  ROMIS  Written Statement (Document Ref: 1MC03-SCJ-IN-SCH-S001-000014_C01)  Local Traffic Management Plan (Document Ref: 1MC03-SCJ-HW-PLN-S001-000002)</p>		
<p><b>RECOMMENDATION SUMMARY: to resolve that, had the application not been appealed for non-determination, the Council would have refused to approve the arrangements proposed by SCS on behalf of HS2 Ltd</b></p>		
<b>Applicant:</b>	<b>Agent:</b>	
High Speed Two (HS2) Limited The Podium 1 Eversholt Street London NW1 2DN	Skanska Costain Strabag (SCS) 3rd Floor, Victoria House 37-63 Southampton Row London WC1B 4DA	

## OFFICERS' REPORT

### 1. BACKGROUND

#### Legislation and policy context

- 1.1 This is an application for approval of routes by which anything is to be transported on a highway by a large goods vehicle is submitted under paragraph 6 of Schedule 17 of the High Speed Rail (London to West Midlands) Act 2017 ("the HS2 Act") and relates to proposed lorry routes for servicing two separate worksites known as the 'Adelaide Road' and 'Euston Approaches' worksites; each facilitate part of the Phase One construction of HS2.
- 1.2 On 23rd February 2017, Royal Assent was granted for the HS2 Act which provides powers for the construction and operation of Phase One of HS2.
- 1.3 High Speed Two (HS2) Limited is the company responsible for developing and promoting the UK's new high speed rail network. It is funded by grant-in-aid from the government.
- 1.4 In order to carry out HS2 works in Camden, HS2 Ltd (the nominated undertaker) is submitting a series of lorry route applications under Schedule 17 of the High Speed Rail (London to West Midlands) Act 2017 ("the Act"), to govern the transportation of materials to and from construction sites.
- 1.5 Schedule 17 sets out the approvals required to be obtained by HS2 Ltd. These are applications for approval of arrangements relating to lorry routes.
- 1.6 Paragraph 4.4 of the Department of Transport's Schedule 17 Guidance notes states; '*These approvals have been carefully defined to provide an appropriate level of local planning control over the works while not unduly delaying or adding cost to the project.*'
- 1.7 The Council can only consider these S17 applications within the constraints of the HS2 Act. The grounds on which the Council can refuse the application, or impose conditions on approval, are that the arrangements ought to be modified to:
  - Preserve the local environment or amenity;
  - Prevent or reduce prejudicial effects on road safety or on the free flow of traffic in the local area; or
  - To preserve a site of archaeological or historic interest or nature conservation value;and are reasonably capable of being so modified.
- 1.8 It should also be noted that conditions can only be imposed with the agreement of the nominated undertaker.
- 1.9 Any representations received from the public and any other third parties shall be considered by the Council within the context of the provisions of the HS2 Act relating to determination of Schedule 17 applications.

- 1.10 Paragraph 22 of Schedule 17 provides a right of appeal for the nominated undertaker who is aggrieved by a decision of the Council. The nominated undertaker also has a right of appeal if the Council does not determine an application within eight weeks of submission (unless HS2 Ltd agree an extension of time for determination). In this instance an extension of time was agreed until 15<sup>th</sup> April 2020. The applicants have appealed against non-determination of the application.

#### Framework of assessment

- 1.11 The Council may only refuse to approve lorry route arrangements under paragraph 6 of Schedule 17 on the grounds set out at paragraph 1.7 above. The Council can only impose conditions on approval on the grounds set out at paragraph 1.7 above and with the agreement of the nominated undertaker.
- 1.12 The DfT's Schedule 17 Statutory Guidance states (at paragraph 10.1): *'The purpose of this is to allow the nominated undertaker and the planning authority the opportunity to agree whether the condition is necessary and appropriate, and would not unreasonably impede the building and operation of the railway, prior to the planning authority issuing its decision. It also avoids the potential for delay that would result from decisions being issued with inappropriate conditions'*.

#### Additional environmental and community protection measures

- 1.13 The High Speed Two (HS2) Phase One Environmental Statement (ES) was produced to accompany the HS2 Act. The ES assesses the likely significant environmental impacts along the route, and describes and takes account of measures to manage and reduce these impacts. In addition to the controls imposed by the HS2 Act, the nominated undertaker is required by contract to comply with the Environmental Minimum Requirements (EMRs) (a group of documents setting out measures to be adopted to reduce adverse environmental impacts). The intention is that the controls contained in the EMRs along with the statutory provisions and the undertakings given to Parliament by the Secretary of State will ensure that the impacts which have been assessed in the ES will not be exceeded, except in limited circumstances, as described in paragraph 1.1.3 of the EMR General Principles document (February 2017). Throughout the construction and operation of Phase One of the project, HS2 Ltd and its contractors will be required to comply with both the EMRs and those statutory environmental controls. HS2 Ltd. Paragraph 1.1.5 of the EMR General Principles document states that the nominated undertaker will use reasonable endeavours to adopt mitigation measures that will further reduce adverse environmental impacts caused by the HS2 scheme. The qualification to that is that the cost of doing so does not add unreasonable costs to the project or delay to the construction programme.
- 1.14 The Code of Construction Practice (CoCP) is Annex 1 of the EMRs. It sets out specific details and working practices in relation to site preparation (including site investigation and remediation, where appropriate), demolition, material delivery, excavated material disposal, waste removal and all related

engineering and construction activities. The CoCP sets out the measures that the nominated undertaker and contractors are required to implement in order to limit disturbance from construction activities, as far as reasonably practicable, including traffic and transport.

- 1.15 Local Environmental Management Plans (LEMPs) have been prepared for each local authority area which set out site specific control measures to be adopted by HS2 Ltd.'s contractors.
- 1.16 Under the CoCP (paragraph 14.2.4) HS2 Ltd. is required to prepare Local Traffic Management Plans (LTMPs) for areas such as Camden that are impacted by HS2. The LTMPs build on the general environmental requirements contained in the CoCP and a route wide traffic management plan and sets out how the project will adapt and deliver the required traffic management measures.
- 1.17 The purpose of the main works for the Camden Sector 1 LTMP is to set out information regarding the traffic management of HS2 construction in Camden and how HS2 Ltd. will engage with stakeholders such as Camden upon this. 'Camden Sector 1' is the area of the areas of Camden north and west of the immediate Euston Station area and includes the Euston Approaches and Adelaide Rd construction compounds.
- 1.18 A number of LTMP's are now in existence for various areas in Camden covered by different stages of the HS2 works. The most relevant LTMP for this application is the Sector 1 Main Works LTMP. The Camden Sector 1 main works LTMP is a 'live' document that will be added to and revised as further details of the proposals, works packages and associated traffic management arrangements are worked up and implemented. This current LTMP, details matters including highway/traffic management and the cumulative traffic impacts of the combined HS2 programme of Sector 1 main works, plus appended details of works, as they come forward. It should be noted however, that the LTMP is a supporting document only, and is not up for approval as part of this lorry route application. However, attention is drawn to HS2's commitment to Parliament to comply with the Environmental Minimum Requirements (EMR's). The Code of Construction Practice for HS2 arises from the EMR's and requires HS2 Ltd. to prepare Local Traffic Management Plans for areas such as Camden that are significantly impacted by HS2 construction works. HS2 Ltd. and its contractors are therefore effectively committed to complying with the contents of the enabling works LTMP.
- 1.19 In considering applications for lorry route applications, Camden as a qualifying authority, should have due regard to the system of controls available under the HS2 Act and shall not therefore seek to duplicate controls that The LTMP (as an EMR) already contains.
- 1.20 The LTMP document provides some context under which lorry route applications would be considered, e.g. it provides information of the movement of HS2 construction traffic to construction sites, building on that set out in the Environmental Statement, and provides further information on its traffic

management and refers to undertakings and assurances provided during the parliamentary process of consideration of Phase 1 of HS2.

- 1.21 Council officers have made extensive comments on the draft of the Camden Sector 1 Main Works LTMP and the specific work sites LTMP relating to the works and worksites associated with this application and has requested further discussion with HS2 and its representatives, in accordance with assurances provided to the Council regarding engagement on updates to LTMP's. It is disappointing to note that the Council has had no positive response to requests for meetings to discuss its comments further, nor has the LTMP been updated in response to comments that it made that were intended to assist in resolving outstanding issues that may have provided comfort to the Council in considering the current lorry route application to/from Euston Approaches and Adelaide Rd worksites.
- 1.22 It is worth noting that HS2 Ltd. has indicated that it does not currently intend to undertake further assessments (such as modelling) on impacts on the local road network, including at junctions, impacts on highway safety, other highway users, pedestrian severance for example to those already provided in the Environmental Statement, unless anticipated impacts significantly exceed those in the Environmental Statement.

## **2. SITE**

- 2.1 The proposed arrangements relate to LGV routes to two separate worksites known as the "Adelaide Road" and "Euston Approaches" worksites. The sites' functions relate to main works for Phase 1 of HS2, including construction of retaining walls, removal of excavated material, movement of plant and material, construction of vent shafts and ancillary buildings and other ancillary works.

### Adelaide Road worksite

- 2.2 The Adelaide Road worksite is a broadly rectangular shape running east-west within the Chalk Farm Embankment. It is bounded by the B509/Adelaide Road to the north and the existing railway corridor (West Coast Main Line (WCML)) to the south. The narrowing eastern extent of the worksite is adjacent to the Adelaide Local Nature Reserve whilst the wider western extent is adjacent to the Adelaide Road Medical Centre.
- 2.3 The worksite is not within a conservation area, though the Eton Conservation Area is in close proximity.
- 2.4 The north of the site is lined with predominantly Victorian housing, with some being Grade II listed. Adelaide Local Nature Reserve lies adjacent to the vent shaft site south of the B509 Adelaide Road. The existing WCML railway corridor bounds the south of the worksite.
- 2.5 This worksite has one access/egress point located on Adelaide Road. The proposed worksite set up is a pit lane segregated off from the main traffic on Adelaide Road.

## Euston Approaches worksite

- 2.6 The worksite is an irregular shape and runs in a general east-west direction; it is bounded by the A400/Hampstead Road to the east and A4201 Parkway and Delancey Street to the west. The northern extent of the worksite is bounded by the existing rail corridor (WCML); the southern extent is bounded by Harrington Street, Stanhope Street and Park Village East.
- 2.7 The Euston Approaches worksite has 4 access/egress points (see Figure 1 below). It should be noted that the position of site access/egress is not for approval under this Schedule 17 application as, if required, this would be secured separately under Schedule 4 of the HS2 Act. Access points are therefore shown for context purposes only, and are not for consideration here.
- Access no. 1: Granby Terrace at the junction of Stanhope Street/Park Village East;
  - Access no. 2: Granby Terrace at the junction with Hampstead Road;
  - Access no. 3: Haul Road access point on Hampstead Road south of Granby Terrace Bridge;
  - Access no. 4: the northern end of Park Village East adjacent to Park Village Studios

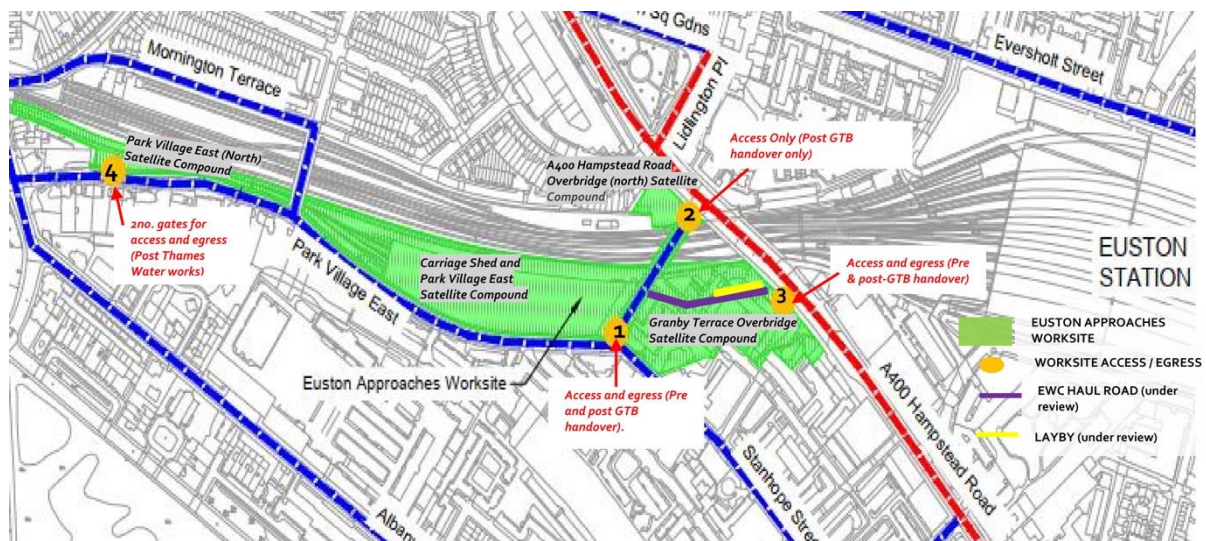


Figure 1: Euston Approaches worksite access points

- 2.8 The worksite is predominantly at track level, with a ramped access from access points 1 and 3. Access point 4 provides street level access for unloading of material to be lifted down to track level.
- 2.9 The worksite is not within a conservation area, but it is adjacent to the Regent's Park Conservation Area to the south. The southern boundary of the site (Park Village East) is adjacent to the Grade II\* listed John Nash buildings.
- 2.10 Euston Station and the WCML rail corridor (with associated operational and maintenance facilities) are notable elements of the area. The existing railway corridor runs north-west in the retained cutting from Euston Station.

2.11 The land uses to the south and east of the Euston Approaches worksite are predominantly residential with blocks of social housing in the Regent's Park Estate and, Georgian housing on Park Village East and Park Village West. The north and east of the site are characterised by Georgian terraced housing on Mornington Terrace and Mornington Crescent alongside some social housing. The existing WCML railway corridor bounds the north of the worksite.

### Highway Network

2.12 The Transport for London Road Network (TLRN) is a network of main roads within Greater London. These are also known as 'Red Routes' and are identifiable by red road markings and signage: the TLRN is equivalent to the trunk road network within Greater London. Lorry route approval applies in respect of routes between worksites/compounds and the special/trunk road network. However, in Greater London, approval is also required for the use of the TLRN. As such, such submissions seek lorry route approval for the use of the whole TLRN. Whilst not the approving body for such requests for the approval of lorry routes, Transport for London (TfL) provide comment.

2.13 The Adelaide Road worksite is located to the south of Adelaide Road (B509) which runs east-west from Haverstock Hill (A502) to Finchley Road (A41) and other associated main roads. Both Haverstock Hill and Finchley Road form part of the TLRN.

2.14 The Euston Approaches worksite is located to the west of Hampstead Road (A400), which runs north/south up to Camden High Street and other major roads, whilst to the south, Hampstead Road connects to Euston Road (A501), which runs east/west. Hampstead Road, Euston Road and Camden High Street south of Parkway all form part of the TLRN.

2.15 Due to restrictions at key junctions along important elements of the TLRN, namely movements turning left onto Euston Road heading east or movements turning right onto Hampstead Road when heading west along Euston Road, alternative 'loops' are utilised. The loop forming part of permission ref: 2018/0438/HS2 (see relevant history) for example, affords traffic to head east off Hampstead Road, via a right turn heading west onto Euston Road, onto Great Portland Street before bearing north and continuing onto Albany Street, then heading east on A4201/Osnaburgh Terrace and south onto A4201 Osnaburgh Street to join the A501 Euston Road heading east. From here, it is possible to follow routes north (Hampstead Road) or continue east (Euston Road). This loop is known as the Osnaburgh Gyratory or 'Loop'. Another loop which the restrictions mentioned above, is the Grafton Way Loop, where vehicles travelling westward along A501 Euston Road, turn right onto A400 Gower Street, right again on to Grafton Way before turning left onto A400 Tottenham Court Road and proceeding north onto Hampstead Road.

2.16 A series of local roads are accessed to the west off Hampstead Road; these include Granby Terrace and Robert Street (running in a west-east direction), together with Harrington Street, Park Village East and Stanhope Street

(generally running in a north-south direction). The London Borough of Camden is the local highway authority for these roads.

2.17 A complete list of main works sites for the Phase One construction of HS2 within Camden are as follows:

- The Podium main worksite
- National Temperance Hospital main worksite
- Adelaide Road Shaft main worksite
- Gordon Street satellite worksite
- Euston Square Gardens east and west satellite worksites
- Euston Forecourt satellite worksite
- Lancing Street satellite worksite
- Melton Street satellite worksite
- Cobourg Street satellite worksite
- Euston Station satellite worksite
- Royal Mail NW1 Delivery Office satellite worksite
- Regent's Park Estate LPA satellite worksite
- Granby Terrace Overbridge satellite worksite
- Hampstead Road Overbridge south and north satellite worksites
- Carriage shed and Park Village East satellite worksite
- Mornington Street overbridge and Mornington Terrace (East Side) satellite worksite
- Park Village East North satellite worksite
- Juniper Crescent satellite worksite
- Camden Carriage Sidings satellite worksite

2.18 It should be noted that the Euston Approaches worksite is not specifically listed, because it is made up of the following four worksites mentioned above, namely:

- Granby Terrace Overbridge satellite worksite
- Hampstead Road Overbridge south and north satellite worksites
- Carriage shed and Park Village East satellite worksite, and the
- Park Village East North satellite worksite

### **3. PROPOSAL**

3.1 The request for approval of Construction Arrangements has been made under paragraph 6 of Schedule 17 of the HS2 Act 2017.

