

**High Speed 2 Phase 1**  
***London – West Midlands***  
***Environmental Statement***

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**London Borough of Camden**  
**Comments on the Environmental Statement**

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**PART II SCHEDULE of DETAILED COMMENTS**

# **HS2 Phase One environmental statement: non-technical summary**

## Non-technical summary of the HS2 Phase One environmental statement (Ref ES.3.0.0)

Section	Sub section	Paragraph	London Borough of Camden response
1	1.1		Camden Council is opposed to HS2. Its adverse impacts on Camden are widespread and completely inadequate account has been taken of them in both the project concept and in proposed mitigation commitments.
	1.2		Camden would like to stress that there have been many adverse effects that have not been mitigated appropriately, which is against the aims identified in this paragraph. There are also occasions where the project is not being integrated into the landscape (such as Adelaide Road Vent Shaft). Camden Council considers the route has not appropriately attempted to avoid environmental effects, for example by tunnelling or by using the rail/canal system instead of lorries.
2	2.1		Camden Council considers that the case for High Speed 2 has not been made and this fundamental defect in the proposal will result in Camden suffering by far the greatest level and number of adverse impacts of any area along the proposed route. The rationale and justification for HS2 has changed many times over the period since it was first announced. The credibility of the HS2 proposition has been fatally undermined when even the project promoter cannot establish consistently why the project is needed and what role it should play. The case set out in this Non-Technical Summary is a post-justification of a weak or non-existent basis for the scheme.
	2.3		<p>Camden Council accepts that rail infrastructure can enable economic growth if properly conceived, designed, planned and implemented. However, the current HS2 proposals do not create the conditions for maximising economic growth and fail to enhance or integrate adequately with the local transport network in Camden. If the Scheme does go ahead, getting the proposals right in Camden as the London terminus for HS2 is vital to the overall success of HS2.</p> <p>As outlined in detail elsewhere in Camden Council's response to the ES, Camden Council has serious reservations about the impacts of HS2 on local transport networks, connectivity and freight movements.</p> <p>Camden Council considers there is insufficient information about or consideration of onward travel and impacts on local transport at Euston from the increase in HS2 passengers. This includes</p>

		<p>whether Euston Square underground and King's Cross/ St Pancras can cope with increased passenger numbers during the construction of HS2. This renders the ES defective.</p> <p>Camden Council also considers that the HS1 Link as currently proposed weakens local transport networks. Camden Council considers the ES is defective in that the ability of the HS1 link to be constructed without severe impacts on the North London Overground Line, a vital local transport artery servicing local people and one of London's top visitor attractions at Camden Town. The Link construction programme necessitates 7 rail bridge replacements which will likely result in long term blockage of the Overground and local freight services whilst those bridges are replaced in this very congested area. The HS1 Link also frustrates growth opportunities on the London Overground line through Camden Road Station because of the limited physical capacity for accommodating tracks and thus train capacity on the viaducts. HS2, in effect, takes away this growth opportunity which will be needed to cater for forecast travel needs in the future. Overall railway resilience, and confidence in rail, will be adversely affected at Camden Town from the convergence and interaction of three different types of train services; freight, Overground and HS2. The suspension or provision of an alternative scheme for the HS1 link is therefore required. The ES does not adequately, or in some cases at all, recognise or assess these issues. Secondary impacts such as the diversions to freight and their impacts on service provision (both for freight and passenger services), related impacts on communities and whether there would need to be transfer to less sustainable freight provision using the road network also need to be identified.</p> <p>More broadly, improved connectivity is just one of the conditions needed to be in place to support growth. Just as Crossrail aspired to be 'more than just a railway', HS2 should not be seen as a rail engineering project in isolation as is currently the case. HS2 aspires to be an 'outstanding project' yet there is insufficient evidence of this in the current proposed scheme and plans. HS2 does offer an opportunity to unlock growth and regeneration but only if the correct conditions and scheme proposal are put in place.</p> <p>Camden Council considers that there is much more that HS2 Ltd must do to put in place the conditions for economic growth but there is no, or only superficial, evidence in the ES that this has been addressed. These include:</p> <ul style="list-style-type: none"> <li>• Raising ambitions for Euston and delivering a comprehensive redevelopment scheme that delivers against all the objectives of the Euston Area Plan.</li> <li>• Addressing the blight caused by HS2 in Camden. HS2 will have severe adverse impacts</li> </ul>
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			<p>on Camden's communities. HS2 Ltd must commit to and deliver a comprehensive blight mitigation and compensation strategy in areas affected by HS2 if future growth is to be enabled.</p> <ul style="list-style-type: none"> <li>• Dropping the HS1 Link in its current form. As HS2 representatives have stated on numerous occasions to Camden Council, there is no business case for the link. The justification that there is a strategic case is weak and has not been clearly made. The link will bring significant impacts to Camden Town, one of London's major tourist destinations and a major centre for the creative and cultural industries. Camden Council asserts that the HS1 Link should be abandoned in its current form. However, if it proceeds, alternatives such as full tunnelling need to be adopted.</li> </ul>
3	3.1		<p>Camden Council rejects the current proposal for Euston station which takes completely inadequate account of the wider local community and planning context. Neither does it offer suitable potential to comprehensively address development potential. A credible and effective over station development potential for this key site of city and national importance will be prejudiced. Provision of a temporary terminus at Old Oak Common Station may give opportunity for replanning and redesigning Euston and should be given full consideration. An option for rerouting local trains from Euston into Crossrail should have been examined.</p>
4	4.1		<p>Camden council had understood that the construction works would commence in 2016. However, there is insufficient clarity on the dates provided in the ES.</p>
	4.2		<p>Camden Council considers that the Local Environmental Management Plans must be developed as soon as possible to enable the council and the community to engage on their development and to fully understand the proposed mitigation measures. Camden Council notes that a number of mitigations throughout the Environmental Statement are referred as being with the CoCP and LEMP and without seeing the content of the LEMP it is impossible to know or evaluate the mitigation measures proposed.</p>
5	5.1		<p>Camden Council considers the ES is defective in that the comprehensiveness of the baseline data gathering as there are gaps identified in the data. For example the modelling used to establish the transport impacts is incorrect and surveys were not conducted to establish the ecological baseline accurately. These flaws have made it difficult to assess the full impacts of the scheme in the Environmental Statement. Camden Council would like to stress that the development and assessment of mitigation measures is not appropriate to the impacts in this proposal. For example,</p>

			increase in air pollution, loss of open space, loss of amenity for residents.
6	6.1		Camden Council does not consider that alternatives have been adequately considered nor have the reasons for their rejection been fully evidenced. The impression given is that only lip service has been paid to alternatives and that the manner and superficial detail in which they are discussed fails to meet any test of reasonableness.
	6.2		Camden Council agrees that more investment in national infrastructure is required but rejects the current proposals for HS2 because of their ill-considered, adverse, impacts on Camden.
	6.3		Camden Council considers that the current HS2 proposal falls between the stools of speed and capacity. The case for it has been inconsistent. This ES does not adequately describe, evaluate or, most importantly, evidence why alternatives could not be adopted for Camden which have less adverse impact.
	6.4		Camden Council notes the reasons stated for the selection of Euston Station as the London terminus but also notes that little visibility has been given (and none in the ES) for properly justifying that decision.
	6.5		Camden Council rejects the description of the scope of work undertaken to assess local alternatives; it considers it derisory. A key local issue, the unilateral dropping of HS2 Ltd.'s initial Euston station option and its arbitrary substitution with a scheme that is manifestly inferior in many ways, is not even mentioned in this section. This airbrushing out of one of the most key aspects of the whole HS2 scheme is inexplicable - and entirely unacceptable.
7	7.3		<p>Camden Council rejects the idea that the changes to operational traffic emissions can be ignored because of anticipated changes in vehicle design given the lack of progress on these issues in recent years.</p> <p>Camden Council strongly repudiates the suggestion that no significant effects are predicted from construction when 6 sites within Camden will have the highest possible score for impact.</p> <p>Camden Council notes that 169 receptors have been identified to have adverse air quality effects from construction traffic and believes this is a significant underestimate.</p>

			<p>Camden Council suggests that given the scale and duration of the project, the impact on pedestrians and cyclists should be considered and mitigated against.</p> <p>Camden Council considers the ES is defective in that, given the health impacts of smaller particles, PM 2.5 has not been properly considered throughout the ES.</p>
	7.4		<p>Camden Council considers that the statement "Where private businesses that provide community facilities ..." should have instead stated "Where private businesses and charities ...", as the current wording excludes charities who may supplement their funding streams by offering room hire.</p> <p>Camden Council finds the demolition of community, commercial, and residential property unacceptable because of the unjustified impact on existing communities.</p> <p>Camden Council considers that community wide adverse effects, whereby a substantial number of local people are significantly affected by the construction of the project, are not just limited to the Regent's Park Estate and Park Village East in Camden, but throughout Camden where construction works and compounds, road closures and traffic, vent shaft construction, and the proposed HS1 link will adversely affect communities including Camden Town, Somers Town, Mornington Crescent, Kilburn, Swiss Cottage, South Hampstead, and others.</p> <p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example in Abbey Road and Agar Grove. The ES does not define what it means by "additional committed development" and has omitted Camden Council's regeneration schemes in the area. Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council's Cabinet as part of the borough's Community Investment Programme and some have been granted detailed planning permission. The Council has previously advised the promoters of the HS2 scheme that these regeneration schemes exist and would be progressed during the construction of the HS2 scheme, should it proceed. The absence of these schemes from consideration in the ES, together with the cumulative impacts created, renders it defective.</p> <p>The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include the Surma</p>

			<p>Centre, Abbey Road, Alexandra and Ainsworth, Langtry Walk, Agar Grove, Adelaide Road, Hawley Wharf, and Maiden Lane regeneration schemes. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council considers that any loss of open space caused by the construction and operation of HS2 is also unacceptable, and that HS2 have not done enough to design the route with minimal losses on green space.</p>
	7.6		<p>Camden Council considers that the loss of services and benefits provided by nature to people also need mitigation and compensation; For example at Adelaide Local Nature Reserve as well as impacts on habitats and species, volunteering opportunities such as the Green Gym and outdoor schooling including Forest Schools will also be affected.</p> <p>Camden Council is disappointed to note that the methodologies used to assess the impact of loss of open space on community and ecology do not take into account the differences between urban and rural environments. Urban green spaces such as those in Euston, Camden Town and Adelaide Road have a different value compared to rural equivalents. The value of urban green spaces is derived from their ecological, social and community benefits, and as a major contributing factor to residents' mental and physical wellbeing. For this reason urban green spaces should be assessed using a different, more appropriate methodology based on the extensive research and evidence collated by statutory agencies such as Natural England, Forest Research and CABI.</p> <p>Camden presented its approach to ecology and nature conservation in a report to HS2 which factors in these considerations, however the points Camden raised have not been included in these assessments.</p>
	7.7		<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p>



			<p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'. The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned.</p> <p>Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retains the right to provide further comments on electromagnetic interference at a later date.</p>
	7.8		<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched and therefore the sites have not been suitably risk assessed. Camden Council therefore considers the ES to be deficient in this regard.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
	7.9		<p>Camden Council considers that the assessment approach of the landscape and visual assessment is fundamentally inappropriate in a city centre environment. The approach has been devised for the many miles of countryside where there is a simple visual objective and none of the complex urban</p>

		<p>issues of central London. The opening line of chapter 7.9 of the Non-Technical Summary states 'HS2 Ltd has designed the project with the aim of avoiding or reducing landscape and visual impacts along the route'. This is an admirable objective where the lines run through verging countryside. Moreover, it is also easily achievable through planting and verge building. In the London Borough of Camden, this approach is appropriate along the line into Euston where the visual impact of the cuttings, bridges, ducts etc. do need to have their visual impacts reduced or removed. However, at Euston Station itself, needs to be assessed differently. Euston is a major public building within a dense urban setting and it is ridiculous to believe that the same approach of hiding the infrastructure can deliver results. Whether the station is visible or not is less of an issue than in the county side, and what the station looks like and its contextual compatibility with the surrounding townscape becomes more key. Beyond this there are elements of the station where visibility actually become very important, such as the prominence of entrances. The absurdity of the visual basement approach can be highlighted in 9.5.37 CFA report on Euston Viewpoint 001.2.016: View east from Hampstead Road. This is a view of the proposed station's northern entrance from the main road. The report talks about opportunities for screening the station (the northern entrance) and goes on to say that trees will be put in the forecourt. Now, it is important to provide the on looking residency with privacy, greener and noise reduction etc. But an assessment approach that considers it a positive thing to screen a station entrance from the main road and the public entirely misses the point. This station would be the major terminus and gateway for the most important train line in the country and its entrances should be of high civic value.</p> <p>Camden Council also considers that the assessment of the LCAs and the ratings of sensitivity are problematic in a dense and diverse city centre location. The approach over simplifies the complexity of the area's form, character, heritage etc. Again we accept this approach is fitting for the countryside where the significance of the landscape is far narrower and easier to define, and its sensitivity to change is clearer. To reduce an area as visually complex and large as The Euston Road Commercial Area in Camden to 'medium sensitivity', results in an assessment which is valueless. It is far too great a simplification.</p>
	7.10	<p>Camden Council notes that section 7.10 of the Non-Technical Summary appears to contradict the CFA reports. It states that HS2 Ltd estimates that approximately 1,510 jobs are at risk route-wide from businesses directly and indirectly affected during the construction of the project. However, within the CFA's for Euston, Camden Town and Primrose Hill/Kilburn the accumulative number of jobs at risk (that is at risk of being lost or displaced) is 3,270. Camden Council considers the ES is defective in that the Non-Technical Summary is inaccurate and that the localised figure does not match up with</p>

		<p>the estimated number of route-wide jobs at risk. Camden Council has reviewed the methodology used to estimate these numbers and with no clear explanation the statement appears to remain contradictory.</p> <p>Camden Council notes that section 7.10 states that 300 businesses route-wide will need to be relocated as a result of the Proposed Scheme. Camden Council estimates that nearly a quarter of these businesses are within the London Borough of Camden. Additionally, Camden Council estimates that there are around 235 businesses in total located in the HS2 safeguarding area in Camden, which will be severely adversely affected. Therefore, Camden Council strongly considers that all compensation and mitigation packages offered to businesses within the borough are reviewed by HS2 Ltd and that the adverse effect of the Proposed Scheme on the economy of Camden is taken into account, rather than judged at a route wide level.</p> <p>Camden Council notes that section 7.10 of the Non-Technical Summary does not consider the resulting loss of GVA to the national or local economies through the Proposed Scheme and does not make assessment of the wider harm to communities that will result.</p> <p>Camden Council also notes that section 7.10 states that HS2 Ltd will provide appropriate, additional support to help businesses relocate to new premises. Camden Council has been seeking assurances and recommending that HS2 Ltd put in place additional support for Camden based businesses forced to relocate (so they can remain in the borough) for a number of months without any commitment from HS2 Ltd. Although Camden Council welcomes the commitment in the ES, it is qualified and there is no explanation of the exact details or commitments of the support. Camden Council therefore requests that HS2 Ltd provide an appropriate and detailed response as to what is meant by the provision of appropriate, additional support to help businesses relocate to alternative premises and that any scheme prioritise the re-location of businesses in their local area.</p>
	7.12	<p>Camden Council strongly considers that the route wide benefits outlined here have no little resonance to the situation in Camden. The ES fails to distinguish between distinctively different areas which are affected differently. Camden Council's reasons for its view are fully explained in this response through the many points of concern that it highlights. The Construction impacts for Camden will be much deeper and more extended than reported in this ES, due to fundamental issues that Camden Council has raised with regard to the highway modelling undertaken by HS2 which is proven with direct data sets that Camden Council hold and also plain observations on the ground. On the Operational side, the impacts will again be deeper and directed at more critical areas than the</p>

			assessment in this ES has managed to model, especially with regard to LU and Bus services and infrastructure that is already under great strain and will be required to meet significant onward travel and access demands from HS2 in the future.
	7.13		Camden Council considers the ES defective because there is not more information about how waste stored by sustainable placement will managed on site.
	7.14		Camden Council notes that the London Plan requires drainage in urban developments should aim to replicate greenfield runoff rather than merely avoid increasing the risk. Camden Planning Guidance CPG3 states that if greenfield is not achievable then a 50% reduction of brownfield should be achieved, however these points are not reflected in the proposed scheme.
8	8.1		<p>Camden Council notes the area proposed to be reprovided as open space in the proposed scheme design and does not consider the proposed space is equivalent in safety, location or size to the sites that have been lost. It also does not offer a solution to the loss of spaces during the long period of construction.</p> <p>The ES has omitted a site of demolition within the Euston area. The remodelling of Euston station and widening of the station approach will require the demolition of 215 dwellings, not 214 dwellings, as an additional dwelling is located at 77-79 Euston Street. The discrepancy between the figures of dwellings authorised to be acquired compulsorily in the Housing Statement and the figures of demolitions and CPOs in the ES is a serious defect of the ES.</p> <p>Camden Council notes that on page 55 there is a reference to four community facilities being lost. The CFA Euston report mentions only two community facilities in 5.1.2 (Old Tenants Hall and Wolfson House), while 5.4.21 / 5.4.22 refers to three (Old Tenants Hall, Wolfson House and 132-140 Hampstead Road). The latter two are UCL facilities, for uses by UCL staff and students, rather than general community use. Camden Council considers the ES is defective in that details of the fourth facility are not provided and there is inconsistency between documents.</p> <p>Camden Council considers that the complacent tone of this section is inappropriate and masks realities that the HS2 scheme and ES have not adequately addressed. Detailed comments have been made to the relevant sections of ES. Camden Council appreciates that this section is a summary rather than a definitive description but considers that it fails to recognise or capture some key impacts for this area. The Non-Technical Summary document is an important tool for</p>

			<p>communicating the project impacts to the general public. Camden Council considers that deficiencies in this regard include; commentary on concerns of residents over potential tunnelling and adjacent civil works impacts, especially potential property settlement concerns as a result of tunnelling works. This legitimate concern and potential impact is entirely ignored by the ES. Other downplayed or ignored issues include, proximity and severance impacts for adjacent occupiers from construction works and traffic arising from building the vent shafts and head houses; failure to more clearly indicate what "temporary" means in time terms when mentioning various impacts; failure to indicate likely scale of recognised adverse impacts when discussing air quality, noise and traffic. There is no mention of a dated works programme without which people can get no real appreciation of the overall impact on their lives. Camden Council has the following additional comments on this section: • P54 "Much of the existing station will be refurbished": this is not sufficient. The whole station needs to be reconsidered to ensure a properly integrated and comprehensive approach.</p> <ul style="list-style-type: none"> <li>• P55 "Demolition of Grant Thornton House and One Euston Square will allow a high quality station design and a unified station frontage onto Euston Road": a unified station frontage can only be achieved through a comprehensive approach that includes all of the buildings (including the Podium and remaining tower) to the front of the station as well as a properly considered, comprehensive approach to station development.</li> <li>• P55 "moving the bus station from the middle of the gardens to Melton Street, allowing the creation of a continuous open public space" the 'bus street' option preferred by TfL would involve access from Melton Street onto the Euston Station site. It would allow the reinstatement of the original continuous open public space that existed prior to the redevelopment of Euston Station in the 1960s. Camden would still like bus facilities focused on Euston Road, to avoid the need of buses circulating and severing the station and gardens, and strongly urge this option to be fully investigated.</li> <li>• P55 "The Government is working in partnership with London Borough of Camden on the replacement of social rented housing that will be demolished": "Partnership" is not an especially appropriate way of expressing a situation where Camden Council and DfT/HS2 Ltd are negotiating to reprovide social housing that will be lost through the HS2 project.</li> <li>• P55 Policy – this section fails to mention Camden's strong opposition to the HS2 proposals for Euston, due to the significant impacts on residents, businesses, the local environment and associated blight.</li> <li>• P55 "The [Euston Area] plan recognises that HS2 has the potential to bring benefits to the "area for both local residents and businesses and for London as a whole": This is an incorrect and one-sided summary of The Euston Area Plan. Whilst the EAP refers to securing any potential benefits associated with the rejuvenation of Euston Station and a new high speed rail</li> </ul>
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			<p>link, it also highlights a range of potential negative impacts of HS2 on the Euston area (which the EAP is seeking to address), highlights Camden's opposition to the scheme, and emphasises that alternative station designs than the current one proposed by HS2 Ltd would better meet EAP objectives for the area.</p> <ul style="list-style-type: none"> <li>• P57 – acknowledges temporary and permanent impacts on the amenity of residents in surrounding areas around Euston (the EAP sets out measures to mitigate these impacts, including flexibility around future land uses where appropriate and indicating a potential layout of replacement buildings if the environment at Coniston, Langdale and Augustus House on the Regent's Park Estate is rendered uninhabitable by HS2)</li> <li>• P58 Landscape and visual assessment "The station frontage will incorporate high quality architectural design": This would be better achieved through a comprehensive approach to station redevelopment rather than piecemeal approach currently envisaged.</li> <li>• P59 "The project will contribute to the regeneration of the surrounding Euston area, helping attract businesses and investment, creating approximately 2,000 indirect jobs" This could only be achieved if an integrated and comprehensive approach is taken that brings together a high quality public realm, significantly improved pedestrian connectivity, world class station design and above station development. Significantly higher job creation and investment could be delivered through a properly planned and comprehensive approach. This is currently not demonstrated to be the case.</li> <li>• P59 "The presence of the construction works may discourage people from using the Roj Café and Sandwich Bar on Eversholt Street, the Exmouth Arms on Starcross Street and the Wesley Hotel on Euston Street". This fails to acknowledge significant potential effects on surrounding businesses including those on Drummond Street and Eversholt Street, whose custom could be significantly affected.</li> <li>• P59 "Other changes to road traffic will result in adverse noise effects around North Gower Street, Cobourg Street, Stanhope Street, Mornington Street and Arlington Street": This should be avoided by ensuring that planning transport provision to avoid focusing on these routes. The EAP sets out proposed measures to guide transport provision to appropriate routes.</li> </ul>
	Community		<p>Camden Council finds the demolition of community, commercial, and residential property unacceptable because of the unjustified impact on existing communities. Camden Council considers the ES is defective in that the areas adversely affected by HS2 impacts have increased since those the draft ES. Numerous properties previously considered unaffected are now at risk. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the</p>

			<p>expanded affected area in Camden. Camden Council considers that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>Camden Council considers that the ES does not fully assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the EIA impact analysis contains only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. The ES is defective in this regard. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impacts of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example,</p>
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			<p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers the ES is defective in that there is a reduction of disabled housing from the demolished blocks (2 in Silverdale) and there are a number of residents with mental health issues that could potentially be compounded by the relocation. In order to properly assess impacts and potential mitigation the ES should have provided for coordination with support services, none of which is mentioned in this analysis.</p> <p>Camden Council notes that the HIA identifies that moving home has an impact upon health, especially for older people and children. The mitigation in the ES suggests that re-housing options will be provided. However, the Council's experience in re-housing suggests that often people need a range on mitigation measures to counter the effects of moving home and from their communities including access to services and ongoing support. This is particularly the case for people that feel they were not part of the decision to move. The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage and Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council requests HS2 to publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p>
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		<p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council finds the demolition of community, commercial, and residential property (ref: pg 61), unacceptable because of the unjustified impact on existing communities. 62 - Community: Camden Council considers the ES is defective in that the areas affected by HS2 have increased since the draft ES. Camden Council considers that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES.</p> <p>Numerous properties previously considered unaffected are now at risk. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council is concerned that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES is defective due to the lack of assessment of cumulative impacts and baseline surveys to be undertaken in advance of works.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES is defective in that the negative impacts on the Hawley Wharf development have not been properly considered. The Council expects no loss of community facilities and affordable housing within the Hawley Wharf development due to HS2. Camden Council considers the impact of HS2 on school children at Hawley Wharf has not been properly assessed.</p>
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			<p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example in Abbey Road and Agar Grove. The ES is not clear about defining “additional committed development” and has omitted Camden Council’s regeneration schemes in the area. Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council’s Cabinet as part of the borough’s Community Investment Programme and some have been granted detailed planning permission.</p> <p>The Council’s Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include Agar Grove, Hawley Wharf, and Maiden Lane regeneration schemes. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council finds the demolition of community, commercial, and residential property unacceptable because of the unjustified impact on existing communities. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed.</p> <p>Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys. Camden Council also considers the ES defective because it does not publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
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			<p>Camden Council would like to reiterate that there are a number of regeneration proposals in this area which will be affected by the HS2 proposals. The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include Abbey Road, Alexandra and Ainsworth, Langtry Walk, and Adelaide Road regeneration schemes. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	Traffic and transport		<p>In addition to the above comments which are also relevant here for the Euston Station and Approach, there are also issues regarding a real lack of cycle and pedestrian connectivity improvements which are entirely expected to comprehensively support a major Scheme such as HS2. Where these modes have been proposed the measures are very modest and in most cases reflect a poor replacement for others that are being lost through the proposed scheme. Similarly the construction impacts have been considerably down played, without full and proper account taken for all construction activities and also utility disruptions, which in accumulation, will have a profound effect on the local community for over 10 years.</p>
	8.2		<p>Camden Council notes that any changes to the proposed development at Hawley Wharf that have a negative effect on open space or affordable housing would also have a significant effect.</p> <p>Camden Council considers the ES is defective in that the residual effects of the Operational scheme reported in the ES incorrectly exclude the growth stagnation for the North London Line as a result of the HS1 Link. Camden Council considers that the flawed HS1 Link proposal will have a severe impact in strangling future growth potential of the North London Line to then not be able to meet projected and committed demands resulting from London's population growth and regeneration improvements within the NLL catchment areas. The impacts of this has not been addressed anywhere in the transport and ES assessment but is considered to be a fundamental issue in adversely impacting this important radial rail asset. Camden Council also considers that cycle and pedestrian connectivity improvements are not sufficiently provided to meet the demands of the HS2 scheme in this area of the Borough. These modes will be incredibly valuable in relieving pressure on more heavily investable modes and HS2 have not embraced this opportunity expansively enough for a scheme of this scale.</p> <p>Camden Council considers that the complacent tone of this section incorrectly masks realities that the</p>

			<p>HS2 scheme and ES have not adequately addressed. Detailed comments have been made to the relevant sections of ES. Camden Council appreciates that this section is a summary rather than a definitive description but considers that it fails to recognise or capture some key impacts for this area. The Summary document is an important tool for communicating the project impacts to the general public. Camden Council considers that deficiencies in this regard include; commentary on concerns of residents over potential tunnelling impacts, especially potential property settlement concerns as a result of tunnelling works. This legitimate concern and potential impact is entirely ignored in the ES. Other downplayed or ignored issues include, proximity and severance impacts for adjacent housing, business, and social enterprise occupiers from construction works and traffic, failure to more clearly indicate what "temporary" means in time terms when mentioning various impacts; failure to indicate likely scale of recognised adverse impacts when discussing air quality, noise and traffic. There is no mention of a dated works programme without which people can get no real appreciation of the overall impact on their lives.</p>
	8.3		<p>Section 8.3 fails to identify three residential properties at 264 Belsize Road which are authorised to be acquired compulsorily in the Housing Statement but are omitted from the ES. Camden Council considers this omission to be a serious defect of the ES.</p> <p>Camden Council disagrees that there will be no adverse effects from construction on ecology, as Adelaide Nature Reserve is adjacent to the vent shaft construction site, which will cause a reduction in nesting and general disruption for the ecology of the valued nature reserve. Camden Council considers there is insufficient information in the ES clarification on the community facility that is listed as being demolished. This facility is not identified elsewhere in the document.</p> <p>Camden Council would like to stress that Adelaide Road Local Nature Reserve is a considerable community resource providing volunteering opportunities for local people and outdoor learning for local schools. Camden Council points out that these community facilities will be adversely affected by the vent shaft construction on the adjacent land, the potential take up of the Local Nature Reserve during construction, road closures and pedestrian diversions. Camden Council would also like to stress that loss of capacity for volunteering at Adelaide Local Nature Reserve will adversely affect the ecology since volunteering programmes are the sole means of management and maintenance for this site.</p> <p>Camden Council considers that cycle and pedestrian connectivity improvements are not sufficiently provided to meet the demands of the HS2 scheme in this area of the Borough. These modes will be</p>

			<p>incredibly valuable in relieving pressure on more heavily investable modes and HS2 have not embraced this opportunity expansively enough for a scheme of this scale.</p> <p>Camden Council appreciates that this section is a summary rather than a definitive description but considers that it fails to recognise or capture some key impacts for this area. The Summary document is an important tool for communicating the project impacts to the general public. Camden Council considers that deficiencies in this regard include; no commentary on concerns of residents over potential tunnelling impacts, especially potential property settlement concerns as a result of tunnelling works. This legitimate concern and potential impact is entirely ignored in the ES. Other downplayed or ignored issues include, proximity and severance impacts for adjacent housing occupiers from construction works and traffic arising from building the vent shafts and head houses; failure to more clearly indicate what "temporary" means in time terms when mentioning various impacts; failure to indicate likely scale of recognised adverse impacts when discussing air quality, noise and traffic. There is no mention of a dated works programme without which people can get no real appreciation of the overall impact on their lives.</p>
	8.6		<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
9	9.4		Camden Council notes that it will be disproportionately affected by carbon emissions related to both

