

**PETITION AGAINST A PRIVATE BILL: EXAMPLE**  
IN PARLIAMENT  
HOUSE OF COMMONS  
SESSION 2013–14  
HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL

Against – on merits – Praying to be heard by Counsel, &c.

To the Honourable the Commons of the United Kingdom of Great Britain and Northern Ireland in Parliament assembled.

THE HUMBLE PETITION of the Camden Civic Society, represented by Mr. Martin Morton, Chairman,

SHEWETH as follows:-

1. A Bill (hereinafter referred to as “the Bill”) has been introduced and is now pending in your honourable House entitled “A Bill to make provision for a railway between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes”
2. The Bill is presented by Mr Secretary McLoughlin, supported by the Prime Minister, the Deputy Prime Minister, Mr Chancellor of the Exchequer, Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill. .
3. Clauses 1 to 36 set out the Bill's objectives in relation to the construction and operation of the railway mentioned in paragraph 1 above. They include provision for the construction of works, highways and road traffic matters, the compulsory acquisition of land and other provisions relating to the use of land, planning permission, heritage issues, trees and noise. They include clauses which would disapply and modify various enactments relating to special categories of land including burial grounds, consecrated land, commons and open spaces, and other matters, including overhead lines, water, building regulations and party walls, street works and the use of lorries.
4. Clauses 37 to 42 of the Bill deal with the regulatory regime for the railway.
5. Clauses 43 to 65 of the Bill set out a number of miscellaneous and general provisions, including provision for the appointment of a nominated undertaker (“the Nominated Undertaker”) to exercise the powers under the Bill, transfer schemes, provisions relating to statutory undertakers and the Crown, provision about the compulsory acquisition of land for regeneration, reinstatement works and provision about further high speed railway works. Provision is also made about the application of Environmental Impact Assessment Regulations.
6. The works proposed to be authorised by the Bill are specified in clauses 1 and 2 of and Schedules 1 and 2 to the Bill. They consist of scheduled works, which are described in Schedule 1 to the Bill and other works, which are described in clause 2 of and Schedules 2 and 3 to the Bill.

*How Camden will be affected by the bill.*

7. In terms of the number of residents, your Petitioners believe Camden is the local authority that will be most extensively affected by the HS2 scheme. The division by HS2 of its proposals into so-called Community Forum areas (three in Camden) has made it difficult fully to assess its overall impact, but some broad facts can be stated: even without the proposed HS2-HS1 link, the construction, demolition and utilities work directly connected to HS2 will occur to a greater or lesser degree (much of it directly in front of or under dwellings of various categories) in the following wards: Belsize, Bloomsbury, Camden Town with Primrose Hill, Kilburn, Regent's Park, St Pancras and Somers Town, Swiss Cottage and West Hampstead, that is eight out of total of 18 Camden wards; if proposed lorry service routes are also taken into account, three more wards can be added (Cantelowes, Kentish Town, and Haverstock).

8. Approximately half of Camden's area is now covered by Conservation Areas (a total of 39 individual CAs), a fact that reflects the high number of old and historic buildings in the borough, typically later Georgian terrace housing but also individually important Victorian and 20<sup>th</sup> century buildings. The following Conservation Areas will suffer construction, demolition and utilities work directly connected to HS2: Bloomsbury, Camden Town, Regent's Park, Primrose Hill, and Alexandra Road Estate.

9. The principal causes of the injurious effects on the Borough of Camden inherent in the Bill are identified by your Petitioners as the broadening-out of the line as it comes from the tunnel at Parkway southwards into Euston, effectively the addition of a new railway to the old, requiring that the Camden Cutting be widened, that homes on the Regent's Park Estate and to the south be demolished, and that an extension to Euston station, effectively a new terminus, be constructed. The principal mitigation that we ask for is that an alternative scheme for this section of the route be adopted: good alternatives that do not require the footprint of the existing London North-Western Railway (LNWR) to be broadened or any demolition to take place have been put forward by local residents and railway professionals. We also request that measures be taken to mitigate the adverse effects of the proposals on local transport, in particular buses.