3.2 The matters to which paragraph 6 of Schedule 17 relates are “the routes by which anything is to be transported on a highway by a large goods vehicle to” a worksite. Skanska Costain Strabag (SCS) provided a list of roads in support of their application and later provided a document with the title ‘List of Roads for Approval’ which sets out routes for approval. That document is marked ‘draft’. SCS has sought consent on behalf of HS2 Ltd. for the following:

3.3 The use of ‘specific routes’ for movements of large goods vehicles (LGVs) required to facilitate:

- Construction of the Park Village East retaining wall, portal and high-speed dive unders including the installation of ground anchors, removal of



excavated material from the station approach, tunnel portal and headhouse works, construction of the decks over the high-speed dive under and railway, south of Mornington Street Bridge.

- Construction of the west and east side retaining wall around Hampstead Road Bridge, extension of Hampstead Road Bridge as well as associated utilities and highway works.
- Support the movement of plant and material down into the Euston approach railway cutting; and support the removal of excavated material generated in the railway cutting
- Construction of Adelaide Road vent shaft and single storey headhouse building; and,
- All other activities for the purposes and in connection with the scheduled and ancillary works.

3.4 The roads to be used are as follows and set within the Overall Lorry Route plan (see figure 2) below:

- Adelaide Road (B509)
- Albany Street (A4201)
- Camden High Street/Chalk Farm Road/Haverstock Hill (A502)
- Churchway
- Eversholt Street (A4200)
- Gloucester Gate (A4201)
- Gower Street (A400)
- Grafton Place
- Grafton Way
- Great Portland Street (LB Westminster)
- Hampstead Road/Camden High Street (A400) (TfL)
- Harrington Square
- Osnaburgh Street (A4201) (LB Westminster)
- Park Village East
- Prince Albert Road (A5205)
- TLRN (TfL)
- Tottenham Court Road (A400)

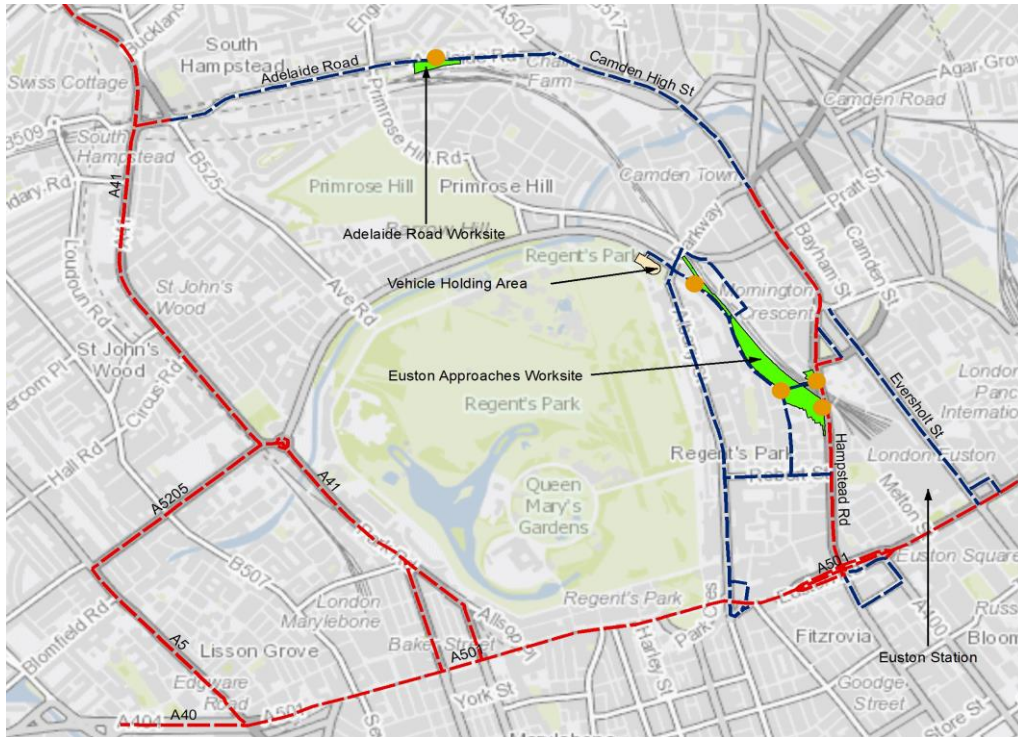


Figure 2: Overall lorry route plan showing Adelaide Road and Euston Approaches worksites

3.5 The access/egress points for each of the two worksites and their associated routes are explained in more detail below:

Adelaide Road worksite

3.6 The Adelaide Road worksite has one access point on Adelaide Road, as shown in figure 3 below.

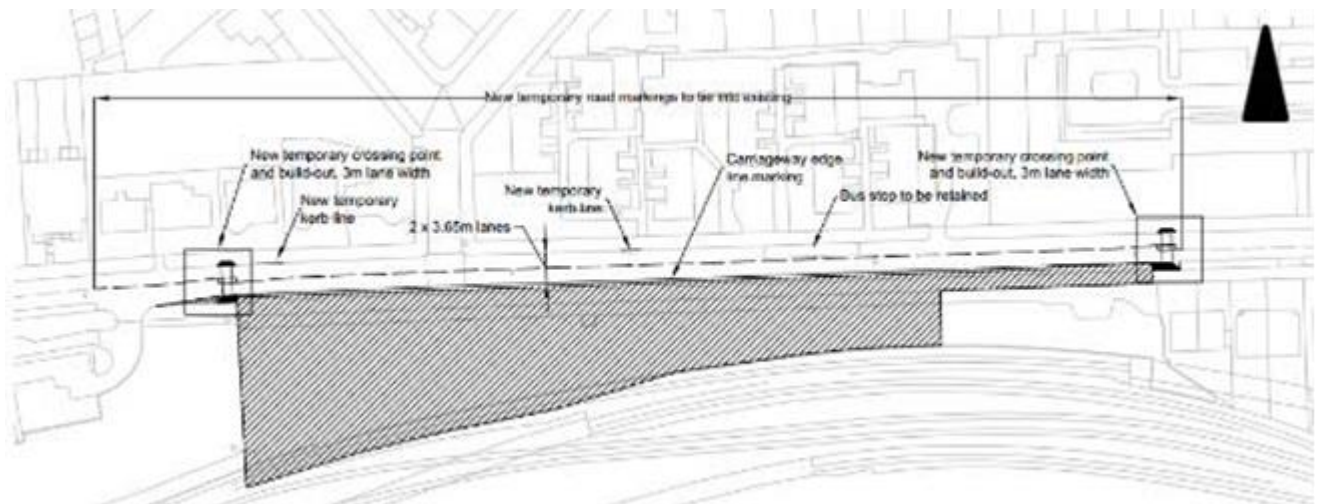


Figure 3: Adelaide Road worksite access points

Adelaide Road – Proposed Route

3.7 Camden have entered into extensive negotiation and discussion with HS2 regarding this route. Following detailed assessment of the submitted Route (hereafter referred to as Route A) the Council’s officers raised concerns about

its impact on road safety and the free flow of traffic in the local area. Various alternative routes to access and egress the Adelaide Road worksite were discussed. HS2 have informed officers that it would not be possible for vehicles to approach and leave the site from the west on Adelaide Rd; an arrangement which would provide the most direct and acceptable route to and from the TLRN. This is because HS2 advise that vehicles would be unable to turn around within their worksite. Having established that there were no other suitable means of enabling vehicles to turn around by using the public highway in the local vicinity to enable HS2 vehicles to approach and leave to the west on Adelaide Rd, the Council's officers subsequently suggested three potential alternative routes named (Routes B-D) as alternatives to HS2's preferred route (Route A).

- 3.8 Each route has advantages and disadvantages from the perspectives of Camden Council and HS2, which are discussed later in the report. Route A is favoured by HS2 and is shown in the submitted documents, whilst Route D is considered by officers to be a feasible and preferable alternative route with reduced impacts when compared with Route A, and therefore officers asked HS2 Ltd to modify their application. HS2 appear to accept that Route D is workable, but they don't feel it is necessary for the proposed Route to be amended and/or that if the Council wishes to replace Route A with Route D it could do so by condition.
- 3.9 Routes B was eventually dismissed, when it emerged that TfL is now proposing to prohibit a left hand turn from Camden St on to Camden Rd that would make the route no longer possible.
- 3.10 Route C was also suggested by Camden, but was rejected by HS2 during the course of discussion. The discussions on this were not concluded, as HS2 preferred route D which had also been suggested by the Council.
- 3.11 Route A is set out below, with the Camden initiated routes rejected by HS2 (Routes B, C and D) expanded upon later within the assessments of the scheme:
- 3.12 Adelaide Road Worksite, Route A – HS2s preferred route northwards. HS2 have proposed the following roads to use as an access route to the Adelaide Road site:
- 3.13 A501 Euston Road TLRN – A400 Gower Street – Grafton Way – A400 Tottenham Court Road – A400 Hampstead Road/Camden High Street (TLRN) – A502 Camden High St/Chalk Farm Rd – B509 Adelaide Rd.
- 3.14 During the period where Hampstead Road Bridge (during phase 4, discussed later in the report) is closed, the proposed route would be:
- 3.15 A501 Euston Road TLRN – A4200 Churchway – A4200 Grafton Place – A4200 Eversholt St – A400 Camden High Street (TLRN) – A502 Camden High St/Chalk Farm Rd – B509 Adelaide Rd.

3.16 The proposed egress route from the site is for vehicles to proceed westward from the site along Adelaide Road, joining the A41 TLRN at Swiss Cottage. See figure 4 below:

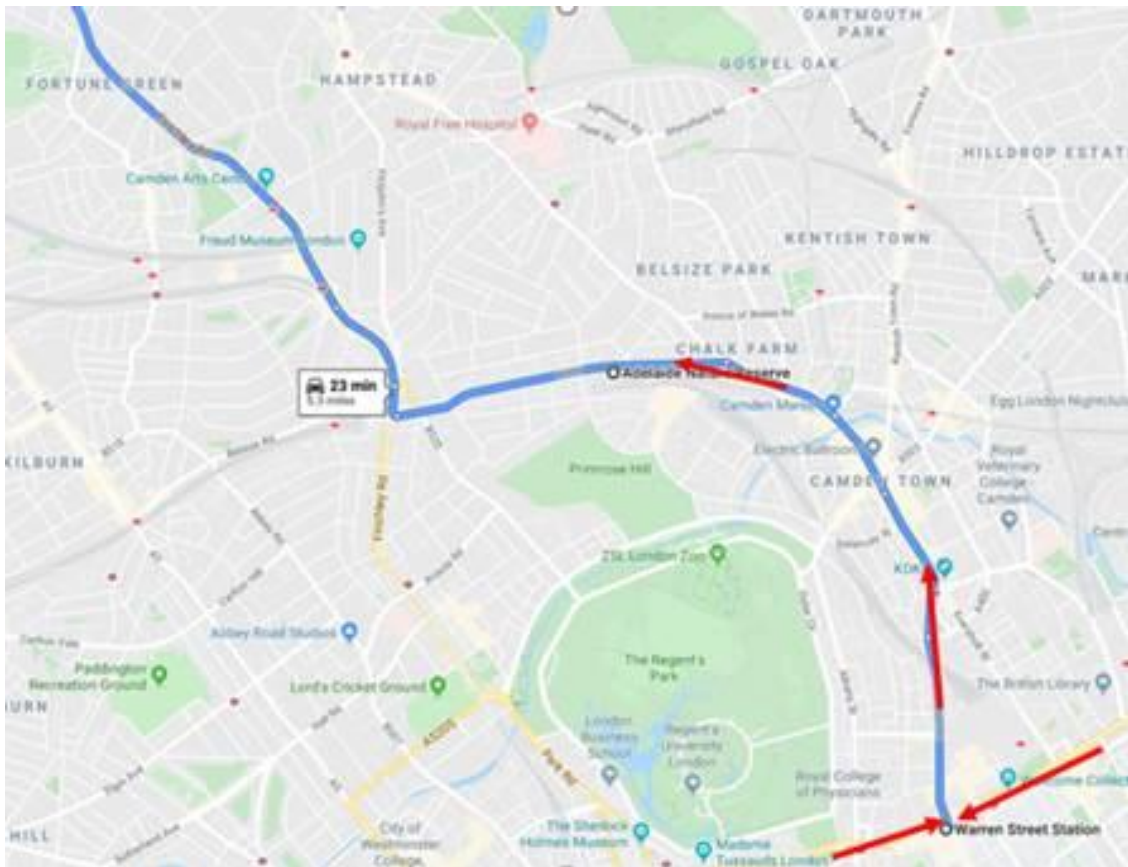


Figure 4: Adelaide Road worksite – Route A.

#### Euston Approaches worksite

3.17 The Euston Approaches worksite has four illustrative anticipated access points (see figure 5 below):

- Granby Terrace at the junction of Stanhope Street/Park Village East (access point 1)
- Granby Terrace Bridge at the junction with Hampstead Road (access point 2);
- Haul Road access point on Hampstead Road south of Granby Terrace Bridge (access point 3);
- The northern end of Park Village East adjacent to Park Village Studios (access point 4)

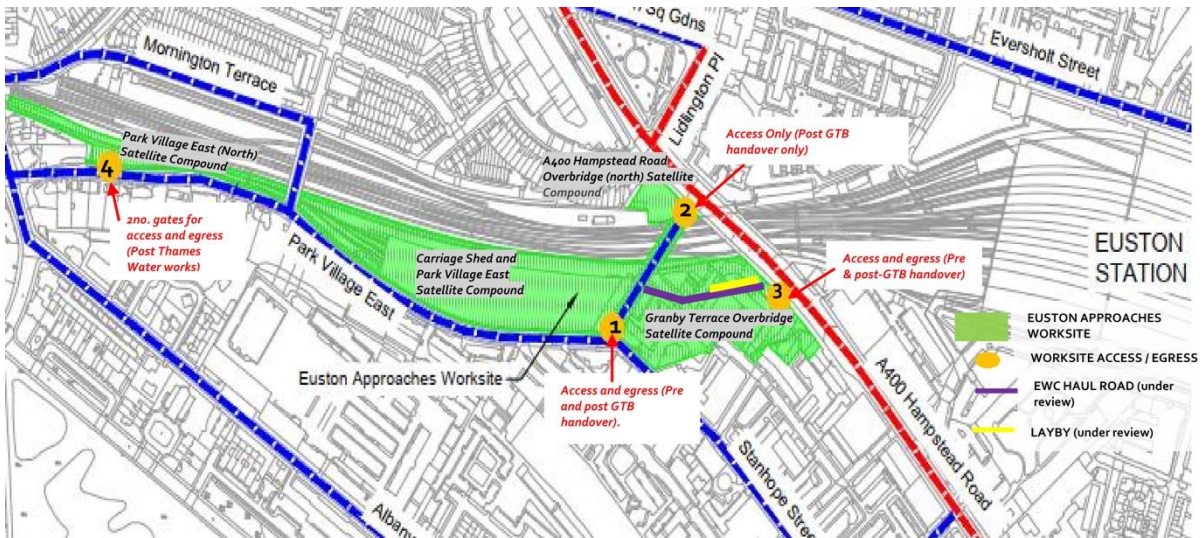


Figure 5: Euston Approaches worksite access points

3.18 The Euston Approaches lorry routes for approval are set out in figure 6 below:

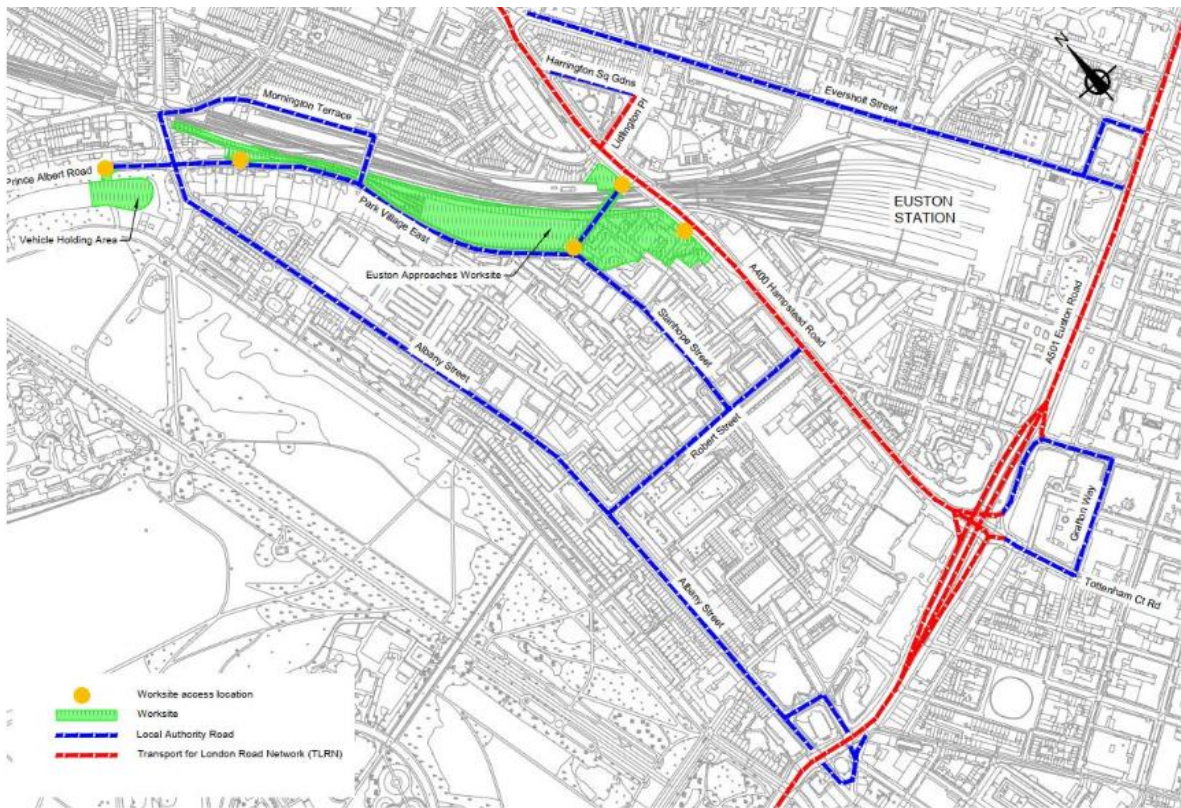


Figure 6: Euston Approaches lorry routes

3.19 The Camden Sector 1 main works LTMP indicates that works are expected to be split into four phases, each requiring different access and egress points. The four phases are listed below, with an accompanying map showing the route. Approximate timescales are also given for each phase, though HS2 Ltd have indicated that these are subject to change. It should be noted, however, that the proposed list of roads makes no reference to these phases and HS2 has refused the Council's request to specify these different phases in the list of

roads for approval, nor to break the proposal in to a series of applications to ease consideration.

