**Hero Granger-Taylor’s preliminary comment, on behalf of PVEHG, on application number 2021/1026/HS2, a Schedule 17 application made by Skanska Costain Strabag JV for a ‘berm and upstand’ along Park Village East retaining wall, date of comment 22.1.21**

This is a preliminary comment on behalf of the Park Village East Heritage Group (a small residents' association).

Like so much we receive from HS2 Ltd and their contractors this application is both incomplete and misleading.

Camden needs to be fully aware that it relates to a design for the Euston Approaches, the Three Tunnels Design, which dates from after the 2017 Act was passed in February 2017 and which so far has no sort of official consent from the DfT. This design was severely criticised in the Oakervee Review and our understanding is that the DfT is currently looking for a simpler design. But it remains in doubt whether it will ever be possible for HS2 to have its own designated high speed tracks in the Euston approaches because of the tightness of the site. If HS2 trains ever reach Euston they are likely to have to come the last mile or so sharing the current NR tracks.

 The proposal is for a Berm and Upstand Support at the bottom of the existing early 20th century retaining wall. The application is dishonest in that it never states that the strange form of this intervention is to meet the short term need for a haul road for lorries to reach the shaft proposed at the northern end of Park Village East (PVE) from the worksite at the southern end. The shaft is intended as access for the excavation of a vast cavern and three enormous 9m diameter tunnels. None of this is stated.

The proposed use of the berm as a haul road explains the remarkable way that it rises up and down alongside the wall - the berm will be more effective as a support the higher it is, but in order to allow the lorries to go under Mornington Street Bridge it is lowered.

 Another major omission from this application is the intention to install ground anchors through the upper part of the wall. This work is supposed to begin in March 2021. The ground anchors are mentioned in the written statement but the two substantial waler or waling beams to which they will be fastened, and which will run horizontally along the upper part of the wall, are not shown in any of the drawings or visualisations. These beams will be about 80 deep and will cast strong shadows. They are in theory 'temporary' and are due to be removed at the end of the 'works', but who knows when this might be - 25-30 years? Even if they do not require Schedule 17 permission it is dishonest not to show the beams and indicate the anchors. Other parts of this application for which no Schedule 17 approval is required, notably the lower levels of the 'scissor box', are shown. Meanwhile PVE residents have been served with official 'notices' about the anchors but no drawings of any sort have been provided with this - we do not know how close the anchors will come to our houses.

Bearing in mind also that the drawings and other documents submitted with this application, 2021/0126/HS2, are also full of simple errors, we strongly recommend to Camden that you ask HS2 Ltd/SCS JV to withdraw this application and not to submit again until a) any overall design of which it is part has Government approval and b) all errors have been corrected.

Errors include the omission of the PVE pavements in most of the section drawings - the road plus pavements plus plantation on the east side is around 17m not the 13m shown. Correct measurements are readily available in OS 1:1250 maps. The houses indicated in outline are too big - the PVE villas are relatively small and most are at least 1 m lower than shown. Section Sheet 1 is superimposed very confusingly over a plan of a different area (Gloucester Avenue). At 2.3.9 in the Written Statement it says that the berm is approximately 13 m below street level. The cutting floor is only 10m below street level, and the top of the berm and upstand shown in the sections are about 5m below the road. At 3.3.2 it says that 'The berm and upstand support structure will be 3m in height', but in the sections it shows them as around 4.8 m and this may not be the maximum height. The Construction Programme at 6 is very out of date. At Fig. 9 of the Written Statement the captions are wrong. On Section Sheet 2, section 2 cannot be at the position indicated by the plan etc. etc. etc.

hero@granger-taylor.com