			<p>the construction and operation of HS2 due to the location of Euston station in the borough with the project's carbon footprint over the course of the construction period representing approximately 1.9% of the UK's annual construction carbon footprint. This means that HS2 will have a negative impact on the council's own borough-wide emissions targets up to 2020 and beyond.</p> <p>Camden Council believes a geographical breakdown of emissions should have been undertaken by HS2, especially in relation to station construction and modal shift of journeys to stations in the operational phase in order to adequately identify the impacts of the scheme.</p>
	9.5		<p>Camden Council stresses the value of urban green space and trees, as well as rail side land to breeding birds.</p> <p>Camden Council emphasises that the potential adverse effects on breeding bird populations in urban areas will also affect urban communities for whom birds and bird song are a vital connection to nature and enhance wellbeing in built up areas</p>

# **HS2 Phase One environmental statement volume 1: introduction to the environmental statement**

## Introduction to the Environmental Statement and the Proposed Scheme (Ref ES 3.1.0)

Section	Sub section	Paragraph	London Borough of Camden response
1	1.5		Camden Council considers that Design Aim 2 should be amended to not just avoid any increase in flood risk but take opportunities to reduce it. This is in line with the London Plan which asks developments to achieve greenfield runoff rates wherever possible.
	1.6	1.6.4	Camden Council considers that compensation payable should be acquired at full unblighted open market value.
2	2.3		Camden Council contends that the extent to which HS2 will relieve capacity on existing lines is not stated or demonstrated and will be strongly influence by price as well as time savings, with different effects depending on market segment. If HS2 fares are priced higher than classic rail services (premium pricing) while the demand for rail will increase due to journey time savings it will fall due to premium pricing. There is no evidence provided that HS2 will relieve capacity. The Council's analysis of CFA01 (paragraphs 12.5.7 to 12.5.9) indicates the opposite may be true. That HS1 has captured 80% of the London-Paris rail/air market (paragraph 2.3.12) infers that HS1 has abstracted traffic from air, but provides no evidence that HS2 would relieve rail capacity on classic lines.
		2.3.6 - 2.3.15	<p>Camden Council states that no reference is made to the relative price of journeys by competing modes, or to the trade-off between time and money made by different market segments by journey purpose. Paragraph 2.3.6 states that many lines would be at or near capacity by 2020, and while paragraph 2.3.11 states that "Journey time is a key influence on the ability of rail to compete with other modes", journey price is also a critical factor affecting demand.</p> <p>"The critical prognosis for the WCML [in terms of reducing capacity] is a key influence both on the overall case for HS2 and on the more immediate benefits of Phase One" (paragraph 2.3.6). "The WCML carries passenger services of every type, including long distance intercity, inter-regional and commuter passenger services and freight. Congestion on the WCML has a noticeably detrimental effect on the reliability of intercity and commuter services, which regularly fail to meet their performance target and are below the national average." (Paragraph 2.3.8). There is no evidence presented here about the extent to which HS2 might relieve capacity on these market segments so is therefore moot.</p> <p>The stated journey time London-Manchester (paragraph 2.3.15) is too short at one hour 8 minutes, and does not agree with 1 hour 40 minutes stated in Table 5.</p>



		2.3.18	Camden Council notes that improved journey times by up to an hour from Edinburgh and Glasgow without changing trains are claimed. However, the current journeys use tilting trains. The HS2 trains won't need to tilt and therefore won't tilt on the WCML reducing their operating speed to "normal". Will this actually result in improved journey times? No evidence is presented in the ES on this claim.
	2.4		<p>Camden Council strongly disputes the assertion that the proposed HS2 scheme puts in place the conditions to harness the potential for economic growth. Section 2.4 of Volume 1 entirely overlooks the vital importance of London to UK growth and to the success of interlinking regional cities. Improved connectivity is just one of the many conditions needed to support growth.</p> <p>Just as Crossrail aspired to be 'more than just a railway', HS2 should not be seen as a rail engineering project in isolation as is currently the case. HS2 aspires to be an 'outstanding project' yet there is insufficient evidence of this in the current proposed scheme and plans. HS2 does offer an opportunity to unlock growth and regeneration but only if the correct conditions and scheme proposal are put in place. As identified in the government's HS2 Growth Taskforce paper 'The Challenge', unlocking regeneration potential and delivering HS2 through our industries and workforce are also vital to the generation of growth from HS2.</p> <p>Camden Council considers that there is much more that HS2 Ltd must do to put in place the conditions for economic growth. These include:</p> <ul style="list-style-type: none"> <li>• Raising ambitions for Euston and delivering a comprehensive redevelopment scheme that delivers against all the objectives of the Euston Area Plan.</li> <li>• Addressing the blight caused by HS2 in Camden. HS2 will have severe adverse impacts on Camden's communities. HS2 Ltd. must commit to and deliver a comprehensive blight mitigation and compensation strategy in areas affected by HS2 if future growth is to be enabled.</li> <li>• Dropping the HS1 Link in its current form. As HS2 representatives have stated on numerous occasions to Camden Council, there is no business case for the link. The justification that there is a strategic case is weak and has not been clearly made. The link will bring significant impacts to Camden Town, one of London's major tourist destinations and centres for the creative and cultural industries. The link also cuts off potential future growth on the expanding London Overground network and freight services. Camden Council recommends that the HS1 Link be dropped in its current form and alternatives such as complete suspension or tunnelling are considered</li> </ul> <p>Camden Council is already a growth ready authority irrespective of HS2. HS2 Ltd is not learning from or utilising the Council's extensive experience in managing the delivery of high quality economic</p>

			<p>growth and regeneration projects, such as HS1 and King's Cross Central. This opportunity is currently being missed.</p> <p>Camden Council notes that paragraph 2.4.4 of Volume 1 uses the example of HS1 acting as a catalyst for growth and regeneration. As the local planning authority, Camden Council was instrumental in enabling the growth that has happened at King's Cross. The Council secured this through a separate strategic visioning and planning process with extensive community engagement and partnership working. HS2 is not currently learning from the Council's experience at King's Cross and putting the conditions in place to secure growth at Euston.</p> <p>Camden Council advises that without a significant change of direction HS2 will have an adverse effect on growth. In Camden Town, the HS1 Link threatens to bring the town centre to a halt, delay major regeneration projects and derail the creative economy and iconic cultural and visitor destinations such as the Camden Markets. In Euston, the current proposed scheme will mean a significant regeneration opportunity will be lost and growth prospects compromised. Additionally, growth will not be enabled unless HS2 Ltd comprehensively mitigates the blight of HS2 on Camden's communities.</p>
	2.5		<p>Camden Council notes that much emphasis is placed on HS2 reducing construction and operational emissions through the implementation of its Sustainability Policy. However Camden Council considers the explicitly low carbon elements of the Sustainability Policy may be subsumed by other areas of the Policy, i.e. 'growth and regeneration' and 'skills and employment'.</p>
4	4.1		<p>Camden Council is opposed to HS2. Its adverse impacts on Camden are widespread and completely inadequate account has been taken of them in both the project concept and in proposed mitigation commitments.</p> <p>Camden Council considers that the case for High Speed 2 has not been made and this fundamental defect in the proposal will result in Camden suffering by far the greatest level and number of adverse impacts of any area along the proposed route. The rationale and justification for HS2 has changed many times over the period since it was first announced. The credibility of the HS2 proposition has been fatally undermined when even the project promoter cannot establish consistently why the project is needed and what role it should play. The case set out in this Non-Technical Summary is a post-justification of a weak or non-existent basis for the scheme.</p>
	4.2	4.2.1 – 4.2.7	<p>Camden Council considers that the current station design would fail to make the best use of new station above the station and tracks as the proposed piecemeal and confused approach would fail to</p>

			deliver a comprehensive development that would maximise development potential, and would fail to take advantage of all opportunities to integrate with the wider area/ wider regeneration. It fails to deliver a number of key EAP objectives.
		4.2.8 – 4.2.10	Camden Council believe that in order to prevent further blight and uncertainty the promoters of the scheme should offer enough security to property owners that tunnelling will not damage their property and put in place a compensation scheme that offers communities security should their properties suffer any damage from tunnelling.
		4.2.11 – 4.2.12	Camden Council does not believe that a convincing case has been made for the link to HS1. Notwithstanding this the proposed link on the existing London line is neither fit for the stated purpose nor does it offer a workable proposal for existing transport networks.
	4.3	4.3.4	Camden Council notes that it is stated that trains on classic network will be equipped with suitable train control system and be reduced width and height. This does not confirm the operating speed on WCML.
		4.3.6	<p>Camden Council considers the ES is defective in that no indication is given for when the projected maximum of 14tphof will operate in Phase One. This is a critical issue for passenger dispersal at Euston. Camden Council notes that no evidence is given for why 11 platforms are required for operation of HS2 at Euston and how this relates to the projected maximum of 18tph in Phase Two.</p> <p>Camden Council objects that Figures 11 to 13 and related text are vague and that further explanatory text is required. In Figure 11:</p> <ul style="list-style-type: none"> <li>• If there are 11 tph on the section between Birmingham Interchange and Old Oak Common and 3 tph proceeding to the Channel Tunnel, then 8tph must proceed to Euston not 11tph, unless 3pth start at Old Oak Common.</li> <li>• There appears to be 8tph to Preston/Glasgow, but none to Liverpool, Manchester, Leeds and Newcastle.</li> </ul> <p>In Figure 12, 3tph + 8tph north of Birmingham Interchange cannot become 14tph south of Birmingham Interchange.</p> <p>In Figure 13, no sense can be made of the proposed numbers.</p> <p>The number in circles must relate to tph on each route section. The Figures read as if they refer to maximum tph that HS2 could operate on each section, but this is not stated. Forecast number of morning peak arrivals are given in Volume 2, CFA01 table 26 and this must be based on an assumed service pattern. The number of assumed tph between OD pairs should be presented in tables. [The lack of details may breach EU regulations.]</p>
		4.3.8	Camden Council contends that the proposed operating speeds on the HS2-HS1 link should be

			specified
		4.3.14	Camden Council would like it to be confirmed whether “safe worksite” will be required in Camden for new assets in the borough.
		4.3.20	Camden Council would like it confirmed if there are stabling and service preparation requirements at Euston and if so, what the implications are, particularly in terms of environmental impacts
5	5.3		Camden Council notes that in order to ensure that any discharge to the urban drainage system is at a controlled rate, sustainable drainage systems must be introduced to ensure that requirements of Camden Planning Guidance 3 that new developments' drainage is a 50% improvement on the previous brownfield development is met. This would still be less than the London Plan's aim that it should replicate greenfield. Calculations of this must consider the loss of infiltration into green spaces. Camden Council, in its role as Lead Local Flood Authority, must be party to any discussions with Thames Water on agreed rates of discharge.
	5.5, 5.7		Camden Council seeks assurances that no structural damage will be caused to property above or in the vicinity of proposed tunnels or ventilation shafts and related works and that compensation will be paid in the event of any damage being caused.  Noise mitigation from urban vent shafts and associated headhouse equipment need to be defined in detail.
	5.14		Camden Council considers that the best available technology should be used when designing and implementing mitigation measures such as noise barriers.
	5.16		Ground-borne noise will be minimised by slab track design to suit ground conditions. More details need to be provided to mitigate noise effects on adjacent properties - particularly immediately above.
6	6.3		Camden Council considers that the LEMP should be made available as soon as possible to ensure that adequate controls are in place to manage construction. Camden Council considers the LEMP should be drafted in conjunction with the local community and the Council.  Camden Council notes that the areas affected by HS2 have increased since the draft ES. Numerous properties and open spaces previously considered unaffected are now at risk. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council considers that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. Camden Council considers that properties that will experience a significant amenity effect have not been

			<p>properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys. Camden Council considers the ES defective as it does not publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
		6.3.4	Camden Council requests HS2 to manage all resident enquiries about disruption in services and manage the interface with utilities and service providers and to provide information to residents about all temporary and permanent impacts to service through effective communication channels.
		6.3.29	Camden Council question where the police resources for escorts will come from. There is no spare capacity within the boroughs police service to cover off such additional tasks without taking away from dealing with community safety priorities.
		6.3.35 - 6.3.46	Although these paragraphs are under the heading "Handling of construction material and waste", Camden Council considers that there is a complete lack of reference to inbound materials at this high level. Camden Council feels there should be an equal emphasis on all in and outbound materials to compounds and this section should be amended accordingly.
	6.4		<p>Camden Council seek assurances that there will be a proper approval process/ method put in place for these and that all steps will be taken to provide as much detailed notice as possible, using the Council's local knowledge to feed into the timetabling and programming of these. Every effort should be made to minimise the impacts of these works and their extent, means that careful co-ordination will be needed.</p> <p>Camden Council considers that advance mitigation works should also involve some planning and preparation of alternative sites to provide for loss of access to greenspace, for example on Regents Park Estate. Camden Council considers that this should include planning for mitigation against the</p>

			loss of services lost at Adelaide Road Local Nature Reserve including provision for Forest Schools and Green Gym volunteering activities. Camden Council considers that similar advance planning might also be necessary to mitigate loss of vehicular access at Baynes Street which is another Green Gym and Forest Schools site.
		6.4.11	Camden Council considers the ES is defective in that it has not properly assessed the impact of HS2 arising from utility diversions and construction work on the health and well-being of local communities and the Council's ability to manage services in affected areas in Camden. Camden Council services include, but are not limited to, deliver of housing repairs and capital works, management of housing voids, mechanical and electrical services, and caretaking services. Camden Council would require that an overview of HS2 works is provided 5 years in advance in line with projected expenditure of the Council's capital programme and 2 years' notice of detailed works in order to allow the Council to respond to the impact on services and communities and meet health and safety regulations. There are significant resources needed to ensure these impacts are managed safely and Camden Council will require compensation for increase costs to housing management and contractor resources incurred to maintain standards where disruption has been caused by HS2.
		6.4.12	Camden Council would require that all council owned utility infrastructure/ associated containment and routes of entry into property be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project.
		6.4.13	<p>Camden Council notes that the utility searches, undertaken as part of the ES, to date do not include Camden owned gas infrastructure and other services and no discussions have been held with the Council, a major gas transporter in the borough. Camden Council therefore considers that HS2 have not taken into consideration the full utility infrastructure in Camden and the ES is therefore incomplete.</p> <p>Camden Council considers the ES is defective in that it does not properly assess the level of disruption of critical services (water, heating, lighting, etc.) and the effect this will have on residents as well as pressure on council services on managing assets and the welfare of residents. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council requests for discussions between Camden Council and HS2 to commence at the earliest opportunity and an approach agreed for any work required. Camden Council will require HS2 to undertake full risk assessment and monitoring of all utilities in the vicinity of HS2 sites. Camden Council will require</p>

			<p>compensation for any break in service cause by HS2 utility diversion works or construction works. Camden Council requests working digital files of HS2 plans and sections in facilitate Camden Council/HS2 discussions of effected areas and mitigation work required. Camden Council requests that all interface with affected utilities is managed in a timely manner by HS2 and that Camden is compensated for any additional burden imposed.</p> <p>Camden Council requests that HS2 have an Emergency Response plan in place to deal with any utility failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time. Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision</p>
		6.4.14	<p>Camden Council notes that as a gas transporter in the Camden, Camden Council would require an approach to be agreed with the Council Camden Council requests that all interface with affected utilities is managed in a timely manner by HS2 and that Camden is compensated for any additional burden imposed. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other way leaves affected by the proposals. Camden Council requests that HS2 manage all other statutory provision associated with the impact to property including but not limited to party wall matters.</p>
		6.4.15	<p>Camden Council requires that the Council is indemnified in perpetuity against any and all claims or action that may arise consequential to the use of high frequency radiation.</p>
		6.4.16	<p>Camden Council considers there to be a high level of disruption caused by the HS2 project on communities and services. Camden Council considers there to be serious health and safety impacts of access disruption and would seek HS2 to work with Camden Council to ensure HS2 construction works will not interfere with the delivery of services e.g. meals on wheels to vulnerable residents, refuse collection, estate cleaning, and ensure safe working conditions are maintained throughout council estates. Camden Council will require compensation for increase costs to housing management incurred to maintain standards where disruption has been caused by HS2.</p> <p>Camden Council considers the ES is defective in that utility searches to date do not include Camden owned gas infrastructure and no discussions have been held with the council to date, a major gas transporter in the borough. Camden Council therefore considers that HS2 have not taken into consideration the full utility infrastructure in Camden. Utility diversions are likely to have a significant effect on a wide area, therefore have an impact on a lot of people who live, work and travel through</p>



			<p>Camden. Camden Council considers there is a significant level of disruption of critical services (water, heating, lighting, etc.) and considers the ES is defective in the lack of assessment on the effect this will have on residents as well as pressure on Council services on managing assets and the welfare of residents. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council requests for discussions between Camden Council and HS2 to commence at the earliest opportunity and an approach agreed for any work required. Camden Council will require HS2 to undertake full risk assessment and monitoring of all utilities in the vicinity of HS2 sites. Camden Council will require compensation for any break in service cause by HS2 utility diversion works or construction works. Camden Council requests that all interface with affected utilities is managed in a timely manner by HS2 and that Camden is compensated for any additional burden imposed. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals. Camden Council requests that HS2 manage all other statutory provision associated with the impact to property including but not limited to party wall matters. Camden Council requires that the Council is indemnified in perpetuity against any and all claims or action that may arise consequential to the use of high frequency radiation. Camden Council will require compensation where the siting of towers/cables impinges on the ability to deliver services e.g. by restricting use of cranes, mobile platforms and other high access equipment. Camden Council requests working digital files of HS2 plans and sections in facilitate Camden Council/HS2 discussions of affected areas and mitigation work required.</p>
		6.4.17	<p>Camden Council will require compensation where the siting of towers/cables impinges on the ability to deliver services e.g. by restricting use of cranes, mobile platforms and other high access equipment.</p>
	6.5	6.5.1	<p>Camden Council would require that all council owned utility infrastructure be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project. Camden Council would require that HS2 works will not interfere with the delivery of council estate services and ensure safe working conditions are maintained throughout Camden Council estates. Camden Council would require that standards of habitability are maintained throughout construction work, including all aspects of health and safety (e.g. fire safety, pest control, etc.) Camden Council requests a two years' notice period prior to commencement of works to assess health and safety and service delivery impacts. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other way leaves affected by the proposals. Camden Council requests that HS2</p>



			manage all other statutory provision associated with the impact to property including but not limited to party wall matters.
	6.6		Camden Council considers that a key factor influencing the location of construction compound should be the likely impact such a compound may have on nearby receptors.
	6.7	6.7.2	<p>Camden Council notes that Adelaide Road Local Nature Reserve has been identified as land potentially required during construction and the Adelaide Road vent shaft and construction compound is to be built on a private nature reserve and woodland.</p> <p>Camden Council notes that other areas identified in the Environmental Statement as land <i>potentially</i> required during construction have been confirmed by HS2 as <i>certain and definite</i> land takes. This renders the Environmental Statement defective and the Council considers the ES is defective, especially considering the potential loss of a Local Nature Reserve, when a large amount of woodland is already been lost from the vent shaft.</p> <p>Camden Council points out that both private and public nature reserves will need sensitive treatment of habitats, species and soils (including seedbanks) to ensure that that the site's ecology and function can be restored post construction.</p>
		6.7.4	Camden Council notes that no assessment is made in the Cultural heritage section of the impact of heavy construction vehicles on grade II listed early 19 <sup>th</sup> century townhouses in Jeffreys Street. In response to local concerns that vibrations could cause structural damage to historic buildings, reference is made to the Environmental Statement Volume 1 Para 6.7.4 which states that where it is agreed with the local authority that there is no best practicable means to reduce predicted or measured vibration, a condition survey of building foundations/third party assets will also be undertaken prior to and after the relevant works. It is requested that this path of action is taken by HS2 Ltd.
	6.18	6.18.1	Refers to methods set out in the relevant CFAs. Please refer to Camden Council's comments provided on the CFA's.
	6.20		Camden Council considers that the design of the noise barriers needs to be in conjunction with the local community and the Council. Where possible, landscaping should be designed to complement air quality and ecology. Camden Council considers that noise mitigation must be focussed at source and not reliant on noise barriers.

	6.25		<p>Camden Council objects to the lack of consideration given to using existing rail infrastructure in Camden, including special services to Euston station during quieter operating times, to deliver materials, take away spoil and waste, as provide construction consolidation activity to serve worksites in the borough (paragraph 6.25.3). Consideration should also be given to using the HS2 alignment into Euston as a 'construction railway' for the above purposes.</p> <p>The Proposed Scheme will reduce the number of platforms for the termination of classic rail services at Euston from 18 platforms to 13 (Table 7). Camden Council considers that the current train capacity for travellers to/from Euston in different types of services and destinations might be reduced creating a detrimental impact on the existing rail infrastructure. The reduction of any classic rail services does not necessarily align with the supposition that HS2 will provide additional capacity. The ES is unclear in this respect.</p> <p>Details must be provided about the impact of the works on the North London line and mitigation of impacts must be set out.</p>
7	7.1		<p>Camden Council considers the ES is defective in that there is a lack of comprehensiveness in the baseline data gathering. Gaps have been identified in the data, for example the modelling used to establish the transport impacts and surveys were not conducted to establish the ecological baseline accurately.</p> <p>Camden Council responded to the draft Environmental Statement through the formal process, however not all comments or discussion outcomes seem to have been captured in this version. Therefore the council believes views from the stakeholder and public consultation have not been taken into consideration adequately, such as designing the vent shafts to be in keeping with the surrounding landscape, leaseholder concerns about the impact of housing demolition in the Euston area and cumulative impacts on the community. Camden Council expects to have this remedied through the Environment Memorandum or through formal commitments post consultation of this document.</p> <p>Camden Council disagrees with many of the assessments of what is considered 'significant effects' and the appropriateness of the assessed mitigations.</p>
	7.2		Camden Council considers that when evaluating the future use of HS2, the Environmental Statement

			(to its detriment), does not take into consideration new emerging technologies or people's travel preferences that may be in effect by the time HS2 is completed. Camden Council considers the geographical scope to be too limited and it does not take a wide enough area view of the impact on the proposal.
	7.3		<p>Camden Council disagrees with many of the assessments of what is considered 'significant effects' and the appropriateness of the assessed mitigations.</p> <p>Camden Council notes that temporary refers to both impacts as short as 1 year and as long as 11 years. An effect that continues for 11 years should be given significantly more weighting, consideration and mitigation because of the impact of such a long duration, which for a child in the area is the majority of their school life.</p> <p>Camden Council considers that not all indirect impacts have been noted within the Environmental Statement, for example the indirect impact to Adelaide Nature Reserve during construction of the vent shaft.</p>
	7.4		<p>Camden Council notes that proposed developments are not included in the cumulative effects assessed in the ES. The Council has a long process of design and consultation when planning regeneration schemes and those that are already under way should be considered through the Environmental Statement. It is significant defect of the ES that the cumulative impact of these developments with the HS2 scheme are not considered.</p> <p>Camden Council considers that cumulative effects should include the loss of further open space which has been caused through the building of new homes in the Euston Area as mitigation for lost housing.</p> <p>Camden Council notes that there is also a cumulative impact in Euston of a loss of open space during construction while multiple sites are being used by HS2 Ltd.</p> <p>Camden Council considers the ES is defective in that many properties that will experience a significant amenity effect have not been properly identified and assessed.</p> <p>Camden Council considers the ES is defective in that there are a number of discrepancies within the environmental statement, and that without a full list of affected properties including those identified for</p>

		<p>demolition it is hard to assess the impact of the scheme.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council requests that where rehousing is necessary as mitigation for severe noise impacts – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p>
	7.5	<p>Camden Council argues that, when considering the effect on community, overheating must be considered both in the construction and operational phases due to the impact on the urban heat island.</p> <p>Camden Council notes that it will be disproportionately affected by carbon emissions related to both the construction and operation of HS2 due to the location of Euston station in the borough. This means that HS2 will have a negative impact on the council's own borough-wide emissions targets up to 2020 and beyond.</p> <p>Camden Council believes a geographical breakdown of emissions should have been undertaken by HS2, especially in relation to station construction and modal shift of journeys to stations in the operational phase in order for the council to appropriately assess the scheme.</p>
	7.7	<p>Camden Council considers the ES is defective in that the robustness of the baseline data as comprehensive surveys were not completed within Camden homes and ecological surveys were not</p>

			<p>conducted on affected open space.</p> <p>Camden Council has identified gaps in the data, for example the modelling used to establish the transport impacts. These flaws have made it difficult to assess the Environmental Statement.</p> <p>Camden Council notes that there is not enough information provided in the Environmental Statement to adequately assess the cumulative impacts on residential housing from the scheme.</p>
8	8.3		<p>Camden Council considers the ES is defective in that there is a lack of comprehensiveness of the baseline data gathering. The Council has identified gaps in the data, for example the modelling used to establish the transport impacts is incorrect and surveys were not conducted to establish the ecological baseline accurately. Camden Council responded to the draft Environmental Statement through the formal process, however not all comments or discussion outcomes seem to have been captured in this version. Therefore we believe views from the stakeholder and public consultation have not been taken into consideration adequately, such as designing the vent shafts to be in keeping with the surrounding landscape, leaseholder concerns about the impact of housing demolition in the Euston area and cumulative impacts on the community. We expect to have this remedied through the Environment Memorandum or through formal commitments post consultation of this document. Camden Council disagrees with many of the assessments of what is considered 'significant effects' and the appropriateness of the assessed mitigations.</p> <p>Camden Council considers that the usage surveys are not reflective of actual open space visitor numbers. Camden Council considers the ES is defective in that HS2's methodology for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to</p>

			<p>mitigation measure installation.</p> <p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the ES is defective in that the data and method used is inappropriate. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impacts of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as supporting document) there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example,</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older</p>
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			<p>residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage, Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA).</p>
8	8.4	8.4.2	<p>Camden Council is dissatisfied that study areas for heritage assets in rural areas stretch to 500m either side of land potentially required for construction, but for urban areas such as Camden the distance is limited to 250m. This approach shows complete disregard for the richness and complexity of the historic urban environment and provides a loophole for significant heritage assets in close proximity to the Proposed Scheme to be overlooked in terms of impacts and effects, thus missing out on mitigation and other construction measures.</p>
		8.4.3	<p>Camden Council considers the ES is defective in the inappropriate use of "a degree of professional judgement to define the extent of the study area" for appraising the setting of a designated heritage asset. This is not a watertight system of assessment and is likely to be prone to inconsistencies due to the different opinions of individual professionals. This is another example of HS2 Ltd.'s failure to treat urban and rural areas equally, based on sound and well-tested procedures.</p>
		8.4.4	<p>Camden Council consider the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk</p>

			<p>assessed and the ES is considered deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council consider the ES to be deficient in this regard.</p> <p>It is therefore possible that lorry movements for removal of contaminated land within Camden have been underreported in the Environmental Statement. This will impact on the assessment of noise, air quality, dust and safety for road-users/pedestrians and is a flaw of the environmental statement.</p> <p>Camden Council highlights that in compiling the cultural heritage baseline data, no information was included on non-designated heritage assets including positive contributors in conservation areas and entries on the Camden draft Local List. Little information was included on archaeological assets of local value. This information is readily accessible on the Council's website and is regularly updated.</p> <p>Camden Council notes that conservation and heritage officers were not involved in discussions with HS2 Ltd on survey work; there appears to have been more onus on HS2 Ltd to discuss matters on a route-wide level with English Heritage staff rather than at local authority level, where there is likely to be greater knowledge of local issues.</p> <p>Camden Council points out that no evidence has been given by HS2 Ltd that the appropriate level of surveys and inspections of heritage assets was made at the feasibility stage, especially where direct physical impacts are likely. It is critical to undertake full internal and structural surveys of listed buildings likely to suffer major impacts, for instance the two listed buildings to be demolished at 14-15 Melton Street.</p> <p>Camden Council points out that it is noted in Vol 2 CFA 01 report, table 1, that the construction of the two 1980s forecourt towers at Euston proposed for demolition is unknown. These are some of the</p>
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			<p>largest buildings to be demolished route-wide and no investigation has been undertaken of their basic structure. As they are modern buildings, documentation should be available from public sources, including the RIBA and local authority Planning and Building Control records.</p> <p>Camden Council requests procedures for survey work are followed as set out in the Environmental Statement.</p>
		8.4.6	<p>Camden Council considers that HS2 Ltd.'s approach to the assessment of impacts on heritage assets based on their significance has not been adhered to in a consistent manner. Each asset has not been dealt with on a case-by-case basis; rather a wholesale approach has been employed looking at unprecedented numbers of assets, invariably disregarding the merits of individual assets and external influences affecting the significance of each asset, individual situations or needs.</p>
		8.4.7	<p>Camden Council considers that HS2 Ltd.'s inconsistent approach to the assessment of the effects on significance of heritage assets is reflected in the widely varied assessments of impacts and effects to be found in the Vol 5 CFA tables of impacts, which need to be fully reviewed to give a fair picture of the extreme harm caused to Cultural heritage in the CFAs by the Proposed Scheme. Invariably, insufficient mitigation measures have been identified, where there are negative impacts on heritage assets. In many cases the harm is extreme and irreversible and can be compensated in its own right through mitigation measures.</p>
		8.4.8	<p>Camden Council wishes to stress that survey work has been inadequate, particularly where extreme physical impacts are anticipated. For instance, where the total or partial demolition of a listed building is proposed, a scholarly assessment can only be made with full survey details of its interior. There is no evidence in the Environmental Statement that HS2 Ltd has undertaken an appropriate level of survey work to make informed decisions on the future of Camden's rich cultural heritage. Camden Council wishes to emphasise that invariably where heritage assets have been undervalued, this has a direct link to the downplaying of impacts and effects. (Please refer to the examples in the response to Para 8.4.5 above.)</p>
		8.4.10	<p>Camden Council supports the approach set out in this paragraph and requests that these procedures cover as wide an area as possible in the vicinity of the Proposed Scheme. Camden Council wishes to highlight a number of significant heritage assets in the three Camden CFAs which are at risk from settlement impacts: grade II* listed Camden Incline Winding House, grade II* listed Primrose Hill Tunnel East Portals, grade II listed Swiss Cottage Library, grade II listed Hampstead Figure</p>

			Sculpture, grade II listed Regency Lodge, grade II listed Primrose Hill Tunnel West Portals, grade II listed Church of All Souls, grade II* listed Alexandra Road Estate, grade II listed former Jack Taylor School. It should be noted that this list is not exclusive as there are likely to further be designated and non-designated heritage assets at risk of settlement.
		8.4.11	Camden Council disputes that planting, whether mature or otherwise, will compensate for the negative impacts from the Proposed Scheme, in particular the manifestation of vent shafts through poorly conceived headhouse designs. Camden Council requests that HS2 “goes back to the drawing board” in cases of poor design which fail to meet basic planning and design policies. Please refer to the response to Para 9.7.2 below.
	8.8		<p>Camden Council considers the ES is defective in that the socio-economic scope and methodology outlined in Volume 1 is limited and provides an unsatisfactory level of detail and therefore fails to address the issues of impact raised by the Council in response to the draft Environmental Statement.</p> <p>Please see Camden Council's full response to volume 5 - Scope and Methodology report and Camden Council's response to the baseline assessments in each Camden relevant CFA report. Camden Council considers the ES is defective in that a number of representations to the EIA Scoping and Methodology Report in terms of data requirements have not been covered in the ES. These included:</p> <ul style="list-style-type: none"> <li>- Exact number of businesses affected at each CFA (the EIA must produce precise data to be able to quantify the impacts on each geographical area)</li> <li>- Local breakdown to include detail of business sectors affected and potential impacts on the dispersal of established commercial centres and business clusters in each locality.</li> <li>- Analysis of the displacement of jobs and the corresponding impacts on employment in Camden's localised areas.</li> </ul>
		8.8.7	Camden Council requests further clarification regards the following statement, found under the fourth bullet point in section 8.8.7 – <i>“Any reduction in employment has been calculated by estimating the total employment of the business(es) affected, then, based on the business activity/sector type, by applying a percentage to represent the likely proportion of employment which could be significantly affected by changes in amenity or isolation”</i> . Camden Council considers the ES is defective in that the methodology used and how it has been applied is unclear. As a result this may imply that job losses have been underestimated.