*Your Petitioners, the Camden Civic Society*

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10. Your Petitioners, the Camden Civic Society, <http://ccs.openpathways.org.uk>, was founded in 1963 as the St Pancras Civic Society (Peter Woodford, "Matters of Susceptibility", an early history of the St Pancras Civic Society', *Camden History Society Review* 24 (2000), pp.39-41; Malcolm Campbell MBE, 'Spotlight on Camden Civic Society', *Newsforum of the London Forum of Amenity and Civic Societies* 56 (Spring 2010), pp.8-9); after the formation of the London Borough of Camden in 1965 from three smaller boroughs – St.Pancras, Holborn and Hampstead – it was renamed the Camden Civic Society; registered as a charity in 1978 (number 276262), it is now the only voluntary environmental

organisation covering the whole of Camden. Always particularly concerned with “current environmental developments”, much of its more detailed work over the years has been ceded to local Conservation Area Advisory Committees, established from c. 1970, and more recently Neighbourhood Fora. The Camden Civic Society, in addition to campaigning on major and borough-wide planning issues, now sees its role as encouraging good planning policy-making by Camden Council (as in its open letters sent to candidates before local elections) and stimulating an interest in their local environment among people who live or work in Camden (as in its annual schools letter-writing competition). It has about 200 paid-up members and its e-mails reach about 150 additional people.

11. Not least because of its origins as the St.Pancras Civic Society, and since then having a preponderance of members living in the part of Camden defined by us here as mid-Camden, your Petitioners have long been involved in the area most threatened by HS2. For example, the Civic Society campaigned for the preservation of Nash’s York and Albany Tavern at the northern end of Park Village East and itself commissioned a restoration scheme that was eventually put into place there.

12. An important early campaign of Camden Civic Society was against the M1 extension, part of the London Motorway Box proposals of the late 1960s that was planned to extend as far as the Euston Road into the south of the borough; for a short distance to the north of Euston, this motorway extensions was to be built directly over the North-West Main Line (NWML) tracks, along exactly the same route now proposed for HS2.

*The character of the part of the London Borough of Camden due to be most affected by these proposals and relevant planning issues*

13. You Petitioners respectfully hope that the description that follows of the character of the part of our borough due to be most adversely affected by the scheme will help to make clear why we are so strongly opposed to these proposals. In addition, we hope that three issues from the past that have really united local people in opposition – the building of Carreras factory at Mornington Crescent and the demolition of Euston station, both described below, together with the abandoned Motorway Box were scheme just mentioned – will illustrate how some innovative and radical developments, which were being forced through by the powers-that-be despite strong and well-informed opposition, have with hindsight turned out to have been fundamentally misguided.

14. The HS2 scheme has from its first announcement been opposed by Camden residents because of the adverse effect it will have on their environment. More recently the people most directly affected have begun to realise how extremely shabbily they are being treated over compensation and, on top of that, have been lectured to by HS2 officials who are ignorant both of the character of the local area and of what the scheme will mean in detail. Many of these local people are now really angry. Your Petitioners have regretfully to report to the Committee of your Honourable House of Commons that for residents the announcement that there will be an overbearing “super development” at Euston and northwards up the line, is proving to be just about the last straw.

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15. Historically and still today, the area covered by the London Borough of Camden has been largely residential. Houses built in the form of terraces typify the early building pattern in the southern and central parts of the borough. In the south the earliest examples, in Covent Garden, Holborn and southern Bloomsbury, date from the second half of the 17<sup>th</sup> century. Building progressed from here gradually northwards, with the best houses arranged around squares. The original houses in Tavistock Square and Gordon Square immediately to the south of Euston Square date to the mid-19<sup>th</sup> century respectively. Euston Square itself was laid out and houses built around it from 1811, though now only two of the original houses remain. In Bloomsbury, south of the Euston Road, few terrace houses are now used as private dwellings, but large numbers of them survive physically intact.

16. While the squares and terraces of Bloomsbury are well known, it is perhaps less appreciated that this pattern of terrace housing extends well to the north of Euston Road, right across what might for convenience be termed mid-Camden, the area due to feel the full impact of the arrival of HS2. (Mid-Camden could be considered to be made up of the following localities: Euston, Mornington Crescent, Camden Town and Kentish Town with, on the east, Somers Town and the Camden Square area, and on the west side, Regent's Park and Primrose Hill.)