### Euston Approaches Phase 1 – until August 2020

- 3.20 Access Point 1 (Stanhope Street/Granby Terrace/Park Village East) is accessed from the TLRN by travelling north up Hampstead Road, turning left on to Robert Street, before turning right on to Stanhope Street and proceeding north to the access point.
- 3.21 Vehicles leaving via this access point head south along Stanhope Street, turning right onto Robert Street heading west, then turning left onto Albany Street heading south towards the Osnaburgh Loop and joining Euston Road. The difference in the egress and access routes is due to traffic restrictions at the Robert Street-Hampstead Road junction, which does not allow vehicles to right turn on to Hampstead Road.
- 3.22 Due to traffic restrictions discussed above, all vehicles that have an origin/destination to the east along Euston Road will be required to use one of either the Grafton Way or Osnaburgh loop.
- 3.23 During Phase One, the route to Access Point 1 is proposed to be restricted to large loads over 40 tonnes that cannot use Granby Terrace Bridge, due to the 40 tonne (40T) max weight limit. All other vehicles accessing the site will be required to use Access Point 2 to ingress to the site. There is no information submitted with the application on the number or percentage of the total of vehicles that are over 40T.
- 3.24 Access Point 2 (Granby Terrace/Hampstead Road) is accessed by vehicles travelling north along Hampstead Road, and turning left into Granby Terrace. During this phase, this access point will be two-way (left in and right out) to/from Hampstead Road. Vehicles leaving the site will be able to turn right directly onto Hampstead Road and head south towards Euston Road, and avoiding Harrington Square.
- 3.25 It is noted that for Phase 1 the plans provided do not clearly show the use of access point 1, despite being used. For phase 1 this is for 40T+ vehicles only.

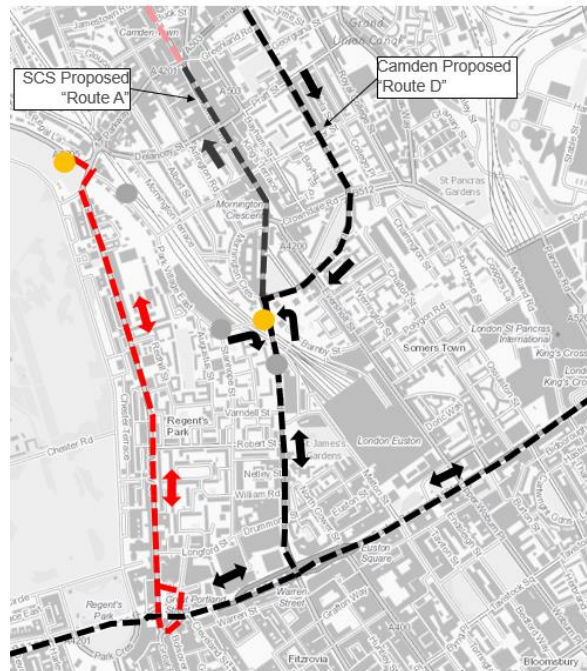


Figure 7: Euston Approaches Phase 1 lorry routes

Euston Approaches Phase 2 – August 2020 until January 2022

- 3.26 During Phase Two, Access Point 2 (Granby Terrace/Hampstead Road) is not available due to works to extend Granby Terrace Bridge.
- 3.27 The route to and from Access Point 1 (Stanhope Street/Granby Terrace/Park Village East) will continue to be used as in Phase One, and will provide access for vehicles to the area at the northern end of the site between Granby Terrace Bridge and the Euston Cavern at the northern end of Park Village East.
- 3.28 It is proposed that a new access is created directly onto Hampstead Road (forming Access Point 3), approximately 150 yards north of the Hampstead Road-Varndell Street junction. Vehicles can access and egress the site from this access point and it is proposed to be available from August 2020. However, only the southern end of the worksite between Granby Terrace Bridge and Hampstead Road Bridge can be accessed from this point. All vehicles heading to the northern end of the site will be required to use Access Point 1 via Stanhope Street. There is no information submitted as part of the application on the proportion or numbers of vehicles that will access either of the two areas of the site.
- 3.29 The route to Access Point 3 from the TLRN (east and west along Euston Road) is the same as that described above for Access Point 2 in Phase One, provided vehicles leaving the site can turn right onto Hampstead Road to proceed south. This will require a new entrance to be formed directly onto the TLRN and a junction formed allowing vehicles to cross the central reservation on Hampstead Road in order to make this southbound movement. The LTMP states this is subject to TfL approval and if this right turn is not possible, vehicles will have to turn left and head north up Hampstead Road and drive

around Harrington Square Gardens on Harrington Square and Lidlington Place in order to proceed south along Hampstead Road before joining Euston Road.

3.30 HS2 has not provided vehicle numbers for any of Access points 1-3 for this phase of the works.

3.31 Access Point 4 (Park Village East) will be in use from January 2021 until March 2026.

3.32 Vehicles will approach this access point from Euston Road TLRN, proceeding north up Albany Street before turning right onto Gloucester Gate and right again onto Park Village East (due to the one way restriction at the top end of Park Village East) where the access is located. The vehicles remain at street level where materials are delivered and lowered down to the site at track level.

3.33 Vehicles leaving the access point will head south along Park Village East, turning left onto Mornington Street and then left onto Mornington Terrace, before turning left onto Delancey Street and heading back to Euston Road via Gloucester Gate and Albany Street.

3.34 SCS have given an estimate of 20-30 daily two-way movements (i.e. one in and one out) as the number of lorries using this access point and the associated routes, which equates to 15 lorries per day.

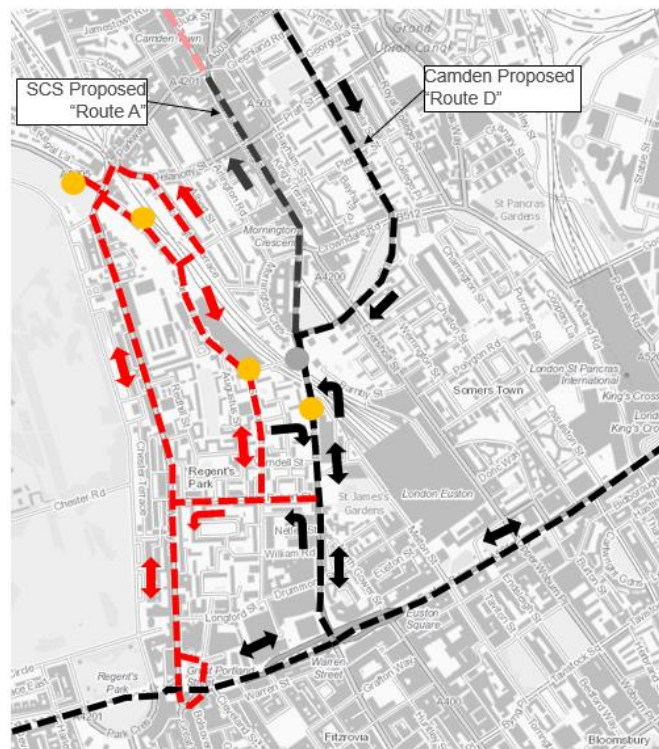


Figure 8: Euston Approaches Phase 2 lorry routes

### Euston Approaches Phase 3 – January 2022 until March 2026

3.35 During Phase Three, Access Point 1 (Stanhope Street/Granby Terrace/Park Village East) is to be used for access/egress for large loads over 40T that



cannot use Granby Terrace Bridge (as explained above). There is no information on the number or percentage of the total of vehicles that are over 40T.

- 3.36 Access Point 2 (Granby Terrace/Hampstead Road) will be an access (left hand turn in) only from Hampstead Road, and provide access to the area of the site between Granby Terrace Bridge and Euston Cavern in the north of the site.
- 3.37 It is proposed that all vehicles that enter the site via Access Point 2 will leave the site via Access Point 1 and proceed along Stanhope Street following the same egress route described in the description for Access Point 1 in Phase One (as explained above).
- 3.38 Access Point 3 (the haul road onto Hampstead Road) will operate and have the same route as described in Phase Two above (as explained above), in that it will be access/egress for vehicles accessing the southern area of the site between Granby Terrace Bridge and Hampstead Road Bridge.
- 3.39 HS2 have not provided vehicle numbers for any of Access points 1-3 for this phase of the works.
- 3.40 Access Point 4 (Park Village East) will operate and have the same access/egress routes as described in Phase Two above (as explained above). This phase will also have up to 30 vehicle movements per day for this access point.
- 3.41 It is noted that for Phase 3 the plans provided do not clearly show the use of access point 1, despite being used. For Phase 3, this is for 40T+ vehicles as well as the egress point for vehicles accessing via gate 2.

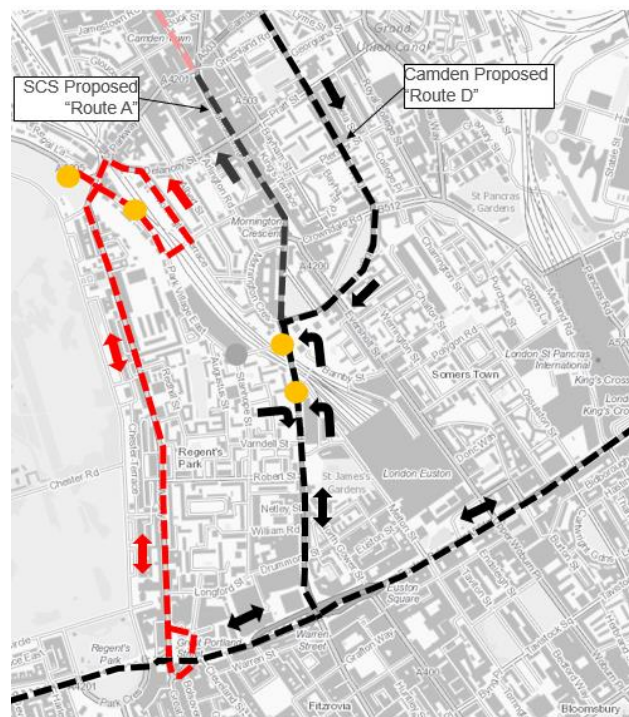


Figure 9: Euston Approaches Phase 3 lorry routes

Euston Approaches Phase 4 – January 2023 & August 2024 (for x2 four weeks only whilst Hampstead Road Bridge is closed)

- 3.42 This phase takes place during the closure of Hampstead Road Bridge, which will occur for 2 x four week periods in January 2023 and August 2024. Access Point 2 (Granby Terrace/Hampstead Road) will not be in use during these periods due to the road closure.
- 3.43 Access Point 1 (Stanhope Street/Granby Terrace/Park Village East) will be used to provide access to the area of the site between Granby Terrace Bridge and Euston Cavern in the north, and the route to/from this access point will be the same as is described in Phase One.
- 3.44 The routes to/from Access Point 3 (the haul road onto Hampstead Road) will be the same route as described in Phase Two above, however the access will only provide access/egress for vehicles accessing the site for Hampstead Road Bridge works.
- 3.45 Access Point 4 (Park Village East) will operate, and have the same route, as described in Phase Two above.
- 3.46 HS2 has not provided vehicle numbers for any of Access points 1-4 for this phase of the works.

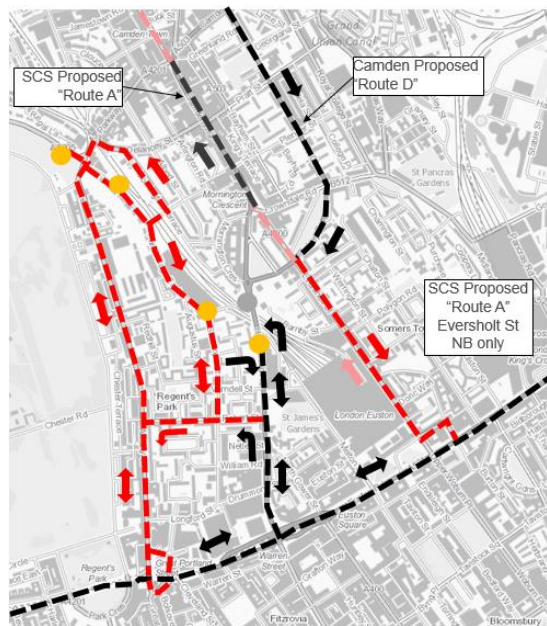


Figure 10: Euston Approaches Phase 4 lorry routes

Vehicle Holding Area

- 3.47 The Vehicle Holding Area (VHA, also referred to as a Lorry Holding Area, however the former term is used for the purposes of this report), is located on Prince Albert Road. Vehicles will approach the VHA from Euston Road, and proceed north up Albany Street (after using the Osnaburgh Loop if necessary),

turning right onto Gloucester Gate and left into Prince Albert Road and left into the VHA.

- 3.48 Vehicles going to Access Point 4 and Access Point 1 can drive directly south from Prince Albert Road onto Park Village East to the respective access points. However, vehicles approaching Access Point 2 and 3 will need to proceed from Prince Albert Road, turn right (west) onto Gloucester Gate and then left (south) along Albany Street, around the Osnaburgh Loop and onto Euston Road before turning left (north) onto Hampstead Road.
- 3.49 SCS have predicted that the average number daily movements to and from the VHA is 130-190 movements (65-95 vehicles), however there is no information on what proportion of these vehicle will use each of the four access points.
- 3.50 It is understood that the VHA will only be used in association with works to the Euston Approaches site.

#### 'Osnaburgh Loop'

- 3.51 Due to traffic restrictions at the junctions of Hampstead Road/Euston Road, vehicles approaching/leaving the Euston Approaches compound from/to the east along Euston Road require the use of either the Great Portland Street/Albany Street/Osnaburgh Terrace/Osnaburgh Street (referred to from now as the 'Osnaburgh Loop') route or the Grafton Way Loop (discussed below).
- 3.52 The normal traffic restrictions (applicable to all HS2 and non-HS2 vehicles alike) at the junctions of Hampstead Road/Euston Road result in the need for this loop to be used. This can be summarised as:
- no left turn from Hampstead Road (when heading south) onto Euston Road
  - no right turn from Euston Road (when heading west) on to Hampstead Road
- 3.53 As a result, vehicles approaching the worksites and access points from the east along Euston Road will require the use of one of the loops in order to access the worksites.
- 3.54 Vehicles approaching the worksites from the west along Euston Road will not be required to use the loop in order to reach the worksites and access points, as they will be able to turn left directly off Euston Road on to Hampstead Road.

#### 'Grafton Way Loop'

- 3.55 Due to traffic restrictions at the junctions of Hampstead Road/Euston Road, vehicles approaching/leaving the Euston Approaches compound from/to the east along Euston Road require the use of the Gower Street/Grafton Way/Tottenham Court Road route (Grafton Way Loop) or the Osnaburgh Loop (discussed above). Vehicles using the Grafton Way Loop will travel along A501/A400 Euston Road, turning left onto A400 Gower Street, right on to

Grafton Way before turning right onto A400 Tottenham Court Road and can then proceed either north onto Hampstead Road or on to A501 Euston Road heading east.

- 3.56 It is understood from the proposal under consideration, that both worksites could have vehicles approaching the sites from the Euston Road and therefore both of these loops could be used by HS2 vehicles during the use of the proposed lorry routes.

'Harrington Loop'

- 3.57 If a right turn is unable to be provided from Access Point 3 onto Hampstead Road, all vehicles leaving the site via this egress point will be required to turn left at this junction on to Hampstead Road. Vehicles will then head north along Hampstead Road, before turning right on Harrington Square and right again onto Lidlington Place, which leads into re-joining Hampstead Road heading south to Euston Road. This route is referenced as the Harrington Square Loop.

#### **4. RELEVANT HISTORY**

- 4.1 No relevant planning history relates to the application sites. Similar Schedule 17 applications have however been submitted:

**2018/3241/HS2** [Granted approval subject to conditions dated 21/11/2018] - Lorry routes associated with demolition, site clearance and other enabling works for HS2 at the Carriageway Shed, Park Village East and Granby Terrace Overbridge Satellite Compound. Incorporating routes via: Transport for London Road Network (TLRN); Great Portland Street, Albany Street, Osnaburgh Terrace and Osnaburgh Street; Granby Terrace; Varndell Street and Harrington Street; and Harrington Square.

**2018/0438/HS2** [Granted approval subject to conditions dated 20/04/2018] - Lorry routes associated with demolition, site clearance and other enabling works for HS2 at the National Temperance Hospital (North and South) and Cobourg Street worksites. Incorporating routes via: Transport for London Road Network (TLRN); Great Portland Street, Albany Street, Osnaburgh Terrace and Osnaburgh Street; Melton Street, Euston Street, Cobourg Street and Drummond Street; and Cardington Street.

**2020/1321/HS2** [Granted approval subject to conditions dated 24/04/2020] - Application for approval under Schedule 17 of High Speed Rail (London - West Midlands) Act 2017 of lorry routes to and from the Melton Street Satellite Compound associated with works for HS2. Main works activities include: Demolition, site clearance, ground investigations, utility works/diversions, and other associated enabling works. Incorporating lorry routes via: Transport for London Road Network (TLRN), Melton Street, Cardington Street.