			<p>Camden Council rejects the assumption of an indicative employment loss rate of 12% within those businesses who fall within the land required for the Proposed Scheme and so will be relocated. This assumption is based on data from the London Olympics construction project. Camden Council believes this comparison is fundamentally flawed because of the differences in geography and the type of businesses, sectors and services affected by the two separate projects. Camden Council therefore rejects the assumed jobs at risk figures caused by relocation and requests that HS2 Ltd conducts an alternative means to measure how job displacement will affect the job loss figures throughout Camden.</p> <p>Camden Council considers the ES is defective in that the ES provides advice which goes against the Proposed Scheme's plan for growth. It is clearly not acceptable against this stated ambition or in the interests of businesses or their wider communities for the ES to state that many businesses significantly affected by the Proposed Scheme because of isolation or changes in amenity can adopt "strategies" before reducing employment. The strategies, such as reducing workforce hours or delaying investments, will severely weaken the competitiveness of the affected businesses and result in more adverse effects on employment. Camden Council contends that it is completely unacceptable for HS2 Ltd to assume that businesses will absorb the negative impacts of HS2 without a comprehensive mitigation and compensation strategy being in place. Camden Council suggests HS2 Ltd refer to the response to section 9.11 which details the mitigations to help businesses in Camden deal with the blight caused by HS2, and that these are implemented as soon as is reasonably possible.</p> <p>Camden Council considers the ES is defective in that that there is no sectorial analysis of the temporary or permanent impacts from the HS2 construction on important nationally significant sectors in Camden such as retail, IT, scientific and technical.</p>
	8.9		Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed.
	8.10		The impacts of works should not be considered in isolation but must be considered in relation to their holistic effects on traffic conditions as a whole in the borough and for central London in general. In this context, 'traffic' includes pedestrians and cyclists. The implications for emergency services must be considered.

			<p>In developing the works programme for sites in Camden, the implications of the holistic effects on all modes of traffic must be considered. Adverse effects should be mitigated or if possible eliminated. The presumption should not be that all the works can take place simultaneously; the works programme will have to be sequenced accordingly. The project will need to discuss mitigation with Camden, with TfL and with adjacent boroughs that are likely to be affected by the works.</p> <p>The sequencing of works will need to take account of advance works and utility works, and allow for contingencies if major disruption of utility and other services may result from whatever works will be required for the Proposed Scheme.</p> <p>The Council objects to the lack of details given anywhere in the ES about pedestrian modelling that HS2 has conducted, though it is understood from TfL that some work has been undertaken. The detailed design of Euston station, its concourse, walkways and interfaces with the surrounding environment, including in particular with the Underground (and as appropriate Crossrail 2) should be subject to pedestrian modelling prior to its construction. The design should be modified to mitigate any problems identified, and should take account of projected demand in rail services and the projected increase in London's population and employment. The design should be designed to be future proofed as far as practicably, including against perturbation of all rail services using the station (high speed and classic rail services, as well as Underground and Crossrail 2) and have suitably dimensioned holding areas for passengers in the event of serious perturbations, especially of rail services terminating at the station.</p> <p>The ES does not demonstrate that HS2 Ltd is aware of the important learning dimensions captured from earlier major railway projects. For example, in <i>Lessons Learnt Crossrail Line 1</i> (Local Authorities Crossrail Inter-Boroughs Group Draft November 2013) paragraph 1.1 states: "The need for schemes to be 'future-proofed' where possible should allow a proper context for the strategic proposal to be set out, along with assessing cumulative impacts both from the project itself and any others in the area. This would allow progress of the projects to be better understood. Future-proofing will enable a better understanding of the project's relationship to the wider area and of the issues that concern those affected by the project." Paragraph 4.20 states "Future proofing should also ensure that new infrastructure and its immediate interface with the urban realm is sufficiently robust to be able to adequately cater for forecast demand growth within a reasonable time horizon, such as 30-40 years. Projects must demonstrate through modelling that pedestrians will be able to move through station walkways, platforms, concourses and ticket halls and that adequate provision is made to reservoir passengers when services are disrupted. Where several projects interact, or where new projects may</p>
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			<p>be included in future, provision should be made so that interfaces between systems can be constructed that linkages can demonstrable handle pedestrian and other flows.”</p> <p>In <i>Crossrail and Crossrail 2 – Latest Developments</i> (London Councils’ Transport &amp; Environment Committee report, 12 December 2013) paragraph 20 states “It is important that Crossrail 2 is developed alongside any HS2 proposals to ensure that London’s infrastructure can support predicted passenger numbers. Should HS2 proceed, the joint work programme for HS2 and Crossrail 2 at Euston will need to be coordinated to minimise the impacts of construction works.”</p>
	8.10	8.10.2	<p>In developing the works programme for sites in Camden, the implications of the holistic effects on all modes of traffic must be considered. Adverse effects should be mitigated or if possible eliminated. The presumption should not be that all the works can take place simultaneously; the works programme will have to be sequenced accordingly. The project will need to discuss mitigation with Camden, with TfL and with adjacent boroughs that are likely to be affected by the works.</p>
		8.10.4	<p>The sequencing of works will need to take account of advance works and utility works, and allow for contingencies if major disruption of utility and other services may result from whatever works will be required for the Proposed Scheme.</p>
	8.12		<p>Camden Council insists that when considering local flood risk, 'perching' i.e. the collection of water in the first layers of ground which cannot drain into the water table must be considered in determining the need for compensatory Sustainable Drainage Systems. (SuDS).</p>
9			<p>Camden Council considers the ES is defective in that there is a lack of mitigation for loss of homes in this section. HS2 needs to take this issue seriously and begin taking genuine steps for mitigating the devastating impact of HS2 on Camden homes and residents.</p>
	9.1		<p>Camden Council would like unreasonable cost or delay to be quantified and also the process and lead in to this. If early talks and detailed discussions are entered into it should be possible to avoid this. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. In general Camden Council do not believe that adequate assessment of the impact of the scheme has been carried out, nor that adequate mitigation is proposed, especially in relation to cumulative impacts.</p>

	9.2		Camden Council believes that there are opportunities for a better designed scheme which could provide mitigation of impacts through the design of the scheme. This applies to all the surface intervention works but especially in and around Euston Station and the vent shaft locations. The proposed scheme for the HS1 link is wholly inadequate. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs.
	9.3		Camden Council considers the ES is defective in that re-provision of lost sites is not considered as mitigation for temporary loss of land. In the case of Euston, 25,000m <sup>2</sup> of land will be lost during construction, and Camden Council expects replacement spaces (for example temporary use or public realm) to be considered as mitigation. Camden Council is disappointed that despite the aims of this section, many open space and recreation facilities that are being lost or significantly affected are not being offered appropriate mitigation.
	9.5		Camden Council considers that, given the huge impact that the project will have on air quality, the current proposals are wholly inadequate and suggests that additional mitigation measures are required for both the construction and in operational phases. These are:- <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from construction dust. Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using rail where possible to transport construction materials, and where not possible, to use the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• An Ultra-Low Emission Zone around the station during the In operational phase, to include restrictions that only allow zero and low emission vehicles to service the station, as detailed in the Euston Area Plan. Camden does not accept that this will happen naturally as a result in</li> </ul>

			<p>improvements in vehicle technology, as this has been promised in the past and has not materialised</p> <ul style="list-style-type: none"> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO2) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM10, PM2.5 and NO2. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
	9.6		<p>Camden Council considers that in order to adapt to climate change, the proposed development must decrease flood risk rather than just not increase it.</p> <p>Camden Council notes that the current scheme reduces green space and so will require the proposed green infrastructure approach to provide large amounts of green infrastructure to both compensate and to allow adaptation to climate change from flooding and overheating.</p>
	9.7		<p>Camden Council has and will continue to feed into the Heritage Memorandum through the Heritage sub group of the planning forum. It has raised a number of issues with the proposed regime which remain. Camden Council reserves the right to continue to comment on the process. Camden Council feels that given the rich architectural and archaeological heritage present in the Borough that there is a real missed opportunity if exemplar studies are not carried out to record and protect both heritage and archaeological assets. Camden Council believes that mitigation measures should go further than 'taking account of the range of effects identified in the ES' as there are many impacts that will be felt keenly but do not fit into the ES criteria. Camden Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refer you to the comments provided on the individual CFA reports, environment topics and route wide effects for Cultural Heritage.</p>
		9.7.1	<p>Camden Council wishes to stress that an unacceptably high number of direct physical impacts on heritage assets will occur in the three CFAs located within the Borough, which currently have not</p>



			been properly assessed and lack a planned programme of mitigation measures.
		9.7.2	Camden Council requests that HS2 Ltd continues to work closely with local authorities, English Heritage, the Greater London Archaeological Advisory Service and other heritage bodies, to achieve a satisfactory Heritage Memorandum for all parties concerned, providing mechanisms for all necessary provisions and procedures to be in place to safeguard the historic environment route-wide, including through mitigation. Camden Council draws attention to a number of instances in Camden of poor quality design proposals with major adverse effects on heritage assets. These cases require a complete redesign at this stage, as they fail to meet national and local planning policy requirements. The nature of the proposals is so sub-standard that modifications in terms of detailed design and mitigation at the Heritage Agreement stage would be unworkable. Camden Council requests that each case is addressed individually by HS2 Ltd, in response to the Council's comments, and that HS2 Ltd works closely with Camden Council in seeking to achieve appropriate solutions and mitigation.
		9.7.3	Camden Council requests that HS2 Ltd consults the Council and the Greater London Archaeological Service (GLAAS) on a Written Schedule of Investigation to set standards of recording on designated and non-designated heritage assets.
		9.7.5	Camden Council requests that HS2 Ltd works closely in the future with Council heritage officers, in conjunction with specialists from English Heritage and the Greater London Archaeological Advisory Service (GLAAS), to identify any further heritage assets currently not identified as being affected by the Proposed Scheme, to devise a programme of survey and investigation works, and a mechanism for delivering mitigation, including through Heritage Agreements.
		9.7.6	In order that the provisions of the Heritage Memorandum are effective, Camden Council requests that HS2 Ltd puts procedures in place to ensure that local planning authorities have the necessary level of heritage staff resources in place to deal with the significantly increased workload resulting from the Proposed Scheme. It is not sufficient for HS2 Ltd to expect already stretched local authorities to find the resources to fund extra officers or consultants. HS2 Ltd has already informed Camden Council that they will not be recommending that Heritage Agreements will warrant application fees, a decision based on current listed building application procedures set by the Government legislation. This means that the current intention is that HS2 project will not provide any fee income for heritage work in Camden. Based on the inadequate level of heritage detail provided in the Environmental Statement, and the extent of Heritage Agreement work requiring Camden Council's involvement up to



			<p>2026, Camden Council requests that HS2 revisits the need for a fee regime for heritage and planning work, and allocates budgetary resources to fund heritage and planning staff in the local authorities affected by the Proposed Scheme. Resource allocation should be proportionate to the level of heritage impacts requiring a local planning authority's attention.</p>
		9.7.7	<p>Camden Council considers that where construction of the Proposed Scheme will directly affect human remains and monuments, notably burial grounds, the hybrid Bill will disapply the various legislative provisions, and a project specific regime will need to be put in place to ensure that all human remains and burial grounds are afforded all due dignity, care and respect. A Human Remains and Monuments Procedure will need to be implemented to address these requirements. Where burial has occurred over 100 years ago, consideration will need to be given to the need for and extent of archaeological investigation works. This is required at St James' Gardens, where if the former burial ground and chapel are to be removed, Camden Council requests that a programme of sensitive and scholarly excavation works are undertaken to nationally recognized standards, through a Human Remains and Monuments Procedure (as outlined above). Camden Council requests that extensive archaeological investigation works are undertaken as burial occurred in the 18<sup>th</sup> and 19<sup>th</sup> centuries.</p> <p>Camden Council has received the following advice from the Greater London Archaeological Advisory Service (GLAAS): "The main archaeological impact would be the loss of St. James's Gardens".</p> <p>Since St James's Gardens is the site of a late 18<sup>th</sup> and early 19<sup>th</sup> century burial which it is understood could contain up to 60,000 burials, it is essential that the Human Remains and Monuments Procedure comprehensively deals with issues of dignity, care and respect by ensuring archaeologically scholarly excavation techniques are employed. Since the majority of the large numbers of burials are likely to be over 100 years old, a full programme of archaeological investigation works should be undertaken. It is estimated that the burial ground may have received c 50,000 or more burials. This is correctly assessed as a major adverse impact with mitigation by a programme of archaeological works to investigate, analyse, report and archive these assets.</p> <p>Conclusion: Assurances should be sought that the investigation will be accorded sufficient time and resource to comply with modern archaeological standards, including guidance on large cemeteries currently in preparation by English Heritage. Further consideration should also be given to suitable resting place and memorial for the dead in consultation with the Church of England and taking account of the long-term research potential of such an assemblage."</p>

		9.7.8	Although mitigation measures are welcomed in principle, the proposed measures to compensate for the loss of heritage in dense urban environments such as Camden are limited. The fundamental issue is the need in the first instance for the provision of high quality and contextual design which is sensitive to the historic environment, adhering to the presumption in favour of preserving heritage assets. This approach has not been taken by HS2 Ltd in its approach to the safeguarding of the historic environment. Appropriate mitigation may be possible through the employment of high quality design, conservation architects and other heritage professionals, to provide creative solutions to avoid or reduce harm to heritage assets, but they are likely to be only partially effective in terms of heritage. Where it is not possible to compensate through design or heritage measures, other forms of mitigation will be sought.
		9.7.9	It is essential that consultation takes place with the community and stakeholders to develop effective mitigation measures for heritage assets which are put 'at risk' due to viability or redundancy issues directly arising from the impacts of the Proposed Scheme. Cases in Camden could include Camden Road Station where a major part of the grade II listed railway station will be made redundant due to the operation of the Proposed Scheme. Residential properties which are likely to suffer access issues during the course of construction (for as long as seven years) include one grade II listed building at 58 Mornington Crescent and 17 grade II* listed buildings in Park Village East.
	9.8		Camden Council would like to see processes put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Ecology in response to this section.
	9.9		Camden Council believe it is essential that they have the opportunity to agree any proposed remediation strategies which should be based on best practice, sustainable means and not just legal requirements. Camden Council will expect 'land potentially containing contaminants' to be remediated appropriate to the future end user once HS2 is operational. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs and proposals. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Land quality in response to this section.

	9.10		Camden Council considers the ES is defective in that the focus on this section is on landscape and not townscape and that the heritage context is not considered as a vital part of this section. The specific nature of Camden's rich townscape and stark difference to the rest of the route means that it will not be possible to apply 'route-wide' principles in most cases. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Landscape and Visual in response to this section.
	9.11		<p>Camden Council do not believe that the compensation offered under the National Compensation Code adequately cover or compensate for the impacts on business. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. This could include a number of proposals to support businesses to remain in situ. There should be an opportunity for Camden Council to have meaningful input into proposals. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Socio -economics.</p> <p>Camden Council considers the ES is defective in that no mitigation strategies are being designed to address how the demolition, delays and uncertainty associated with HS2 poses a threat to Camden's prospects for economic growth. Camden Council considers that a creative strategy should have been included in the Environmental Statement, that would be responsive the issues as they arise and which would help mitigate blight in the area during the construction period. The Environmental Statement is considered defective without such a creative strategy</p>
		9.11.1	<p>Camden Council considers the approach to socio-economic mitigation to be entirely inadequate and if adopted it will have devastating implications for Camden's businesses, local economy and communities. The adverse effects of HS2 will be particularly severe in Camden where the vast majority of businesses to be affected by HS2 are located. Camden Council raised serious issues at the time of the draft environmental statement in this respect and none of these defects have been addressed in this ES.</p> <p>Camden Council notes that according to HS2's own mitigation hierarchy as outlined at figure 43,</p>

			<p>compensation should be a last resort and all reasonable steps should first be taken to 'avoid, reduce, abate and repair' harm before resorting to compensation. Camden Council acknowledges that there are circumstances where compensation is entirely necessary. However, HS2 Ltd.'s proposed approach to business (and other) compensation and preventative or supportive mitigation is wholly inadequate to the adverse effects of HS2 in Camden.</p> <p>Camden Council is alarmed that after months of discussion with HS2 through the Business and Employment Mitigation Working Group, including the clear identification of major adverse effects to the business community in Camden, that the ES fails to recognise the need for comprehensive socio-economic mitigation. Further recommendations as to the type of mitigation required in Camden can be found in Camden Council's response to the individual CFA reports but include:</p> <ul style="list-style-type: none"> <li>• HS2 specific business advice and support service</li> <li>• Establishment and resources to put in place formal mechanisms for engaging with businesses throughout the HS2 project</li> <li>• Access to enhanced business compensation package</li> <li>• Specialist commercial property support to enable businesses forced to relocate to remain in Camden</li> <li>• Open for business, marketing &amp; promotion campaigns</li> <li>• Hoardings and Artwork to promote local businesses and commercial areas affected</li> <li>• Visitor information resources and support</li> <li>• Meanwhile uses to ensure land and properties acquired or blighted by HS2 remain active</li> <li>• Employment, job brokerage &amp; training support for individuals that lose their job as a consequence of HS2</li> <li>• Maintaining access and way finding for local retailers and other customer focused businesses</li> <li>• Property modifications to ensure businesses are protected from amenity blight.</li> </ul> <p>Camden Council insists that HS2 must commit to the delivery of a comprehensive blight mitigation strategy to prevent, minimise and/or mitigate the extensive impacts of HS2 on local businesses, employment and the economy.</p>
		9.11.2	<p>Camden Council strongly disagrees that the National Compensation Code is a fair basis for compensation in respect of costs. Camden Council has responded to each of HS2 Ltd.'s Property and Compensation consultations outlining that HS2's current compensation strategy is not fit for purpose in the case of a project of the scale of HS2 and that the compensation proposals on offer to</p>

			<p>businesses including the very limited discretionary measures are inadequate.</p> <p>Camden Council insists that HS2 Ltd put in place a fair and enhanced compensation package that includes additional measures to address impacts on businesses both within and outside the safeguarding zone.</p> <p>Camden Council notes that the CoCP and LEMP's will have a role to play in mitigation. However, their scope is limited and they will not alleviate the majority of significant socio-economic effects generated by the scheme. Camden Council, local communities and businesses must have a central role in developing the LEMP's if they are to be effective and reflect local concerns.</p> <p>Overall Camden Council considers HS2 Ltd.'s approach to socio-economic mitigation to be entirely inadequate in addressing the significant effects of the scheme on Camden's communities and in fulfilling HS2's own mitigation objectives. Camden Council insists that HS2 Ltd commit to the delivery of a comprehensive blight mitigation strategy that is supported by a substantially enhanced business compensation offer.</p>
	9.12		<p>Camden Council does not agree that ""The development of the Proposed Scheme has, as far as reasonably practicable, kept the alignment away from main communities and low in the ground"". Camden Council does not consider that the route has avoided noise sensitive locations within Camden; whilst it may or may not be the case that the overall route alignment has avoided many noise sensitive locations, the decision to terminate the route at Euston has led to many significant noise and vibration impacts being identified within this densely populated urban area. Camden Council considers it a bold statement for HS2 to state that the trains will be quieter than the European Standard.</p> <p>Camden Council supports the design of the trains to be quieter than the European Standard. However, it is understood that the trains have not been procured yet and by basing noise assessments on the assertion that they will be quieter than the European Standard, there is a significant risk of under predicting potential effects. This could potentially lead to additional mitigation having to be implemented in order to compensate.</p> <p>Camden Council do not believe that adequate assessment of the impact of noise and vibration has been carried out, nor that adequate mitigation is proposed, especially in relation to cumulative impacts. Processes should be put in place to ensure that the Council is involved at the right time to</p>

			ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into mitigation design. Camden Council also refer you to the comments provided on the individual CFA reports, environment topics and route wide effects for Sound, noise and vibration.
	9.13		Camden Council would like to see processes put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Traffic and transport in response to this section.
	9.14		Camden Council would like to see processes put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Waste and material resources in response to this section.
	9.15		<p>Camden Council considers it necessary that mitigation measures reduce the runoff from sites by 50% in line with Camden Planning Guidance 3. The London Plan identifies that large developments such as this must be taken as opportunities to tackle the pressure on the Thames Water system and states they should aim for greenfield runoff rates.</p> <p>Camden Council would like to see processes put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for water resources and flood risk in response to this section.</p>
	9.9		Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of

			<p>contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
10	10.1		<p>Camden Council considers that Parliamentary SO27A requirement to, inter alia, include "outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects" has absolutely not been fulfilled by the Environmental Statement. The description of alternatives considered evidences the narrow and partial approach taken whilst the justification and analysis behind why they have apparently been rejected is at best vestigial. The entire approach to alternatives, both strategic and local, is fundamentally flawed. Not least, potentially credible alternatives raised by respondents during the Draft Environmental Statement exercise in early 2013 have been treated with near disdain and almost summarily dismissed. This makes a mockery of the sponsor's obligation to enable alternatives properly to be evaluated and understood in their context.</p>
	10.2		<p>Camden Council accepts that "do nothing" would be an unwise strategy in light of increasing needs for economic and personal connectivity, and need to support wider national economic and social objectives. The alternatives considered in the Environmental Statement, however, are unacceptably narrow in context of the potential palette of infrastructural investments that could also meet these objectives. This narrowness of approach fatally undermines the credibility, in principle, of the HS2 railway proposition as outlined and discussed in the Environmental Statement, and thereby undermines the ES itself.</p>
	10.3		<p>Council accepts that "do nothing" would be an unwise strategy in light of increasing needs for economic and personal connectivity, and need to support wider national economic and social</p>



			objectives. The alternatives considered in the Environmental Statement, however, are unacceptably narrow in context of the potential palette of infrastructural investments that could also meet these objectives. This narrowness of approach fatally undermines the credibility, in principle, of the HS2 railway proposition as outlined and discussed in the Environmental Statement, and thereby undermines the ES itself.
	10.4		<p>Camden Council notes that the HS2-HS1 Link is an integral part of the HS2 project. It is surprising and unacceptable that it is not mentioned at all in Section 10.4 in context of its potential for rebalancing train path demand away from Euston to other potential destinations, such as Stratford, thus enabling Euston Station to be provided at a smaller scale of provision. This could be cheaper and would certainly reduce adverse local community impacts there. In addition, such wider assessment would have taken proper account of the form that such a Link would otherwise take; the present single track viaduct concept would have been tested against a tunnelled option and single track tested against double track. In addition, the role of the Link to serve UK as well as Europe would have been more clearly identified and the economic impacts would have changed radically as a consequence. Given the adverse impact on local communities and on the future capacity of freight rail and the London Overground arising directly from the viaduct solution it is a dereliction of responsibility not to have identified and assessed other concepts and options for the Link.</p> <p>Camden Council is disappointed that no mention is made of creating a preferred walking route between Euston and St Pancras. Over the Olympics a walking route via Phoenix Road/Brill Place was established and promoted - this helped take pedestrians off Euston Road and created a more scenic route between the stations.</p>
11	11.1		Camden council challenges and rejects the basis of section 11.1 and 11.2. It considers that there was a duty on the project promoter to give further consideration to the alternatives, especially in the case of Camden, Euston Station and the HS1Link. For Euston, the station scheme changed radically in Early 2013 and yet Table 8 rests upon the earlier decision taken 12 months or more before that. The 2013 change evidences that the January 2012 decisions were not inviolate and should therefore have been reconsidered. This point applies both to Euston Station and to the HS1 Link.
	11.2		Camden council challenges and rejects the basis of section 11.1 and 11.2. It considers that there was a duty on the project promoter to give further consideration to the alternatives, especially in the case of Camden, Euston Station and the HS1Link. For Euston, the station scheme changed radically in Early 2013 and yet Table 8 rests upon the earlier decision taken 12 months or more before that. The



			2013 change evidences that the January 2012 decisions were not inviolate and should therefore have been reconsidered. This point applies both to Euston Station and to the HS1 Link.
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## **HS2 Phase One environmental statement volume 2: community forum area reports and map books**

## CFA 01 report: Euston Station and approach (Ref ES.3.2.1.1)

Section	Sub section	Paragraph	London Borough of Camden response
2			<p>Camden Council considers the ES is defective in that the overview of the area is based upon an inadequate record and analysis of existing baseline conditions. In particular the ES fails to identify and describe the particular socio-economic character of Euston quoting only general statistics.</p> <p>Euston is a major commercial centre that contributes significantly to the London and UK economy. It is an area with a strong scientific knowledge, creative and professional services base with major institutions such as University College London (UCL), Grant Thornton, British Library and The Wellcome Trust. As such the ES should have provided careful consideration (but hasn't) of the sensitive equipment and complex uses, looked at timings such as examination periods for students attending these institutions' and the impact on sensitive research and science equipment located close to construction (include routing and tunnelling) and on-going operation of scheme.</p> <p>The ES has also either grossly underestimated or not considered at all the impacts on properties south of the Euston Road.</p> <p>The area also comprises a range of local shops and services and the unique independent restaurant and food businesses of Drummond Street. Camden Council is of the view that the overview of the area that the ES is not based upon an adequate understanding or appreciation of the unique socio-economic character of Euston. The existing socio economic character of the area is an important aspect of the baseline. Absent a proper description and identification of baseline information it is not possible to carry out an assessment of likely significant effects as required by the EIA Directive.</p>
	2.1		<p>Camden Council has reviewed the transport assessment within this ES and very specifically the core transport information provided in Vol 5. On the basis of its own Screenline surveys and data and experience and that of other stakeholders, it is Camden Council's contention that the transport impacts described in the ES are largely under-estimated resulting in inadequate mitigation proposals arising from this inaccurate and not fit for purpose transport assessment.</p> <p>Largely inaccurate reported information, such as free-flow baseline traffic conditions in and around Euston without mitigation; or major inaccuracies such as all the additional HS2 demand trips in 2026 being forecast to arrive/depart at HS2 through Euston Square via a narrow new underpass link where</p>