17. In mid-Camden, the terrace houses are still generally lived in, though often they have been subdivided. Two surviving streets of late Georgian houses due to be directly impacted by HS2 are Drummond Street (c.1820-25) and Mornington Crescent (c.1821-32), while Mornington Terrace, facing west straight onto the Camden Cutting, follows the same building pattern but is early Victorian in date (probably 1840s). (Late Georgian terrace housing is also found in streets to the north of Camden Town, for example Randolph Street (early 19<sup>th</sup> century), which is already bisected by the North London Railway (London Overground) of c.1850 and which was due to have been severely affected by the alterations to the latter necessary to form the HS2-HS2 link). Some or all of the houses in the streets just mentioned are listed Grade II.

18. Mornington Terrace and the neighbouring streets of Delancey Street, Albert Street and Mornington Street, illustrate well the typical arrangement of terrace housing which is not built around a square or other shared garden but where terraces form four sides of a block. North of the Euston road, and especially on the west side of Camden Town, such blocks still enclose private gardens at the rear, usually of generous proportions and forming green oases often unimagined by passers-by.

19. Park Village East on the western side of the Camden Cutting is the surviving half of the first part of John Nash's Park Village scheme. The houses here, free-standing single and semi-detached villas constructed between 1827 and c.1835 and all listed II\*, represent a lower density type of housing development. As recorded in the listing descriptions, this is the earliest ever garden suburb, a prototype of many 19<sup>th</sup> and 20<sup>th</sup> century suburban

developments. Here the large gardens with mature trees are glimpsed through the gaps between the houses, the most southerly point in the borough where such an effect is seen.

20. Within mid-Camden, some areas have entirely lost their terrace houses and where this has happened this is usually because they have been demolished to make way for Council Housing. In particular, the Regent's Park Estate, a large area of well-spaced blocks of varied design built from late 1940s onwards, replaced streets of small terrace houses designed by John Nash as workers' dwellings: prior to demolition, this area along with many other parts of London had been heavily bombed during WWII. Some council housing is in the form of high-rise towers, most visibly the three towers Gilfoot, Dalehead and Oxenholme on the Amptill Estate just south of Mornington Crescent. As far as Your Petitioners know, there are no high-rise blocks in mid-Camden which do not contain housing.

21. Mid-Camden is typified by the existence cheek by jowl of these various forms of housing and different forms of major transport infrastructure. The oldest element in this transport mix is arterial roads leading northwards out of London, in particular the A400, which for part of its length is the Hampstead Road. The Regent's Canal, built 1812-20, which links the Grand Union Canal to the Thames at Limehouse, was for many years an important freight route: this canal, like the viaduct carrying the North London Railway (1850-52), runs approximately east to west just beyond Camden Town Underground station. But the form of transport taking up the most space of course is three mainline railways running north from their respective termini - King's Cross (1852), St Pancras (1868) and Euston stations (originally 1837). Early railway-related buildings still border these railway lines, including, in the case of the LNWR, the Round House (1847) and the Stables complex, both on Chalk Farm Road.

22. In addition to housing and transport there is of course a lot of commercial activity in this part of Camden, but generally speaking, whether in the form of shops or offices or pubs and restaurants, this is contained within buildings of relatively modest size. The large and high office buildings fringing the Euston and Marylebone Roads, including the particularly tall Euston Tower at the southern end of Hampstead Road, have up to now scarcely strayed beyond the next east-west road to the north of the main road.

23. A notable exception to the general rule that large-scale commercial buildings have not penetrated into mid-Camden is the very big Art Deco building at Mornington Crescent. Now containing the offices of many different firms, this was built as a factory for Carreras *Black Cat* cigarettes. When originally constructed in 1926-28, directly over the gardens which formed the centrepiece of the elegant Mornington Crescent, the public outcry led to strengthened demands for legislation to protect London's open spaces; the result was the London Squares Preservation Act of 1931: two Camden open spaces protected by this act are due to be injuriously affected by the HS2 proposals, Euston Square and St James's Garden: like the garden at Mornington Crescent a hundred years before, St. James's Gardens is now itself due to be largely

covered over, in its case with tarmac, to create the new vehicle entrance for the "Option 8" enlarged and redesigned Euston station.

24. A cautionary tale illustrating the risks in claiming the Black Cat building as a precedent for other large buildings is provided by the 1990-1 Inmarsat Granby Terrace planning application decision ( Inmarsat Place Ltd and the British Railways Board, Granby Terrace, ref lrp219/x5210/09). Inmarsat (International Marine Satellites) applied to construct a large headquarters building in place of the train sheds just inside the cutting wall at the southern end of Park Village East and alongside the LNWR. This application was turned down by Camden and the decision was upheld by the two Secretaries of State following a public Inquiry: the claim by the applicants that the Black Cat factory was a nearby example of a commercial building of similar height and bulk did not help them when it was pointed out that the Black Cat building would never have been allowed had the Act which it provoked been in place before it was constructed. In their decision document of December 1991, the Secretaries of State write as follows: "...that the proposed building would radically alter and dominate the local street scene and reduce the open easterly outlook, that it would not sit entirely comfortably with the nearby listed buildings and that it would detrimentally affect the nearby conservation areas."