## **5. CONSULTATION SUMMARY**

5.1 Consultation responses were received from the following bodies, groups and stakeholders:

- Transport for London (TfL)
- London Borough of Brent
- City of Westminster
- Camden Town District Management Committee (DMC)
- Camden HS2 Association of Residents' Groups for Engagement (CHARGE)
- University College London Hospitals NHS Foundation Trust (UCLH)
- New Age Project (Charity working with older people within the Regent's Park Estate)
- Camden Town Urban Improvement Society
- Netley Primary School Governing Body

5.2 95 comments were received on the scheme including from the following street addresses:

- Albany Street
- Albert Street
- Arlington Road
- Augustus Street
- Cumberland Market
- Delancey Street
- Eton Avenue
- Gower Street
- Harrington Street
- Mornington Crescent
- Mornington Place
- Mornington Terrace
- Netley School
- Park Avenue East
- Park Village East
- Redhill Street
- Robert Street
- Rydal Water
- Stanhope Street
- Varndell Street
- Winchester Road

5.3 Full details of the consultation and comments received are noted within Appendix 2. The comments were considered prior to the determination of the application.

## **6. LEGISLATION, Guidance, and Environmental Minimum Requirements**

6.1 The applicable legislation is referred to above in section 1 of this report; the most relevant documents are identified below for assistance:

### The HS2 Act

- High Speed Rail (London - West Midlands) Act 2017, in particular Schedule 17 paragraph 6

### Statutory Guidance

- High Speed Rail (London - West Midlands) Act 2017 - Schedule 17 Statutory Guidance

### Environmental Minimum Requirements and related documents

- High Speed Rail (London - West Midlands) Environmental Minimum Requirements (the EMRs) General Principles February 2017
- High Speed Rail (London-West Midlands) Environmental Minimum Requirements Annex 1: Code of Construction Practice High Speed Rail (London-West Midlands) Environmental Minimum Requirements Annex 1: Code of Construction Practice
- High Speed Rail (London-West Midlands) Environmental Minimum Requirements Annex 2: Planning Memorandum
- High Speed Rail (London-West Midlands) Environmental Minimum Requirements Annex 3: Heritage Memorandum
- High Speed Rail (London-West Midlands) Environmental Minimum Requirements Annex 4: Environmental Memorandum
- HS2 Context Report October 2017
- London - West Midlands Environmental Statement 2013
- Supplementary Environmental Statement 4 and Additional Provision 5 (Supplementary Environmental Information) 2015
- HS2 Phase One information papers: environment (series E)
- Local Environmental Management Plan London Borough of Camden (LEMP) December 2017
- Camden Local Traffic Management Plan
- The Dales Local Traffic Management Plan
- High Speed Two Phase One: Route-wide Traffic Management Plan

### Planning Forum Note 6: Lorry Route Approvals

## **7. ASSESSMENT**

7.1 The grounds that are relevant for the determination of this application are considered in the following sections of this report:

<b>8</b>	<b>Adelaide Road Worksite</b> <ul style="list-style-type: none"><li>- The Route Proposed (Route A)</li><li>- Assessment of Route A</li><li>- Archaeological or historic interest or nature conservation value</li><li>- Is proposed Route A reasonably capable of being modified?</li><li>- Disqualification of Routes B and C</li></ul>
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	<ul style="list-style-type: none"> <li>- Assessment of Route D</li> <li>- Use of Conditions</li> </ul>
9	<b>Euston Approaches Worksite</b> <ul style="list-style-type: none"> <li>- The Proposed Route</li> <li>- Assessment of the Route</li> <li>- Prejudicial effect on the free-flow of traffic</li> <li>- Archaeological or historic interest or nature conservation value</li> <li>- The proposed route</li> <li>- Use of Conditions</li> </ul>
10	<b>Equality Act 2010</b>
11	<b>Conclusion</b>
12	<b>Recommendation</b>

## 8. ADELAIDE ROAD WORKSITE

- 8.1 The application proposes lorry route access and egress from the Adelaide Road worksite; this is described in full in section 3 of this report.
- 8.2 The Council can only consider S17 applications within the constraints of the HS2 Act. The Council must consider whether the arrangements proposed ought to be modified to:
- a) Preserve the local environment or amenity;
  - b) Prevent or reduce prejudicial effects on road safety or on the free flow of traffic in the local area; or
  - c) To preserve a site of archaeological or historic interest or nature conservation value;
- and whether the arrangements are reasonably capable of being so modified.

### The Route Proposed (Route A)

- 8.3 HS2 proposes the use of Route A to access the Adelaide Road worksite. This is described in full in section 3 of this report, but briefly comprises the following roads:
- 8.4 Access: A501 Euston Road TLRN – A400 Gower Street – Grafton Way – A400 Tottenham Court Road – A400 Hampstead Road/Camden High Street (TLRN) – A502 Camden High St/Chalk Farm Rd – B509 Adelaide Rd.

During the period where Hampstead Road Bridge (during phase 4, discussed later in the report) is closed, the proposed route would be: A501 Euston Road TLRN – A4200 Churchway – A4200 Grafton Place – A4200 Eversholt St – A400 Camden High Street (TLRN) – A502 Camden High St/Chalk Farm Rd – B509 Adelaide Rd.

- 8.5 Egress: Vehicles to proceed westward from the site along Adelaide Road, joining the A41 TLRN at Swiss Cottage.
- 8.6 The Written Statement submitted by HS2 Ltd in support of the application (paragraph 3.8.14) states that the excavation, removal of excavated material,

and construction activities at the Euston Approaches worksite are scheduled to take place between Q1 2020 and Q4 2024.

### Assessment of Route A

- 8.7 It is the view of officers that Route A ought to be modified to reduce prejudicial effects on road safety.
- 8.8 Officers consider that it is unacceptable for construction traffic to follow a route northwards along the north section of Camden High Street from the station to the lock and then northwards up Chalk Farm Road. The carriageway here is narrowed to a single lane, although the pavements have been widened, the amount of footfall in this tourist hotspot at times exceeds what can be safely accommodated on the footway and pedestrians frequently spill into the highway.
- 8.9 Officers consider that the use of the non-TLRN section of Camden High Street as a route for construction vehicles, between the Camden High Street/Parkway Junction and Chalk Farm Road/Castlehaven Road junction would lead to prejudicial effects on road safety. This section is heavily used by pedestrians, both commuters and tourists, to access Camden Town underground station and Camden Markets.
- 8.10 Camden High Street accommodates up to 3.4 million pedestrians movements per month, and this number has been increasing year on year. A survey carried out in 2011 after the implementation of the 'Naked Streets'<sup>1</sup> scheme in 2011 showed that 3,100 pedestrians crossed Camden High Street adjacent to the Camden Town underground station exit during the peak hour. Peak pedestrian comfort levels at this junction are noted to be 'sub optimal' which causes pedestrians to spill in to the carriageway. Entry and exit data collected in 2017 (latest data available) by TfL for Camden Town station shows that there is an average of 31,183 weekday exits and an average of 41,851 Saturday exits from the station on to Camden High Street.
- 8.11 Pedestrian counts undertaken in 2019 (by Camden Town Unlimited) show there is an average of 26,121 pedestrians per day on weekdays walking along the eastern side of Camden High Street, north of Camden Town station. Saturdays experience even higher pedestrian numbers, with an average of 41,617 per Saturday in 2019. There were over 30 days in 2019 where pedestrian counts were over 40,000 (Monday-Saturday) and several days exceeding 45,000, while the surveys also show that the number of days where pedestrian counts exceed 40,000 is increasing annually.

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<sup>1</sup> Camden Town's 'Naked Street' - Through decluttering (removal of unnecessary guard railing, bollards and street signs), footway widening and removal of yellow lines and formal pedestrian crossing points, the project aimed to encourage more personal responsibility and awareness among all road users. The scheme, which was implemented on Camden High Street between Camden Town underground station and the markets, also improved the streetscape, including increased tree cover, which improved the attractiveness of the area. Camden's 'Naked Street' achieved speed reductions to below 20mph in some places, while surveys indicate the number of pedestrians on the street has increased by up to 2,000 people an hour.



8.12 It should be noted that the total number of pedestrians walking along Camden High Street will be significantly higher than these figures portrayed, as these counts are taken from the footway on the eastern side of Camden High Street only and no counts are available for the western side.

8.13 In the 3 year period from 2016, there were 76 recorded casualties between the Hampstead Road/Harrington Square junction and the Camden High Street/Chalk Farm Road/Castlehaven Road. This included 1 pedestrian fatality and 10 serious casualties, 5 of which involved pedestrians and 4 involving cyclists. The accident data shows a cluster of collisions at the Camden High Street/Camden Road/Parkway junction shown in Figure 11 below. Figure 12 below shows the location of the 20 collisions along Camden High Street involving pedestrians between January 2016 and December 2018.

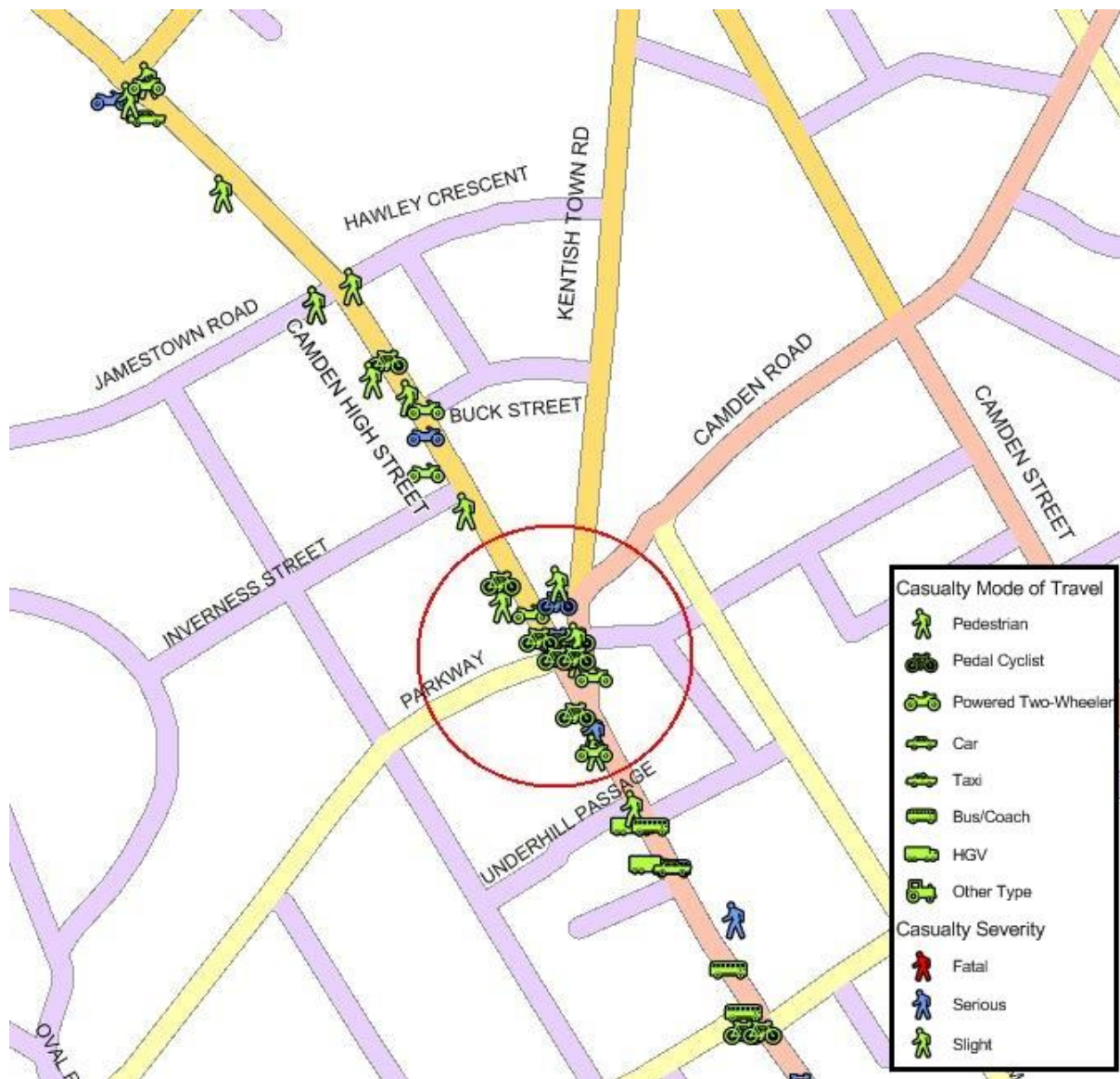


Figure 11: Collision at the Camden High Street/Camden Road/Parkway junction, January 2016-December 2018

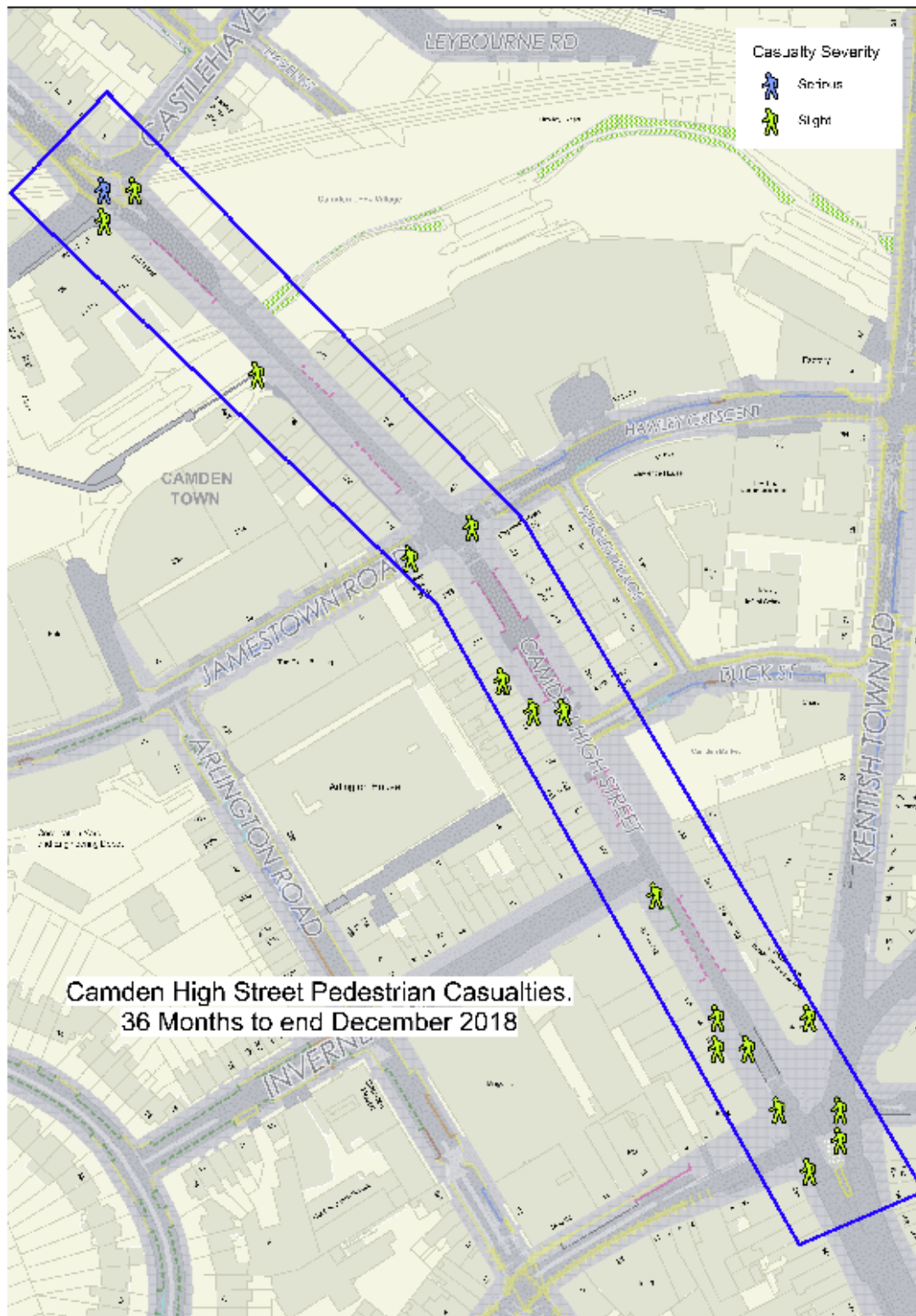


Figure 12: Pedestrian casualties on Camden High Street north, January 2016 - December 2018

8.14 The Council has been concerned about traffic levels in this sensitive location of high pedestrian activity in Camden Town Centre for a considerable time. It previously implemented a scheme to widen the pavements and restrict vehicle flow on the northern section of Camden High St under the 'Naked Streets' initiative which resulted in a 90% drop in heavy goods vehicles on the that part

of the High St. Traffic surveys from January 2020 show that there were 164 large goods vehicles (large goods vehicles with two axles or more) using Camden High Street between 8am and 6pm. It should be noted that this 164 vehicles is likely to contain vehicles less than 7.5T, and therefore the number of LGVs 7.5T and over using Camden High Street will likely be a lot less than 164. The Environmental Statement predicts 40-50 one-way movements of LGVs to the Adelaide Road site, which would be routed northward along Camden High Street if Route A is used. This would equate to an increase of LGVs using the northern section of Camden High Street of approximately 27.5% between 8am and 6pm.