			<p>no details have been provided to assess its suitability, on LU routes that serve much lower population catchment areas or require additional interchanges, rather than allocating the trips to much more obvious high demand links like the Northern and Victoria Lines.</p> <p>If the operational scheme were to be more accurately and robustly re-assessed with the associated adverse impacts re-evaluated, such that the true severe congestion to many parts of the surrounding transport network that HS2 will generate, could be seen and considered in tandem with the considerable disruption and safety concerns that will need to be endured for over 10 years throughout construction, then the full extent of the adverse impacts , balanced against the modest benefits that the proposed Scheme brings in its current form to Euston and the wider Borough, would be seen in a much more transparent light. Camden Council considers that if this clarity of forecasting, impact and mitigation were to be embraced and fully evaluated, then the current scheme proposal would become unacceptable and unviable to HS2 and would then be revised to achieve a better solution.</p> <p>Camden Council considers that this section is inaccurate as a result of omissions. Whilst the proposed rebuilt concourse proposal is mentioned, the text is silent on the retention of the main part of the existing Euston Station structure which is widely recognised as a significant inhibition to development and to the whole area. The text, curiously, does not explain how this situation relates to the claim in 2.1.9 that "all platforms will allow longer trains to operate". To achieve this, the existing station will necessarily have to be altered in a major way, with significant consequences and opportunities. This impact is not mentioned or even inferred in the text so it is not possible to understand what is really intended to happen at the "classic" station.</p>
		2.1.8	<p>Camden Council considers that this section is inaccurate as a result of omissions. Whilst the proposed rebuilt concourse proposal is mentioned, the text is silent on the retention of the main part of the existing Euston Station structure which is widely recognised as a significant inhibition to development and to the whole area. The text, curiously, does not explain how this situation relates to the claim in 2.1.9 that "all platforms will allow longer trains to operate". To achieve this, the existing station will necessarily have to be altered in a major way, with significant consequences and opportunities. This impact is not mentioned or even inferred in the text so it is not possible to understand what is really intended to happen at the "classic" station. HS2 did not consider Crossrail as part of its Old Oak Common assessment, which is clearly major oversight (see also comments in response to Alternatives Report in Volume 5)</p>

	2.2		Camden Council shares the views in section 2.2.29 that it is necessary to further explore the potential for integrated development, including above and around the station. It however rejects the proposed station scheme as giving a credible basis for this. The current proposal relates only to railway matters but even in that manner does not address the full station site in a comprehensive way. It has not in its fundamental design concept taken account of the likelihood of large scale integrated development and nor does the ES recognise this prospect other than in the most desultory way. As a consequence, no identification of critical inter-actions and interfaces that would be needed within the railway component of the scheme to allow a large scale over station development scheme to be constructed and to operate effectively have been identified or included in the scheme. The Environmental Statement is fundamentally deficient for the reason that without that initial fundamental thinking having been given to the principles of integration a scheme could not emerge and be developed in any recognisable manner of efficiency, effectiveness, economy or in accordance with city planning norms and expectations of “placemaking”. The ES has the associated deficiency that it does not adequately take account of the Euston Area Plan framework or its requisite development capacity for this site.
		Land use 2.2.2-2.2.5	Camden Council considers that this section should more clearly have noted and reflected the high density and complex interlinking and interlocking of land uses within this inner city location.
		2.2.6-2.2.8	Camden Council has provided transport comments relating to the existing transport infrastructure in: Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline Conditions, section 5.3
		2.2.9	Camden Council considers the baseline community overview does not demonstrate sufficient consideration of equality issues such as income, health, gender, belief and ethnic differences. For this reason, Camden Council is not confident the mitigation measures proposed are tailored towards the local community.
		2.2.11	Camden Council notes, in 2.2.11, the reference to three early-years educational facilities, six primary schools and two secondary schools in the area but does not name any of them other than Maria Fidelis Convent (Lower) School. Camden Council considers that these schools should have been individually listed in the ES for the sake of clarity, to avoid any confusion and to ensure that no schools have been left out and the impacts in relation to all such schools have been properly considered.
		2.2.14-	Camden Council would like to point out that this section does not include Hampstead Open Space or

		2.2.17	the Rydal Water community allotments both of which are in the Euston Station and Approach CFA 01 area.
		2.2.15	Camden Council notes the reference to six community/youth facilities, but also notes that the report only lists three - Ampthill TRA Hall, Old Tenants Hall and Somers Town Community Sports Centre. Camden Council points out that for the sake of clarity and to avoid any confusion, that HS2 should have provided details of the other three community facilities.
		2.2.16	Camden Council points out that this section does not include Hampstead Open Space or the Rydal Water community allotments both of which are in the Euston Station and Approach CFA 01 area.
		2.2.21	Camden Council would like to point out that this section does not include Hampstead Open Space or the Rydal Water community allotments, both of which are in the Euston Station and Approach CFA 01 area.
		2.2.25	For information, the proposed submission EAP was published for review during the week beginning 6th January 2014.
		2.2.26	<p>The proposed submission EAP has been amended to be more flexible to demonstrate how its principles and policies could be taken forward under a range of station design scenarios, allowing for potential alternative station designs, namely the previous 'baseline' scheme (a comprehensive redevelopment station with the lowering of all platforms and tracks, including existing); and an 'existing station footprint' scenario.</p> <p>Current proposed 'Option 8' station design: the proposed submission EAP highlights that "The ability to achieve key objectives of the EAP is severely constrained" by the current station design option, noting that " East-west ground level streets above the new station are not possible if tracks and platforms are not lowered to sub surface level."</p> <p>As it is currently envisaged the 'Option 8' station design would need considerable refinements to address the objectives and principles in the Euston Area Plan, including increased east-west connectivity, active frontages and a significantly enhanced public realm</p>
		2.2.27	o Camden Council considers that the current station design would fail to make the best use of new space above the station and tracks as the proposed piecemeal and confused approach would fail to

			<p>deliver a comprehensive development that would maximise development potential, and would fail to take advantage of all opportunities to integrate with the wider area/ wider regeneration</p> <ul style="list-style-type: none"> <li>o This paragraph omits to mention a number of other objectives that are relevant to HS2, in particular Objective 4: New streets above the station and tracks: To create new green streets above and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building. Whilst the previous 'baseline' station design scheme could have enabled this by lowering all platforms and tracks, the Option 8 design would not.</li> <li>o The land use strategy in the proposed submission EAP allows for between 2,800 and approximately 3,800 additional homes; and between 180,000 and approximately 280,000 sqm of employment/ economic floorspace (providing between 7,700 and approximately 14,100 additional jobs). The quantum that could be achievable would depend on the approach taken to station design, with greater potential enabled by a comprehensive approach under the previous 'baseline' or 'Option B1 value managed' schemes</li> </ul>
		2.2.28	<p>The EAP establishes a clear preference for ground floor streets/ connections across the station site wherever possible. The proposed option 8 station design would preclude this by retaining the existing Network Rail tracks in their current position. However, the provision of raised east-west links further north across the station is made particularly difficult by the current approach to station design, due to the retention of the service deck and failure to relocate Network Rail platforms 1 and 2.</p> <p>The extent of over site development, the quality of development and public realm created would be influenced by the approach taken to station design. The current approach would fail to take advantage of the opportunities presented at Euston. For example, the retention of the service deck in its current size and location would severely limit development space available as well as severely limiting the potential environmental quality of any development and raised connections on the site.</p>
		2.2.29	<p>Camden Council considers the ES deficient because it has not effectively considered an alternative, comprehensive station redevelopment schemes that better reflect improved connectivity, public realm and development quality. These deficiencies include failing to consider other options for fully integrating and reconfiguring in a more holistic way both HS2 and the inextricably interrelated classic station, facilities and tracks together with the ability to fully integrate over station development including provision for development interfaces with the railway functions. This fundamental defect in the ES will result in the failure of the overall Euston Station to optimise its potential as one of London's principal national railway "gateways" and one of its key sites. It will also fail to meet and</p>

			achieve the objectives and principles set out in the Euston Area Plan.
		2.2.32	Camden Council notes that the information on this map and others is insufficient and inaccurate. Little mention is made of conservation areas (three conservation areas are in close proximity: Bloomsbury, Regent's Park and Camden Town) in the Cultural heritage section and no information is included either in the written statement or on the accompanying maps, of positive contributors in conservation areas or buildings on the Camden draft Local List. Camden notes that the information on this map and others is inadequate as the system of one dot per list entry does not indicate where the entry covers multiple listings such as terraces of houses and other building groups which are widespread in an urban area such as Camden). Furthermore, the maps do not fully portray heritage assets as either conservation areas or non-designated heritage assets and no buildings on Local Lists are shown.
		2.2.42	<p>Camden Council has commented on the production of the development options study, including through its membership of the Euston Area Plan. Through the Euston Area Plan team, Camden and the GLA have highlighted the shortcomings of the development options study work, including the weaknesses of the proposed approach compared to the potential provided by the 'baseline' station design whose relative performance has not been tested. Notwithstanding this key issue, a number of more detailed comments were provided on the development options work:</p> <ul style="list-style-type: none"> <li>• Whilst paragraph 2.2.42 states that HS2 Ltd supports many of the objectives of the draft EAP, the development options study has failed to include any of the requested additional categories from the EAP team for the assessment for development options, including in relation to commercial, permeability and streetscape, socio economic benefits, and planning and townscape. This has not allowed for the proper consideration of the impact of development on some of the key objectives and principles contained within the EAP</li> <li>• The need to include the relocation of platforms 1 and 2 of the station in order to create meaningful active frontages along Eversholt Street and to significantly increase values and the transformational potential of development here</li> <li>• The need to explore the provision of a reduced size and relocation of the service yard. By preventing development at lower levels, the current service yard severely constrains over site development, and restricts the potential to create attractive east west links across the top and internally within the station</li> <li>• Given the significant rebuilding and construction works required to achieve higher levels of development, and the remaining need to integrate the station development with its surroundings, a comparison should be presented regarding development capacities and values of this options with</li> </ul>



			the baseline station design or similar design which sinks platforms and tracks, in order to enable a proper assessment of the differences in costs, benefits and timescales more fully.
	2.3		Camden Council considers the ES evaluation deficient because it does not identify or assess the resultant design and functional impact upon Eversholt Street arising from the proposed scheme details. Whilst the Council welcomes the entrance on Eversholt Street, it is concerned by the decision to maintain much of current the Eversholt Street frontage. This frontage is very unattractive and discourages people to walk up Eversholt Street towards Camden Town and towards St Pancras/Kings Cross (via Brill Place). This would, amongst other matters, have a direct consequence for the utilisation of the proposed new entrance. The ES fails to recognise or evaluate this impact which would, for mitigation, have identified a design means of achieving a scheme for Eversholt Street that creates a more attractive route.
		2.3.2	<p><i>“The combined station will become the centrepiece and catalyst for the regeneration and development of the Euston area”</i>: Camden Council agrees that the redevelopment of Euston Station (with or without HS2) is key to regeneration and development in the Euston area. Given that this is the case, the current confused and piecemeal approach to station design must be reconsidered. The role of a redeveloped station in generating development and regeneration can only be delivered on if a more comprehensive approach is secured, with greater consideration given to the delivery of a high quality public realm and above station development, properly integrated into the surrounding area.</p> <p>An economic visioning for Euston (GVA, updated December 2013), notes:  <i>“Euston currently sits at a critical point in its evolution with a range of influences converging to create a major opportunity for change... Euston Station is [also] the only significant piece of Government-owned land in Central London that may undergo change at this scale, which provides the potential to create a new mixed use piece of city that can contribute to the long term value of Camden’s, London’s and the national economy”</i> (p2)</p> <p><i>“There is a risk at Euston that a reduced or piecemeal scheme will not be of sufficient scale to overcome and counteract existing constraints and their impact on image, identity and investment value these have”</i> (paragraph 10.39).</p> <p>Whilst the proposed submission Euston Area Plan allows for up to 1,900 homes and up to 13,600 jobs to be potentially delivered on the Euston Station and Tracks site (alongside significant</p>

			environmental improvements), this level of growth and transformational change could only be achieved through a comprehensive approach to station redevelopment. Camden considers that the current approach to station design, as set out in the ES, would fail to deliver this.
		2.3.3	Camden Council considers that the measures listed in this paragraph would not together provide for a comprehensive and properly integrated approach that takes the opportunity to enhance connectivity, the public realm and development and economic potential.
		2.3.8	<p>Point 3: “substantial reconstruction and refitting of the existing station concourse, which will be integrated with the new high speed concourse to the west”: Camden Council considers that the proposals would not create a properly integrated station compared to a more comprehensive approach to station redevelopment.</p> <p>Point 4: Camden Council notes that the introduction of a northern entrance is supported, enabling greater accessibility to Camden Town. However any knock-on effects on the remaining area of St James’s Gardens would need to be fully mitigated and it should be noted that the Council's preference would be to retain the National Temperance Hospital building as it is identified as a heritage asset.</p> <p>Point 10: Camden Council would considers the retention of the parcel deck to be inappropriate, failing to take opportunities to enhance the use of the space above Euston Station and reflecting the piecemeal nature of the proposals. The existing parcel deck would significantly reduce above station development potential and would maintain a blank frontage along the Eversholt Street at the upper levels.</p> <p>For the construction of the subway a large portion of Euston Square Gardens will be dug up and exposed to the elements. However, no assessment has been made on the heritage, landscape or archaeological impact of the excavation works on this important London Square, on the Bloomsbury Conservation Area, on any potential impacts on listed buildings and other heritage assets within the land to be potentially taken for construction (including the grade II listed Drayton House (aka Friends’ House), which is situated immediately to the east of Gordon Street, whose setting will be affected by the planned road closure and new underground entrance). No assessment is made of the impact of the excavation on the site of a find spot for a ring set with a Solidus possibly of Theodosius II within Euston Square Gardens, as identified in Para 6.3.6 as being a non-designated asset of low value lying wholly or partially within the land required, temporarily or permanently, for construction. Please refer to the formal detailed response from the Greater London Archaeological Service (GLAAS).</p>

			<p>Camden Council considers the ES is defective in that no reference was made to the following two pieces of art that are currently situated in Euston forecourt and that were specially commissioned for the space:</p> <ul style="list-style-type: none"> <li>• Paul de Monchaux's Four stone seat 'benches' with feature markings. Both the benches and their footings, with inscriptions detailing the source and age of the stone need to be retained.</li> <li>• Eduardo Paolozzi's Piscator, a bronze cast block that is a version of the sculptures that suggest a head on its side from which emerge block shapes that suggest architecture, city scape or an industrial landscape. This piece was commissioned by Network Rail and paid for by them and public money.</li> </ul> <p>Camden Council would expect these public art pieces (paid for through public money) to be retained in the re-development Euston forecourt. Should this not be possible, Camden Council considers HS2 should commission two new pieces of public art of equal value (approximately £500,000 each).</p>
		2.3.12	<p>Camden Council notes that whilst the provision of entrances may in themselves help to facilitate pedestrian movement to the station from surrounding streets, the wider proposals involved in the current station design would work to detract from pedestrian movement and the public realm. For example, the provision of taxi lanes along the length of Cobourg Street would negatively impact on the pedestrian environment and impede pedestrian movement from Drummond Street. To the east side of the station, a failure to integrate the relocation of platforms to enable ground floor frontages onto Eversholt Street and a failure to relocate the parcel deck to enable a better environment at ground level on Eversholt Street and positive uses at raised levels would also represent a failure to improve the pedestrian environment and encourage walking.</p>
		2.3.13	<p>Camden Council considers an assessment should have been made of the impact on the setting of the grade II* listed 1-9 Melton Street, whose newly exposed northern flank wall be in close proximity to the vent shaft; no details are given of its impact on the setting of the Bloomsbury Conservation Area; no mention is made of the granite-setted carriageway in the adjacent Stephenson Way which could be directly affected by the construction of the vent shaft and which is a non-designated heritage asset on the Camden draft Local List. No details are given of the vent-shaft's above-ground design including footprint dimensions, elevation design, materials and associated features. No photomontages have been provided in the CFA 01 Map Book. The low level of written and visual information provided is unacceptable, and provides no opportunity for comment on its impact.</p>
		2.3.14	<p>Camden Council would like to point out that:</p>

			<ul style="list-style-type: none"> <li>• The description of building heights reflects the lack of integrated design, risking the creation of station complex that does not when taken together, provide a high quality, unified appearance befitting its status as a national rail terminus, a gateway to London and it is a potential major development location.</li> <li>• “The retained platforms and external fabric of the existing station, north of the concourse, will generally be unaltered, including much of the Eversholt Street frontage”. This represents a failure to deliver much-needed improvements to the eastern façade of the station, including the introduction of active uses at ground floor level (and above).</li> </ul> <p>No detailed written information is provided in the Cultural heritage section regarding the proposed vent shaft headhouse and how it will impact on its historic context. No assessment has been made of its impact on the setting of the grade II* listed 1-9 Melton Street, whose newly exposed northern flank wall be in close proximity to the vent shaft; no details are given of its impact on the setting of the Bloomsbury Conservation Area; no mention is made of the granite-setted carriageway in the adjacent Stephenson Way which could be directly affected by the construction of the vent shaft and which is a non-designated heritage asset on the Camden draft Local List. No details are given of the vent-shaft’s above-ground design including footprint dimensions, elevation design, materials and associated features. No photomontages have been provided in the CFA 01 Map Book. The low level of written and visual information provided is unacceptable, and provides no opportunity for comment on its impact</p>
		2.3.15 and 2.3.17	<p>Para 2.3.15 and 2.3.17 state that the Proposed Scheme includes public realm improvements and reinstatement, including a landscaped public forecourt with hard and soft landscaping to the northern entrance, incorporating the remaining St James’s Gardens. No detailed written information is given.</p> <p>Photomontages in CFA 01 Map Book illustrate the western side of the new HS2 terminus incorporating a new entrance on an extended Cobourg Street, as seen from Hampstead Road across the cleared sites of the National Temperance Hospital and St James’s Gardens. The images show an open and exposed environment, with all traces of the former gardens and burial ground removed. The images support the point that the gardens will have lost their integrity, setting and sense of enclosure currently provided by historic buildings, boundary railings and mature trees. Little detail is shown in the views towards Drummond Street, Melton Street and Euston Road. Strong concerns are raised that all traces of the existing historic environment will be wiped out with few mitigation measures to compensate</p>

		2.3.16	<p>The design of the bus street as a linear street along the back of Euston Square Gardens is recognised as a potential improvement, but the design of the bus facilities should prioritise pedestrian movement and not dominate the setting of the gardens and entrance to the station. Camden Council would prefer that buses are not brought into the front of the station at all, and that bus facilities use Euston Road and Eversholt Street to allow for the better setting of the gardens and station entrances, with high quality public realm and new development blocks, The current station design does not include development parcels fronting onto the gardens.</p>
		2.3.17	<p>“The main station forecourt will be larger and no longer dominated by Grant Thornton House and One Euston Square, which are to be demolished”: however, the Podium and One Eversholt Street will remain, which would continue to dominate the area in front of the station and provide a poor setting. These should be redeveloped as part of a comprehensive scheme in line with the EAP principles for the station area.</p> <p>Two 1970s 'International' style forecourt towers stand at the front of Euston Station. Grant Thornton House at 22 Melton Street is a 10 storey office building; and One Euston Square at 40 Melton Street is a 16 storey office building. Both buildings, which were designed by Richard Seifert (who also designed the existing Euston Station), are candidates for the Camden draft Local List.</p> <p>Camden Council points out that no assessment has been made of the demolition works on the setting of the Bloomsbury Conservation Area, Euston Square Gardens (a protected London Square) and on the listed buildings and structures situated in and around Euston Square. An assessment should qualify the impact of the demolition works and if found to be significant, the construction works should be relocated or changed to minimise the effects on the setting of the area.</p> <p>Moving the bus station is seen as a benefit if the gardens are unified and the setting of the grade II lodges is improved; however, no justification has been given for the total disruption of this important London square which is situated in the Bloomsbury Conservation Area for a decade; furthermore, an insufficient level of information has been provided to assess the appropriateness of the proposal in heritage terms at this stage.</p>
		2.3.18	<p>Whilst the proposed open space north of Langdale may provide some replacement play provision for the community, Camden Council considers the ES is defective in that the quantum, location and quality of this space (and others) would be highly inadequate on its own as a replacement for the open spaces lost as a result of HS2. Alternative provision is required in the longer term to replace</p>

			open spaces such as St James's Gardens. The Euston area Plan indicates the potential site for a substantial site that could provide permanent replacement space close to the St James's Gardens site. There is also concern that there would be a long period of open space shortfall during the construction process for HS2, before the proposed open space north of Langdale and the site identified in the Euston Area Plan could come forward for open space use.
		2.3.21	<ul style="list-style-type: none"> <li>• Points 2 and 9: Camden Council considers the ES is defective in that the current proposals for Cobourg Street (including a double width southern taxi rank) could cause public realm, air quality and severance issues due to provision for significant taxi movements in a mixed commercial/ residential area, potentially separating Drummond Street and other side roads from the station site.</li> <li>• Point 3: Camden Council supports the permanent closing of the northern end of Gordon Street to traffic. This will help to mitigate increased pedestrian and cycle flows and encourage sustainable onward movement into Bloomsbury and the West End. Camden would expect HS2 to consider the design of the whole of Gordon Street as part of their proposals</li> <li>• Point 4: a potential 'bus street is an option that would represent an improvement on the current sub-standard bus station, as it could enhance the public realm and pedestrian and cycle connectivity to the station site. However, Camden Council believes that an alternative option that would remove buses from the station site, instead using existing roads (including Euston Road without diverting off) should also be fully investigated in order to establish which would be the optimal solution for all transport modes, the public realm and the station site.</li> <li>• Points 5, 6 and 7: Camden Council supports the provision of significantly increased cycle parking.</li> </ul>
		2.3.25	Camden Council supports the provision of a direct subsurface link to a new entrance for Euston Square underground station.
		2.3.26 – 2.3.29	Station and highway drainage: The ES indicates that surface water will be held in attenuation tanks and then pumped into the combined sewer. Camden seeks to promote sustainable urban drainage management, with minimum impacts on the combined sewer network. In order to create a world class, sustainable 21st Century terminus, the station (alongside any above station development) should look to minimise discharges into the combined sewer through the provision of green spaces, green and brown roofs and walls and other sustainable drainage infrastructure

		2.3.30	<p>Point 1: if the span of Hampstead Road is to be expanded, careful design will be required to ensure that satisfactory pedestrian crossings are provided, and a high quality public realm created. The Euston Area Plan highlights an aim to enhance crossings and the pedestrian environment along Hampstead Road. The levels and design of the bridge should also support development above the railway cutting both to the north and south of the bridge to fulfil the aspirations of the Euston Area Plan.</p> <p>Para 2.3.30 outlines the proposal to demolish Granby Terrace Bridge, which links Hampstead Road to Granby Terrace. It is proposed to construct a truss bridge which will run through the existing Addison Lee depot on a different alignment, up to 1.6m higher at the eastern to tie in with proposed raised road levels in Hampstead Road. The new alignment will be closer to a pair of grade II listed early 19<sup>th</sup> century townhouses in Hampstead Road and a number of grade II listed townhouses in the southern section of Mornington Crescent, with implications on their setting. Although the existing Granby Terrace Bridge has no heritage value in its own right, no mention is made of the bridge's reconstruction in the Cultural Heritage section and no written assessment is made of the impacts and effects of the proposed re-routed Granby Terrace Bridge on the settings of the adjacent designated heritage assets comprising the grade II listed buildings in Mornington Crescent, which are situated in the Camden Town Conservation Area. Photomontages in CFA 01 Map Book show the bridge and the Hampstead Road Overbridge (North) Satellite Compound running very close to the southern flank wall of 261 Hampstead Road, compromising its setting and the setting of adjacent listed buildings in the conservation area.</p>
		2.3.31	Camden Council considers that, as part of works to the cutting, supports should be provided to enable the provision of new homes and open space above the tracks, as proposed in the Euston Area Plan.
		2.32 and 2.33	<p>The Euston Area Plan proposes the creation of new residential-led development over the cutting between Euston Station and Granby Terrace, where possible. Active uses above the cutting would provide a much better street frontage than new retaining walls and should be enabled wherever possible as part of works to the cutting. Designs should maximise the potential to deliver this development capacity, and further joint HS2 and Network Rail feasibility and development options work should reflect the EAP aspirations to develop above the tracks and stations.</p> <p>Paras 2.3.34-2.3.36 railway drainage: the provision of new homes and open spaces above the railway cutting (as proposed in the Euston Area Plan) would enable the provision of sustainable urban drainage systems to reduce the need for water to drain into the sewer network. The provision</p>



			of these uses above the cutting should be enabled wherever possible as part of works to the cutting.
	2.4	2.4.6	Camden Council considers that reference should also be made to the Local Environmental Management Plans in this section in addition to the Code of Construction Practice as these will be the key documents demonstrating the local and site specific controls. Camden Council considers that in listing the key provisions of relevance to this report from the CoCP, this should not undervalue the importance of other measures and mechanisms noted within the CoCP and consider that this section should make clear that these key provisions do not form a comprehensive list of provisions. Camden Council consider the omission of the LEMPs from this paragraph to be a deficiency in the identification of the key relevant provisions.
		2.4.7	<p>Camden Council considers that construction working hours should be adjusted where work is being undertaken near schools and children's centres so that the 'school' day is not disrupted. Camden Council notes that work around Euston will not be confined solely to core working hours and this will be particularly disruptive for children's services in the local vicinity. Camden Council is disappointed to note that the proposed development will cause such significant disruption. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking assessments of the impacts as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time.</p> <p>Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council considers the ES is defective in that the disturbance due to construction traffic and demolition that will be caused around the Stanhope Street</p>



			area has not been properly assessed. Camden's primary pupil referral unit is located on this road and the Council considers there are real issues arising from the impact this disruption will have on the future running of the unit and the vulnerable young people who attend it.
		2.4.8	<p>Camden Council would require that an overview of HS2 works is provided 5 years in advance in line with projected expenditure of the Council's capital programme and 2 years' notice of detailed works in order to allow the Council to manage impact on services and communities and meet health and safety regulations. Camden Council will require compensation for increase costs to housing management incurred to maintain standards where disruption has been caused by HS2. Camden Council would require that all Council owned utility infrastructure be surveyed before and after, and for HS2 Ltd. to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project.</p> <p>Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals</p> <p>Camden Council requests that HS2 manage all other statutory provision associated with the impact to property including but not limited to party wall matters.</p> <p>Camden Council understands the need to limit disruption to normal passenger services during the construction works but also considers that the overriding principle should be the consideration of amenity impacts on those living and working around the construction site and notes that this very important consideration is missing from the ES</p>
		2.4.16	<p>The ES has omitted a site of demolition within the Euston area. The remodelling of Euston station and widening of the station approach will require the demolition of 215 dwellings, not 214 dwellings, as an additional dwelling is located at 77-79 Euston Street. The discrepancy between the figures of dwellings authorised to be acquired compulsorily in the Housing Statement and the figures of demolitions and CPOs in the ES is a serious defect of the ES.</p> <p>59, 61, 65 and 67 Cobourg Street comprise four 3 storey early 19<sup>th</sup> century masonry residential terraced townhouses divided into flats situated on the east side of Cobourg Street between Drummond and Euston Streets. Immediately to the south, on the corner of Euston Street is the Bree Louise PH, 69 Cobourg Street, a 3-storey masonry public house dating from the interwar period. All these properties are on the Camden draft Local List.</p>

			<p>The Cottage Hotel, 67-75 (odd) Euston Street is situated on the south side of the street to the west of the Stephenson Way junction. The properties comprise three adjoining 3 storey masonry townhouses in an early 19<sup>th</sup> century terrace incorporating an historic shop front at No 67, and are candidates for the Camden Local List. 77-79 Euston Street forms the western end of the early 19th terrace, situated at the junction with Cobourg Street. It comprises a 3 storey masonry building (with a retail unit on the ground floor and a residential unit above), and is a candidate for the Camden Local List. The entirety of this terrace consisting of 67-75 (odd) and 77-79 (odd) Euston Street will be demolished to allow for the westward expansion and remodelling of Euston Station.</p> <p>No mention has been made of these non-designated heritage assets in the Cultural heritage section. No heritage assessment has been made or justification given for the total demolition of these non-designated heritage assets, which is considered to be wholly unacceptable in heritage terms.</p>
		2.4.17	<p>Camden Council does not consider that the ES has properly assessed the impact of the scheme on utility works.</p> <p>Camden Council notes that utility searches undertaken by the promoter and referred to in the ES do not include Camden-owned utility infrastructure and no discussions have been held with the Council to date, a major water and gas transporter in the borough.</p> <p>For example, the ES fails to identify and describe the Camden Council owned gas network within the Amptill Square Estate to the north of Euston Station although the ES states utilities will be diverted through this area. The projected realignment through the middle of a densely populated estate does not take into account any existing utilities and the impact on the 324 households on the estate which rely on this gas network, owned and managed by Camden Council, for heating and hot water. Furthermore, there are three separate boosted water supplies to each of the three blocks; Gillfoot, Oxenholm &amp; Dalehead which are owned and managed by Camden Council. The level of detail supplied within the ES is insufficient to determine if these assets would be affected by the proposed diversion works. Camden Council therefore considers that HS2 have not taken into consideration the full utility infrastructure in Camden.</p> <p>Camden Council notes that map CT-05-002 referred to in the ES does not exist.</p>
		2.4.18	Camden Council request that HS2 have an Emergency Response plan in place to deal with any utility

			failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time. Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision
		2.4.19	<p>Camden Council considers the ES is defective in that the impact of HS2 arising from utility diversions and construction work on the health and well-being of local communities has not been properly assessed. The ES has also not considered or addressed the Council's ability to manage services in affected areas in Camden. Camden Council services include, but are not limited to, deliver of housing repairs and capital works, management of housing voids, mechanical and electrical services, and caretaking services.</p> <p>Camden Council considers the health and safety impacts of access disruption and would require HS2 to work with Camden Council to ensure HS2 construction works will not interfere with the delivery of services e.g. meals on wheels to vulnerable residents, refuse collection, estate cleaning, and ensure safe working conditions are maintained throughout council estates. The ES again does not address this.</p> <p>Camden Council would require that HS2 works will not interfere with the delivery of Council estate services and ensure safe working conditions are maintained throughout Camden Council estates. Camden Council would require that standards of habitability are maintaining throughout construction work, including all aspects of health and safety. Camden Council would require that an overview of HS2 works is provided 5 years in advance in line with projected expenditure of the Council's capital programme and 2 years' notice of detailed works in order to allow the Council to respond to the impact on services and communities and meet health and safety regulations. There are significant resources needed to ensure these impacts are managed safely and Camden Council will require compensation for increase costs to housing management and contractor resources incurred to maintain standards where disruption has been caused by HS2.</p>
		2.4.20	Camden Council requests that all council owned utility infrastructure be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals

			Camden Council requests that HS2 manage all other statutory provisions associated with the impact to property including but not limited to party wall matters.
		2.4.21	<p>Camden Council expects full mitigation of impacts of utility works on local communities, including schools on Phoenix Road.</p> <p>Camden Council considers the ES is defective in that it does not properly assess the impact of the amount of utility works that are being undertaken around Euston and the impact that this will have on children's services such as noise, dust, proximity to construction sites, lorry routes and traffic route changes which could impact adversely on the health and safety of children and their families and staff; risk of loss of funding due to pupil number reductions either as a direct result of residents being forced to leave local communities or as a result of families experiencing difficulties at the beginning and end of the school day to access the schools safely.</p> <p>Camden Council considers the ES is defective in that the impact of utility works on Maria Fidelis school has not been properly assessed both in terms of noise disruption and the travel disruption around the school - this is a particular problem for the school in view of the fact that the school is on two sites and there is considerable travel between the two. Camden Council expects that any works being undertaken within the school boundary will be undertaken outside of school session time - for instance holiday periods, to avoid additional impact to the school and its pupils. The Council believes that the school needs to be relocated from North Gower Street as a direct result of the proposed scheme and disagrees with the assumption made within the ES that the school will not suffer significant effects. Although discussions have been taking place with HS2 regarding relocating the school, no agreements have yet been reached that would enable this to happen and we therefore require HS2 to secure agreement with the Metropolitan Police Service for the purchase of the garages at Drummond Crescent to enable the consolidation of the school in Somers Town to take place. Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice.</p> <p>Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> </ul>

			<ul style="list-style-type: none"> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
		2.4.24	<p>Camden Council does not consider that the ES has properly assessed the impact of the scheme on utility works.</p> <p>Camden Council notes that utility searches undertaken by the promoter and referred to in the ES do not include Camden-owned utility infrastructure and no discussions have been held with the Council to date, a major water and gas transporter in the borough.</p> <p>Camden Council considers that HS2 should manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals</p> <p>Camden Council considers that HS2 should manage all other statutory provision associated with the impact to property including but not limited to party wall matters</p> <p>Camden Council as a multi services provider is obliged under statute to continue to provide its services and will require compensation from HS2 in respect of all additional costs incurred.</p>
		2.4.25	<p>Camden Council notes that utility searches to date do not include Camden owned gas infrastructure and no discussions have been held with the council to date, a major gas distributor in the borough. Camden Council therefore considers that the ES has not taken into consideration the full utility infrastructure in Camden and is defective as a result.</p> <p>Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals</p> <p>Camden Council considers that HS2 should manage all other statutory provision associated with the impact to property including, but not limited, to party wall matters</p>

			<p>Camden Council as a multi services provider is obliged under statute to continue to provide its services and will require compensation from HS2 in respect of all additional costs incurred.</p> <p>The general description of identified utilities and Figure 7 may not be the only ones needing diversion and more critically there are no forecasts of phasing of the works which is imperative when trying to establish construction impacts. Therefore and without this being inherent within the assessment, the construction impact on transport is likely to be significantly underestimated</p>
		2.4.26	<p>Camden Council would require that all council owned utility infrastructure be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council requests for discussions between Camden Council and HS2 to commence at the earliest opportunity and an approach agreed for any work required.</p> <p>Camden Council requests HS2 to manage the interface with Utilities and to provide information to its residents about all temporary /permanent impact to service.</p> <p>Camden Council would require that all council owned utility infrastructure be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council requests for discussions between Camden Council and HS2 to commence at the earliest opportunity and an approach agreed for any work required.</p> <p>Camden Council requests HS2 to manage the interface with Utilities and to provide information to its residents about all temporary /permanent impact to service.</p>
		2.4.27- 2.4.99 Engineering and Building Works Compounds	<p>Camden Council considers the ES is defective in that no mention is made of how the Gordon Street satellite compound will affect the Wellcome Collection, the Friends Meeting House, UCL buildings and other non-residential buildings located around the area. The Wellcome Collection is one of London's most visited attractions and Camden Council would expect mitigation measures to be put in place to ensure that the construction process does not affect the operations of these community facilities.</p>

		2.4.35	<p>Generally, the description contained within this section and the number of construction personnel at each compound which are significant does not feed in to any Construction Trip Generation assessment which would be expected to be contained in Vol 5 Part 3 or a related annexe. Without this derivation then the prediction of construction impacts is not fit for purpose. This paragraph also indicates that there will be limited storage space for construction materials at the construction compounds, which will presumably lead to a large number of smaller just-in-time (JIT) deliveries. To avoid a reliance on JIT deliveries, Camden Council feels there is an opportunity here for HS2 to examine innovative methods of materials management such as the use of consolidation centres, developing and adopting Materials Logistics Plans as set out by WRAP (Waste and Resource Action Programme) and agreeing a suitable Construction Logistics Plan with TfL.</p> <p>Camden Council notes that two specialist concrete batching plants would be required at Euston (para 2.4.37) and that one is "likely to be located at track level". Given the quantity of aggregates that these facilities will probably require, Camden Council feels it is important that deliveries of these materials are carried out by rail. Therefore Camden council would encourage HS2 to examine this option. More comments on the inadequacy of the construction impact assessment within the ES are contained at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.4</p>
		2.4.36	<p>Camden Council considers there is insufficient information on Podium workers within the ES; how they will be housed, how they will travel and the duration of their stay. The Council considers the ES is defective in that little attention has been given to the management of such a significant increase in population in such a small area of an already exceptionally densely populated area. The information contained in the ES is therefore deficient. As a result it is not possible to determine the full extent of the environmental impacts of the HS2 scheme.</p>
		2.4.46	<p>Camden Council considers the ES is defective in that it has not fully considered the significant impacts on the operation of Robson House pupil referral unit during construction of the proposed scheme and the impact that this will have on vulnerable young people who use the service. There will be demolition in close vicinity and Stanhope Street will be one of the main construction traffic routes.</p>
		2.4.100	<p>Camden Council has provided transport comments on the impacts of the road closures in relation to the construction scenario at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.4. Major issues are raised particularly relating to phasing and cumulative impacts in the construction scenario which mean the assessment under-estimates</p>



			<p>impacts and therefore is not fit for purpose. Modelling needs to show the impact of the permanent and temporary closures on the highway network, for example, and the resulting reassignment of traffic. Temporary road closures need to show more precisely their timing and duration and the sections of the roads concerned that would be closed. Some turns are indicated that are prohibited (such as the left turn from Hampstead Road on to Euston road at Euston Circus for example) and would not be possible and would be opposed by Camden Council, however even the impacts of these unacceptable alterations are not assessed.</p> <p>The proposals present serious conflicts on alternative routes proposed, reassignment of traffic to inappropriate roads off of the SRN and TLRN to roads lower in the road hierarchy without justification and no adequate mitigations are proposed. The proposals are not detailed or costed in terms of works required. The inter-action between road closures are not assessed to minimise disruptions, including the impact of utilities</p>
		2.4.104	<p>Camden Council considers that the ES is deficient as it does not properly take into account the significant effect of the proposed route on schools and children's centres. The ES methods have been developed for predicting and assessing effects which draw on existing guidance, analysis and methods established for other railway and large infrastructure projects but these are not considered to adequately take into account of the impact on schools, children's centres and other children's services as the size of this development is unlike any other large infrastructure project undertaken in the country.</p> <p>Camden Council therefore considers the ES is defective in that it has not properly assessed the impacts the level of road closures around Euston and the impact that this will have on families, pupils and staff experiencing difficulties at the beginning and end of the school day to access the schools and children's centres safely in the Euston and wider area. Camden Council believes that young people travelling to and from Maria Fidelis school, and between the school's two sites, will be particularly affected by the road closures around Euston station.</p>
		2.4.106	<p>Camden Council considers that the ES is deficient as it does not properly take into account the significant effect of the proposed route on schools and children's centres. The ES methods have been developed for predicting and assessing effects which draw on existing guidance, analysis and methods established for other railway and large infrastructure projects but these are not considered to adequately take into account of the impact on schools, children's centres and other children's services as the size of this development is unlike any other large infrastructure project undertaken in</p>



			<p>the country.</p> <p>Camden Council therefore considers the ES is defective in that the level of path closures around the Euston area and we have not seen sufficient detail on the measures HS2 will put in place to ensure that families, pupils and staff do not experience difficulties at the beginning and end of the school day to access schools and children's centres safely.</p>
		2.4.107-2.4.109	<p>Camden Council's comments at para 2.4.35 set out above also have bearing to the information presented in paragraphs 2.4.107 to 2.4.109. However, generally Camden Council notes that no overall Construction Logistics Strategy is being formulated along the lines of that being developed by the Thames Tideway Tunnel project and would be expected by Transport for London. Major issues are also raised in Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.4, particularly relating to phasing and cumulative impacts in the construction scenario which mean the assessment under-estimates impacts and therefore is not fit for purpose.</p>
		2.4.123	<p>Camden Council considers the ES is defective in that there is a lack of planned mitigation to deal with the impact of LUL closures on pedestrian and bus activity. We are particularly concerned at the impacts this will have on people travelling to and from Camden Town, one of the busiest and most visited parts of London, which has also not been properly assessed in the ES.</p>
		2.4.130	<p>Camden Council notes that the ES contains no heritage assessment nor has a detailed justification given for the total demolition of this non-designated heritage asset, which is considered to be wholly unacceptable in heritage terms. Although Para 6.4.2 states the replacement retaining walls, parapets and landscaping, are to be designed to reflect the current setting of Park Village East, this statement is contrary to the photomontages in CFA 01 Map Book which show the impact of the loss of the historic brick parapet wall and its replacement with a new wall with little resemblance to the existing in terms of architectural treatment.</p>
		2.4.132	<p>The proposed access gates to the proposed portal/headhouse are shown to detract from this highly sensitive setting. The reinstated parapet/landscape feature does not sufficiently resemble the existing in terms of architectural treatment, rather aping the wall in an insensitive fashion and impacting negatively on the setting of the grade II* listed buildings in Park Village, the grade II Mornington Street Bridge piers and on the Regent's Park Conservation Area. The impact is likely to be major, not moderate.</p>

	2.6		<p>Camden Council considers that whilst this section lists various meetings that were held, it utterly fails to capture the widespread dissatisfaction amongst Forum members and the Euston public over the way that HS2 Ltd. has engaged through the Forum and related processes. There is a major gap between holding meetings and using those meetings as an effective engagement, information exchange and explanatory mechanism. The Environmental Statement is deficient because it gives rise to an impression that the listing of multiple meetings means that engagement has been effectively carried out by HS2 Ltd – this is incorrect.</p> <p>The Council and community collectively consider the whole exercise to have been a whitewashed public relations stunt which has barely addressed, in almost any way, the information needs of the communities so adversely affected. Actions for HS2 Ltd agreed in the Forum meetings were not carried out or were later repudiated; points of key concern were ignored or responded to on a most superficial basis. Section 2.6 reports a series of meetings and topics in a way that gives the impression that active engagement over them has taken place within and around the Forum. In practice, HS2 Ltd has evaded giving clear answers to many questions and issues raised, and, generally proved to be an interlocutor whose sole objective has seemed to the Council, Forum members and the wider Euston community to be "ticking a box" to assert and give comfort that consultation has appropriately taken place. Camden Council completely rejects this and likewise rejects that section 2.6 reports and evidences that effective consultation has occurred. Attending a few meetings, stonewalling in them and then not following up matters raised cannot in any way be said to be proper consultation with what is one of the communities worst and most injuriously affected of all along the whole HS2 route.</p>
	2.7		<p>Camden Council will expect the design of the underground entrance to be situated at Gordon Street to be in keeping with the attractiveness and historical features of the area.</p> <p>Camden Council notes that the purpose of the reviews has been to ensure that the scheme "...achieves the appropriate balance between engineering requirements, cost and the likely environmental effects". Camden does not accept that the proposal which is the product of that review achieves such a balance because the Environmental Statement has not properly considered or evaluated alternatives. The basis of the current station scheme (previously called Option 8) was announced, without prior warning or notice, in Spring 2013, as the adopted scheme for the asserted reasons that it was less costly and had less onerous programme impacts than the scheme adopted up to that time. Nowhere in those asserted reasons was there any reference to the relative "likely</p>

			<p>environmental effects" as between the two schemes. Camden Council and its communities have consistently argued that Option 8 does not, and cannot, meet the wider objectives for the area or, indeed, for the HS2 project. The Council considers that the ES should have described and evaluated the environmental effects of the options considered in detail because of the highly adverse impacts (discussed elsewhere in Camden Council's response) and consequences arising from what is one the largest and most key infrastructure elements of the whole HS2 project. Such an analysis is absent from the ES. This is a serious deficiency in the analysis. The Council considers it unacceptable that such a fundamental change to the scheme should have been made without prior consultation and without full account being taken of the wider economic, community and other consequences. Camden Council questions the manner in which various apparent options are described in section 2.7 and notes that there was no effective consultation, or in most case no consultation at all, regarding the assessment and validation of alternative station configurations.</p>
3			<p>Camden Council considers that the Environmental Statement does not take into consideration the activities of providing and maintaining Camden's urban forest. Urban forests are well recognised as a collective resource and have an essential function for things like air temperature regulation, cleaning pollutants from the air through filtration as well as supporting biodiversity. Urban forestry is a recognised discipline, and trees and woodlands in towns and cities should not be considered in isolation, but as a collective resource in the same way rural forests are.</p> <p>Camden Council points out that the Environmental Statement does not establish a baseline for Camden's urban forest (trees and woodlands) and its functions. It does not provide any information on the number, species and locations of trees to be affected and what proportion of Camden's overall tree resource and canopy cover will be affected. The Environmental Statement is considered incomplete and defective as a result.</p>
4	4.1		<p>Camden Council questions the use of 2017 air pollution estimations as a baseline for all construction. Whilst it is accepted that to use 2017 data as the baseline for the entire 10 years could be classed as conservative, past experience indicates that 2017 data is likely to be an underestimation of levels in 2017, as in the past, emissions have entirely failed to reduce in line with predictions.</p> <p>Camden Council considers that all boilers used for the station during the in use phase should be "Ultra Low Emission", and energy demands should be minimised through energy efficient building and where possible the use of renewables.</p>

	4.2	4.2.3	<p>Camden Council considers the ES is defective in that the methodology for assessing impacts arising from construction dust emissions does not fully assess the impacts on lower numbers of properties. The Environmental Statement states that, in line with the methodology, a single property cannot experience 'significant effects'. Camden Council does not agree with this view and is considers the ES therefore defective as it does not take account of the type of property that may be affected. We believe that schools (where there are hundreds of pupils present) should have a higher weighting in any methodology due to the amount of users at and travelling to each site and their particular vulnerabilities. There should be the capacity therefore to class any schools particularly affected by these work as having a 'significant effect' from the proposed scheme.</p> <p>Camden Council considers that Maria Fidelis school will be significantly impacted by the proposed scheme and needs to be relocated from North Gower Street as a direct result; the Council therefore disagrees with the assumptions made within the Environmental Statement that the school will not experience significant effect. Although discussions have been taking place with HS2 regarding relocating the school, no agreements have yet been reached that would enable this to happen and we therefore require HS2 to secure agreement with the Metropolitan Police Service for the purchase of the garages at Drummond Crescent to enable the consolidation of the school in Somers Town to take place.</p> <p>Camden Council is disappointed to note that the proposed development will cause these significant effects on the school.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice.</p> <p>Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> <li>•</li> </ul>
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			<p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	4.3		<p>Camden Council strongly questions the use of the Defra background maps to predict emissions in 2017 and 2026 as this will not give an adequate assessment of likely significant effects to be undertaken. The DEFRA background maps are highly likely to significantly under-estimate emissions in these years. These maps assume reductions based on improved vehicle emissions which have yet to be realised, and in the past, have not materialised as hoped. The ES should have included current levels as an additional baseline representing a worst case scenario.</p>
	4.4		<p>Camden Council strongly refutes the Environmental Statement's classification of those areas where, even after mitigation the impact is 'Slight Adverse', as 'Insignificant.' Within the IAQM Guidance, if the impact is still "Slight Adverse" this is actually the worst designation (which only offers two options - insignificant and slight adverse, after mitigations are in place), so we do not agree that it is insignificant.</p> <p>Camden Council considers the ES is defective in that the predicted adverse impacts on numerous roads and receptors during construction as a result of road closures and construction traffic have not been properly assessed, despite the fact that they are highly significant. There is also no clear indication of the duration of these effects.</p> <p>In order to be effective the ES should have given some indication of the time frames of predicted construction impacts, given that these could be anything from a few weeks to ten years, more information on this is essential in order to assess the impact of construction and the proposed scheme.</p> <p>Camden Council considers that it is unclear exactly which receptors are at risk from construction and the reason why these properties have been identified as receptors and others as near to the construction haven't been.</p> <p>Camden Council considers the ES is defective in that the lack of sufficient analysis of and mitigation for locations suffering from combination and/or cumulative impacts – cumulative impacts of dust and road traffic have not been properly considered and profiled.</p>

			<p>Camden Council considers that Air Quality traffic impacts have been significantly under-estimated, due to the under-estimation of congestion within the transport assessment.</p> <p>Camden Council considers the ES is defective in that while the impact on static receptors has been considered, but no consideration has been given to the impact on pedestrians and cyclists using these areas, who will be exposed to significantly increased pollution levels over a long period of time.</p> <p>Camden Council notes that in addition to the comments on the CoCP, Camden Council requests the following further mitigation measures:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul> <p>Camden Council considers that Air Quality impacts have been significantly under-estimated, due to the under-estimation of congestion within the transport assessment. Many of the baseline and future year scenarios during the construction phase are predicted by HS2 to have 'free-flow' conditions on</p>
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			the highway network. However, this is not the case and therefore the congestion will result in poorer air quality results than predicted in the ES.
	4.5		<p>Camden Council notes that adverse impacts are predicted, and considers the traffic models are underestimated (including at a number of junctions around Euston Station for example) then the air quality impacts are also underestimates.</p> <p>Camden Council considers the ES is defective in that in spite of predicting adverse impacts at numerous receptors, the Environmental Statement states that no mitigation will be put in place. Camden Council would like to highlight the requirement for an Ultra-Low Emission Zone around the station, as outlined in the Euston Area Plan.</p>
5			<p>Camden Council notes that a key cultural and community institution in Euston is missing from the study area. The Camden People's Theatre on Hampstead Road is an important asset within London and will be adversely effected by environmental impacts arising from HS2 including noise and traffic which could be seriously compromise the ability of the theatre to run performances. Appropriate mitigation measures such as soundproofing should be installed prior to start of construction to allow the theatre to function during HS2 works.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council requests that an appropriate assessment of cumulative impacts and baseline surveys be undertaken in advance of works.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council notes that the areas around Euston have well established communities that rely on local networks and amenities. It is important to consider the compounded effect HS2 proposals will have on residents living in the Regent's Park Estate and the wider Euston area and working in</p>

			Drummond Street, for example.
	5.1		<p>Camden Council points out that the permanent loss of open spaces and play areas refer to St James Gardens (loss of approximately 7100 m2) and Hampstead Open Space (1221 m2), two play spaces and a Mixed Use Games Area.</p> <p>Camden Council is disappointed to note that Ampthill Open Space and Harrington Square Gardens are listed as potentially required during construction; however the Council has received confirmation via a letter to our Assistant Director from HS2 Ltd's strategic relationship manager, that they will <i>in fact</i> be required. These details should have been included in the Environmental Statement as the spaces are required during the construction phase and the impact of this should have been assessed. The Environmental Statement is deficient without this information.</p> <p>Camden Council considers the ES is defective in that this does not reflect the additional lost spaces due to building of housing onto open spaces to accommodate for the loss of estates through the proposed plan. There are a number of options to mitigate for this, such as exploring the use of public realm for green space and re-providing parks using a bridge across the tracks. More details can be found in the Euston Area Plan.</p> <p>Camden Council points out that there are a significant amount of trees that are proposed to be lost, including all the trees along Eversholt Street. This will have an impact on air quality and community amenity that Camden Council would like to see mitigated with a 2 replaced to 1 tree lost ratio.</p> <p>Camden Council notes that the equality impact assessment suggests that BAME groups are more likely to be disproportionately affected in Camden by loss of open space, and this is likely to be the case in the Euston Area, and appropriate mitigation is required.</p>
	5.1	5.1.2	<p>Camden Council considers the ES is defective in that there is no mention of the disruption that will be caused to schools and children's centres in the Euston area, particularly the impacts on Maria Fidelis school, within the list of key issues relating to the community with this study area.</p> <p>Camden Council considers the ES is defective in that it does not properly assess the wider impacts of the HS2 route on children's services such as noise, dust, proximity to construction sites, lorry routes and traffic route changes which could impact adversely on the health and safety of children and their families and staff and risk of loss of funding due to pupil number reductions either as a direct result of</p>



		<p>residents being forced to leave local communities or as a result of families experiencing difficulties at the beginning and end of the school day to access the schools safely.</p> <p>Camden Council is disappointed to note that the proposed development will cause these significant effects children's services in the area.</p> <p>Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice.</p> <p>Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	5.2	<p>Camden Council stresses that the impact of losing a resource in a localised community can be significant, and in many cases 1km is too far a distance for people to travel in order to access alternatives.</p>
	5.3	<p>Camden Council considers the ES is defective in that the usage surveys are not reflective of actual open space visitor numbers as the surveys were conducted at inappropriate times and in almost all cases not during peak periods such as lunchtimes, after school or after work. For example, there are numerous weekend surveys being conducted at 8am, which is not an appropriate time to obtain correct baseline data.</p> <p>Camden Council considers the ES is defective in that the methodology for assessing a combination of impacts on the community is not robust. Camden Council considers HS2's methodology in predicting combined effects to be limited and insufficient.</p>

		<p>Camden Council considers impacts on individual properties can be significant.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the ES is defective in that the data and method used is inappropriate. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impacts of HS2 on vulnerable</p>
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			<p>residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as supporting document) there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example,</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers the ES is defective in that the community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage; Kilburn; Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA).</p> <p>Camden Council considers the ES is defective in that it uses the terms "community facilities" and "community resources" to refer to retail (including provision of food and drinks, and services such as Doctor and dental surgeries) premises, education premises and faith / religious premises, as well as</p>
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			tenant halls and voluntary sector run community centres. Each of these facilities provides a different offer to the community. These differences should be identified and considered in the Environmental Statement separately and in their own right. HS2 should make direct contact with every affected property in these categories and address any requests for mitigation and / or compensation.
		5.3.10	<p>Camden Council i considers the ES is defective in that the nature at St James' Gardens is not considered here as a community resource and so impacts are not assessed and mitigation for the loss of nature conservation value is not considered.</p> <p>Camden Council stresses that, as a site of importance for nature conservation, St James' provides a valuable experience of nature to the local community, access to nature is proven to improve health and wellbeing. Camden Council considers that this community service should be assessed and mitigated for alongside all the other service provided at St James such as play etc., and mitigated with the provision of a replacement park in the area, one suggestion for which is the decking over of the tracks.</p>
		5.3.12	<p>Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals, including the Surma Centre in the Euston area. The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. The Surma Centre project seeks to re-develop an existing 2-storey community centre that is home to the Bengali Workers Association (BWA). Proposals seek to re-provide a new, modern and fit-for-purpose community space for the BWA with improved facilities together with 18-21 units of residential accommodation above. Planning permission is likely to be submitted in early 2014. Camden Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example the Surma Centre. The ES is not clear about defining "additional committed development" and has omitted Camden Council's regeneration schemes in the area. Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council's Cabinet as part of the borough's</p>

			Community Investment Programme and some have been granted detailed planning permission.
		5.3.13- 5.3.14	Camden Council considers the ES is defective in that proposed developments are not included in the consideration of impacts assessed in the Environmental Statement. The council has a long process of design and consultation when planning regeneration schemes and those that are already under way and will be impacted on by HS2 should be considered through the Environmental Statement.
		5.3.13	Camden Council considers the ES is defective in that proposed developments are not included in the cumulative effects. The council has a long process of design and consultation when planning regeneration schemes and those that are already under way and will be affected by HS2 (such as Adelaide Road Development and some of our Community Investment Programme schemes) should be considered through the Environmental Statement. These communities will suffer from the impacts of long term construction across both developments.
		5.3.15	Camden Council considers the ES is defective in that proposed developments are not included in the cumulative effects. The council has a long process of design and consultation when planning regeneration schemes and those that are already under way and will be affected by HS2 should be considered through the Environmental Statement. These communities will suffer from the impacts of long term construction across both developments.
	5.4		<p>Camden Council does not consider the avoidance and mitigation measures noted here to be exhaustive and consider that further avoidance and mitigation measures should be explored with a view to including within the Local Environmental Management Plan.</p> <p>Camden Council notes that the Secretary of State and Camden Council have not entered a partnership agreement; however both parties are discussing options for replacement housing. Options for the provision of replacement social rented housing have been developed with Camden Council, however DfT/HS2 have not met commitments to meet delivery milestones.</p> <p>Camden Council considers the ES is defective in that the ability of HS2 Ltd. to deliver replacement housing prior to demolition, but would require replacement housing to be completed prior to start of HS2 project. The ES is defective in this regard as it does not properly consider these housing issues.</p> <p>Camden Council requests all tenants to move only once and meet the needs of residents as stated in</p>

		<p>the Housing Needs Survey. Any solutions for HS2 replacement housing will be no net loss to affordable housing supply for the borough as a whole. . All residents housed within scope for replacement housing with a mixed tenure approach similar to existing. Affordable buy options should be considered for leaseholders within the affected area.</p> <p>Camden Council considers the ES is defective in that it does not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community and inadequate compensation measures may force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally.</p> <p>Camden Council considers the ES is defective in that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehoused as close as possible to requested need and location noted in the Housing Need Survey carried out by the council.</p> <p>Camden Council considers HS2 Ltd. does not have an understanding of leaseholder issues in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p> <p>Camden Council does not agree that HS2 has been working with Camden Council to help identify suitable alternative land or premises and to facilitate the re-provision of the Silverdale Old Tenants Hall. Camden Council would require community facilities to be replaced and all costs borne by HS2. Camden Council considers that HS2 Ltd should have had these discussions about reprovision with the Council long before the Environmental Statement was submitted and the Environmental Statement is deficient both as a result of HS2 Ltd's lack of engagement on this issue and as a result the lack of suitable replacement being identified.</p> <p>Camden Council considers the ES is defective in its proposal for the quantum, location and quality of the proposed open space north of Langdale as it would be highly inadequate on its own as a replacement for the open spaces lost as a result of HS2. The impact of such an inadequate open space has not been properly considered. Alternative provision is required in the longer term to replace open spaces such as St James's Gardens. The Euston Area Plan indicates the potential for a substantial site that could provide permanent replacement space close to St James's Gardens. There</p>
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			has not been a proper assessment of the impact of the long period of open space shortfall during the construction process for HS2, before the proposed open space north of Langdale and the site identified in the Euston Area Plan could come forward for open space use. The ES is defective as a result.
		5.4.1	<p>Camden Council considers the ES is defective in that the quantum, location and quality of the proposed open space north of Langdale would be highly inadequate on its own as a replacement for the open spaces lost as a result of HS2. Alternative provision is required in the longer term to replace open spaces such as St James's Gardens. The Euston area Plan indicates the potential site for a substantial site that could provide permanent replacement space close to the St James's Gardens site.</p> <p>There is also noted that there would be a long period of open space shortfall during the construction process for HS2, before the proposed open space north of Langdale and the site identified in the Euston Area Plan could be provided for open space use. The impact of this shortfall has not been properly considered in the ES to its detriment.</p>
		5.4.2	<p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys. Camden Council considers the ES defective as it does not publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council finds it unacceptable to comment on the ES's assessment of impacts and effects of sounds, noise, and vibration prior to reviewing the Noise Insulation and Temporary Re-housing Policy which has not been published. Camden Council requests that where rehousing is</p>



			<p>necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions has not been properly assessed. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES is defective in that where noise insulation is dependent on windows remaining closed, this presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p>
		5.4.3	<p>Camden Council that sites and locations identified as potential reprovision sites for replacement housing as a result of those HS2 propose to demolish as a result of the proposals should be included within the assessment of impacts and effects as potential future receptors. There is otherwise a risk of sites being identified as potential reprovision sites being affected by the scheme and therefore not being suitable locations for replacement housing.</p>
		5.4.6	<p>Camden Council notes that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden.</p> <p>Camden Council notes that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot properly assess the impacts of the scheme from the ES.</p> <p>It is impossible for Camden Council to assess which properties will be affected by the HS2 scheme. The information is unclear, inconsistent and there is a lack of detail and clarity about the assumptions</p>