25. The 1991 decision recognised the particular character of the area around the Camden Cutting and the approach to Euston. This same locality is now threatened by the arrival of the HS2 tracks which will cut through the north-eastern corner of the Regent's Park Estate, forcing on residents the demolition of the four blocks (Eskdale, Ainsdale, Silverdale and Stalbridge House) and bringing about a much more fundamental change to this immediate neighbourhood than we your Petitioners could have imagined when fighting the Inmarsat application.

26. Many Camden tenants and leaseholders were highly indignant that the almost complete absence of any offer of compensation from HS2 has been justified by a senior HS2 executive, David Prout, on the grounds that the area which contained their homes was "intense and vibrant" (reported in Camden New Journal, 10/4/14). In fact, among the streets to be most directly affected by the proposal, it is really only Drummond Street which could be described in this way. The streets of housing where there are no shops or restaurants – the great majority - are quiet and peaceful, with little traffic except on the Hampstead Road, and with the railway itself creating open views and a channel for fresh air.

27. David Prout was also wrong to describe local residents homes as "overlook[ing] directly six or eight [railway] tracks" (again CNJ, 10/4/14) Very few dwellings beyond some of the flats in the tower blocks on the Amphil Estate actually afford views onto the railway itself; in Park Village East, for example, which runs alongside the Camden Cutting, the tracks at this point are up to 10 m below ground level and cannot be seen from the road or from inside the houses.

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28. Local residents had already found insulting remarks by HS2's chairman, Sir David Higgins, to the effect that their area was "deprived" and in need of "regeneration" (reported in the CNJ, 20/3/2014). It is true that a relatively high number of families categorisable as deprived live in social housing in mid-Camden. But this does not mean that buildings they inhabit or their neighbourhood as a whole is in need of rebuilding, least of all by a commercially-driven foreign company. Camden Council has greatly improved the care of its housing stock in recent years and on the Regent's Park Estate, among others, all the blocks have now been double glazed and insulated. The exterior areas are also much better maintained. The many green spaces on the Regent's Park Estate are planted with trees that are now mature together with shrubs and flowers at ground level. In Your Petitioners' view, there is nothing here that could be substantially improved by large scale redevelopment/regeneration.

29. Looking more closely at Euston station itself, it will be recalled that the present building, built in the 1960s, replaces the original station, a muddle of buildings of different dates, but among them some dating back to Robert Stephenson and the opening of the line in 1837, and some - the huge Euston Arch (Philip Hardwicke 1837) and the magnificent Great Hall (Philip Charles Hardwicke 1849) - very fine pieces of architecture in their own right. The demolition of the original station including the Euston Arch was felt by many to be an act of vandalism made possible through deception. The Euston Arch Trust has written as follows: "the loss of the Euston Arch - an event that shocked and appalled the British public - helped to kick-start the conservation movement. Never, it was felt, should such a gross act ever again be committed in the name of the British public and against their desire." (<http://www.eustonarch.org/campaign.html>).

30. Your Petitioners believes that the strong feelings of loss which followed the demolition of the old station are a major reason for the public's dislike of its replacement. The current station is indeed very plain, with a simple though elegant central hall leading to platforms within a low-roofed train shed, this latter looking especially dreary now that the original arched glass roofs of the St Pancras and King's Cross train sheds have been restored. But the development in front of the station, four asymmetrically-placed buildings, designed by Richard Seifert and built 1974-8, form a fine a fine composition which has up to now not been fully appreciated. Made of good materials, carefully detailed, this group takes as its departure point the GLC planning policy requirement to maintain the view of St Paul's from Primrose Hill across the roof of the station (this policy is still in place). Your Petitioner, the Camden Civic Society, regrets that the Secretary of State did not agree to list the Seifert buildings when recently requested to by the 20<sup>th</sup> Century Society. If the practical arguments for demolishing these buildings were found to be overwhelming (if, for instance, it was necessary to extend the tracks further south, as would be the case if the Double Deck Down alternative scheme were implemented), listing would at least have ensured more careful consideration of whatever was proposed to replace them.

