

Transport for London

Our ref: LBC.LR.10002

LPA Application Ref: PP-08715975

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Dear Alistair,

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

London Borough of Camden: S3 Main Works – Early Works Worksite

Thank you for including Transport for London (TfL) in the planning application process, the aim of which is to ensure that the application is successful in transport terms and in accordance with the HS2 Phase 1 Act.

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

Proposals affecting the TfL Road Network (TLRN)

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

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

As the TLRN was not specifically mentioned within the HS2 Phase 1 Act the nominated undertaker is also applying to LBC for the entire TLRN to be designated as a main lorry route to access the trunk road network.

Based on the information contained within this application, the Local Traffic Management Plan (LTMP) for S3 Main Works- Early Work Package (ICP01-MDS-CL-PLN-S003-000014 C01), ICP01-MDS-CL-PLN-S003-000012 C01 – ROMIS and Proposed Lorry Route Management Plan (ICP01-MDS-TP-PLN-SS06-000001 C01) we understand that works relating to this application are predicted to generate a

MAYOR OF LONDON



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significant amount of LGV traffic as was assessed in the HS2 Environmental Statement (ES).

Site context

This application relates to the lorry routes associated with main works activities associated with the existing Costain Skanska Joint Venture (CSJV) enabling works worksite, the worksite is bounded by Cardington Street to the north and east, beyond which is Euston Station, Drummond Street to the south and Cobourg Street to the west. On-site activities will include site and welfare establishment, removal of the basement slab of the former Ibis Hotel, ground levelling, installation of piling mats, installation of guide walls and the boring of c.162 piles and an associated capping beam to form the western retaining wall of the station basement.

Our position

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

Use of the TLRN must reflect and take account of road safety, environmental and network impact issues, which will vary depending on specific locations and local conditions. HS2 must also continue to consider how these lorry routes impact on the Mayor's Transport Strategy policies including Vision Zero and Healthy Streets proposals. In addition, London is in the early stages of a sustainable recovery from COVID-19, which includes installing measures across London on street to help people cycle and walk around the capital. It is vital that we take into account these changes when planning construction activity.

In line with the Mayor's Transport Strategy and as described in the Local Traffic Management Plan for S3 Main Works- Early Work Package, we expect that:

- Vehicles related to this application **avoid entering central London in the AM peak**. This will help to meet the Mayor's aim to reduce freight traffic in Central London during the morning peak and contribute to the target of reducing the number of Lorries and vans entering central London during the morning peak by 10 per cent by 2026
- The routing of vehicles to and from construction sites covered by this application will be as set out in the Local Traffic Management Plan for S3 Main Works- Early Work Package
- HS2 Ltd will **adopt a vehicle management strategy** as set out in HS2's Route Wide Traffic Management Plan (RTMP) These measures, plus other control mechanisms outlined in the Environmental Minimum Requirements (EMRs) and Code of Construction Practice (CoCP), seek to reduce the risk to vulnerable roads users and the environmental impact from the proposed lorry routes
- HS2 Ltd will comply with the **Heavy Goods Vehicles (HGV) Safety Permit Scheme for London (DVS)**. The Scheme's objective is to address London's particular problem with collisions between HGVs and vulnerable road users such as pedestrians and cyclists by improving the safety standards of the HGVs coming into the capital

- Discussions continue regarding the reduction of vehicle numbers and use of alternative freight strategies such as material by rail
- Discussions continue regarding London's recovery from COVID-19, including the location of measures planned on street through the London Streetspace Plan to help people walk and cycle around the city

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 S3 Main Works is developed. Here TfL expects HS2 Ltd to undertake a thorough review of lorry routes for all construction sites that will be operating concurrently. My team will be available at all times to continue this dialogue.

Proposed Informatives

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

Adherence to the EMRs

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

Construction traffic management

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

Summary

In summary, whilst we accept that the TLRN has a role in facilitating access to and from the sites during the works described in this application, we wish to continue working closely with HS2 Ltd, relevant contractors, the London Borough of Camden and other impacted London Boroughs to ensure the suitability of proposed lorry routes, how they are being used, and how they interface with measures such as the London Streetspace Plan. 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.

Yours Sincerely,



Robert Semple
Works Master Planning Manager
Transport for London