			<p>made. The impacts and lack of detail make it very difficult to identify with any confidence the approximate buildings and locations affected. The ES does not provide the necessary detail to understand impacts on both individual dwellings and effects considered to be significant on a community basis.</p> <p>Camden Council has scrutinised several reports on each CFA to help the Council produce a list of possible properties affected. The ES is not at all clear or consistent in identifying specific or approximate addresses for the properties affected. Some examples of this defect are set out below.</p> <ul style="list-style-type: none"> <li>• The relationship between data identified in the various sections of the ES (Volume 2 and 5) relating to noise and vibration impacts is unclear and inaccurate in the presentation of impacts. For example, impacts are on “Cubitt Court, Tintern House, Silsoe House and Richmond House (approximately 145 dwellings)” are clustered together under direct impacts on individual dwellings, but then Richmond House is clustered with Goldsmith’s House Hostel (total of 65 dwellings) for noise and vibration considered to be significant on a community basis. There are 141 units between Richmond House and Goldsmith House Hostel. From the ES, it’s impossible to identify which units are predicted to experience impacts. Volume 5 Community data reports and maps do not clarify which units are impacted, but generally identified ‘residential properties on Stanhope Street, Robert Street and Albany Street.’ The rationale and contradictory conclusions in different reports are not explained.</li> <li>• Some impacts are identified in Vol 5 Community data reports but not in Volume 2 CFA table of impacts on a community basis. Where noise is identified as part of in-combination effect in community data and maps, these are not also identified in table for adverse effects for noise and vibration. An example of this omission is the impact on Eversholt Street. Volume 5 CFA 1 Community Data community impact assessment record sheet 2.6 “Residential properties on A4200 Eversholt Street” states that residential properties on A4200 between A501 Euston Road and Barnby Street are predicted to experience in-combination effects arising from significant air quality, noise and construction traffic effects during the construction phase, resulting in loss of amenity.” Reporting of ‘in-combination’ effects in Volume 5 is not always related to noise effects in CFA 2 as per the Eversholt Street example. There is no indication of how long these properties will be impacted. There is no mention of this in the Volume 2 CFA 1 report.</li> <li>• Not all units are counted in each block that is marked on the relevant map as affected. It’s</li> </ul>
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			<p>unclear which flats and in many cases which buildings are affected and what methodology and assumptions are used for the broad range of properties identified. For example, “four residential blocks (approximately 50 dwellings) Amphill Square” are “forecast to experience noise levels higher than the noise insulation trigger levels.” As there are nine blocks and a total of 324 units on the Amphill Square Estate, this description is inadequate as an assessment of impacts on the estate. The ES CFA 1 further describes impacts “on a community basis” for 16 months of night time noise and 28 months of daytime noise for 80 dwellings in Gillfoot and noise impacts on 80 dwellings in Dalehead, and 50 dwellings on Amphill Square are predicted to experience 38 months of daytime noise and 21 months of night time noise on a community basis. The impacts on Dalehead and Gillfoot are reported on separately, making it unclear if “50 dwellings” on Amphill Square included in CFA 1 are inclusive or exclusive of Dalehead and Gillfoot. It’s not clear if the properties included on a community basis are inclusive of properties identified under direct effects.</p> <ul style="list-style-type: none"> <li>• Furthermore, Volume 5 Community Data report states “130 properties on Amphill Square Estate are predicted to experience in-combination effects arising from significant visual and noise effects during the construction phase, resulting in loss of amenity.” In this section, the source is “residential properties in Amphill Square Estate, principally the residential blocks of Dalehead, Gillfoot and Oxenholme.” Volume 2 CFA reports that there will be close and direct views of construction from Oxenholme but Oxenholme is omitted from any sections reporting noise impacts. The maps in Volume 5 Community sections are misrepresentative of the possible impacts in each area. The maps use dots to provide approximate locations, but these are too generic to provide a true understanding of the properties at stake, for example a single dot on a map does not sufficiently illustrate which “approximately 130 residential properties Amphill Square Estate”.</li> </ul> <p>Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed.</p> <p>Camden Council considers the ES deficient as it does not contain an assessment of cumulative impacts and baseline surveys to be undertaken in advance of works.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime</p>
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		<p>should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least two years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers the ES is defective in that the usage surveys are not reflective of actual open space visitor numbers.</p> <p>Camden Council considers the ES is defective in that HS2's methodology for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
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		<p>Camden Council considers that the ES does not fully assess the impact of the HS2 scheme on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the lack of leaseholder data and lack of information on deprivation and protected groups, such as female headed households, disabled and vulnerable adults/children to be a defective omission within the ES. Camden Council considers the incorrect data and method has been used. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impact of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as supporting document) there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example,</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older</p>
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			<p>residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage, Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA).</p> <p>Camden Council requires information on what potential environmental sources were considered in this assessment. Camden Council require information on the addresses of the affected properties as these are Council freehold properties and Camden Council need to know which properties are being reported as having these effects. Camden Council requests information on what mitigation will be implemented to address these impacts.</p> <p>A total of 880 dwellings will experience day time noise levels &gt;75dBLeq 0800-1800. It is claimed, that the mitigation measures and possibly noise insulation will render indoor noise levels "not significant". Camden Council considers that evidence should have been provided within the ES to support this statement. The result will be the need for ventilation systems which will need to be maintained. The night time construction noise levels are not quoted but it is stated in para 11.3.2 that this activity is limited to certain locations.</p> <p>Camden Council considers that evidence should have been provided within the ES to support this statement such as noise modelling and calculations to predict the internal noise levels post</p>
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			<p>mitigation. An assessment of the predicted in combination effects at the dwellings post mitigation should also have been provided. Without this information, Camden Council are unable to determine whether the mitigation measures proposed are adequate and therefore consider the ES to be deficient in this regard.</p> <p>Camden Council requires an assessment of all impacts on a property by property basis to test the habitability of those living in close proximity to the works, for example Coniston, Langdale, Cartmel, Augustus House, The Tarns, Gillfoot and Cobourg Street properties. These impacts should be assessed cumulatively and based on a wide range of factors, not just noise, vibration and dust but also such factors as ventilation, visual, amenity, daylight, air pollution to access routes to ensure a safe and habitable environment is maintained for all residents living near construction for a prolonged period of time. Camden Council considers the ES to be deficient in not considering the impacts in a cumulative basis when determining habitability or triggers for temporary re-housing.</p> <p>Furthermore whilst the ES refers to a “Noise Insulation and Temporary Re-housing Policy” this document has not been included in the ES or draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information is available to enable a thorough assessment of impacts and mitigation measures.</p>
		5.4.10-5.4.16	<p>Camden Council considers the ES is defective in that while the ES acknowledges the created in-combination effects on A400 Hampstead Road (between William Road and Euston Road) for residents, it has failed to identify or address the effect it will have non-residential properties, such as the Camden People's Theatre an important community facility in the area. For residents the magnitude has been assessed as medium, and the impact a major adverse effect; however the Camden's People's Theatre has not been assessed. Camden Council would expect to see HS2 work with the theatre to minimise the impact of construction work and traffic on the performances, and compensation provided for any loss of income.</p> <p>Camden Council notes that utility works in the grounds of Maria Fidelis are likely to take around 3 months. Camden Council does not agree that the nature of these works will not have a significant effect on the school. The school will lose a considerable amount of already limited play space during the time of these works and the Council also considers the noise and disruption that will impact Maria Fidelis as a result of the works being undertaken has not been properly considered. Camden Council</p>

			<p>believes that these impacts, along with the wider impacts on the school of the huge construction works (noise, pollution) and road/path closures around Euston, will mean that the school will experience significant impacts from the proposed HS2 works. The Council does not consider that Maria Fidelis can continue to operate at its North Gower Street site as a result. Although discussions have been taking place with HS2 regarding relocating the school, no agreements have yet been reached that would enable this to happen and we therefore require HS2 to secure agreement with the Metropolitan Police Service for the purchase of the garages at Drummond Crescent to enable the consolidation of the school in Somers Town to take place</p> <p>Camden Council believes there will be wider impacts of the HS2 route on children's services such as noise, dust, proximity to construction sites, lorry routes and traffic route changes which could impact adversely on the health and safety of children and their families and staff; risk of loss of funding due to pupil number reductions either as a direct result of residents being forced to leave local communities or as a result of families experiencing difficulties at the beginning and end of the school day to access the schools safely. Camden Council believes that Netley primary school and Maria Fidelis will be amongst those schools in the local area that could be affected.</p> <p>Camden Council considers the ES is defective in that the impact of the proposed scheme on Regent's Park children's centre have been assumed within the ES to experience significant noise disruption over a 12 month period. We believe that this could significantly impact on its operation. Children centres are an integral part of the borough's education and wider children's services strategies and the borough has made a significant investment in its early year's services to reflect these priorities. Works in Albany Street and increased construction traffic will also impact on Christ Church NW1 primary school and the Council considers the impacts on the school have not been properly assessed or considered in the ES.</p> <p>Works in Albany Street/Parkway and increased construction traffic will also impact on Regent's Park Nursery and Preschool, and Northbridge House Preparatory school.</p> <p>Camden Council is disappointed to note that the proposed development will cause these significant effects on children's services in the local area. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p>
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			<p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers the ES is defective in that the cumulative effect on the Surma Centre, at junction of Hampstead Road and Robert Street, where the Council has a redevelopment proposal, has not been properly assessed.</p>
		5.4.17	<p>Camden Council considers there is insufficient information provided in the Environmental Statement to allow the identification of what trees will be removed within Euston Square Gardens. This section states that 'some of the existing mature trees will be retained', but without further information it is not possible to assess the impact that any removal of trees will have on ecology and also air quality. Camden Council requests that when the garden is reinstated after construction, that local need is assessed and fed into the redesign.</p> <p>Camden Council points out that there is a cumulative effect of a large number of green spaces being lost in the Euston area during construction, This has not been recognised in the Environmental Statement and therefore the necessary mitigation with regards to this has not been addressed.</p>
		5.4.18	<p>Camden Council considers that the cumulative impacts on open spaces should consider noise impacts on all open spaces not only those which are designated quiet areas as the Council considers this definition to be too restrictive and does not sufficiently account for the importance of relatively quiet and tranquil areas within densely populated urban areas such as Camden.</p> <p>Camden Council would also like to stress that a reduction in open space across multiple sites during construction will cause a cumulative effect.</p>



		5.4.19- 5.4.20	<p>Camden Council finds the demolition of residential property unacceptable due to the unjustified impact on existing communities. The HS2 HIA identifies that moving home has an impact upon health, especially for older people and children. The mitigation in the ES suggests that re-housing options will be provided. However, the Council's experience in re-housing suggests that often people need a range on mitigation measures to counter the effects of moving home and from their communities including access to services and ongoing support. This is particularly the case for people that feel they were not part of the decision to move. Camden Council notes that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden.</p> <p>Camden Council considers the ES is defective in that it does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least two years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers that the usage surveys are not reflective of actual open space visitor numbers. The methodology used by HS2 for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES</p>
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			<p>deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the incorrect data and method was used. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers that the ES does not fully assess the impact of the HS2 scheme on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as a supporting document) there is little evidence that the HIA has fed into the ES.</p>
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			<p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example, Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage, Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA). Camden Council is concerned about the reduction of disabled housing from the demolished blocks (2 in Silverdale). Camden Council is concerned that there are a number of residents with mental health issues that could potentially be compounded by the relocation. This would involve coordination with support services, all of which is not mentioned in this analysis.</p>
		5.4.23- 5.4.26	<p>Camden Council notes that in the Environmental Statement the effects on Euston Square Garden are considered temporary; however the loss of this site for 11 years is quite a significant amount of time for an urban environment with limited green spaces.</p> <p>Camden Council would like to point out that the reprovided space is smaller than the loss of St</p>

			<p>James's Gardens and would like commitment for mitigation of the remaining square metres, preferably with a local park situated on a bridge across the tracks.</p> <p>Camden Council stresses that the redesign of St James Gardens should be for green space not just open space, in line with its existing features.</p> <p>Camden Council considers that appropriate mitigation is required for the significant loss of trees in this area. Camden Council notes that the final sentence of 5.4.25 is incorrect; it should state 'The loss of Hampstead Road Open Space is a major adverse effect.....'</p>
		5.4.24	<p>Camden Council considers that access to nature at St James Gardens site of importance for nature conservation should be considered a community resource alongside sports, play, benches etc. and therefore the impact of the loss of access to nature should be considered to be a major adverse and significant affect and should be re-provisioned as part of the mitigation during construction and operation</p>
		5.4.27	<p>Camden Council stresses that there will be further cumulative effects from the loss of open space through the need to build replacement housing (for that lost to HS2) on existing open space land. This has extra cause of concern for its permanent effect on loss of green space, which will have an impact on the health and wellbeing of residents in the area. Camden sees one option is a park on a bridge over the tracks as mitigation to this.</p> <p>Camden Council notes that a reduction in open space in the area will contribute to the urban heat island effect and increased risk to flooding.</p>
		5.4.28	<p>Camden Council notes that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council is concerned that the areas affected by HS2 have increased since the draft ES. Numerous properties and open spaces previously considered unaffected are now at risk. Camden Council is concerned that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES.</p>

		<p>Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers the ES is defective in that the usage surveys are not reflective of actual open space visitor numbers. Camden Council considers the ES is defective in that the methodology for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of</p>
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		<p>time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers information on the mitigation measures that will be implemented in cases where significant effects have been identified should have been provided in the Environmental Statement in order to allow an assessment as to whether such mitigation measures are effective in overcoming the relevant impacts of the scheme.</p> <p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the incorrect data and method has been used. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES fails to properly consider the impact of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions.</p> <p>Although the HIA has been published (as supporting document) there is little evidence that the HIA</p>
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			<p>has fed into the ES. Camden Council considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example, Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA).</p> <p>Camden Council notes that the map books indicate that part of the Ampthill Estate open space will be affected through the utility works; however that information is not indicated in this section. This renders the Environmental Statement deficient in that it does not fully express the impacts of the scheme.</p>
		5.4.31	Camden Council notes that while they appreciate the reprovion of this play area, moving it to the proposed site will take away valued green space in the estate. Discussions should be had to ensure



			<p>reprovision meets the needs of the community (for example by using natural play).</p> <p>Camden Council considers the ES is defective in that the health and safety of residents, and the impact on community safety as a result from compromising security for the estate during construction have not been properly assessed in the ES.</p>
		5.4.32	<p>Camden Council is disappointed to note that the utilities work at Ampthill Open Space and Harrington Gardens is not mentioned here. Although identified as land potentially required during construction in the Environmental Statement, Camden Council has received confirmation that this land will be used for utility works. This will destroy the green space these areas provide and also affect residents' ability to access these sites. It is a significant flaw of the Environmental Statement that these plans are not included, and that the effects of these works are not properly identified or assessed.</p>
		5.4.33	<p>Camden Council considers the ES is defective in relation to the plans to remove all the mature trees on Eversholt Street. The impact this will have on noise, air quality and ecology have not been properly assessed. The Environmental Statement does not identify how many trees will actually be affected by the proposed scheme, which makes it impossible to assess the impact fully, but any loss of trees in this congested area will be significant. However this has not been assessed in the Environmental Statement, a striking defect.</p>
		5.4.34	<p>Camden Council notes that there will be a cumulative impact because of the in-combination effect of losing multiple play areas and green spaces – this cumulative impact has not been assessed in the ES.</p>
		5.4.43	<p>Camden Council considers the ES is defective in that the area proposed to be reprovided as open space in the proposed scheme design is inappropriate. St James' Gardens is an established and well used green space and historical burial ground and the proposed space is not an equivalent in safety, location or size. It also does not offer a solution to the spaces lost during the long period of construction. The impacts of this substandard replacement has not been assessed in the ES.</p> <p>Camden Council considers the proposed improvements in Cumberland Market, Munster Square, Clarence Gardens, Hope Gardens and Tolmers Square should have been detailed in the ES to allow proper assessment of the effectiveness in mitigating the loss of open space in this area of the borough. Some of these spaces are very small and would not be able to reprovide play spaces.</p>



			<p>Camden Council considers the ES is defective in that Cumberland Market is not the best space to offer an 'eco-gym' and it already contains one multiuse games area with no space for a second. Access to the identified sites would need to be addressed, as some of these spaces are confined or hidden within estates.</p> <p>Camden Council disagrees that there are limited opportunities to create space as we have suggested parking areas and potential streets that could be utilised in this way. Camden Council would like clarification on what is proposed on the corner of Stanhope and Robert Street.</p> <p>Camden Council considers the ES is defective in that the construction phase will leave the area with a significant lack of open space, in order to mitigate this we would like to see barriers (such as cultural or physical) that prevent people accessing Regent's Park to be addressed through programmes of activities that engage residents in the space as well as wayfinding.</p> <p>Camden Council notes that the Secretary of State and Camden Council have not entered a partnership agreement, however both parties are discussing options for replacement housing. Options for the provision of replacement social rented housing have been developed with Camden Council, however DfT/HS2 have not met commitments to meet delivery milestones.</p> <p>Camden Council considers the ES is defective in that the Environmental Statement makes no mention or assessment of the utilities works at Amptill Open Space and Harrington Gardens that has been confirmed by HS2 that will go ahead. This will cause significant effects on the ecology and amenity of these spaces and should be assessed for mitigation measures.</p>
		5.4.44 – 5.4.49	A number of measures are described and promise to continue working with Camden Council to resolve, particularly loss of dwellings. But the number affected and needing temporary rehousing due to construction noise and diversion of traffic needs more careful analysis.
		5.4.49	Camden Council is in discussion with HS2 Ltd regarding relocating Maria Fidelis school but no agreements have yet been reached that would enable this to happen and Camden Council therefore require HS2 to secure agreement with the Metropolitan Police Service for the purchase of the garages at Drummond Crescent to enable the consolidation of the school in Somers Town to take place.
		5.4.50	Camden Council considers properties that will experience a significant amenity effect have not been

			<p>properly identified and assessed in the ES.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council would also like to point out that the permanent loss of open spaces and play areas refer to St James Gardens (loss of approximately 7100 m2), Eskdale Play Area (900m2) and Hampstead Open Space (1221 m2), numerous play spaces and a Mixed Use Games Area. Camden Council considers the ES is defective in that it does not reflect the additional lost spaces due to building of housing onto open spaces to accommodate for the loss of estates through the proposed plan. Camden Council considers the ES is defective in that the quantum, location and quality of the proposed open space north of Langdale would be highly inadequate on its own as a replacement for the open spaces lost as a result of HS2. No assessment is made of the impact in the loss of open space. Alternative provision is required in the longer term to replace open spaces such as St James's Gardens. The Euston area Plan indicates the potential site for a substantial site that could provide permanent replacement space close to the St James's Gardens site. There is also concern that there would be a long period of open space shortfall during the construction process for HS2, before the proposed open space north of Langdale and the site identified in the Euston Area Plan could come forward for open space use.</p>
		5.4.51	<p>Camden Council believes that there will be an impact on schools and children's centres in the local area around Euston and across the borough as a result of the proposed scheme. Impacts will include noise, dust, proximity to construction sites, lorry routes and traffic route changes which could impact adversely on the health and safety of children and their families and staff; and risk of loss of funding due to pupil number reductions either as a direct result of residents being forced to leave local communities or as a result of families experiencing difficulties at the beginning and end of the school</p>

			<p>day to access the schools safely. Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	5.5	5.5.2	<p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council would require that any mitigation measures be proposed and agreed at least 18 months in advance of works. Camden Council requests that appropriate compensation should be provided to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES contains insufficient information on how this assessment was reached in particular whether mitigation measures were accounted for when undertaking this assessment and if so, which type of mitigation measures and what mitigation do we consider they</p>

			<p>provided. Camden Council notes that Cartmel has not been included within this statement without any supporting detail as to why Cartmel was determined not to be significantly affected along with Langdale, Coniston and Augustus House. Camden Council considers the ES is insufficient in the absence of information on what environmental sources were considered within the assessment of in combination effects in order to reach these conclusions. Camden Council considers there is a lack of information on HS2's proposals on how the major adverse significant effects will be mitigated against or if they cannot be mitigated against, what HS2's proposals are to address this matter. Camden Council is of the view that no properties within Camden should be exposed to significant effects during the operation of the scheme.</p>
		5.5.3, 5.5.4	<p>Paragraph 5.5.3 of CFA1 states that the HS2 scheme “<i>will support the delivery of the objectives set out in the draft Euston Area Plan (EAP) which identifies substantial capacity in the area to accommodate new housing, commercial and other development linked to existing public transport and future improvements, which will support 7,700 jobs</i>”.</p> <p>Camden Council considers that this is an incorrect assumption, and is considers that the current approach to station design is likely to fail to deliver on EAP objectives, due to its failure to secure a comprehensive approach to station redevelopment, to satisfactorily integrate with the surrounding area, or to properly consider the facilitation of high quality above station development.</p> <p>In March 2013 LB Camden, along with TfL and the GLA wrote to the Secretary of State of Transport to highlight issues with the ‘Option 8’ station design risks failure to deliver on EAP objectives compared to other station design approaches, and paragraph 5.5.3 of CFA1 is deficient in failing to recognise this apparent shortcoming. The proposed submission version of the EAP (January 2014) allows for between 7,200 and 13,600 additional jobs on the Euston Station site: however the delivery of this level of growth at Euston (as part of a mix of uses, set within a high quality public realm and integrated with the wider area) is dependent on an integrated, comprehensive approach to station design. This is not delivered on by the current ill-conceived Option 8 station design. It cannot claim it will mitigate the effects of the loss of community facilities.</p> <p>Camden Council contests that there will be cumulative effects arising from operation, and question its assessment. Attention is drawn to the reference to cumulative impacts referred to above in the Council's response to paragraph 5.5.2 above.</p>
		5.5.3	<p>Cross reference to the benefits of the Euston Area Plan creating 7,700 jobs is seen as a positive</p>

			<p>effect. The scheme is claimed to generate 2000 jobs (Section 10) but it cannot claim that it will facilitate the delivery of the EAP and thus mitigate the effects of the loss of community facilities and significant visual and noise effects during the operation phase for residents of between 50 and 60 properties in the Regent's Park Estate at the very least.</p> <p>Camden Council considers the ES is defective in that the cumulative effect on the health and wellbeing of residents in the Euston area as a result of the lost open space that will not be reprovided post construction have not been assessed.</p> <p>Camden Council considers that the Environmental Statement is defective as it fails to undertake a proper assessment of the cumulative effects of the scheme.</p>
6	6.1	6.1.3	<p>Camden Council notes that with regard to Para 6.1.3, the maps do not fully portray heritage assets. Neither conservation areas as designated heritage assets, nor positive contributors in conservation areas are represented on the Maps nor are buildings on Local Lists are shown. It is a major omission of the Environmental Statement that it fails to acknowledge the major role of buildings on Local Lists and buildings which make a positive contribution to conservation areas. Such non-designated heritage assets, either as individuals or groups, play a vital role in making up the high quality and distinct character of the historic townscape, but this has been completely overlooked by HS2 Ltd in the assessment of the existing built environment and the impacts it will suffer as a result of the Proposed Scheme.</p>
6	6.3		<p>Camden Council considers the ES is defective in that no reference was made to the two pieces of art that are currently situated in Euston forecourt and that were specially commissioned for the space:</p> <ul style="list-style-type: none"> <li>• Paul de Monchaux's Four stone seat 'benches' with feature markings. Both the benches and their footings, with inscriptions detailing the source and age of the stone need to be retained.</li> <li>• Eduardo Paolozzi's Piscator, a bronze cast block that is a version of the sculptures that suggest a head on its side from which emerge block shapes that suggest architecture, city scape or an industrial landscape. This piece was commissioned by Network Rail and paid for by them and public money.</li> </ul> <p>Camden Council would expect these public art pieces (paid for through public money) to be retained in the re-development Euston forecourt. Should this not be possible, Camden Council would expect HS2 to commission 2 new pieces of public art of equal value (approximately £500,000 each).</p>
		6.3.2	<p>Camden Council notes that the Environmental Statement states that <i>"the following designated</i></p>

		<p><i>heritage assets are located partially or wholly within the land required, temporarily or permanently, for construction: 19 Grade II listed buildings plus one group of grade II* listed buildings (2-16, 22-34, 36A and 36B Park Village East (17 in number), one grade I Registered Park and Garden (Regent's Park), 3 London Squares (Euston Square, Amptill Square Gardens and Harrington Square)."</i> This is a disproportionate number of heritage assets for one local authority area, in its own right and in the context of the wider route of the Proposed Scheme.</p> <p>Camden Council points out that 36A and 36B Park Village East is actually one residence, and should state 36 Park Village East. An error such as this within the ES shows a lack of proper information for assessment.</p> <p>Camden Council points out that the Cultural Heritage section fails to provide a sufficiently detailed assessment of the temporary and permanent impacts on these important heritage assets which are likely to occur during the construction of the Proposed Scheme. In particular, impacts caused by access issues for the 16 grade II* listed residential properties in Park Village East have not been assessed. The residents are likely to suffer access issues for up to seven years during the construction period. In the absence of an appropriate level of information at this stage, it is unacceptable to include these properties in the land potentially to be required for construction.</p> <p>Camden Council notes that para 6.3.2 states that the grade II listed statue of Robert Stephenson in Euston station forecourt (which was formerly located in the Great Hall of the earlier station) will have to be dismantled and located, but no assessment of impacts and effects or outline of mitigation is made.</p> <p>Camden Council considers the ES is defective in that there is no assessment of how character and context of the asset and its setting in the wider conservation area will be impacted by construction activities associated with the demolition of the Park Village East railway retaining wall and by the associated underpinning works and retaining wall replacement works.</p> <p>Paras 6.3.2 and 6.4.4 state the grade II* villas at 2-16 (even), 22-34 (even), 36 Park Village East are assets of high value which lie within the land required to construct the Proposed Scheme. This means these residential properties could be required by HS2 during construction for a period as long as seven years, with the highway also closed for access between the Parkway junction to about 30 metres south of Mornington Street Bridge. The future of these 17 nationally important designated heritage assets may necessitate their addition to the English Heritage "<i>Heritage at Risk</i>" Register.</p>
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		<p>The potential access issues that relate to these properties over a number of years is likely to cause neglect and deterioration of the historic fabric of the buildings, and no assurances are provided that the properties would not suffer structural damage.</p> <p>Camden Council considers the ES is defective in that that an extremely low level of information is provided on the impacts and effects on special interest of grade II* listed buildings.</p> <p>Camden Council considers the ES is defective in that there is a discrepancy over the value of Mornington Street Bridge as a non-designated heritage asset; although it is stated in paragraph 6.3.5 that the bridge is a heritage asset of moderate value, Para 6.4.10 states it is of 'low' value</p> <p>Camden Council notes that para 6.3.2 contains an inaccuracy as there is no property address of 58 Mornington Crescent. Map CT-05-001 suggests the property in question is the grade II listed 1 Mornington Crescent, at the southern end of the crescent close to the drinking trough. It is also understood that during construction the rear sections of a number of rear gardens in the southern section of Mornington Crescent may be required. No written information is provided, but the truncation of back gardens is indicated on map CT-05-001 in CFA 01 Map Book. Since these gardens form the curtilage of grade II listed buildings situated in a conservation area, their settings will be badly compromised, which is unacceptable</p> <p>Camden Council notes that para 6.3.2 is contrary to map CT-05-001 CFA 01 Map Book, which shows the York and Albany PH as outside the construction zone, although the adjacent roads and buildings are included in the zone</p> <p>Camden Council considers the ES is defective in that the street location and identity of the heritage assets is unclear, but it is assumed that the drinking fountain is situated in Albany Street which is shown on Map CT-05-001 as land potentially required during construction. The gate bridge would appear to be the grade II listed Gloucester Gate Bridge, dating from the 1870s, situated to the west of Parkway. No written assessment has been made of the impacts and effects on the either listed structures. No structural assessment has been made at this stage on the viability of using the 19<sup>th</sup> century bridge for construction purposes, including by heavy construction vehicles with vibration implications on the structural integrity of the bridge impact.</p> <p>Camden Council notes that para 6.3.2 states that construction sites for the works to the retaining walls and tunnel portal have been located and designed to avoid physical impacts to listed buildings.</p>
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			<p>Although this statement is welcomed, it is noted on Map CT-05-001 in CFA 01 Map Book that a section of Regent's Park close to Gloucester Gate will potentially be required during construction, impacting on the grade I Registered Park and Garden and on the Regent's Park Conservation Area, and on the setting of two important early 19th century townhouses, 14 Gloucester Gate by James Burton (grade I listed) and 15 Gloucester Gate (grade II* listed) by JJ Scoles. The setting of three grade II listed buildings at 1-3 (consecutive) Prince Albert Road (within the Primrose Hill Conservation Area) will also be affected. In the absence of a written assessment, it is impossible to assess the impacts and effects of the Proposed Scheme on these significant assets</p>
		6.3.3	<p>Camden Council notes that this paragraph includes only a small number of significant heritage assets whose settings will be affected during construction. It makes no mention of a number of important listed buildings grouped around Euston Square, including the grade I listed St Pancras New Church, the grade II* listed Euston Fire Station and the grade II listed Drayton House (Friends' House) in Euston Road. Other landmark buildings are omitted, such as the grade II listed Edinburgh Castle PH and its grade II listed neighbour at 58 Mornington Terrace. Para 6.3.20 is inaccurate as it describes the grade II* Euston Fire Station as Art Deco; the list description states it follows a domestic Arts and Crafts style.</p> <p>Camden Council considers the ES is defective in that the setting of numerous grade II listed buildings, in majority early to mid-19<sup>th</sup> century residential terraces, are likely to be affected during construction with possible impacts from vibration without proper assessment of this impact.</p> <p>Camden Council is concerned that Map CT-05-001 in CFA 01 Map Book shows the following streets as potentially required during construction: Albert Street (northern section), Delancey Street, Parkway (western section), Gloucester Crescent/Oval Road, Mornington Crescent, Hampstead Road and Eversholt Street (in the Camden Town Conservation Area), Chalton Street, and Parkway and Gloucester Gate (in the Regent's Park Conservation Area), plus numerous others.</p> <p>Camden Council is disappointed that no assessment has been made of the impacts and effects of the Satellite Compound at Lancing Street on the setting of the grade II listed Art Deco Royal George PH at 8-14 (even) Eversholt Street.</p> <p>Camden Council notes that in response to local concerns that vibrations could cause structural damage to historic buildings, reference is made to ES Vol 1 Para 6.7.4 which states that where it is agreed with the local authority that there is no best practicable means to reduce predicted or</p>



			measured vibration, a condition survey of building foundations/third party assets will also be undertaken prior to and after the relevant works. It is requested that this path of action is taken by HS2 Ltd.
		6.3.5	<p>Camden Council considers the ES is defective in that no heritage assessment has been made or justification given where works of total demolition are proposed to designated and non-designated heritage assets, including two grade II listed buildings at 14 and 15 Melton Street, and a sizeable number of non-designated heritage assets which are candidates for the draft Local List including buildings and structures in Melton Street, Cobourg Street, Euston Street, Hampstead Road and St James's Gardens. The proposed demolition in the total absence of justification in heritage terms is considered to be wholly unacceptable.</p> <p>Camden Council notes that para 6.3.5 states the St James's Gardens memorials, as non-designated assets of moderate value, lie wholly or partially within the land required, temporarily and permanently, for construction. Three monuments in St James's Gardens are recorded as grade II listed. No mention is made of the third, an Obelisk to Baron Southampton whose location is in the south-west corner of the gardens, on land potentially to be required during construction. This monument is currently in Council storage as it has been fire-damaged. Notwithstanding, its listed status requests its future to be addressed in relation to the Proposed Scheme: it should be treated equally to the other listed monuments in the gardens. However, no assessment has been made of this grade II listed monument, with no information on relocation, repairs, storage, reinstatement and associated mitigation measures.</p> <p>Camden Council considers the ES is defective in that no mention is made of the three grade II listed monuments in Table 1, Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. In the absence of detailed information on their dismantling and relocation, their future is uncertain putting them in the category of demolition. Due to their uncertain future, the three grade II listed piers will be at risk and will be considered as additions to the English Heritage "<i>Heritage at Risk Register</i>".</p> <p>Camden Council considers the ES is defective in that no mention is made of the grade II listed mid-19<sup>th</sup> century residential villa at 58 Mornington Terrace, immediately south of the Edinburgh Castle PH, and no mention is made of four 19<sup>th</sup> century terraced townhouses at 9-12 (consec) Mornington Terrace, which are positive contributors in the Camden Town Conservation Area. Both examples of</p>