- 8.15 Camden Council and TfL are currently working with local stakeholders to reduce traffic volumes and improve air quality as part of the Camden Low Emissions Neighbourhood (LEN) scheme that includes the northern part of Camden High St. The current proposals being considered, while yet to be formalised, are considering options for trial closure of section of the northern section of Camden High St at weekends. These may be extended if successful, to roll out further periods of closure, potentially leading to a permanent closure of the northern section of Camden High St.
- 8.16 The scheme has been conceived in conjunction with TfL, who will largely fund the scheme, as part of its Vision Zero initiative, which aims to eliminate serious injuries and road deaths, focussing on London's streets. Vision Zero, seeks to reduce road danger for everyone and create streets safe for walking and cycling. Amongst the objectives of the Camden LEN scheme are the reduction of traffic casualties and the reduction of transport emissions. Increasing the number of HGV's by 27.5% from 8am-6pm is contrary to these objectives. Heavy good vehicles have been found to be involved in a disproportionate proportion of KSI's (Killed or Seriously Injured) involving pedestrians and cyclists in London and are a particular area of concern to TfL and the Council. TfL research shows that between 2015 and 2017 HGVs were disproportionately involved in fatal collisions in London, with 63 per cent of those involving people cycling and 25 per cent of those involving people walking. This is despite HGVs only making up four per cent of the overall miles driven in the capital.
- 8.17 Camden's markets are a major visitor attraction of London-wide importance. Stables Market, for example has been ranked as London's fourth largest attraction in terms of visitor numbers. As discussed above, there is a strong correlation between the number of passengers that leave Camden Town Underground Station and those using the northern section of Camden High St that leads to Camden's markets. A number of bus stops that provide access to Central London are also located in the area close to Camden Town Underground Station, which could also be reasonably be assumed to be used by a number of market goers who may also access these bus stops via Camden High St.
- 8.18 Taking the above information, the proposal to direct 40- 50 Large Goods Vehicles per day via Camden High St would be seriously contrary to Camden's aims and objectives as part of the Camden LEN to reduce the dangers of road traffic and its impacts on air quality. It would undermine initiatives already

implemented that have resulted in significant reductions in the number of Heavy Goods Vehicles and a highway that has large numbers of pedestrians that at times spill on to the carriageway and which has a history of collisions involving vehicles with pedestrians and cyclists. The introduction of additional LGVs on this part of Camden High Street would increase the chance of collisions with pedestrians occurring and thereby prejudice the safety of those using Camden High Street. The importance of maintaining safety of pedestrians on this street is emphasised by the important role it plays as a pedestrian route for large numbers of visitors to Camden's popular markets which play an important role in London's tourist offer.

- 8.19 Whilst the proposal would impact on the local environment and amenity of Camden High Street to some degree (due to pedestrian discomfort, pollution and resultant air quality), Officers consider that, on balance, it is unlikely to result in an unduly harmful impact on the local environment or local amenity for the purposes of this assessment.
- 8.20 However, officers consider that the proposed route to access the worksite would have prejudicial effects on road safety and have therefore considered whether the route is reasonably capable of being modified to prevent or reduce those prejudicial effects.

#### Archaeological or historic interest or nature conservation value

- 8.21 Regarding Archaeological interest, safeguarding measures exist within the CoCPs (Section 8), E8: Archaeology in addition to the HS2 Phase One Heritage Memorandum within the EMRs. This is supported by paragraphs 189 - 192 (Proposals affecting heritage assets) of the National Planning Policy Framework, a route-wide Generic Written Scheme of Investigation: Historic Environment Research and Delivery Strategy (GWSI:HERDS).
- 8.22 Safeguarding measures also exist with reference to ground movement, settlement and the structural stability of buildings, including: The CoCP (Section 10) and C3: Ground Settlement. A programme of settlement monitoring and the implementation of avoidance measures where appropriate shall be undertaken by the contractors.
- 8.23 Further safeguarding measures exist with reference to nature conservation value, notably Section 9 of the CoCP.
- 8.24 Notwithstanding the above, contractors would be required to undertake appropriate monitoring of the consequences of construction works on ecological resources and of the effectiveness of the management measures designed to control ecological effects, as detailed within the CoCP.
- 8.25 The application neither seeks, nor is it within its remit of, the excavation, demolition, alteration or removal of land, buildings or nature assets and therefore its impact in this regard is limited. Given the existing safeguarding measures and assurances under EMRs, CoCPs, LTMPs and LEMPs, there are no outstanding additional issues in regard to the archaeological or historic

interest or nature conservation value which would warrant grounds for refusal on this matter alone.

Is proposed Route A reasonably capable of being modified?

8.26 As explained above, the Council raises significant concerns with the use of Route A with particular reference to the prejudicial effects on road safety in the local area.

8.27 In compliance with Section 17 of the HS2 Act, during the course of negotiations with HS2, Camden suggested three alternate routes: Routes B, C and D. These three alternate routes are described below.

8.28 Adelaide Road Worksite, Route B – This proposes access to the site from the TLRN and Adelaide Road, egress from the site would be via B509 Adelaide Rd – A502 Chalk Farm Rd – Castlehaven Road/Hawley Road – A400 Camden Street – Camden Rd (TLRN). See figures 13 and 13A below:

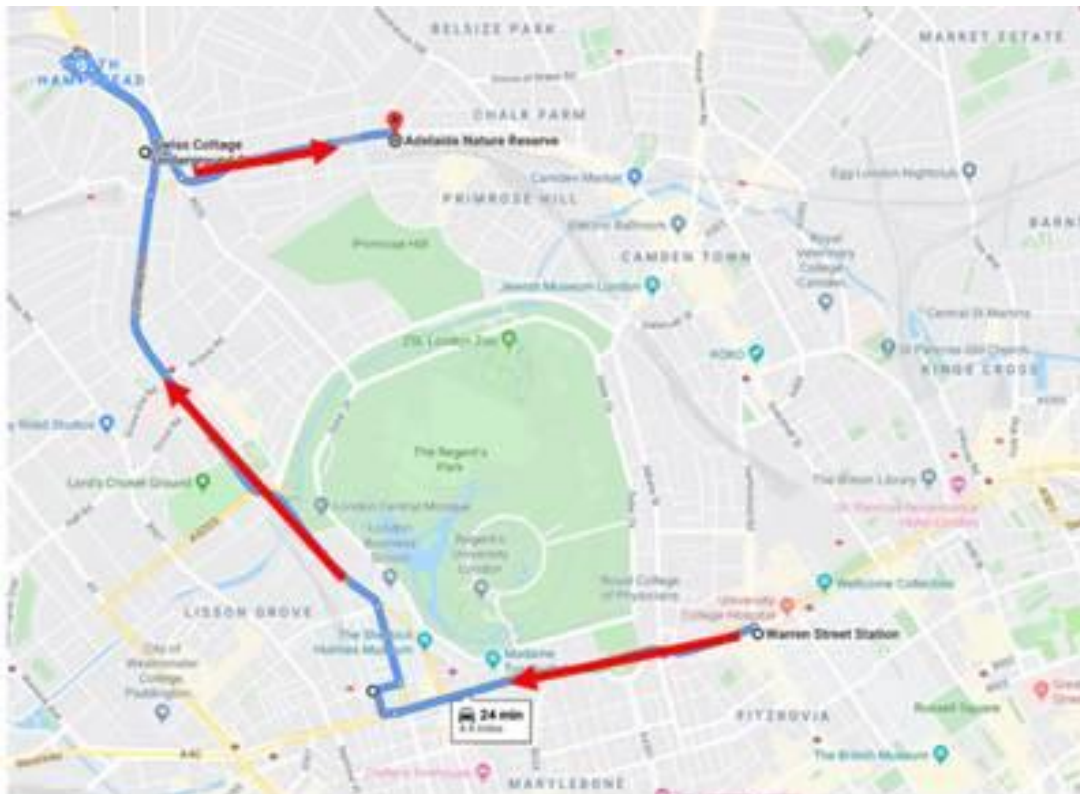


Figure 13: Adelaide Road worksite – Route B access

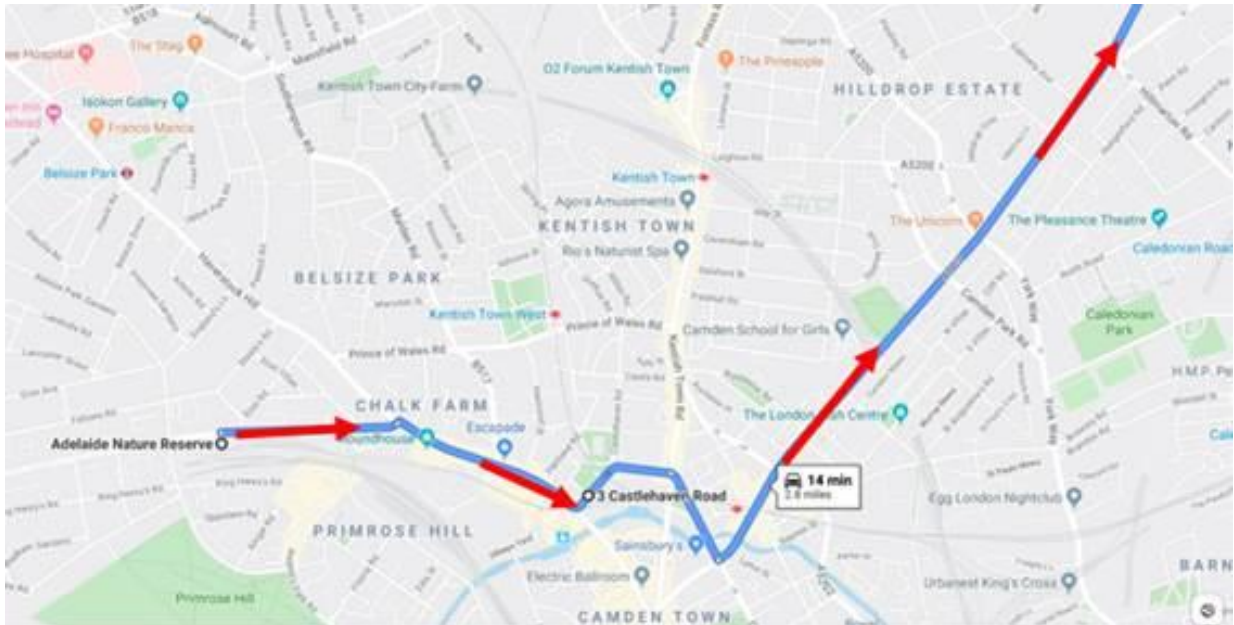


Figure 13A: Adelaide Road worksite – Route B egress

8.29 Adelaide Road Worksite, Route C – This proposes access to the site from the TLRN and Adelaide Road, egress from the site would be via B509 Adelaide Rd – A502 Chalk Farm Rd – Castlehaven Road/Hawley Road – A400 Camden Street – Crowndale Rd – Midland Rd - TLRN. See figure 14 below:

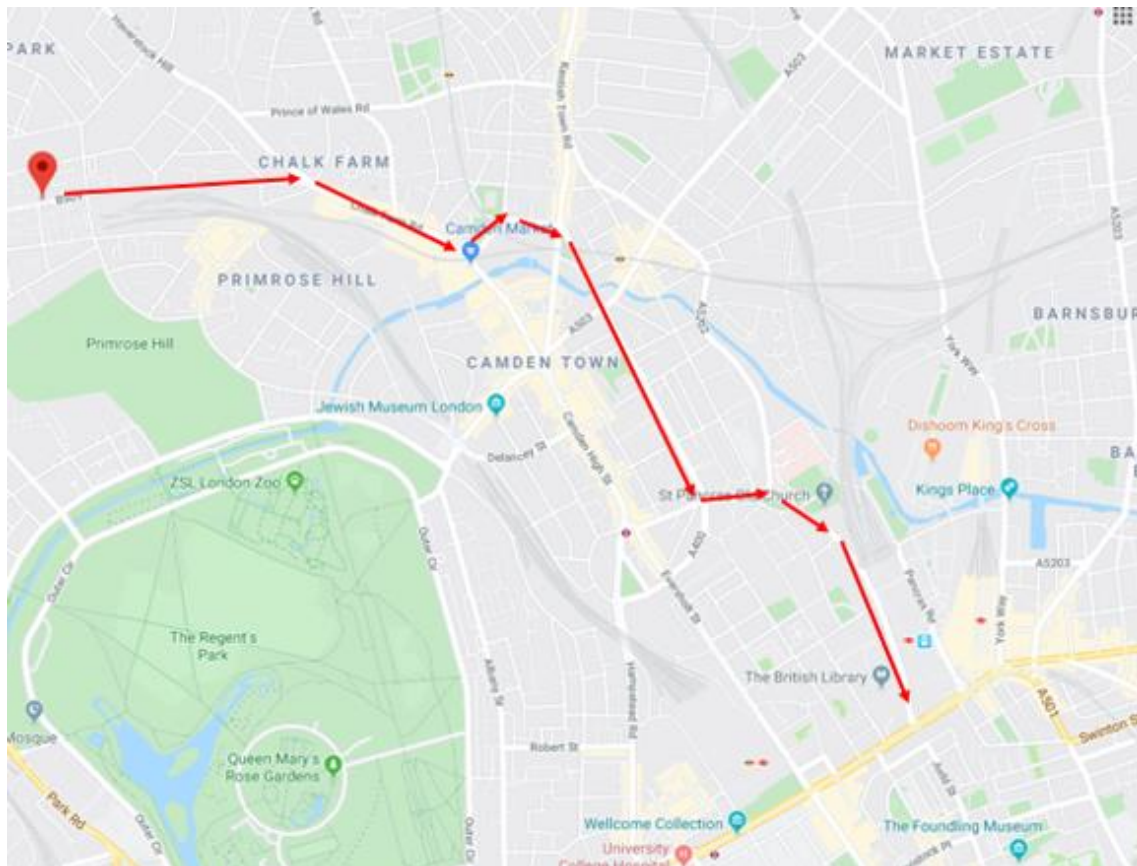


Figure 14: Adelaide Road worksite – Route C

8.30 Adelaide Road Worksite, Route D – Council Officers have suggested that vehicles approach the site from the west travelling along Adelaide Road from the A41 TLRN. Vehicles leaving the site will proceed eastward along Adelaide Road and then south towards Euston Road (TLRN), any vehicles needing to travel east on Euston Rd should use the Osnaburgh St gyratory, following the route below:

8.31 B509 Adelaide Rd – A502 Chalk Farm Rd – Castlehaven Road/Hawley Road – A400 Camden Street – A400 Camden Street (TLRN) – A400 Oakley Square (TLRN) – A400 Lidlington Place (TLRN) – A400 Hampstead Road (TLRN), Euston Rd (TLRN), (and if subsequently needing to travel east on Euston Rd, travel via the Osnaburgh St gyratory, namely Great Portland St, Albany St, Osnaburgh Terrace, Osnaburgh St, Euston Rd).

8.32 During the period where Hampstead Road Bridge (during phase 4, discussed later in the report) is closed, the proposed route would be:

8.33 B509 Adelaide Rd – A502 Chalk Farm Rd – Castlehaven Road/Hawley Road – A400 Camden Street – A400 Camden Street (TLRN) – A400 Oakley Square (TLRN) – A4200 Eversholt Street – A4200 Grafton Place – A4200 Churchway – A501 Euston Road (TLRN). See figure 15 below:

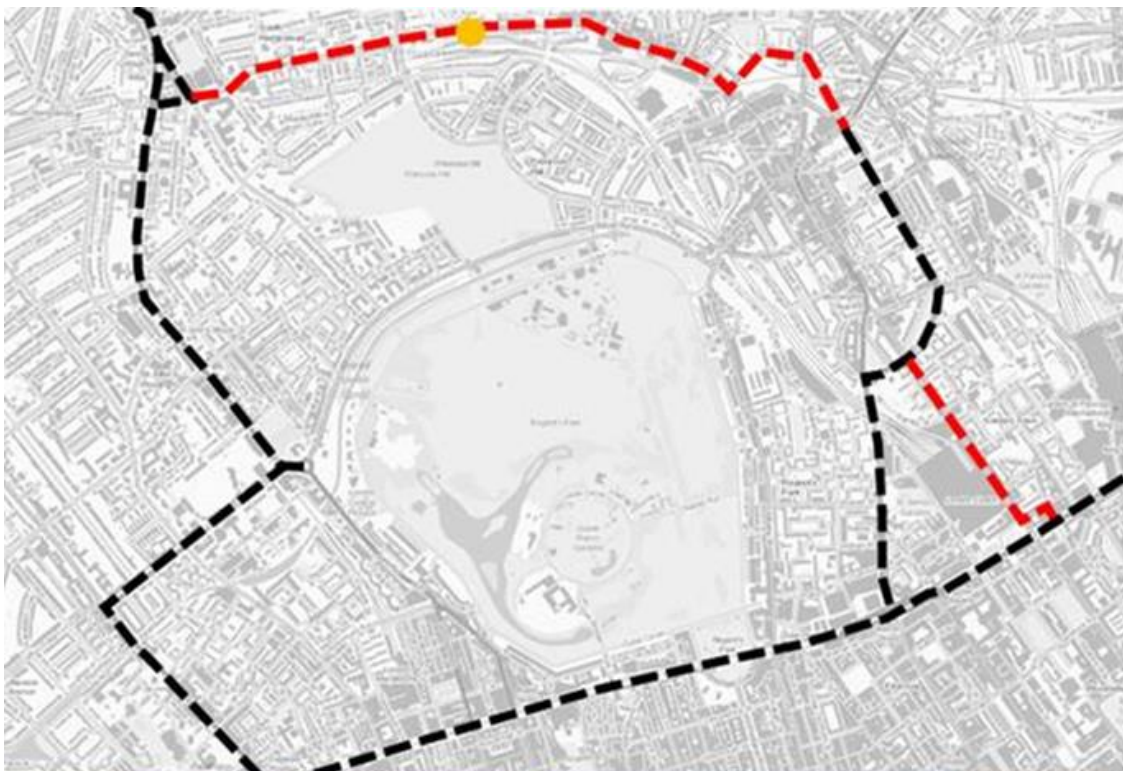


Figure 15: Adelaide Road worksite – Route D

#### Disqualification of Routes B and C

8.34 Route B was discounted as TfL have recently consulted on and are planning to implement the prohibition of a left turn from A400 Camden Street to A503 Camden Road (TLRN). This would mean vehicles are unable to follow the proposed Route B as this left turn would be required as part of the route.