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31. Euston Road in front of the station, built as the New Road in 1756 and “London’s first bypass”, has always formed a border between central London and the inner suburbs to the North. Nowadays it marks the boundary between the WC1 and NW1 postal areas, the current limits of the Congestion Charge Zone, and approximately corresponds to the outer edge of Transport for London’s Zone 1.

32. All the three railway termini along Euston Road were built north of this important border, the reason being that principal landowners at the time did not want dirty steam trains to come right into what they and we would consider to be truly the centre of London. Therefore Euston station was never able to claim for itself particular prominence and in fact the first station was largely blocked from view by pre-existing terrace houses.

33. The original relationship of the track itself to housing in the area is shown in F A Bartlett’s map, *Survey of the Borough of St Marylebone*, published 1837; the line emerged from the station towards the Mornington Crescent and the Camden Cutting across land which was still open but which had already been plotted out for further terrace housing.

34. The long-established proximity to the LNWR line to housing has meant that in the past even houses of high architectural value have had to be knocked down to enable it to be altered or widened. This is most dramatically illustrated by the enlargement of the Camden Cutting in 1900-1906 when all the houses on the east side of Park Village East were demolished together with all those on the west side of Mornington Terrace.

35. The fact that the areas through which the current LNWR mainline passes are primarily residential is complemented by the fact that there are no substantial brownfield sites in its immediate vicinity, at least within the borough of Camden. In short, the addition of new tracks at the same level as the existing tracks and the extension of Euston station westwards can only be at the expense of people’s homes and amenities and of firmly-established communities.

#### *Adverse Effects on Camden*

36. Your Petitioners and their interest are injuriously affected by the Bill, to which your Petitioners object for reasons amongst others, hereinafter appearing.

37. The Bill includes powers for the Secretary of State and the Nominated Undertaker to do construction works that are estimated to take 10 years to complete. The most damaging components of these construction works and the most important permanent adverse effects are understood by your Petitioners to consist principally of the following:

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- Tunnelling under the western part of Camden to emerge just south of Parkway at the start of the Camden Cutting,
  - The erection of two ventilation shafts, one beside Adelaide Road and the other immediately adjacent to the Alexandra Road Estate
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- The creation of a very deep cutting-within-cutting along side Park Village East which will include the building a new retaining wall further to the west and very close to the Park Village East listed houses
- The complete demolition and rebuilding of the Mornington Street and Granby Road bridges
- The gradual rebuilding and partial closure of the Hampstead Road bridge
- The demolition of four blocks of housing – Ainsdale, Eskdale, Silverdale and Stalbridge House
- The continued westwards widening of the railway between Hampstead Road and Euston station including further construction of new barrette walling.
- The demolition of most of the block between Melton Street/Cardington Street and Cobourg Street, including two listed terrace houses
- The felling of most of the trees in St James's Gardens and many more trees in the surrounding streets especially Cardington Street
- The loss of most of St. James's gardens
- The felling of all the trees in Euston Square
- The construction of a new underground station entrance that will cause Gordon Street to be permanently blocked off
- The demolition of the western end of Euston station and the addition to it of a new terminus building reaching westwards as far as Cobourg Street.

Your Petitioners do not wish to present these works and their effects in more detail because we are aware that this will be have done very thoroughly by individual residents and organisations covering smaller areas than ours.

38. An additional reason for your Petitioners not wishing or able to go into greater detail is the difficulty we have had of establishing what the proposals involve precisely. This point was made by us in our response to the Environmental Statement (ES) where we have identified the ES to be incomplete in a number of ways that fall principally under the following three headings: an inadequate level of detail for an urban context; a lack of detailed assessments, e.g. of soil conditions; a very great number of errors. These are obstacles to our understanding of the proposal. They have also been, we respectfully submit, serious obstacles to the Promoter's own understanding of the effect of the plans on our area. The many inadequacies of the ES leads us to think that the proposals have been put together by people unfamiliar with the area, perhaps particularly employees of Arup at "The Arup Campus" in Solihull. Our understanding is that teams of local HS2 employees were formed only after the main engineering elements of the scheme had been put together by Arup. In any case, whoever made the decision on how exactly HS2 should be sited within Camden seems to have been much more cautious about its effect on Network Rail's classic lines and their continued functioning than its effects on individuals and communities living and working in Camden.