		<p>these residential properties are shown on map CT-05-001, CFA 01 Map Book as being situated within land potentially required, temporarily or permanently, for construction; however, no written mention is made of these designated and non-designated heritage assets, which are likely to be inaccessible and possibly inhabitable for a sizeable length of the construction period. Access issues to these buildings including a potential lack of occupancy, could cause these buildings to decay, harming the character and appearance of the Camden Town Conservation Area, and requiring the grade II listed 58 Mornington Terrace to be added to the English Heritage “<i>Heritage at Risk Register</i>”.</p> <p>Camden Council considers the ES is defective in that no mention is made of the Mornington Street Overbridge (north) Satellite Compound on Mornington Terrace, linear in form, located at high level adjacent to, and affecting the setting of positive contributors on the east side of Mornington Terrace within Camden Town Conservation Area.</p> <p>Camden Council notes that para 6.3.5 states that the non-designated assets of moderate value at 1 Park Village East, a late 19<sup>th</sup>/early 20<sup>th</sup> century riding school (a positive contributor in the Regent’s Park Conservation Area) lies wholly or partially within the land required, temporarily or permanently, for construction. Although it is agreed this building is of moderate value, this rating is inconsistent with other positive contributors in conservation areas which are categorised as of low value, but which should also be given a moderate value rating in line with their heritage significance in the historic environment.</p> <p>Camden Council notes that para 6.3.5 states the grade II listed statue of Robert Stephenson in the forecourt of Euston Station (which was formerly located in the Great Hall of the earlier station) will have to be dismantled and relocated. No assessment has been made of the impacts and effects of the dismantling, storage, repairs, relocation and reconstruction of the grade II listed statue, and no necessary mitigation measures are considered. The statue will be dismantled and relocated, so its location will be altered with a new setting. It is considered that the dismantling and relocation of the monuments will have a high impact and high adverse effect.</p> <p>Camden Council considers the ES is defective in that no mention is made of the grade II listed Robert Stephenson statue in Table 1, Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. In the absence of detailed information on its dismantling and relocation, its future is uncertain putting it in the category of demolition. Due to its uncertain future, the grade II listed statue will be at risk and will be considered as an addition to the English Heritage “<i>Heritage at Risk Register</i>”.</p>
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			<p>Camden Council considers the ES is defective in that no reference was made to the following two pieces of art that are currently situated in Euston forecourt and that were specially commissioned for the space:</p> <ul style="list-style-type: none"> <li>• Paul de Monchaux's Four stone seat 'benches' with feature markings. Both the benches and their footings, with inscriptions detailing the source and age of the stone need to be retained.</li> <li>• Eduardo Paolozzi's Piscator, a bronze cast block that is a version of the sculptures that suggest a head on its side from which emerge block shapes that suggest architecture, city scape or an industrial landscape. This piece was commissioned by Network Rail and paid for by them and public money.</li> </ul> <p>Camden Council would expect these public art pieces (paid for through public money) to be retained in the re-development Euston forecourt. Should this not be possible, Camden Council considers HS2 should commission two new pieces of public art of equal value (approximately £500,000 each).</p>
		6.3.20	<p>Camden Council considers that Para 6.3.20 is inaccurate as it describes the grade II* Euston Fire Station as Art Deco. The list description states it follows a domestic Arts and Crafts style.</p> <p>The Council considers that the setting of numerous grade II listed buildings, in majority early to mid-19<sup>th</sup> century residential terraces, are likely to be affected during construction with possible impacts from vibration.</p> <p>Camden Council is concerned that Map CT-05-001 in CFA 01 Map Book shows the following streets as potentially required during construction: Albert Street (northern section), Delancey Street, Parkway (western section), Gloucester Crescent/Oval Road, Mornington Crescent, Hampstead Road and Eversholt Street (in the Camden Town Conservation Area), Chalton Street, and Parkway and Gloucester Gate (in the Regent's Park Conservation Area), plus numerous others.</p> <p>The Council notes that no assessment has been made of the impacts and effects of the Satellite Compound at Lancing Street on the setting of the grade II listed Art Deco Royal George PH at Nos 8-14 (even) Eversholt Street. This is considered essential to understand the impact of the HS2 scheme on these heritage buildings.</p>
	6.3 – 6.4		<p>Camden Council notes that the main archaeological impact would be the loss of St. James Garden 18<sup>th</sup>-19<sup>th</sup> century chapel and burial ground. It is estimated that the burial ground may have received c</p>

			<p>50,000 or more burials. This is correctly assessed as a major adverse impact with mitigation by a programme of archaeological works to investigate, analyse, report and archive these assets. The discovery of such a burial ground at St. Pancras during the construction of HS1 caused considerable difficulties for (and conflicts between) the archaeological and construction works.</p> <p>Camden Council would like assurances that the investigation will be accorded sufficient time and resource to comply with modern archaeological standards, including guidance on large cemeteries currently in preparation by English Heritage. Further consideration should also be given to suitable resting place and memorial for the dead in consultation with the Church of England and taking account of the long-term research potential of such an assemblage.</p> <p>Camden Council notes that there is insufficient information and that more detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway and canal heritage (both above and below ground). This applies both to Euston Station and for example to Mornington Street Bridge and Parkway Tunnel. The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the Environmental Statement and so the need for a specialist integrated industrial heritage assessment should be emphasised.</p> <p>Camden Council considers there is a need for more specialist consideration of 18-19<sup>th</sup> century transport infrastructure which draws upon recent work, for example Crossrail and Kings Cross Central.</p>
	6.4	6.4.2	Camden Council notes that although the retention of the 1930s extension at 1-9 Melton Street is an improvement on the draft Environmental Statement, the issue of setting remains as the extension contributes to the special interest of the listed building. Insufficient information has been provided regarding planned mitigation measures, which should be addressed at this stage prior to the implementation of the provisions of the Heritage Memorandum.
		6.4.5	Camden Council considers that there is no evidence that a structural assessment has been undertaken at this stage to ascertain the impact of such works on the grade II* listed Park Village East villas; no information is given as to how far below the buildings the interventions would be and the potential impact from settlement
		6.4.8	Camden Council considers that an extremely low level of information has been provided to support or

			<p>justify the total loss of the two significant listed grade II listed buildings at 15-15 Melton Street. These buildings are considered to be of high value, not of moderate value as stated in Para 6.4.8; they are of national significance and are contemporary with Euston Square which was constructed as an important piece of townscape. Furthermore, their demolition will have a high adverse effect, rather than a moderate adverse effect. Para 6.4.22 states a programme of built heritage works will be prepared to investigate, analyse, report and archive these assets, but due to the extreme impact the demolition of these buildings will have, more detailed information on this programme should be provided at this stage ahead of the implementation of the provisions of the Heritage Memorandum.</p> <p>Camden Council notes that para 6.7.4 of ES Vol 1 sets out that demolition will be carried out by conventional methods (e.g. boom-mounted hydraulic breakers, cutters etc.) and will use best practicable means to maximise the recovery of materials for reuse and recycling). Appropriate demolition techniques are not outlined in connection with the clearance of the two grade II listed buildings, and no reference is made to the Code of Construction Practice.</p>
		6.4.9	<p>Euston Station has been assessed as a non-designated heritage asset of moderate value in Para 6.3.5, acknowledging its heritage significance. However, Para 6.4.9 states that the partial demolition works will only have a moderate adverse effect. Camden Council disputes this rating as the adverse effect will be high.</p> <p>The Environmental Statement is considered defective as no assessment has been made of the loss of key areas of Euston Station including the forecourt and the total demolition of the power signal box, as non-designated heritage assets of moderate value. In the absence of detailed assessments at this stage, it is not possible to fully comment on the impacts and effects of these demolition works forming part of the Proposed Scheme.</p>
		6.4.10	<p>Camden Council considers the value in the ES of the former Euston Underground Station entrance on the corner of Melton Street and Drummond Street, which dates from 1907 and was constructed for the Northern Line, is incorrectly assessed in the ES. It was designed as part of series of distinctive underground stations employing 'ox-blood' red glazed tiles designed by Leslie Green. Although no longer used as an underground entrance, it retains most of its original features. The building is on the Camden draft Local List. It is disputed that the heritage asset has a 'low' value, rather it has a 'moderate' value. The demolition will not constitute a moderate adverse effect; rather it will have a major adverse effect. No heritage assessment has been made or justification given for the total demolition of these non-designated heritage assets, which is considered to be wholly unacceptable in heritage terms</p>

			<p>Camden Council notes that para 6.4.10 states that 1 and 3 Cobourg Street, an asset of low value, will be demolished for the expansion of Euston Station and this will constitute a high impact and moderate adverse effect, however para 6.3.5 states that 1 and 3 Cobourg Street is a non-designated asset of moderate value. It is disputed by Camden Council that the non-designated heritage asset has a 'low' value; rather it has a 'moderate' value. 1 and 3 Cobourg Street is a well preserved piece of railway heritage which contributes to the setting of St James's Gardens. The demolition will not have a moderate adverse effect, rather a major adverse effect. No heritage assessment has been made or justification given for the total demolition of this non-designated heritage asset, which is considered to be wholly unacceptable in heritage terms.</p> <p>Camden Council notes that para 6.4.10 states Granby Terrace carriage shed, a non-designated asset of moderate value, will be demolished for the expansion and remodelling of Euston station and Euston approach and this will constitute a high impact and moderate adverse effect. Although it is agreed this non-designated heritage asset has 'moderate' value, this rating is not consistent with those of other non-designated heritage assets. It is considered that the loss of the carriage shed will have a high adverse effect rather than a moderate adverse effect. No heritage assessment has been made or justification given for the total demolition of this non-designated heritage asset, which is considered to be wholly unacceptable in heritage terms. Nowhere is it stated that the carriage shed will be demolished so that the replacement Granby Terrace bridge can be re-routed. If the new bridge could be positioned as existing this railway building of heritage importance could be retained.</p> <p>Camden Council considers that the value given in para 6.4.10 for the Mornington Street Bridge is incorrectly assessed. The para states the bridge is a non-designated heritage asset of low value, which will be demolished for the remodelling of Euston approach and this will constitute a high impact and moderate adverse effect. The 'low' value is disputed. The bridge is considered to have moderate value, particularly because the listed piers and bridge are integrally linked to each other. This is a discrepancy as it is described as being of 'moderate' value in Para 6.3.5. The adverse effect is considered to be major. No heritage assessment has been made or justification given for the total demolition of this non-designated heritage asset, which is considered to be wholly unacceptable in heritage terms. No assessment is made of the impact of demolition and reconstruction of the bridge on the grade II listed piers</p>
		6.4.11	<p>Camden Council considers the statement in para 6.4.11 is flawed because the list description covers the entire tunnel (grade II listed), which is incorrect. Due to this inaccuracy, a more detailed</p>

			assessment is required at this stage outlining which parts of the tunnel and curtilage structures will be demolished and how the works will impact on special interest of tunnel with full justification in heritage terms. In the absence of this information, it is considered that the grade II listed Parkway Tunnel should be included as an item for demolition in Table 1 Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. Due to its uncertain future, the grade II listed tunnel will be at risk and will be considered as an addition to the English Heritage “ <i>Heritage at Risk Register</i> ”.
		6.4.12	<p>Camden Council notes that a substantial red brick parapet wall bounds the west side of the Euston railway cutting, running along Park Village East to Granby Terrace. This wall has historic townscape value and dates from the late 19<sup>th</sup>/early 20<sup>th</sup> century. It is on the Camden draft Local List, and borders the Regent’s Park Conservation Area. Camden Council disputes that the above non-designated heritage asset is of ‘low’ value, as set out in Para 6.4.12, as it is an historic piece of railway infrastructure which borders onto the Regent’s Park Conservation Area and affects the setting of a number of grade II* listed buildings.</p> <p>Camden Council considers the ES is defective in that although Para 6.3.5 states the replacement retaining walls, parapets and landscaping, are to be designed to reflect the current setting of Park Village East, this statement is contrary to the photomontages in CFA 01 Map Book which show the impact of the loss of the historic brick parapet wall and its replacement with a new wall with little resemblance to the existing in terms of architectural treatment. The proposed access gates to the proposed portal headhouse are shown to detract from this highly sensitive setting. The reinstated parapet/landscape feature does not sufficiently resemble the existing in terms of architectural treatment, rather aping the wall in an insensitive fashion and impacting negatively on the setting of the grade II* listed buildings in Park Village, the grade II Mornington Street Bridge piers and on the Regent’s Park Conservation Area. The impact is likely to be major, not moderate. No heritage assessment has been made or detailed justification given for the total demolition of this non-designated heritage asset, which is considered to be wholly unacceptable in heritage terms.</p> <p>Camden Council notes that the photomontages in CFA 01 Map Book show views west over the railway cutting from the northern end of Mornington Terrace (south of the grade II listed Edinburgh Castle PH) looking towards the grade II* listed Nash villas in Park Village East (within the Regent’s Park Conservation Area). The setting of the grade II* listed villas and conservation area will be harmed by the replacement parapet wall (and barrette) which in the images is out of keeping in terms of construction, dimensions (including increased height), materials and general detailed design. The</p>



			setting of the villas and the conservation area will be affected by the large bulk and mass of the portal headhouse structure in the cutting.
		6.4.13	Camden Council does not agree with fact that the Mornington Terrace retaining wall parapet is of 'low' value, and that there would be a moderate adverse effect, rather the wall has a moderate value and there will be a high adverse effect. The 'low' value rating conflicts with the 'moderate' value rating given to the wall in Para 6.3.5, which is considered to be a fair assessment. The parapet wall will be rebuilt in its current location. This will constitute a high impact and moderate adverse effect. The demolition works would have a high adverse effect rather than a moderate adverse effect. No written indication is given at this stage of the extent of demolition or on how the wall will be rebuilt, for instance there no assurances that it will be reconstructed like-for-like. In the absence of such information it is not possible to comment on the impacts and effects of the demolition and reconstruction which are likely cause harm to these non-designated heritage assets and to the Camden Town Conservation Area
		6.4.14	<p>Camden Council notes that para 6.4.14 states that the National Temperance Hospital and former print works, assets of moderate value, will be demolished for the expansion and remodelling of Euston Station. The impact will be high and have a major adverse effect. Para 6.4.22 states a programme of built heritage works will be prepared to investigate, analyse, report and archive these assets. Para 6.3.5 states that the National Temperance Hospital and former print-works, non-designated assets of moderate value, lie wholly or partially within the land required, temporarily or permanently, for the construction of the Proposed Scheme.</p> <p>There is inconsistency in the Cultural heritage section regarding assessment of value; this non-designated heritage asset has a 'moderate' value rating, when others are assessed as having low value. However, this is a fair value rating for the National Temperance Hospital buildings, a rating which should be given to all locally listed buildings, positive contributors in conservation areas and other non-designated heritage assets which have an important role in the historic environment.</p> <p>No heritage assessment has been made or justification given for the total demolition of these non-designated heritage assets, which is considered to be wholly unacceptable in heritage terms.</p>
		6.4.15	Camden Council notes that para 6.4.15 states that St James's Gardens burial ground and the site of St James's Chapel located in the adjacent hospital car park, assets of high value, will be removed for the expansion and remodelling of Euston station, temporary construction compounds and for the



			<p>construction of new access roads. This will constitute a high impact and a major adverse effect. P</p> <p>The high rating value of St James's Gardens is a fair assessment which is welcomed. However, the temporary loss of the gardens during construction and the permanent loss of a substantial part of the gardens and the former burial ground, as non-designated heritage assets of high value, is considered to be wholly unacceptable, particularly in the absence of detailed assessments at this stage of the impacts and effects of the Proposed Scheme, and no justification in heritage terms for the proposed westwards expansion of Euston Station.</p>
		6.4.16	<p>Camden Council notes that para 6.4.16 gives a fair assessment of the negative heritage impacts on 1-9 Melton Street, which will harm the setting of the grade II* listed building. However, insufficient information is provided on the altered setting after the demolition of 10 Melton Street, or of planned mitigation measures. The photomontages in CFA 01 Map Book do not portray the altered setting of the grade II* listed building or the impact on the Bloomsbury Conservation Area within which it is situated</p> <p>Camden Council notes that 14 and 15 Melton Street comprises two grade II listed buildings, comprising a pair of 3 storey masonry terraced townhouses dating from the early 19<sup>th</sup> century (in residential use, divided into 3 flats), with attached front railings. To facilitate the construction of the Proposed Scheme, in particular the westward expansion and remodelling of Euston Station, both grade II listed buildings will be totally demolished as part of widespread clearance in the Melton Street, Cobourg Street, Euston Street and Drummond Street area.</p>
		6.4.17	<p>Camden Council notes that Para 6.4.17 states that the grade II listed buildings Southampton Monument and Christie Monument in St James's Gardens will be relocated to an appropriate location. These assets are of moderate value and although they will be retained, their intended setting will be altered, which will affect the settings and appreciation of the assets. This will constitute a medium adverse impact and moderate adverse effect. The monuments will be dismantled and relocated, so their location will be altered with a new setting. However, Para 6.4.23, summarising likely residual effects, states that the relocation of these two monuments significantly alters their setting. It is considered that the dismantling and relocation of the monuments will have a high impact and high adverse effect, rather than moderate, especially since no detailed information is provided on the monuments' relocation, repairs, storage, reinstatement and other necessary mitigation measures.</p> <p>Camden Council notes that three memorials in St James's Gardens are grade II listed. No mention is made of the third, an octagonal drinking fountain whose location is in the centre of the gardens, on</p>

			<p>land potentially to be required during construction. This memorial is currently in Council storage as it has been fire-damaged, and the Council's intention is to repair and reinstate it. Notwithstanding, its listed status requires its future should be addressed in relation to the Proposed Scheme: it should be treated equally to the other listed monuments in the gardens. However, no assessment has been made of this grade II listed monument, with no information on relocation, repairs, storage, reinstatement and associated mitigation measures.</p> <p>Camden Council disagrees with the assessment of value of the Mornington Bridge piers and lamp stands, west and east ends. The listed piers are considered to be of high value since they have national significance; as such, the impact and adverse effect are high. In the absence at this stage of information on the dismantling and reconstruction of the listed elements, and an assessment of how the new bridge design will impact on the grade II listed piers, it is considered that the Mornington Street Bridge piers should have been included as an item for demolition in Table 1 Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. Due to their uncertain future, the grade II listed piers will be at risk and will be considered as an addition to the English Heritage <i>"Heritage at Risk Register"</i>.</p> <p>Para 6.4.17 classifies the war memorial as being of moderate value and although it will be retained, its intended setting will be altered, which will affect its setting and appreciation of the asset. This will constitute a medium adverse impact and moderate adverse effect. However, Para 6.4.23 is contradictory, as when summarising likely residual effects, it states that the relocation of the war memorial and railings 'significantly alters its setting.'</p> <p>Camden Council notes that Para 6.4.17 states that the war memorial will be (dismantled and) relocated further south as part of the alterations to the bus station, but on its original intended alignment within the gardens. The proposed new location of the war memorial is vague; no assessment has been made at this stage of the impacts and effects of the relocation on the grade II listed memorial itself and on the London Square and the Bloomsbury Conservation Area. The memorial is considered to have high value since it is of national significance, and by being dismantled and relocated it will endure a high impact and adverse effect. No detailed information is provided on relocation, repairs, storage, reinstatement and other necessary mitigation measures. This absence of information from the Environmental Statement is noteworthy – it renders the document incomplete and therefore defective in detailing the impacts of the HS2 scheme.</p>
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		<p>Camden Council notes that no mention is made of the grade II listed war memorial in Table 1, Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. In the absence of detailed information on its dismantling and relocation, its future is uncertain putting it in the category of demolition. Due to its uncertain future, the grade II listed war memorial will be at risk and will be considered as an addition to the English Heritage “<i>Heritage at Risk Register</i>”</p> <p>Camden Council notes that Euston Square Gardens is defined by grade II listed cast-iron 19<sup>th</sup> century boundary railings. Some sections were renewed in the 20<sup>th</sup> century, but the railings retain their special historic interest as a whole. Para 6.4.17 states that the railings will be removed, retained and installed around the edges of the restored gardens. These assets are of moderate value and although they will be retained, their intended setting will be altered, which will affect the settings and appreciation of the assets. This will constitute a medium adverse impact and moderate adverse effect. However, Para 6.4.23 is contradictory, as when summarising likely residual affects it states that the relocation of the railings significantly alters their setting. The railings will be dismantled and relocated, with a new location and significantly altered with a new setting rather than an altered setting. No detailed information is provided on the railings’ relocation, repairs, storage, reinstatement and other necessary mitigation measures. In the absence of this information, it is considered the railings will endure a high impact and high adverse effect, rather than the ‘moderate’ adverse effect stated in Para 6.4.17</p> <p>Camden Council considers the ES is defective in that no mention is made of the grade II listed boundary railings in Table 1, Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. In the absence of detailed information on their dismantling and relocation, their future is uncertain putting them in the category of demolition. Due to their uncertain future, the grade II listed railings will be at risk and will be considered as additions to the English Heritage “<i>Heritage at Risk Register</i>”.</p> <p>Camden Council notes that the grade II listed piers of Mornington Street bridge are considered to be of high value since they have national significance; as such, the impact and adverse effect are high. In the absence at this stage of information on the dismantling and reconstruction of the listed elements, and an assessment of how the new bridge design will impact on the grade II listed piers, it is considered that the Mornington Street Bridge piers should be included as an item for demolition in Table 1 Para 2.4.16 which lists all buildings and structures in the Euston area to be demolished. Due to their uncertain future, the grade II listed piers will be at risk and will be considered as an addition to the English Heritage “<i>Heritage at Risk</i>” Register.</p>
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		6.4.21	<p>Camden Council considers that the assumption this statement makes that the entire gardens will be lost, contradicts information given elsewhere in the Cultural heritage section. Camden Council does not have in-house archaeological expertise to fully comment on archaeological issues, although note is made of survey work and mitigations measures set out in sections 6 and 8 of ES Vol 1. The timeline set out in Para 2.4.130 shows removal of graves from St James' Gardens in the period from the beginning of 2016 to the middle of 2017; this is very early in the overall timeline, so it is essential that a full and appropriate strategy is in place for an archaeologically sensitive excavation, archaeological recording and the management of potential finds, prior to the implementation of the provisions of the Heritage Memorandum. Please refer to the formal detailed response from the Greater London Archaeological Service (GLAAS).</p>
		6.4.22	<p>Camden Council considers that no heritage assessment has been made or justification given for the total demolition of the Granby Terrace Carriage Shed, which is considered to be wholly unacceptable in heritage terms. Nowhere is it stated that this non-designated heritage asset on the draft Camden Local List will be demolished to make way for the proposed replacement, re-routed Granby Terrace bridge. No assessment or justification has been given in a heritage context for the replacement of the bridge.</p> <p>Camden Council considers the programme of built heritage works has not described how the demolition of these building will be managed. This is a significant defect of the ES.</p>
		6.4.23	<p>Camden Council notes that Para 6.4.23 states the grade II listed Mornington Street Bridge piers and lamp stands will be relocated, significantly altering their setting. Para 6.4.22 states a programme of built heritage works will be prepared to investigate, analyse, report and archive these assets.</p> <p>Although a correct assessment, the statement that the relocation of the listed elements will significantly alter their setting, this goes against Para 6.4.17, which states that the works will constitute a medium adverse impact and moderate adverse impact, as the setting of the piers and the bridge itself are intrinsically connected. Photomontages in CFA 01 Map Book illustrating the view of the proposed replacement Mornington Street bridge from the northern end of Mornington Terrace (south of the grade II listed Edinburgh Castle PH) show that the new bridge will have lower, plainer sides (not stepped up as existing), which compromise the setting of the listed piers, brackets and lamps when reassembled and reinstated as part of the replacement construction.</p>

7	7.1	7.1.2	Camden Council notes that there has been no survey of the trees in St James Gardens to establish a baseline or to assess the impact of the loss, nor is there any indication of how many trees are required to be removed for the proposed scheme.
	7.2	7.2.5	Camden Council points out that an access license for St James' Gardens was issued to HS2 Ltd, but it was not signed and returned.
	7.3		Camden Council stresses that that the methodology used to assess impacts on ecology at Camden sites are flawed since no surveys were completed on site and without detailed surveys the environmental baseline cannot be accurately reported and impacts cannot be sufficiently assessed. Camden Council would like to stress that that no environmental baseline or assessment of impacts and effects is presented for Camden's urban forest (trees and woodlands).
		7.3.10	Camden Council points out that the Environmental Statement ecological survey (Vol 5) reports that house sparrow are likely to be breeding at St James' Gardens, furthermore grassland management at St James Garden's is specifically to increase invertebrate food to support House Sparrows; House sparrow is a species of principal importance (Section 41, NERC Act 2006) and a London Biodiversity Action Plan priority species. This is not reflected in this section.
	7.4	7.4.2	Camden Council would like to point out commitments within the Camden Biodiversity Action Plan to maintain the extent of Camden's network of Sites of Importance for Nature Conservation (SINC), and reporting commitments to DEFRA on SINC's under positive conservation management, both of which are compromised by the loss of St James Garden's alongside 36% of the North London Line SINC and 37% of the Chalk Farm Embankment and Adelaide Road Local Nature Reserve SINC. These commitments and obligations will be detrimentally affected by the construction of the proposed scheme, and will have an impact on Camden's ability to meet these commitments. These effects have not been assessed in the Environmental Statement and it is deficient as a result.
		7.4.3	Camden Council stresses that impacts on both the Camley Street Natural Park Local Nature Reserve and Regents Park Site of Metropolitan Conservation Importance cannot be accurately assessed without baseline surveys. The Environmental Statement is deficient as it does not include these surveys.
8			Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is

			<p>considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
9			Camden Council expects that HS2 will consult fully with its staff and residents in respect of reinstatement of landscaping.
	9.1		Camden Council notes that there are a significant amount of trees that are proposed to be lost, including all the trees along Eversholt Street. This will have an impact on air quality and community amenity that Camden considers should be mitigated with a two replaced to one tree lost ratio and in line with Camden's Tree Policy identifying the right tree for the right location. Camden Council would like to see green hoardings during construction as mitigation for loss of open space.
	9.2	9.2.5	Camden Council considers the ES is defective in that views from an unidentified quality of locations were not assessed. Considering that much of the land in this area is owned by either rail companies or Camden Council, and other land does not seem to be in sensitive ownership, there should be no reason for any views to be inaccessible.
	9.3	9.3.4	Camden Council does not consider that the adjacent bus station and forecourt building overshadow the gardens. The gardens are a light south facing space and the buildings highlighted sit to the north of the space. The central podium which occupies most of the frontage is a relatively low building. Camden Council rejects that the gardens have a neglected air. They are in good condition and well looked after.