- 8.35 Route C was rejected by HS2 as junction works are required at the Camden Street/Crowndale Road junction. These works included moving stop lines and signal heads, to allow LGVs to turn left from Camden Street on to Crowndale Road which was required as part of the route.
- 8.36 The discussion on Route C was not pursued, as during discussion it became apparent that HS2 favoured Route D as an option, which appeared a feasible option worthy of further consideration for both parties (albeit that HS2 maintained their preference for Route A, which officers consider would have prejudicial effect on road safety, as referred to above).
- 8.37 Route C is considered preferable as an egress route, as it avoids the heart of Camden Town Centre with the ensuing issues of safety and amenity issues to the Town Centre mentioned above. It does not have the high footfall levels of Camden High St and has lower casualty risks, evidenced by lower casualty figures than Camden High St route. Route C does provide a swift route on to the TLRN at Camden St, which is a generally agreed principle with HS2. However, as HS2 have highlighted, it does pass a number of schools and for this reason the Council would seek a condition being used by HS2 construction vehicles to use best reasonable endeavours using this egress route during school pick up and drop times by planning condition.
- 8.38 This led to two routes being discounted because in one case the entirety of the route would no longer be available (Route B) or were not preferred by HS2.

#### Assessment of Route D

- 8.39 Vehicles using this proposed egress route route would avoid Camden High Street in its entirety. Thereby avoiding the heart of Camden Town Centre and the problems set out above in relation to road safety.
- 8.40 The Council's records of accidents on this route are significantly lower than route A, as one might expect, given that it avoids Camden High St in the heart of Camden Town Centre with its high footfall and more likely conflicts between pedestrians and cyclists with motorised vehicles. The map below shows the differences in Route A and Route D.



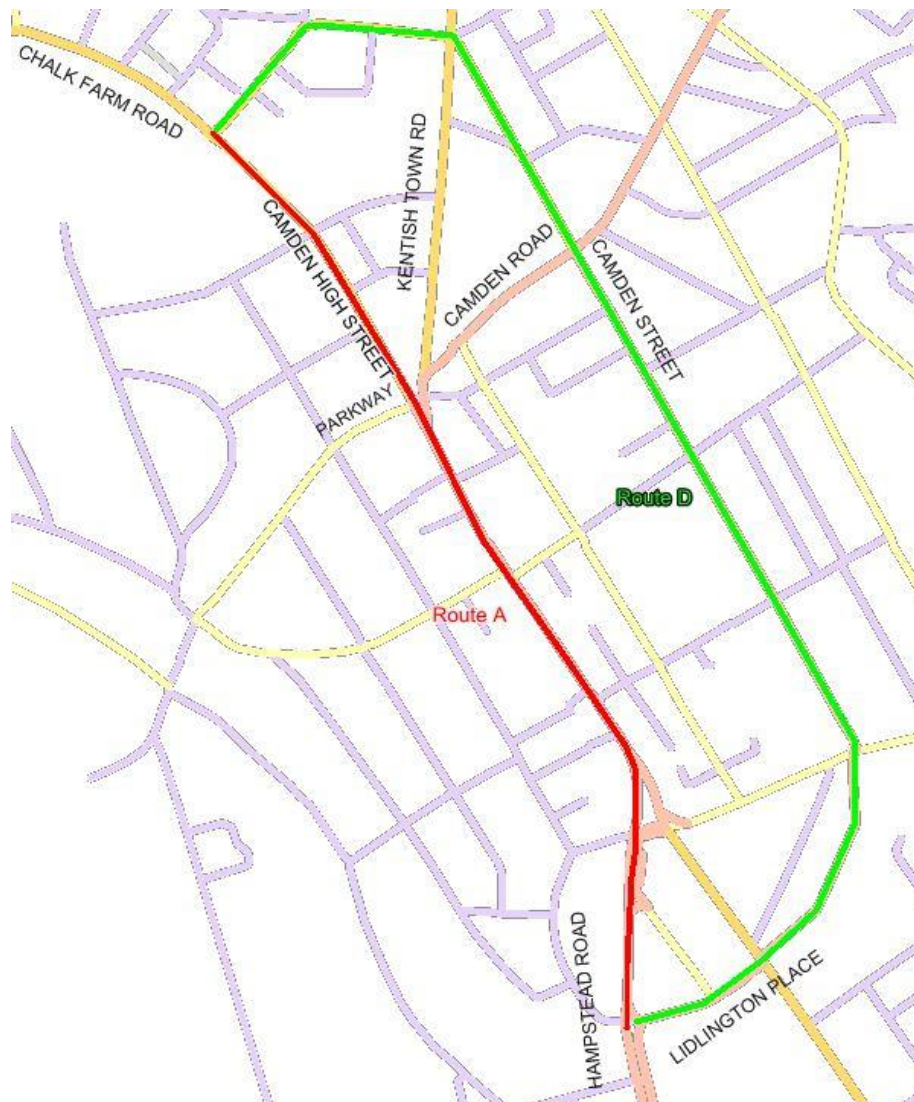


Figure 16: Map of Route A and Route D through and around Camden Town

8.41 As discussed above, collision data from January 2016 to December 2018, there were 76 recorded casualties between the Hampstead Road/Lidlington Place junction and the Camden High Street/Chalk Farm Road/Castlehaven Road, shown marked in red as Route A. These collisions include 36 pedestrian casualties, 20 of which are on Camden High Street north, and 22 cyclists casualties. By comparison, collision data for Route D (shown in green) for the same period shows 60 collisions, including 13 pedestrian casualties and 15 cyclist casualties.

8.42 This route also provides a direct route on to the TLRN at Camden St via the Camden Strategic Road Network (or SRN, which is the northern part of Camden Street). Officers have agreed with HS2 that the Council would normally seek to direct HS2 construction traffic as swiftly as possible to these highest ranked roads as a matter of guiding principle, (and the SRN where the TLRN is not available), as they are the traffic most suited to high volumes of traffic and to the largest vehicles, such as LGV's.

- 8.43 The route to access the site would be from the west on Adelaide Rd and neither HS2 nor the Council would have objections to such an access route in principle, as far as officers are aware.
- 8.44 It is recognised that, as a consequence of the location of the worksite being situated to the south of Adelaide Rd, LGV's would need to cross a lane of westbound traffic in order to access and egress the site. It is not uncommon, however, for construction sites to need to cross a lane of traffic in order to access or egress a worksite which is capable of being addressed by traffic management arrangements such as signals and/or the use of marshals. In the view of officers, this is not a matter that should dictate which LGV's should be required to access or egress the worksite in light of the overall route considerations.
- 8.45 HS2 drew attention to a number of new sensitive receptors near egress Route D, comprising three primary schools, two public gardens and another area of open space, two places of worship, three social services/community centres and a working men's college. However, of these, all but Castlehaven Open Space and Hawley Primary School are located adjacent to the TLRN or SRN. Camden is a high density inner city area and such sensitive receptors are sometimes located next to major roads that have high volumes of traffic. Officers have sought HS2's agreement to a condition which would prevent HS2 LGV's from using the egress route for an hour during school drop off and pick up times during school term times. The purpose of such a condition would be in reduce prejudicial effects on road safety, in particular to school children.
- 8.46 In the overall circumstances, it is not considered that the existence of these sensitive receptors, which are generally close to major roads with existing high traffic volumes, would preclude Route D from being an appropriate alternative route with the recommended condition attached to mitigate dangers to school children at times of their arrival and departure from school.

#### Use of Conditions

- 8.47 It has been considered as part of this process whether the route could be modified instead by the imposition of conditions to be agreed by HS2. Whilst this option has been explored, The Council's officers considered that the change from the proposed Route A to the proposed Route D, would fundamentally and materially alter the substance of the application and deprive those consulted of an opportunity to make comments on Route D. The officers therefore consider that the proposed route could not be amended via condition. However, if on appeal, a view was taken that such a condition was capable of being imposed, and if HS2 agreed to its imposition, a condition which required Route D to be followed, combined with a condition restricting LGV movements at school drop off and pick up times, would reduce prejudicial effects on road safety. In addition, a condition preventing the use of Eversholt Street would also be required in order to prevent prejudicial effects on road safety and on the free flow of traffic in the local area. The conditions suggested by the Council are numbers (7) to (11) inclusive on the list attached to this report.

8.48 It is the view of officers that the arrangements put forward by HS2 Ltd in relation to routes to and from the Adelaide Road worksite ought to be modified to reduce prejudicial effects on road safety and that they are reasonably capable of being so modified by following Route D.

## **9. EUSTON APPROACHES WORKSITE**

9.1 The application proposes lorry route access and egress from the Adelaide Road worksite; this is described in full in section 3 of this report.

9.2 The Council can only consider S17 applications within the constraints of the HS2 Act. The Council must consider whether the arrangements proposed ought to be modified to:

- a) Preserve the local environment or amenity;
- b) Prevent or reduce prejudicial effects on road safety or on the free flow of traffic in the local area; or
- c) To preserve a site of archaeological or historic interest or nature conservation value;

and whether the arrangements are reasonably capable of being so modified.

### The Proposed Route

9.3 The Euston approaches worksite has four entrances being utilised at different times during four different phases predicted from 2020-2026. This has been detailed in full in Section 3 of this report.

9.4 The Written Statement submitted by HS2 Ltd in support of the application (paragraph 3.7.39) states that the excavation, removal of excavated material, and construction activities at the Euston Approaches worksite are scheduled to take place between Q1 2020 and Q4 2024.

### Assessment of the Route

9.5 HS2 has proposed a complex set of arrangements across four phases of the Main Works, as set out in appendix 3 of the Camden S1 Main Works Local Traffic Management Plan (henceforth referred to as the 'LTMP', for ease of reference).

9.6 The Council has received a large number of objections from residents of the Regent's Park Estate who are understandably concerned about the impact upon the amenities and road safety of a potentially high number of vehicles accessing via minor roads passing through the Regent's Park Estate (RPE) and especially the dangers posed to vulnerable sectors of the population such as school children. The catchment area for Netley School covers the RPE for example.

9.7 For these reasons, officers have sought clarity regarding the times, durations and numbers of vehicles using the RPE. Officers have suggested the establishment of a stakeholder group to identify means of reducing the numbers of vehicles using Camden's roads (especially on the Regent's Park Estate) and their impacts.

- 9.8 The discussions to date regarding the maximisation of the use of haul routes to provide access to Hampstead Rd are appreciated and officers are of the view that continuation of this dialogue would be beneficial. However, the Council needs clearer commitments from HS2 regarding the periods when the use of roads on the RPE would actually be used and would not be used and on what basis before officers can advise the Council to agree to the use of routes on RPE.
- 9.9 With regard to reducing impacts, officers are of the view that only exceptional access (no egress) should be allowed to the Euston Approaches construction compound via RPE during school pick up and drop off times, and that this shall be via Park Village East, in order to minimise conflicts with school children accessing Netley School at these times (unless with the prior written consent of the Council). This would prevent HS2 LGV's from using Robert St and Stanhope St. These roads are close to Netley Primary School and are used by school children as important walking routes in the catchment area to gain access to the school. These roads are listed as 'local roads' in the Council's Network Management Plan which states that these roads should only be used by Heavy Goods Vehicles for essential deliveries. This document also states that 'Pedestrian movements are also relatively important in 'residential areas' based around 'Local' roads, which are not suitable for freight use save for local access.' The disproportionate incidence of heavy goods vehicles in KSI collisions with pedestrians in London is highlighted above. The sharing of these local roads with school children at school drop off and departure times therefore represents a significant road safety danger to these vulnerable road users.
- 9.10 HS2 has explained that it requires access for concrete vehicles at these times for potential concrete pours and in recognition of this, officers have suggested an alternative route that would allow access only via a route on Park Village East, that would minimise the conflict between HS2 LGV's and children, as it is at the periphery of Netley School's catchment area. Furthermore, officers consider that no such exceptional urgency exists for the need for vehicles to egress the worksite at these times. Therefore, the Council has recommended a condition to this effect. The suggested condition allows for exceptions with prior written agreements from the Council. Such exceptional circumstances would be judged in more detail at the relevant time, but which might, for example, include circumstances if the route on Park Village East were not available.
- 9.11 In 2018, The London Mayor also has produced a report on Air Quality as part of its School Air Quality Audit Programme. This made a series of key recommendations to improve the poor air quality for the benefit of children attending Netley School, including matters relating to vehicle emissions, especially at school drop off and pick up times; introduction of school streets to improve road safety for children; retiming of deliveries to any nearby construction sites to off-peak periods; various measures to reduce emissions from vehicles at/travelling to or from construction sites; adoption of a Healthy Streets approach to reallocate local road space from vehicular traffic to more sustainable transport modes and reduce congestion while making the area a greener more pleasant place to live with improved air quality.

- 9.12 Officers acknowledge that absolute accident figures for collisions on RPE are currently low, however this reflects the low traffic levels, which includes low levels of Heavy Goods Vehicles and the success of the Council's traffic calming measures that have been implemented on RPE. The Council also recognises the measures being taken by HS2 in securing vehicles to Euro VI standard and using an advisory 10 mph speed limit for roads on the Regent's Park Estate outlined in the Camden Sector 1 Main Works LTMP.
- 9.13 The Council secured an assurance for the transportation of materials by rail during the Select Committee process which included investigation of establishment of a railhead at the site in the area now usually referred to as the former DB Cargo carriageway sidings (which has become part of the Euston Approaches worksite). This investigation has since been concluded by HS2, where the Secretary of State accepted the recommendation that it was not feasible to establish a railhead at this location (unlike the railhead planned at Euston Station itself). As a consequence, it is currently anticipated that all materials will be carried to and from the Euston Approaches worksite by road. This means of transport was assumed in the Environmental Statement as a so-called worst case scenario, albeit that contractor estimates predict lower levels of construction traffic generation than the worst case scenario assumed in the Environmental Statement and that HS2 have a general commitment to seek to reduce the impacts of the construction of HS2, where reasonably practicable.
- 9.14 Notwithstanding these matters, the numbers of vehicles proposing to use the Euston Approaches worksite and thus potentially able to use the local roads on the proposed routes via the Regent's Park Estate remain high. However, HS2 are only required to avoid exceeding the relevant significant impact levels set out in the worst case scenario of the Environmental Statement (HS2 have pointed out that they are not required under the Act to indicate numbers anticipated to use individual roads, such as those on the Regent's Park Estate, and have declined to do so).
- 9.15 The Council accepts that HS2 needs to gain access to the Euston Approaches worksite in order to complete the Main Works authorised by the HS2 Act and that, under the proposals set out, this will involve use of local roads on the Regent's Park Estate when there is no alternative. The Council has therefore framed conditions that work with the information provided by HS2 to ensure that the routes through RPE are modified to prevent use of these sensitive roads on the Regent's Park Estate any more than is essential under the Act, and where there is no alternative during this complex set of arrangements until the completion of S1 Main Works, which HS2 has advised are anticipated to be completed in 2026 in order to preserve local amenity and reduce prejudicial impacts on road safety.
- 9.16 The Council has therefore sought HS2's agreement to conditions that effectively require the use of:
- Haul routes on to Hampstead Rd where these are available,
  - Require that Robert St only be used in a westerly direction in order to reduce the impact of vehicles on that street,

- Limiting the use of HS2 LGV's to allow access only by lorries carrying concrete via Park Village East only during school pick up and drop off times (as discussed above).

9.17 These measures would be secured by conditions, if agreed by HS2.

9.18 The Council requested these changes within the LTMP, though HS2 refused to accommodate them. Camden is unable to issue a decision granting approval to the proposed routes to the Euston Approaches Worksite because HS2 have not made the amendments that officers have requested and have not given any indication that they are likely to accept our conditions.

9.19 Furthermore, Harrington Square is proposed as a route in the proposed list of routes, however contrary information is included in the Camden Sector 1 Main Works LTMP, which states that a right hand turn is proposed that would prevent the use of Harrington Square. It is understood that HS2 is currently in discussion with TfL to seek to secure the provision of a right turn from the proposed haul road entrance on to Hampstead Rd, as under existing arrangements this would not be possible. At present, any LGV's egressing any haul route onto Hampstead Road would therefore have to turn left heading north along Hampstead Rd and would need to use the Harrington Square gyratory in order to return to Euston Rd. These discussions have yet to conclude and it is unclear whether any measures to implement such a right hand turn would be capable of being carried out before the haul route on to Hampstead Rd could be installed and used by HS2 LGV's. There is no expectation that vehicles would use Camden High St to access or egress the Euston Approaches site.

9.20 In the circumstances, conditions have been suggested to HS2 to prevent the use of Harrington Square, unless a haul route were not available, in order to preserve local amenity for residents on Harrington Square.

9.21 A condition has been suggested to HS2 to prevent the use of Camden High St and Camden Rd west of the Camden St junction in order reduce prejudicial impacts on road safety in Camden Town Centre.

#### Prejudicial effect on the free-flow of traffic

9.22 Grafton Way is a one-way road, with traffic flowing westward from Gower Street to Tottenham Court Road. There is a signalled junction where Grafton Way meets Tottenham Court Road. This allows traffic heading west on Euston Road to turn off south along Gower Street, turn right along Grafton Way and right again onto Tottenham Court Road to head north up Hampstead Road.