39. Besides the physical reality of the new railway your Petitioners are concerned about serious knock-on effects of the scheme on local traffic and local public transport. In particular it appears that traffic will become much more congested in two important arterial

roads, Eversholt Street and Hampstead Road, used by many buses, and that this congestion will not just be temporary (some 10 to 15 years) but will continue into the period of the scheme's operation.

40. Your Petitioners are aware that local residents are also very worried about the public health effects of the scheme. The causes of their worry are especially the noise and dust of the construction phase, especially the many months of night-time working. Your Petitioners regret to report that HS2 has already caused residents a great deal of stress and will apparently continue to do so for many years to come.

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#### *Requests for mitigation*

41. In our response to the Environmental Statement consultation your Petitioners the Camden Civic Society wrote: "Our belief is that, just as no-one would now consider bringing a motorway into central London, the point in time where it might have been acceptable to bring a new railway above ground into the centre of the city and to construct there what is effectively a new terminus has now passed. The urban structure, both built and social, in central and south Camden is too dense and too complex to allow this to happen without unacceptable negative consequences on local residents, local businesses and visitors" This remains your Petitioners' position and we therefore request that, if the high-speed trains have to be brought into Euston station on or near ground level, your Honourable the Commons find a way of achieving this which has much fewer and much less widespread adverse effects than the published scheme. A range of possibilities have been presented to the Committee of your Honourable House by other campaigners. If your Petitioners have understood correctly, these include:

- a) The Double Deck down 2 scheme, where platforms within the station and the trains approaching and leaving it would be on two levels, allowing the wider HS2 trains and the classic trains to both function within the footprint of the present station, tracks and cutting.
- b) The scheme presented by Professor James Croll where the HS2 trains would leave their tunnel at Queen's Park and travel on to Euston on tracks alongside the classic tracks. Space for the HS2 tracks would be created by diverting away local services currently using Euston station to Crossrail 1.
- c) The original Euston Cross scheme, as above but with the addition of an east-west tunnel to bring trains linking Hs2 and HS1 to an interchange station between Euston and St.Pancras/King's Cross
- d) A completely-tunnelled railway using an underground interchange station shared with Crossrail 2 between sited between Euston and St.Pancras/King's Cross.

All of these options have the great advantage over the proposed scheme of not requiring extra land to be permanently taken in the vicinity of Euston. Of the four, b) is the scheme which requires least construction work and which therefore causes least associated

disruption and demolition and costs the least. (We recognise Petitioners are required only to propose as mitigation schemes which bring the HS2 trains to Euston. For this reason we have not listed above the HSUK scheme proposal made by Colin Eliff and Quentin Macdonald. However we understand this is the scheme favoured by railway professionals and which would make best use of the available money; it would spread the investment so that higher speed rail services became much more widely geographically available. )

42. Associated adverse effects of the proposed scheme in the construction phase include a large number of lorry movements and much disruption to everyday traffic due to the closing of roads and demolition of bridges. Your Petitioners request therefore that your Honourable the Commons bear in mind such relative side effects when considering alternatives to the proposed scheme. Your Petitioners also requests that whatever scheme is finally decided upon, that HS2 be required to remove all spoil by rail rather than by road.

43. Your Petitioners are concerned that both during the construction phase and in the longer term, great strain will be put on local transport services by the proposed scheme. Your Petitioners believe extra traffic in the major thoroughfares on either side of Euston station, Eversholt Street and Hampstead Road, will slow down important bus routes serving other parts of the borough and beyond. Your Petitioners fear in particular that the closure of Melton Street and of Gordon Street on the opposite side of Euston Road will push much existing traffic, particularly taxis, onto these bus routes. Your Petitioners respectfully requests that your Honourable the Commons consider these knock on effects on local public transport when deciding on the acceptability of any scheme: Melton/Cardington Street and Gordon Street should be kept open and serious consideration should be given to further below ground local services, including Crossrail 2. .

44. Your Petitioners observe that estimated figures for road traffic in the operational phase of the schemes envisage greatly increased levels of traffic also in some side streets around Euston. Your Petitioners therefore request that traffic management measures be adopted to distribute this additional traffic in the best way possible.

45. Your Petitioners respectfully request that HS2 be required to minimise the impact of any work on residents' health. At present we are afraid that the amount of night working will cause excessive stress. Other matters that need to be attended to include infestations, particularly of rats which are bound to be displaced by the works.