9.23 Grafton Way originally featured two lanes (both flowing westward), however one lane was partially removed to include a pit lane for the University College of London Hospital (UCLH) construction site to the south of Grafton Way and, following the imminent completion of the West End Project, this section of the road will remain as a single westbound lane and introduce two way traffic on the Gower St part of the gyratory.

- 9.24 Officers are of the view that a further increase in the number of lorries using the gyratory associated with the HS2 enabling works, will have an adverse impact on the free flow of traffic along Grafton Way.
- 9.25 The junction of Grafton Way and Tottenham Court Road currently operates at close to capacity, with vehicles backing up along Grafton Way as far as Beaumont Place on occasions. There is a serious risk that if the queue from the junction of Grafton Way/Tottenham Court Road extends too far eastward back along Grafton Way, access to the entrance to the UCLH construction site (south off Grafton Way) and the A & E entrance for ambulances (north of Grafton Way) to UCL Hospital will be impeded.
- 9.26 Given the numbers of LGV's that are proposed to use the worksites, officers are of the view that the use of the Grafton Way as a primary route to access and/or egress the worksites at Euston Approaches or Adelaide Rd would have prejudicial effects on the free flow of traffic in the local area. A suitable alternative exists by using the Osnaburgh St gyratory, via Euston Rd, to access and egress these sites.
- 9.27 Officers have requested further details of the proposed flows of LGV's proposed to use these gyratories (as estimated LGV numbers are only given at the point that LGV's enter the worksites) to enable a more informed discussion. The Council suggested in its comments on the latest draft of the Camden Sector 1 LTMP in January 2020 that more detailed discussion would enable a dialogue about whether suitable mitigations could be proposed to address the Council's objections, both to the prejudicial impact on the free flow of traffic, and to prevent potentially blocking access to UCLH hospital A and E as a result of the arising congestion.
- 9.28 Regrettably, HS2 has not responded to this request and the Camden Sector 1 LTMP merely states that HS2 will be employing a Vehicle Management System. This general statement primarily relates to monitoring of vehicles as they enter and leave the worksites, rather than addressing in the LTMP proposed mitigations to address a particular issue of free flow of traffic on a HS2 LGV (again, as Camden reported in its comments on the LTMP). The LTMP also refers to co-ordination and assisting Camden, as highway authority, with its Network Management responsibilities, where reasonably practicable.
- 9.29 However, neither of these generalised statements provide a tangible remedy to overcome the likely impact on the free flow of traffic. No measures have been proposed by HS2 to overcome the specific concerns that officers have raised regarding the unacceptable prejudicial impacts of allowing an unsuitable route to be used by significant volumes of HS2 LGV traffic on the Grafton Way gyratory, thereby causing prejudicial impacts on the free flow of traffic. Officers remain willing to discuss this matter further and to discuss specific mitigations and commitments from targeted measures aimed specifically at preventing prejudicial impacts on the free flow of traffic on the gyratory routes.
- 9.30 The Osnaburgh gyratory is considered to be a suitable alternative that mainly comprises two lanes of traffic and is suited to major traffic, as it leads off and

back on to the TLRN. HS2 has provided no evidence to demonstrate whether the demand of its vehicles would exceed the capacity of the gyratory, indeed the Council is unable to establish from HS2 the numbers of their LGV's that would need to use this gyratory if the Grafton Way gyratory were not to be used. As stated in the preceding paragraph, officers would be willing to have an informed discussion regarding the proposed number of HS2 LGV's that would use the Grafton Way gyratory to understand whether the use of that gyratory by HS2 LGV's could avoid having prejudicial impacts on the free flow of traffic and any relevant mitigations that HS2 could use. However, HS2 has not responded positively to the Council's requests on this matter. Such discussions could involve reaching agreement as to whether the Grafton Way could be used as an alternative secondary route (to the primary use of the Osnaburgh St gyratory), if it was clear that mitigations would be used to prevent the free flow of traffic at the Grafton Way gyratory becoming prejudiced in such a scenario. Regrettably, such HS2 has not taken up Camden's offer to such discussions.

- 9.31 In the circumstances officers recommend that a condition be proposed which would secure that the Grafton Way gyratory would not be allowed to be used other than if the Osnaburgh St gyratory were not available. This is as flexible as possible, given the limitations of conditions as a mechanism of control. Officers recognise that more precise mitigation measures may be possible to be created following further exchange of information about measures that could be agreed to by HS2. However, such specific mitigation measures and commitments are not in place, therefore the Council cannot take them into account in making its decision on the acceptability of routes.
- 9.32 Officers have also requested that consideration be given to allowing HS2 LGV's travelling southbound to make a left hand turn from Hampstead Rd (southbound) on the Euston Rd slip road (eastbound). While the Council appreciates there are concerns that would need to be addressed by TfL (TfL have not ruled out such a change, but have set out matters that would need to be addressed), officers have repeatedly asked for a meeting to discuss this matter further with HS2 and TfL.
- 9.33 It is not anticipated that LGV's will use Eversholt St to access or egress the Euston Approaches worksite. However, this area is likely to be under increased traffic demand with potential for congestion that is likely to result in prejudicial effects on road safety and on the free flow of traffic in the local area during the construction of HS2 due to arrangements associated with HS2 construction, revised Network Rail servicing arrangements, limitations to access to Euston Station and displaced traffic from works to nearby areas of public highway. A condition should be imposed to prevent the use of Eversholt Street so as to prevent prejudicial effects on road safety and on the free flow of traffic.
- 9.34 The use of local roads by LGVs accessing and egressing HS2 worksites, including those on the Regents Park Estate will prejudice road safety. The use of other roads, such as Harrington Square will fail to preserve local amenity. In other cases, such as the use of the Grafton Way loop the use of roads by LGVs will prejudice the free flow of traffic in the local area. The use of such roads by LGVs accessing and egressing the worksites can only be justified when there



are no reasonable alternatives (or to use the words from paragraph 6 of Schedule 17, when the routes are not reasonably capable of being modified) and for such period as the worksites are required for HS2 purposes. HS2 Ltd have estimated the time period over which the works will continue. To allow the routes to be used for a longer period than that for which HS2 estimate they are required would prejudice road safety, prejudice the free flow of traffic and fail to preserve local amenity. Further officers are of the view that the arrangements are reasonably capable of being modified by limiting the period over which LGVs can use the specified roads, as the time limit is based on HS2's own estimates. For those reasons officers, on behalf of the Council, put forward a time limiting condition (suggested condition (10)).

#### Archaeological or historic interest or nature conservation value

- 9.35 Existing safeguarding measures regarding archaeological interest, ground movement, settlement and the structural stability of buildings and nature conservation have been previously outlined within this report. Given these existing safeguarding measures, there are no outstanding additional issues in regard to the archaeological or historic interest or nature conservation value which would warrant grounds for refusal on this issue.

#### The proposed route

- 9.36 The route for the Euston Approaches worksite is considered acceptable, subject to the imposition of conditions
- 1) Restricting the use of the Grafton Way gyratory in order to reduce prejudicial effects on the free flow of traffic (condition (11)),
  - 2) Restricting the use of roads on the Regents Park Estate in order to preserve local amenity and reduced prejudicial effects on road safety (conditions (1) to (4) inclusive)
  - 3) Restricting the use of Harrington Square in order to preserve local amenity (condition (6)).
  - 4) Preventing the use of Eversholt Street (condition (5)).
  - 5) Limiting the use of the routes to the time period when the worksites are due to be in operation (condition (10)).

#### Use of Conditions

- 9.37 Conditions such as those referenced above could only be imposed with the prior agreement of HS2.
- 9.38 Conditions were discussed with HS2 throughout the application process. The wording of suggested conditions was sent to HS2 Ltd on 22 April 2020. The list of suggested conditions is attached as Appendix 1 to this report. Hs2 failed to respond to the Council's suggested conditions.

## **10. Equality Act 2010**

- 10.1 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment,

pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. The Duty requires due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Having due regard to the Public Sector Equality Duty, it is recognised that the current application would have a greater impact on third parties whom are elderly or disabled, two protected characteristics, than would otherwise be the case.

10.2 Whilst it is acknowledged that the application shall be refused, should the application have been recommended for approval, the proposed development would facilitate the delivery of HS2, a national infrastructure project. The benefits arising from HS2 and associated development would warrant the approval of this application, and would not be outweighed by the equality impact.

## **11. CONCLUSION**

11.1 The proposed routes are considered unacceptable for use by HS2 associated LGVs to facilitate main works at the Adelaide Road and Euston Approaches worksites.

11.2 Officers are of the view that for the Adelaide Road worksite, the route proposed (Route A) would cause prejudicial effects on road safety and is reasonably capable of being modified by adopting Route D. Route D would move routes away from Camden Town Centre and reduce prejudicial effects on road safety.

11.3 In order to preserve local amenity and/or to prevent or reduce prejudicial effects on road safety on the proposed routes to the Euston Approaches worksite, particularly (though not exclusively) within the Regent's Park Estate, conditions could be imposed. HS2 Ltd has not agreed to the imposition of conditions, and as a result the proposed route will result in harm to local amenity and to a prejudicial effect on road safety. In addition, in the absence of a condition restricting use of the Grafton Way gyratory, the proposed routes will have a prejudicial effect on the free flow of traffic in the local area.

11.4 For these reasons, it is the view of officers that, had they been in a position to do so, the Council as the Local Planning Authority & Qualifying Authority within the meaning of the High Speed Rail (London - West Midlands) Act 2017, should have refused consent for the Schedule 17 Lorry Routes application.

## **12. RECOMMENDATION**

12.1 The Council as the Local Planning Authority & Qualifying Authority within the meaning of the High Speed Rail (London - West Midlands) Act 2017 resolve that, had the application not been appealed for non-determination, they would have refused to approve the arrangements proposed by SCS on behalf of HS2 Ltd for the following reasons:

(1) The routes proposed for access to and egress from the Adelaide Road worksite would give rise to prejudicial effects on road safety in Camden High

Street, and the arrangements ought to be, and are reasonably capable of being, modified by adopting Route D in place of Route A.

- (2) In the absence of a condition (11) on the attached list restricting the use of the Grafton Way gyratory, the routes proposed to access to and egress from the Euston Approaches worksite would give rise to a prejudicial effect on the free flow of traffic in the local area.
- (3) In the absence of conditions (1) to (4) inclusive on the attached list restricting the use of roads on the Regents Park Estate at particular times and for particular purposes, the routes proposed to access and egress the Euston Approaches worksite would fail to preserve local amenity, and give rise to a prejudicial effect on road safety.
- (4) In the absence of condition (5) on the attached list preventing LGVs from using Eversholt Street the routes proposed to access and egress the Euston Approaches worksite would give rise to a prejudicial effect on road safety and on the free flow of traffic in the local area.
- (5) In the absence of condition (6) on the attached list which provide that, in the event that a right turn is available from the Euston Approaches worksite on to Hampstead Road, no LGV may use Harrington Square, the routes proposed to access and egress the Euston Approaches worksite would fail to preserve local amenity.
- (6) In the absence of condition (10) on the attached list use of the routes when the worksites are not anticipated to be in use would fail to preserve local amenity and would have prejudicial effects on road safety and the free flow of traffic.

12.2 The conditions suggested by the Council are set out in the list appended to this report.

## **APPENDIX 1 CONDITIONS**

### **Euston Approaches**

1. No large goods vehicles (“LGVs”) shall transport anything to or from the Euston Approaches worksite/s using the following highways on the Regents Park Estate (namely, Stanhope Street, Robert Street) unless those LGVs are unable (whether as a result of weight restrictions or closure) to access and egress the Euston Approaches worksite/s using Granby Terrace Bridge or a haul road with access/egress directly on to Hampstead Road.
2. No large goods vehicles shall transport anything to or from the Euston Approaches worksite/s using the following highways within the Regents Park Estate (namely, Stanhope Street and Robert Street) at school drop off and pick up times (8.30-9.30am and 3.30-4.30pm), unless otherwise agreed in writing with the Local Planning Authority or otherwise directed to do so by temporary traffic diversions by the relevant highway authority.
3. Park Village East between the junction of Mornington Street and Stanhope Street shall not be used by LGVs to access or egress the Euston Approaches worksite/s other than by LGVs carrying concrete to (but not from) the worksite/s during school drop off and pick up times (8.30-9.30am and 3.30-4.30pm), unless otherwise previously agreed in writing with the Local Planning Authority or if otherwise directed to do so by temporary traffic diversions by the relevant highway authority.
4. Robert Street shall only be used westbound, unless otherwise agreed in writing with the Local Planning Authority or otherwise directed to do so by temporary traffic diversions by the relevant highway authority.
5. LGVs accessing or egressing the Euston Approaches worksite shall not use Eversholt Street, unless otherwise agreed in writing with the Local Planning Authority or if otherwise directed to do so by temporary traffic diversions by the relevant Highway Authority.
6. The Harrington Square gyratory shall only be used by vehicles egressing the Euston Approaches worksite in the eventuality that no right-hand turn is available to vehicles exiting the worksite onto Hampstead Road. If a right-hand turn is available, LGV’s egressing the Euston Approaches worksite shall only travel southbound on Hampstead Road.

### **Adelaide Road (Route D)**

7. No part of Camden High Street or Camden Road (west of its junction with Camden Street) shall be used by any LGVs, unless directed to do so by temporary traffic diversions put in place by the relevant Highway Authority.
8. LGVs shall only egress from Adelaide Road worksite in an eastbound direction and only in a south-eastern direction on Chalk Farm Road to permitted parts of

the TLRN and only outside of school drop off and pick up times (8.30-9.30am and 3.30-4.30pm), unless otherwise agreed in writing with the Local Planning Authority or otherwise directed to do so by temporary traffic diversions by the relevant highway authority.

9. LGVs leaving the Adelaide Road worksite are only permitted to use Eversholt Street when Hampstead Road is closed to through traffic, unless otherwise agreed in writing with the Local Planning Authority or if otherwise directed to do so by temporary traffic diversions by the relevant Highway Authority.

### **Both routes**

10. The lorry routes relating to the Euston Approaches and Adelaide Road worksites hereby approved under Schedule 17 of the HS2 Act are only to be used until 31 December 2026, unless otherwise previously agreed in writing by the Local Planning Authority.
11. No LGVs shall access and egress the Euston Approaches or Adelaide Rd worksite/s using the Grafton Way gyratory unless the highway forming the Osnaburgh St gyratory is closed or not open to traffic, in which case the Grafton Way gyratory may be used, but only during the period that the Osnaburgh Street gyratory is closed.

### **Informatives (15 and 16 requested by TfL)**

12. We would include an informative which sets out that the LTMP will be subject to on-going review during the life of the permission and that there is a commitment for them to continue to consider whether these remain the best routes available taking account of the need to minimise the impact on amenity and the transport network.
13. We would include an informative highlighting the working group which we are asking to be set up and which we would like to be enshrined in the LTMP.
14. You are advised that condition 2 prohibits LGVs from using local roads within the Regents Park Estate to access/egress the Euston Approaches worksite during school drop off and pick up times (8.30-9.30am and 3.30-4.30pm). The Council acknowledges that this restriction is not compatible with concrete deliveries, as you require a constant supply of concrete to be provided. Condition 3 prohibits LGVs using of Park Village East between the junction of Mornington Street and Stanhope Street to access/egress the Euston Approaches worksite. However, the condition provides an exception to allow those LGVs delivering concrete to (but not leaving) the Euston Approaches worksite to do so during school run times as this would provide a better alternative to use of other local roads that are likely to be used by school children arriving and departing local schools within the Regents Park Estate at these times. The conditions seek to minimise conflict between LGVs and school children to prevent road safety issues.

15. In accordance with assurances given by the Secretary of State, the applicant is reminded that HS2 Phase 1 Environmental Minimum Requirements must at all times be fully complied with in undertaking the works.
16. In accordance with Phase 1 Code of Construction Practice, the applicant must adhere to the control measures set out in the HS2 Phase 1 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.

## APPENDIX 2 CONSULTATION RESPONSES

Consultation responses were received from the following bodies, groups and stakeholders:

### Transport for London (TfL):

*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.*

*To strengthen this position we would 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 1 Environmental Minimum Requirements must at all times be fully complied with in undertaking the works.*

#### Construction traffic management

*In accordance with Phase 1 Code of Construction Practice, the applicant must adhere to the control measures set out in the HS2 Phase 1 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.*

*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 to discharge our respective statutory network management duties contained in the Traffic Management Act 2004.*

### London Borough of Barnet:

No response received

### London Borough of Brent:

*The London Borough of Brent, the Local Planning Authority, has considered the proposal and has NO OBJECTION.*

London Borough of Haringey:  
No response received

London Borough of Islington:  
No response received

City of London:  
No response received

City of Westminster:  
*The City Council has considered the proposals and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).*

### **Local groups/stakeholders**

#### **Camden Town District Management Committee (DMC):**

*As chair and on behalf of the Camden Town DMC whose catchment area includes most of Regent's Park ward and, I write to object to the above S17 application proposals on multiple health and safety grounds. I have worked over the past three years with other local representatives whose aim has been to reduce the negative impacts of HS2 enabling and main construction works. I fully support the contents of Regent's Park TRA's objection authored by my colleague, Steve Chrisofi, who has relevant technical qualifications and has supplied significant statistical evidence from reliable sources.*

*1300 residents housed in 13 blocks will have to live with huge HGVs continually driving up Stanhope Street and Robert Street. With a high density of ~500 persons per hectare several thousand more will live in close proximity.*

*Netley Primary School is just metres away from what will become an even more dangerous cross roads at the intersection of Robert Street with Stanhope Street. Additionally outdoor play provision for a nursery is located on the roof of premises on Stanhope Street.*

*Residents, particularly those living in Stanhope Street, Robert Street and adjacent streets are trapped in an unsafe and unhealthy environment. They have had their lives seriously negatively impacted for the past three years from HS2-related utility diversions and other enabling works, noise and dust from building replacement homes, disruption to pedestrian and vehicular routes, removal of parking facilities, increased air pollution, unprotected demolition of Ainsdale housing block. The latter demonstrates how little care HS2 have for the health and safety of residents.*

***It is therefore imperative that LBC and the planning committee use all and every means at their disposal to limit further future negative impacts on residents' health and safety. Any delays or cost increases of building HS2 are not the fault or responsibility of residents. HS2 should not be able to cite either additional costs or further delays to their schedule***



**compromising the health and safety of residents which should be paramount.**

Specific Requests

**Restriction of traffic and HGVs on estate and residential roads, especially through Regent's Park Estate.**

Commitment to 10mph restriction on all vehicles travelling along the lorry routes in Regent's Park Estate should be made obligatory and enforceable rather than a mitigation tool that might be considered/employed by HS2.