46. Questions relating to housing and compensation have been dealt with very fully in the petition of the HS2 Euston Area Action Group of which your Petitioners, the Camden Civic Society, is a cosignatory and supporter. Compensation as presently offered by HS2 to residents of Camden is grossly inadequate and discriminatory, particularly in its unequal treatment of Camden vis-a-vis areas outside the M25. Although compensation is not covered by the bill, Your Petitioners nevertheless request fervently that your Honourable the Commons consider this matter closely and make undertakings which resolve this

question fairly. A group of residents already particularly hard hit by blight are Camden leaseholders living adjacent to the blocks due to be demolished who have bought their leases under the Government's Right to Buy scheme and who appear now to be being penalised for having done so.

47. Your Petitioners, the Camden Civic Society, is concerned that the planning system should function properly and that as much power as possible should remain under democratic control, ideally with the local authority. Your Petitioners are therefore particularly concerned about clause 47 in the Bill which provides for powers of acquisition wider than the principle of the Bill; these would permit massive reconstruction of Euston station for example independently from HS2's operational needs. Your Petitioners respectfully request that this Clause is omitted from the Bill.

48. Elsewhere in the Bill, the Promoter is granted permission to override listed building consent, for example in the matter of the boundary walls of the Grade II\* listed houses in Park Village East. Your Petitioners request that decisions regarding these listed structures remain with the local authority. The Promoter is perhaps not aware that that listing does not prevent change altogether: it only required that changes to listed structures should be properly considered.

49. Your Petitioners follow the Camden Cutting Group in deploring the proposed exemptions to be allowed to Undertakers (as outlined allowed in the ES Vol 5 Draft Code of Construction Practice CT-003-000 sections 5.2.6 to 5.2.10), freeing them from the obligation to restrict work to the daytime and clearing the way for 24-hour working. Noise estimates suggest that there will be much more night-time working in Camden than in anywhere else along the line, perhaps to a truly intolerable level for local residents. This is another matter which Your Petitioners request is closely scrutinised.

50. Your Petitioners respectfully request that any redevelopment above and beyond the strict requirements of the railway is limited to what has been agreed in the Euston Area Plan (EAP) and that decisions about it be left to the London Borough of Camden. Your Petitioners have not objected to the policies established by the Euston Area Plan but should wish to comment on both outline and detailed proposals even when the proposals adhere to the EAP.

51. Draft proposals for the complete redevelopment of Euston have begun to appear in the press and Your Petitioners are very unhappy to see that these go far beyond anything envisaged by the Euston Area Plan. For example we notice that a view published by London and Sydney at <http://www.sydneyandlondon.com/the-euston-estate/the-future/> includes both exceptionally large and tall buildings plus the use of land to on the western side of the station associated with the Option 8 proposal. We have been told that the Option 8 scheme for the station has been abandoned and we therefore earnestly request that your Honourable the Commons seeks to ensure that unacceptable aspects of an effectively

rejected proposal are not allowed to be carried over to a new scheme without operational justification but only in order to use land outside the station's current footprint for profitable development.

52. Lastly Your Petitioners respectfully request your Honourable the Commons to recollect when considering this Bill and associated proposals that your Petitioners, the Camden Civic Society, as explained above, have found the scheme to be based on a far too superficial knowledge of the character of the area it is due so adversely to affect.

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53. There are other clauses and provisions of the Bill which, if passed into law as they now stand will prejudicially affect your Petitioners and their rights, interests and property and for which no adequate provision is made to protect your Petitioners.

YOUR PETITIONERS therefore humbly pray your Honourable House that the Bill may not be allowed to pass into law as it now stands and that they may be heard by their Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Bill as affects the property, rights and interests of your Petitioners and in support of such other clauses and provisions as may be necessary or expedient for their protection, or that such other relief may be given to Your Petitioners in the premises as your Honourable House shall deem meet.

AND your Petitioners will ever pray, &c.

Signed Martin Morton, chairman and representative, Camden Civic Society,

22 May 2014

IN PARLIAMENT

HOUSE OF COMMONS

SESSION 2013–14

**HIGH SPEED RAIL (LONDON - WEST  
MIDLANDS) BILL**

PETITION OF CAMDEN CIVIC SOCIETY

AGAINST, By Counsel, &c.

Camden Civic Society,