All HGVs, not just articulated juggernauts, should be routed and restricted to TLRN roads to and from the construction site (ie. Albany Street, Euston Road, Hampstead Road, Robert Street east and Stanhope Street. HGVs should be banned from using Robert Street (west) - except for home and retail deliveries and essential services - in both directions between Stanhope Street Junction and Albany Street to prevent this being used as a short cut for lorries.

Once Park Village East reopens to through traffic there are likely to also be significant volumes of traffic that would have used the now closed Granby Terrace Bridge on to Hampstead Road Bridge to travel south which unless prevented from doing so are likely to add significant additional vehicles through Regent's Park estate using Robert Street unless prevented from doing so.

**Retail/commercial units on Stanhope Street**

The Shops and public house in Stanhope Parade have suffered considerable reduction in business due to disruptions and diversions.

This clearly affects the viability and livelihoods of commercial premises and their proprietors.

Additionally their closure would cause a significant loss of convenience stores and an affordable social facility and meeting place in the pub and garden. The shops and pub are needed more than ever for the duration of HS2 construction as RPE communities are more isolated and cut off from other retail opportunities due to diversions/road closures and impending bus stop closures. Is there anything LBC could do to prevent business closures and loss of retail amenities via planning conditions?

**Loss of residents parking**

Significant numbers of residents on-street estate parking spaces have been sequestered causing problems in shortage of convenient supply. Some parking meters too have been acquisitioned. Residents were able to park free of charge at meters in the evening and overnight. Loss of parking on the lorry routes is long term.

**An equivalent number of current metered parking should be made available free of charge to those losing spaces due to HS2**

**Proposed signaled right turn from Robert Street into Hampstead Road and requirement for a comprehensive study of increased volumes of traffic including mega-trucks at this junction and potential for accidents.**

This proposal solves the otherwise long loop via Harrington Square otherwise required. However, the proposed right hand though welcome in some ways brings concerns regarding congestion and pollution from queuing and idling vehicles. Furthermore, the design raises safety concerns for pedestrians and

cyclists. Since enabling works began the number of accidents at this junction has increased with cyclists being particularly at risk. It is felt that increasing the volume of traffic including an HGVs every two minutes during peak flow will make this junction a potential accident black spot.

**We urge that prior to any proposed HS2 application being considered a study should be undertaken to detail increases in traffic and assessment of safety of putting in place the proposed signaled junction of Robert Street with Hampstead Road.**

### **Materials by Rail.**

We understand that exporting spoil via rail applies only in connection with the building of HS2 and not the construction of the station. It is difficult to see how expanding the number of rail tracks into Euston on the scale envisaged can be constructed without rebuild/adapting Euston station which is therefore an integral part of the whole project.

All demolitions to date (with the possible exception of several immediately adjacent to the station) have been explicitly for the purpose of widening the cutting approach into Euston entirely HS2-construction related.

### **Transport of materials and spoil without rail**

*It beggars belief that:*

- Railway sidings have been demolished to accommodate the temporary storage of spoil generated above ground.
- Spoil is loaded on to lorries at ground level where it is generated
- Loaded trucks and then driven via a ramp and dumped on the cutting floor
- This then releases an empty lorry to drive up the ramp to ground level.
- Process 2-4 is then repeated for as long as required.
- For onward journey the spoil is then subsequently re-loaded on to mega-sized juggernauts to haul the spoil up from the cutting floor to ground level (where it was generated)
- Once the operation is 'flowing smoothly' mega trucks will then form a lorry-convoy which at peak frequency will match off-peak Victoria Line tube frequency, ie, one every two minutes
- The severe level of disruption and negative impacts will damage the quality of life, health and safety of local residents and add to the risk of road accidents in the process
- Having navigated their way through narrow residential streets and reached Hampstead Road trucks will travel south (by whatever route available at the time) the juggernauts begin using the most convoluted route possible to Destination Unknown where they will discharge their cargo.
- This route includes the tight circum-navigating of a busy hospital
- Adding to the dangers inherent in an already complex and scary junction for pedestrians
- Having returned to Euston Road, trucks will then travel half a mile west using a residential street to effect 180° change of direction to head back the way they had come filtering into and adding hugely to the

heavily congested traffic on the Euston Road and travel eastwards to somewhere east of London.

***Harrington Square Loop considered significant safety risk***

*There is also concern about huge mega juggernauts using the Harrington Square loop which will add to congestion and delays, probable loss of yet more resident parking. Crucially concerns arise mainly on grounds of safety. In particular large juggernauts negotiating the severe angle at the northern apex of Harrington Square to join southbound traffic. The articulated trucks will be more dangerous due to cyclists and pedestrians because of their rear axles cutting using a much tighter arc when turning and the acute angle of travel.*

***ES Worst case scenario***

*The number of lorries quoted as required to use residential streets was referred to in the Environmental Statement as ‘the worst case scenario’. Are we facing this imminently even before main works have commenced?*

***Residential roads not built to accommodate proposed juggernaut tonnage and loads. Full Risk Assessment and Emergency Plan accessible to public should be required prior to granting application.***

*No account appears to have been taken about potential damage to infrastructure of roads or utilities. Neither estate roads nor Harrington Square were built to withstand proposed tonnage of HGVs and loads. Given the experience of Eversholt Street it is not impossible for some major event to occur. Is there a risk assessment to deal with flooding, road collapse or other major event?*

***Need for clear timetable of access routes to Hampstead Road***

*It is unclear when the agreed haul road will be completed and for how long it will be operational as this will eventually be subsumed into the expended cutting.*

*Nor is it clear what arrangements will be in place to extend/rebuild Granby Terrace Bridge and excavate beneath it.*

*Furthermore, it is unclear how both these issues will impact removal of spoil by road.*

***Granby Terrace rebuild/extension should trigger provision of Materials by Rail***

*Though subsumed into enabling works, the replacement/extension of Granby Terrace Bridge is part and parcel of HS2 construction and should trigger the 15% spoil by rail commitment.*

*Surely it cannot be beyond the wit of man to construct a single track located north of GTB could be built to carry excavated earth away by rail before any tunneling commitment is commenced. Even if it was only operational for a year or so it would provide massive desperately needed respite for residents in Regent’s Park Estate. Please can this be explored.*

*Until all the above questions are answered and a clear gant chart produced with forecast timing and impacts on spoil removal we believe it is premature to give consent to this Section 17 HS2 application.*

**We consider this S17 planning applications is premature and should not be heard until further information is available and a range of issues solved.**

**Please defer this planning application until such times as supplementary information is to hand.**

CHARGE – (Camden HS2 Association of Residents' Groups for Engagement):

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.*

University College London Hospitals NHS Foundation Trust (UCLH):

*Whilst UCLH supports projects of national significance, we need to ensure that we mitigate the risks to the hospital and our patients and would like to put a holding objection on the application pending further dialogue with HS2 to clarify the following:*

- The daily volume and numbers per hour of vehicles using the Grafton loop
- Measures to mitigate the use of the Grafton Loop
- Assurance that the additional vehicle movements will not cause congestion on the top part of Gower Street once Gower Street goes 2 way as a result of the West End Project
- Assurance that there will be no material impact on blue light, patient transport or pedestrian traffic to UCH campus having regard to the recent opening of UCLH Phase 5 and the Autumn 2020 opening of UCLH Phase 4.

New Age Project (Charity working with older people within the Regent's Park Estate):

*We are a local charity working with over 400 local older people with our centre based at Cumberland Market on the Regent's Park Estate. Each week up to 300 older people attend our centre to take part in organised activities and receive support from our staff. Our service users used Stanhope Street and Robert Street to access our centre each weekday and are already experiencing difficulties due to current road and footpath closures, temporary changes in vehicular and pedestrian, numerous pavement obstacles and the moving or closing of local bus stops on both Hampstead Road and Albany Street.*

*The proposal to send large volumes of construction traffic along Stanhope Street and Robert Street in the middle of the estate would make these problems considerably worse. Older people are particularly vulnerable to the effects of air pollution and particularly vulnerable to road accidents. We are therefore very concerned about the risks to their health from increase air pollution and the risks to their safety due to the number of lorries being driven along residential streets which were never designed to cope with such traffic.*

*We are also deeply concerned that the level of increased heavy traffic would become a major deterrence for older residents in leaving their homes and so increase the already high levels of social isolation and loneliness (the Regent's Park Estate attains among the highest risk factors for acute loneliness among older residents in the borough).*

*We ask you to please explore as a matter of urgency alternatives such as a dedicated haulage road from Granby Terrace worksite directly onto Hampstead Road across an existing bridge and reject this application to use unsuitable residential streets.*

#### Camden Town Urban Improvement Society:

*While this costly HS2 project is clearly seen by many, if not by everybody in Camden and elsewhere, except by Lord Andrew Adonis of Camden, as totally unnecessary, a glance at the details provided here by the joint developers informs me that it has been prepared based on outdated traffic direction.*

*Please look at the proposed use of the existing one-way system (in clockwork direction) of Hampstead Road into Euston Road east wards then Gower Street and Tottenham Court Road going North. Then turn left into Euston Road for westward travel.*

*If the joint developers were aware of the actual road signage round this area, none of the damaging circuitous route needs to be used at all since traffic from Hampstead Road is allowed to turn 'right' into Euston Road, going West. Said enough? A need for a traffic aware cartographer?*

*Further, if lorries from Hampstead Road wish to turn left into Euston Road going East, all the joint developers need to do is to persuade TfL to place a sign (straight ahead except HS2 Lorries and buses on diversion) on the junction. The failure of such a sign on this junction and some appropriate new kerb line configuration for buses on diversion, eg bus 168, 253 makes a bus route a*

*mockery of skilled Urban Planning for traffic...in case of diversionary route demand.*

Netley Primary School Governing Body:

*The current proposal is for Stanhope Street to be used as a haul Rd for three years without any regard for this massive impact on local residents. This impact has not been estimated, nor mitigated, and it is additional to the current massive impacts on residents on the estate.*

*In particular, regard must be given to the children on the estate, who will be put at risk from the HGVs, and further pollution, which already impacts on their health and well-being. Not only are they imprisoned in a construction site, there is this proposal to add to the cumulative effects.*

*Already HS2 causes reducing enrolment in the area, particularly for Netley, and these proposals further reduce the likelihood that families will want their children in addition to be exposed to the pollution and danger proposed for residential streets.*

*We understand that HS2 has a problem in getting spoil out, but this is a problem of their own making due to allowing their timescale to slip. Spoil should be taken directly onto the Hampstead Rd, but their problem is they haven't yet demolished Silverdale and the other buildings.*

*However, it is not acceptable to inflict additional noise, pollution, vibration and danger on the local residents instead. The obvious solution is for them to reschedule, taking the burden on themselves, and use Granby Bridge terrace.*

*The hybrid bill of February 2017 gave HS2 excessively wide reaching powers which in this instance they are abusing to save themselves money, to the detriment of the local community.*

*We look to Camden Council to honour and defend the assurances they were given in the petitioning process in the commons. They must defend the vulnerable from the danger of a heavy goods vehicle every three minutes down the middle of a residential estate, with up to seven thousand at risk including a thousand children under the age of eleven walking daily to schools and nursery.*

*Camden withdrew their petition in exchange for those assurances, and none of ours were granted using the excuse that the council has received the assurances that safeguard our families and children. We therefore look to Camden to refuse this planning application and require HS2 to think again and make a better plan that safeguards the residents.*

Other Third Parties:

A total of 46 site notices were erected on 25/09/2019 (expiring on 19/10/2019) at regular intervals along the proposed lorry routes.



A press notice was published on 26/09/2019 (expiring on 20/10/2019).

In accordance with the Statement of Community Involvement (SCI), Camden no longer sends neighbour notification letters about planning related applications. Third parties are notified by site notice, press advert, and e-alert (provided they have opted in to this service).

### Representations summary

95 comments were received on the scheme including from the following street addresses:

- Albany Street
- Albert Street
- Arlington Road
- Augustus Street
- Cumberland Market
- Delancey Street
- Eton Avenue
- Gower Street
- Harrington Street
- Mornington Crescent
- Mornington Place
- Mornington Terrace
- Netley School
- Park Avenue East
- Park Village East
- Redhill Street
- Robert Street
- Rydal Water
- Stanhope Street
- Varndell Street
- Winchester Road

The concerns related to the below matters. For the officer's comments, please refer to the relevant sections of the report.

#### Noise:

- *Associated with road works and traffic lights*
- *Secondary glazing is needed to all windows in affected properties*

#### Pollution/dust:

- *Health impacts particularly on vulnerable groups (young, elderly, those with respiratory and other health concerns)*
- *This is supposed to be a zero emissions zone*
- *Impact on wildlife at Adelaide Road Nature Reserve which will need to be periodically closed*
- *Pollution levels will be far higher than legal limits*

#### Public safety concerns:

- *Particularly impacts on vulnerable groups (young, elderly, those with disabilities or other health concerns)*
- *Danger for both cyclists and pedestrians*
- *Danger to children, particularly with two schools within the vicinity*
- *Removal of speed bumps (to reduce noise impacts) would result in speeding*
- *Lorries proposed are unable to negotiate tight turns proposed (e.g. the northern apex of Harrington Square)*
- *Concerns for people accessing their properties (particularly for more vulnerable residents)*
- *The level of signs and barriers are a magnet for low level crime as well as a physical danger to pedestrians and cyclists*
- *Motorbikes and cyclists ignore speed cushions causing a danger to pedestrians*
- *Vehicles around Camden Town are a particular concern given the town centre status*
- *Toxic material/spill (e.g. asbestos) requires removal by rail as it cannot be removed from the site by lorry without raising health and safety concerns for residents*

#### Congestion, parking and traffic:

- *Additional lorries will result in congestion and delays*
- *Loss of resident's parking is a concern*
- *Works around the Chalcots blocks and 100 Avenue Road are already increasing congestion, as are traffic issues to A41 (main route into London), all of which will be worsened by the proposal*
- *Vehicles parked in the area are likely to be damaged*
- *Parking suspensions are likely to be needed - concerning especially for those with limited mobility*
- *If Robert Street is opened to right turning traffic, this will encourage commuter traffic to cut through the estate to avoid Great Portland Street and Euston Road*
- *Parking spaces and meters have been removed causing issues*
- *Signalling at Hampstead Road and Robert St will increase queueing traffic with associated pollution effects*

#### Other:

- *Feels as though there is movement within nearby properties as a result of nearby construction and lorry movements*
- *Maintenance issues and costs associated with roads not designed to accommodate use by HGVs*
- *Signage and road closures is unclear for residents and those visiting the area*
- *The shops and public house in Stanhope Parade have suffered considerable reduction in business due to disruptions and diversions, their closure would result in social exclusion*

#### Suggest assurances/conditions:

- *Robert Street should not be used for 3.5t and 7.5t lorries as these rigids cause as many noise and pollution issues as heavier lorries*
- *All HS2 vehicles should be clearly displayed with 'HS2' to enable robust monitoring and enforcement (this is currently lacking despite being mandatory under the HS2 Act)*
- *The access/egress gates do not form part of this S17 application, but instead form a separate S4 application; any S17 should therefore be subject to the approval of the separate S4 application as it relies on their approval (and vice versa)*
- *Lorries must not cause congestion at the top part of Gower Street (which goes two ways as a result of the West End Project)*
- *There must be no material impact on blue light, patient transport or pedestrian traffic to UCH campus having regard to the recent opening of UCLH Phase 5 and the Autumn 2020 opening of UCLH Phase 4*
- *Camden previously secured commitments to reduce HS2 construction vehicle emissions and to maximise materials by rail. This needs to be complied with*
- *10mph speed restriction should be applied to all HS2 vehicles travelling along the lorry routes in the Regent's Park Estate*
- *An assurance is needed to mitigate harm to businesses affected by the works and residents reliant upon them*
- *Articulated vehicles should only be able to access the TLRN*

Suggested alternative routes:

- *Materials by rail requires full consideration*
- *A dedicated haul access route should be implemented*
- *A junction is required at Hampstead Road (alongside a haul road) to prevent the need to use the Harrington Square loop*
- *Consideration should be given to the proposed use of the existing one-way system (in clockwork direction) of Hampstead Road into Euston Road eastwards then Gower Street and Tottenham Court Road going north. Then turn left into Euston Road for westward travel*
- *Routes should be evenly distributed so no one area is overwhelmed*
- *All HGVs should be routed via Albany Street to and from the LHA (although the use of the LHA itself should be minimised to lessen impacts), onto Euston Road and up Hampstead Road directly into the works site compound*
- *One alternative would be to use Park Village East for lorries in transit to/from the Park Village East south compound and work sites, which is to make use of Granby Terrace Bridge as a two-way lorry route between the compound and Hampstead Road. Granby Terrace Bridge is presently closed to all public traffic, and has been for some time, so its use for this purpose would not represent a loss to residents compared with the present situation*
- *A right turn from Hampstead Road into Varndell Street would reduce the use of the Robert Street-Hampstead Road junction*