			Camden Council notes that that although this is a mixed area of mixed quality, there are parts which are of significant townscape value which have a high sensitivity to change.
		9.3.5	The report states that this is a dense urban landscape...with long views. Camden Council considers that this is not a dense urban environment and that is specifically why there are long views in the area. Buildings typically sit back from the street behind garden buffers. Camden Council also considers that the tranquillity in this area is at least medium to high and rejects that it is low. Although buildings are tall this is essentially a quiet, residential, suburban landscape with unrefined streets and little through movement.
	9.4		Camden Council considers the ES is defective in that detail on the numbers and locations of trees to be removed has not been provided; since trees play an important role in landscape character and visual amenity, it is therefore considered that the assessment is incomplete.
		9.4.96	Camden Council notes that living green hoardings during construction could be an interim measure to temporarily mitigate against the loss of open space. Camden Council would like the planting to be in line with its own Biodiversity Action Plan, and also be complementary to improving air quality.
		9.4.97	Camden Council points out that the term temporary is used to cover both short term and long term lengths of time. 11 years is a substantial amount of time, especially for young families in the area, and this should be considered significant impacts and potential mitigation. Camden Council would like to see living green hoardings during construction as mitigation for loss of open space. Camden Council would like the planting to be in line with our Biodiversity Action Plan, and also be complementary to improving air quality.
	9.5	9.5.1	<p>Camden Council is aware that these trees make a significant townscape contribution and would expect replacement trees of a mature age to be provided in the area.</p> <p>Camden Council notes the removal of the bus route through the centre of the square; however the proposal still results in a severance between the station and garden, and would continue to harm the setting and enjoyment of the gardens.</p> <p>Camden Council would like to stress that at the proposed 35m in height, the station will be noticeably higher than much of its neighbouring context. Designs must take into consideration this change in</p>



			<p>scale in the form of the proposal with an aim of reducing the buildings impact.</p> <p>Camden Council rejects that it is possible to restore part of St James Garden within a new station forecourt. The forecourt space is simple an extension of the station function and cannot be considered to be public space in any real sense.</p> <p>Camden Council considers the ES is defective in that this bridge will be a safe and effective route and suggests that alternative safe, direct and active east west routes be proposed.</p> <p>Camden Council considers the artistic impressions of the bridges are of a unrefined engendered nature not suitable for this central London location. We would expect any forthcoming designs to be more architecturally considered to help reduce their jarring and uninspiring nature.</p> <p>Camden Council points out that 'the loss of mature trees' does not provide sufficient information to determine how many trees will be lost, or what the impact will be. This section also fails to mention that a significant amount of trees are also to be lost along Eversholt Street. This will have an impact on noise, air quality and community amenity that Camden would like to see mitigated with a 2 replaced to 1 tree lost ratio.</p> <p>Camden Council points out that any the incorporation of St James Gardens into the northern forecourt implies that the gardens will be turned into paved entrance and therefore does not constitute reprovision of the green space that is lost from the previous gardens. 100% of St James gardens will be lost as a public space.</p>
		9.5.2	<p>Camden Council would like to stress that retaining the existing undesirable Eversholt Street station frontage is not would not lead to a satisfactory mitigation or avoidance as it is not a resolved design solution for the station and fails to bring forward mitigating improvements to the Euston area.</p> <p>Camden Council would like to stress that the part retention the station forecourt buildings and part replacement is not a mitigation or avoidance measure but rather a compromised proposal that would undermine the aim of achieving a unified station frontage of high quality design.</p> <p>Camden Council considers the ES is defective in that the quantum, location and quality of the proposed open space north of Langdale as offered as a mitigation measure in this section would be highly inadequate on its own as a replacement for the open spaces lost as a result of HS2.</p>



			<p>Alternative provision is required in the longer term to replace open spaces such as St James's Gardens. The Euston Area Plan indicates the potential site for a substantial site that could provide permanent replacement space close to the St James's Gardens space that would be much better and more appropriate for mitigation. There is also concern that there would be a long period of open space shortfall during the construction process for HS2, before the proposed open space north of Langdale and the site identified in the Euston Area Plan could come forward for open space use. This section does not offer any mitigation or avoidance measures for this impact, which renders the ES defective.</p> <p>Camden Council points out that the replacement of trees as offered in this section is not appropriate mitigation as they will not be reinstated until post construction, and when reinstated will be smaller trees that will not offer the same benefits as the mature trees that are being lost. A more appropriate mitigation would be to replace trees on a 1 lost to 2 replaced ratio, and other AQ measures such as green hoardings to be provided during construction.</p>
		9.5.4	<p>Camden Council considers clarification is required in (but is missing from) the Environmental Statement as to exactly how St James's Garden will be replaced "through other forms of public realm" as it is proposed in this paragraph. This section implies that the proposed public realm will not cause detrimental landscape and visual effects, however replacing green gardens with pavements is not a like-for-like replacement and should be assessed on that basis.</p> <p>Camden Council notes that this section omits mention the loss of Hampstead Open Space, and Eskdale Play Area, which will cause significant impact and effects on the landscape of the area. The Environmental Statement is therefore considered to be incomplete and defective.</p> <p>Camden Council considers the ES is defective in that the impact on ecology, noise and air quality of the loss of trees in the area during construction. This has not been adequately assessed in the Environmental Statement, as the number of trees that will be lost in this area (or across the whole line) has not been identified.</p>
		9.5.9	<p>Camden Council would like to stress that Euston Square gardens is a public amenity and should not be used for station cycle parking.</p>
		9.5.10	<p>Camden Council considers that it is not possible to provide a meaningful and usable piece of open green space adjacent to the northern forecourt as shown on the current proposals. This area would effectively be used as external station concourse and not as a genuine amenity space. Alternative</p>

			replacement of green space should be provided.
		9.5.12	The conclusion of 'medium' is stated to be based on the low level of detail currently available. Camden Council considers the ES is incorrect in this assessment as the magnitude of change will be high; with the major effect on the character of the small scale streets to the west to be of great concern.
		9.5.13	Camden Council considers that many parts of their character area have a high sensitivity to change.
		9.5.14	Camden council rejects the statement that the loss of St James garden and its replacement with fragmented parcels of residue open space would result in an overall effect of unchanged with regard to mature planting character.
		9.5.17	Camden Council considers the ES is defective in that the proposed scheme will result in alterations which result in an unresolved urban form. The area proposed for the public space would be in a backland area without appropriate building frontage and with Harrington Street terminating in a dead end against urban design best practice.
		9.5.29	Camden Council considers that for the station to be compatible with views across Euston Square the station must have a single cohesive frontage. The analysis does not take into consideration associated development or OSD which would alter the magnitude of change.
		9.5.33	Camden Council considers that although tree planting in front of the station entrance is desirable, our experience at Kings Cross has shown that other demands on movement and visibility etc. place pressure to limit tree cover. As such the future provision of these trees cannot be relied upon to obscure views.
		9.5.37	Camden Council considers that the removal of a street frontage building which encloses the street with entrance to a major railway station setback behind an external concourse space results in a magnitude of change on this residential area greater than medium. Camden Council considers the magnitude of change to be high.
		9.5.76	Camden notes that this conclusion would change with a scheme that considered over site development.
		9.5.77	Camden Council notes that high quality architecture which enhances context is essential as a

			<p>mitigation measure.</p> <p>Camden Council also refutes that the permanent effects have been significantly reduced through the proposed measures, and believes more mitigation is required. Camden Council would like the planting to be in line with our Biodiversity Action Plan, and also be complementary to improving air quality.</p>
10	10.1	10.1.1 – 10.1.3	<p>Camden Council considers that the scope of the socio-economic assessment is too narrow and that sever deficiencies exist. For example, no consideration has been given to levels of deprivation, disability, sex, age and ethnicity. Camden Council considers that the scope fails to take into account the full socio-economic impacts of the scheme and that the impacts have therefore been underestimated.</p> <p>Camden Council considers the ES is defective in that the introduction does not make any reference to mitigation proposals to overcome the adverse effects on businesses, the local economy and community.</p>
		10.1.4	<p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account the significant blight and uncertainty on businesses and the local economy both in terms of those directly affected and in impacts in the wider area. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated. Further details of Camden Council's issues with the ES can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics</p>
		10.1.5	<p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account noise, vibration and other factors that could impact upon businesses ability to operate. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated. Further details of Camden Council's issues with the ES can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p>
	10.2		<p>Camden Council considers the ES is defective in that the socio-economic scoping and methodology has not been covered in full and fails to provide an adequate basis for assessment. The full socio-economic impacts of the scheme have therefore not been adequately assessed and are likely to have been underestimated. Further details of Camden Council's issues with the ES can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p> <p>Camden Council notes the absence of a local policy review section within the socio-economic chapter</p>

			<p>of each CFA report and within the CFA report as a whole. Camden Council highlights the importance of policy in establishment of a baseline and assessment of effects.</p> <p>Camden Council asserts that ES has not been prepared with sufficient engagement of stakeholders and community organisations and that many of Camden Council and the community's representations to HS2 Ltd on the impacts of HS2 on business and employment in Camden have been ignored and are not reflected in the ES. Camden Council is aware of numerous businesses that have reported their concerns to HS2 Ltd but the assessment in the ES indicates that this engagement has not been adequately taken into account.</p>
		10.3.1 – 10.3.2	<p>The Environmental Statement fails to provide a comprehensive or adequate socio-economic baseline for Euston CFA. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline assessment does not follow the approach set out in the Scope and Method report at Volume 5 and therefore fails to provide an adequate basis for the assessment of impacts of the scheme. In particular, the baseline has failed to consider stakeholder views and has failed to cover an adequate range of socio-economic indicators and has failed to take on board local information and intelligence.</p> <p>Camden Council considers the ES is defective in that the local economy will not be in position to take advantage of the planned EAP regeneration due to the length of the Planned Scheme's construction period and the resulting long term damage caused by the relocation of certain sectors. In Euston, the professional, scientific and technical sector is strongly represented, reflecting a number of large, established institutions. This is a sector which Camden has identified as a growth area for the future, and for which it is well known, for example across all three areas the professional, scientific and technical sector makes up over 20% of all occupations<sup>1</sup>. However Camden Council is alarmed to see that the adverse effect of the Proposed Scheme upon this area of growth is not addressed within the ES.</p>
		10.3.4 – 10.3.11	<p>Camden Council is aware that the Equalities Impact Assessment (ESA 4.5) contains some additional socio-economic data, however no reference has been made to this information, nor has it been utilised in the assessment of the socio-economic baseline at Euston.</p> <p>Camden Council is very disappointed to see that, based on the information in this section, HS2 have</p>

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			<p>looked at a narrow set of statistics which do not tell enough. The assessment is based upon a narrow set of statistics which is not sufficient to provide an adequate baseline. In particular the information relied upon does not provide adequate information about the communities in the DCAs; such as levels of deprivation, disability, sex, age and ethnicity. For example the IMD deprivation scores for six LSOAs in St Pancras / Somers Town ward are within 20% of the nation's most deprived areas. Key statistics for St Pancras/Somers Town ward include that 29% of all households have one person who has a long term health problem or disability, 31% of workers who live in the ward work part-time (less than 30 hours per week) and it has a diverse ethnic population with 15% Bangladeshi. Key statistics for Regents Park ward are very similar. The Regents Park Estate (LSOA EO1000950) is within the 10% most deprived areas in the nation, whilst 25% of households within the ward have someone who has a long term problem or disability, 28% of workers are part-time and 12% of its population are Bangladeshi<sup>2</sup>.</p> <p>Camden Council considers the ES is defective in that the high deprivation in Euston or the population of disabled residents has not been considered in the baseline/ ES. The effects of the Proposed Scheme could be significant for these communities. In addition to this the relocation of big employers within the Euston area and wider impacts could mean residents of the wards will have less employment opportunities as consequence of HS2's construction.</p> <p>Whilst Camden Council accepts that some construction jobs will be created no subsequent research has been undertaken to see whether or not the necessary skills base is present to ensure local people are able to take advantage of the jobs created by the Proposed Scheme. No impact assessment has been conducted to assess the adverse effects on the local employment market (e.g. on part-time work). There has been no assessment of how many local people are likely to lose their jobs as a result of the relocation of businesses whilst also carrying out a thorough investigation regarding the similar effects on businesses outside the safeguard zone.</p> <p>Camden Council believes that HS2 need a more comprehensive understanding on the Euston CFA area and further environmental baseline analysis should be conducted in order to do so. HS2 should consider the following:</p> <ul style="list-style-type: none"> <li>• Review how the scheme will impact on small areas of deprivation and important business</li> </ul>
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			<p>clusters, for example, Euston's thriving professional, scientific and technical sector</p> <ul style="list-style-type: none"> <li>• Assess the kinds of jobs that will be lost to the area and in what numbers</li> <li>• Consider the direct and indirect (supply chain) adverse impacts on key sectors</li> <li>• Assess the impact on residents/ local communities of the disruption to smaller, retail or service based businesses, for example, specialist shops and restaurants along Drummond Street</li> <li>• Carry out a thorough skills gap analysis to consider whether there will be a skills mismatch between jobs lost and jobs created</li> <li>• Carry out an Equalities Impact Assessment to consider how the Proposed Scheme will impact on particularly vulnerable groups such as lone parents, people with disabilities via impact on community facilities or those with part time jobs</li> <li>• Consider how the disruption and noise from the scheme impact home workers/shift workers</li> </ul> <p>The ES fails to provide a comprehensive or adequate socio-economic baseline. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline assessment does not follow the approach set out in the Scope and Method report at Volume 5. In particular, the baseline has failed to consider stakeholder views, has failed to cover in adequate depth a range of socio-economic indicators such as ethnic composition of communities, vulnerable groups and local enterprise and has failed to take on board local information and intelligence. The baseline therefore fails to provide a discerning basis for the assessment of impacts of the scheme.</p>
		10.3.12 – 10.3.17	<p>Camden Council accepts the findings within this section but is alarmed that although it concludes that sourcing alternative building accommodation for most sectors will be unlikely it does not go onto to provide sufficient mitigations against the negative effects this will have upon the economy of Camden. For example Camden Council notes that the negative effects of the UCL not being able to source similar accommodation within the borough is not sufficiently addressed at all within this section. As key employer of skilled professionals the loss of three key sites – and the function of these three sites – has the potential to have a significant effect on the local economy and jobs market, of which professional, scientific and technology plays the most significant part.</p>
		10.3.18	<p>The Environmental Statement fails to provide an adequate future baseline. The assessment provided is highly limited and does not provide an adequate basis against which to assess the true impacts of the scheme.</p>
	10.4		<p>Camden Council considers the ES is defective in that the assessment of socio-economic impacts is</p>

			<p>wholly inadequate and severely underplays the effects the proposed scheme will have on local businesses and the local economy. The Council considers that the impacts will be much greater and more severe, affecting a considerably larger number of businesses than those outlined in the ES. The assessment fails to identify the full extent of socio-economic receptors and to effectively assess the magnitude or significance of effects.</p> <p>The limited mitigation proposed in section 10.4 fails to address the serious effects that the proposed scheme will have on local businesses and employment. Failure to address the major socio-economic impacts anticipated at Euston would have serious effects on the economy and community, and will limit any potential for future growth.</p> <p>The assessment in the ES is focused on land-take with very little assessment of socio-economic, business or employment impacts beyond the safeguarding area where significant harmful effects will occur. This is particularly relevant to Euston, given that it is the terminus and main construction site, and the concentration and important nature of businesses in the locality. Camden Council advises that impacts on businesses will be significantly greater than those identified by the ES.</p>
		10.4.1	<p>The proposed socio-economic mitigation is entirely insufficient. The mitigation proposed, is considered inadequate in addressing the significant effects identified. The failure of the assessment to identify the true breath and magnitude of impacts implies that substantial additional mitigation is required. Camden Council would like to stress that Euston is anticipated to be one if not the worst affected area along the HS2 route and will suffer from major adverse construction effects over a period of ten years or more. It is therefore imperative that this is reflected in HS2's mitigation and compensation strategy.</p> <p>10.4.1 – 10.4.2 –Camden Council has made a detailed response to the Code of Construction Practice which should be referred to. Generic provisions set out in the CoCP and a vague reference to the maintenance of access to businesses premises during construction are the only provisions identified in the CFA. Such measures implemented in isolation, will fail to prevent or mitigate the significant socio-economic effects of the scheme. Camden Council considers that this is unacceptable and a failure on the part of HS2 to protect the communities most directly affected by the scheme.</p> <p>10.4.1 Despite other serious concerns, Camden Council welcomes the commitment at 10.4.1 to maintain access to businesses during construction and to maintain pedestrian access to Drummond Street and Euston Street. This is a serious concern for local businesses and Camden Council is</p>

			<p>pleased that this has been recognised by HS2 Ltd. Camden Council requests further details as to how direct, safe and attractive access will be maintained to these businesses.</p> <p>Camden Council is disappointed that the independent consultant's report provided to HS2 Ltd on 'Best Practice in Blight Mitigation for Business and Employment', has not been taken into account in developing socio-economic mitigation for HS2. This report was shared with HS2 in the hope they would draw on the industry best practice identified including examples from the Olympics, Crossrail, Kings Cross Central and a variety of other relevant projects. Camden Council is disappointed that this industry best practice has not been utilised by HS2 to develop an appropriate mitigation strategy for Euston.</p> <p>The proposed mitigation fails to take into account feedback from consultations and engagement or industry best practice.</p> <p>Camden Council requests that HS2 Ltd commit to deliver a significantly enhanced comprehensive mitigation and compensation strategy that deals with blight and uncertainty, loss of business and commercial trade, transport disruption and reduced accessibility and degraded environment.</p> <p>This should include but not be limited to funding and delivery of projects for:</p> <ul style="list-style-type: none"> <li>• Design and construction modifications</li> <li>• HS2 Business Advice and Support Service</li> <li>• Formal mechanisms and capacity building for engaging with businesses/ business groups</li> <li>• Access to enhanced business compensation package</li> <li>• Specialist commercial property support</li> <li>• Open for business, marketing &amp; promotion campaigns and events</li> <li>• Hoardings and artwork</li> <li>• Visitor information</li> <li>• Property modifications</li> <li>• Meanwhile uses</li> <li>• Employment, job brokerage and training support</li> <li>• Maintaining access &amp; way-finding.</li> </ul> <p>Camden Council considers that noise mitigation such as sound insulation must be offered to</p>
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			businesses and community facilities that may be affected by noise during the construction or operational phase of the proposed development. Camden Council considers that there must be a robust noise insulation policy in place for affected businesses and community facilities.
		10.4.2	Camden Council acknowledges that there is a role for the CoCP in minimising effects on businesses, but advises that this should be in addition to robust mitigation measures. Camden Council highlights the necessity for local business engagement in the development of LEMP's. This further highlights the need for HS2 to build capacity of local business representative organisations and establish formal mechanisms for engaging with the business community to ensure that this can be achieved.
		Assessment of impacts and effects	Camden Council considers the assessment of effects arising during construction in Euston to have been severely underestimated. The information provided is incomplete, lacks transparency and is inaccurate.
		10.4.3	Camden Council reiterates that impacts 'will' amount to significant amenity impacts.
		10.4.3 – 10.4.8	<p>Camden Council considers the ES is defective in that the Environmental Statement only specifically identifies three businesses (Exmouth Arms, The Wesley Hotel and the Roj Café), as likely to experience significant effects from noise, visual and construction traffic, and therefore a loss of amenity, when other businesses operating within immediate proximity to these premises have not been recognised.</p> <p>Camden Council considers this to be a gross underestimate. There are significantly more businesses both within and beyond the safeguarding area will be considerably affected by changes in amenity value. This reveals a serious defect in the assessment within the Environmental Statement of the impacts of HS2.</p> <p>Camden Council considers that the amenity, isolation and cumulative impacts of the scheme would have severe socio-economic impacts resonating throughout Euston and beyond. Based on current information, Camden Council understands that approximately 100 businesses are located within the safeguarding area in Euston. Camden Council has shared evidence of the businesses and areas likely to be affected with HS2 Ltd. The Council considers that all of these businesses and many more in the wider area will be severely affected by the prolonged and intensive construction of HS2. Camden Council notes that the severity of amenity impacts means some businesses may have to close or relocate and this has not been assessed.</p>

			<p>For example, businesses in West Euston whose premises are outside the safeguarding area have raised concerns about the impacts construction will have on their business. The nature of business activities in these areas includes member organisations, offices and research that receive many customers and visitors and include conference and examination rooms, libraries and performance areas that require a quiet environment. A number of businesses in this area have expressed concerns that excessive construction noise and disruption from HS2 works is likely to seriously affect their ability to operate. This represents just one example of the many businesses and clusters that HS2 Ltd has failed to identify or provide assessment of effects.</p> <p>Camden Council considers the assessment in the ES to be highly flawed and that the number of businesses significantly affected by changes in amenity will be much greater than that suggested by the ES.</p> <p>Camden Council agrees that the Exmouth Arms on Starcross Street will experience significant amenity affects as a result of the scheme. Camden Council considers the ES is defective in that it outlines no proposed mitigation and/or compensation to this business.</p> <p>Camden Council agrees that the Wesley Hotel on Euston Street will experience significant amenity affects as a result of the scheme but considers the ES is defective in that HS2 Ltd outline no proposed mitigation and/or compensation to this business in the ES. Camden Council notes that there are a number of other hotels in the area both directly affected by demolition and in the wider area that are likely to be affected by amenity impacts. The cumulative impact on hotels in this important visitor destination has not been adequately assessed and the Council has previously requested that HS2 Ltd carry out a full hotel/visitor impact assessment. Camden Council considers this to be essential to understanding the full socio-economic impacts in Camden that welcomes many millions of visitors each year.</p> <p>Camden Council strongly refutes the assessment at 10.4.6 that businesses on Drummond Street will not experience significant amenity affects as a result of the construction of the scheme. Camden Council, Drummond Street Traders Association and the Euston Community Forum have repeatedly informed HS2 Ltd of the serious implications of the scheme for Drummonds Street's highly valued independent business cluster.</p> <p>Camden Council would like to reiterate the importance and specialist nature of Drummond Street to the local economy. The council estimates that Drummond Street contains approximately 35</p>
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			<p>enterprises, which are predominately small businesses. These businesses provide local jobs, support the local community and draw in a large number of people from outside the area who come for the ethnic shops and restaurants. Camden Council considers the assessment of impacts on the Drummond Street businesses is flawed as it does not recognised the full customer base which is much wider than local residents and station users. Given the small, independent nature of the businesses, many are operating under a small retail footprint and within tight profit margins. The business community are also reliant on the finely balanced critical mass of restaurants and shops, therefore the loss of one or two specialist businesses could affect the viability of the businesses cluster as a whole.</p> <p>Camden Council presented a report to HS2 Ltd through the Business and Employment Mitigation Working Group outlining the serious blight, amenity and access impacts that Drummond Street would experience and the implications of this for the local community. The report also outlined recommended mitigation measures – none of which have been taken into account other than maintaining pedestrian access. Camden Council had been of the view that HS2 Ltd were in agreement with the Council in respect of severity of impacts at Drummond Street and is therefore very disappointed by the assessment in the ES.</p> <p>Camden Council considers that the ES provides no sound explanation as to why the Council's and local community's concerns have been dismissed by HS2 Ltd in respect of businesses on Drummond Street and consider the assessment to be damagingly incorrect. Camden Council contends that, in the absence of a full and proper assessment of the impacts on Drummond Street the ES is deficient. Such an assessment should be used to draw up a comprehensive mitigation and compensation strategy to prevent, minimise, mitigate and compensate businesses and ensure their viability is maintained.</p> <p>Camden Council welcomes HS2's commitment to ensure a pedestrian access route is maintained between Euston Station and Drummond Street throughout the construction phase. However, this needs to form part of a comprehensive mitigation strategy.</p> <p>Camden Council agrees with the assessment that the Roj Café would experience significant amenity effects but considers the ES is defective in that it outlines no proposed mitigation and/or compensation to this business in the ES.</p> <p>Camden Council considers the ES is defective in that the impact of utilities work on the Council-</p>
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			owned Chalton Street Market, which provides an important local service to communities, has not been properly assessed. The adverse effects on the market have not been covered in the socio-economic assessment.
		10.4.8	<p>Camden Council impression of the relatively low impacts that HS2 would have on access to the Underground and the dispersal of passengers from Euston station no attempt has been made to quantify the effect on employment at CFA level resulting from temporary effects. Given that the extent of works in Camden and that the temporary effects of the scheme are likely to last over 10 years, there will be major implications on local employment over an extended period of time. Camden Council considers the failure to assess these employment factors as unacceptable and lacking in transparency leading to an under-assessment of significant effects. Camden Council request that these figures are provided.</p> <p>Camden Council also notes that no attempt has been made to quantify temporary amenity impacts in terms of lost or delayed economic output. Again Camden Council considers this to be a major flaw in the assessment leading to an under-assessment of significant effects.</p>
		10.4.9	Camden Council contends that businesses within Euston 'will' experience significant isolation effects as a result of construction works, in turn leading to a loss of trade. Camden Council considers the ES is defective in that there is a lack of information and analysis in the CFA of who these businesses are. In the absence of this information, the council considers this section to be incomplete and does not provide an adequate assessment of isolation effects.
		10.4.11	<p>Camden Council strongly rejects HS2's assertion that pedestrian and vehicular access is maintained and therefore the isolation effect for Euston is not significant. Camden Council believes that the numerous access closures highlighted in this paragraph will have a significant isolating effect for businesses in the area. Camden Council would like to stress that limited access and traffic diversions, combined with increased congestion and delays will have significant implications for local businesses. Camden Council considers that this needs to be urgently addressed by HS2 Ltd and prevents or mitigated.</p> <p>Camden Council also considers paragraph 10.4.9 and 10.4.11 to be contradictory. The former stating that there may be significant isolation effects whilst the latter suggests otherwise.</p> <p>Camden Council would like to make HS2 aware that road closures and diversions at Stephenson Way and the cul-de-sac behind the Regnart buildings in West Euston also present a major concern for businesses in this area as they are essential for servicing and deliveries. Camden Council would like to stress that HS2 must take every measure to ensure these entrances are maintained.</p>

			<p>Camden Council considers the ES is defective in that the full extent of construction, transport and utilities works proposals has not been adequately assessed in terms of their socio-economic implications and considers there to be lack of co-ordination between the 'Traffic and Transport' assessment in the CFA report and the 'Socio-economic' assessment.</p> <p>For example, Camden Council has noted that a number of commercial streets, including Drummond Street, Arlington Road, Royal College Street and Robert Street, have been identified as construction routes and construction traffic anticipated to reach 740 combined two way vehicles movements in Euston at the peak of construction. Camden Council considers the ES is defective in that these impacts have not been assessed in terms of their socio-economics implications. This represents a major flaw in the assessment and infers that significant effects have been massively under-estimated.</p>
		10.4.12-15	<p>Camden Council notes that the construction compounds in this CFA could generate a maximum of 2,100 jobs during the height of construction and potential opportunities in the supply-chain. Camden Council has urged HS2 Ltd to put in place an employment, skills and training strategy, as soon as practicable, and procurement support to enable local residents and businesses to access these opportunities, otherwise there will be no benefits to the localities that will experience the significant adverse effects. This strategy should align with the objectives of the Council's Camden Plan and also look at supporting NEETS and adult population not in work.</p>
		10.4.16-18	<p>Camden Council does not consider that cumulative effects have been adequately assessed. Camden Council considers the ES is defective in that cumulative temporary effects on the labour market are only assessed at route wide level. Failure to provide this information at CFA level is a serious flaw in the assessment and local employment impacts will be significant. Camden Council requests that this information is provided.</p>
		10.4.19	<p>Camden Council considers the ES is defective in that the full extent of permanent business impacts has not been assessed. Assessment is focused on premises that will be subject to compulsory purchase. No assessment has been made of the permanent socio economic, business or employment impacts beyond the safeguarding area where significant harmful effects will occur. Camden Council considers the ES is defective in that no consideration has been given to the residual and permanent effects on businesses resulting from severe isolation, amenity and construction impacts.</p>
		10.4.20	<p>Camden Council considers the way businesses are grouped together to form defined resources to be unclear and inaccurate. The ES should include a more detailed breakdown in each respective CFA,</p>

			<p>including:-</p> <ul style="list-style-type: none"> <li>• the naming of each of the businesses described as being directly affected;</li> <li>• within each defined resource why the businesses have been grouped this way; and</li> <li>• the consequential assessment of significant effects.</li> </ul> <p>The failure of the Environmental Statement to include such a breakdown makes it impossible to evaluate the soundness of the assessment and appears to downplay the scale of impacts and causes ambiguity as to the actual effects.</p> <p>Camden Council notes that paragraph 10.4.20 states that 93 businesses will be directly impacted by the scheme i.e. subject to compulsory purchase and that these businesses have been grouped together to form 17 defined resources. The ES fails to identify the 93 businesses or the 17 resources. Of the 17 resources, it is advised that only 8 will experience significant effects. HS2 should identify all businesses directly impacted and explain the reasoning for the grouping of resources and assessment of significant effects. The failure to include this information makes it impossible to understand the assessment; resulting in serious concerns that impacts have been downplayed. Camden Council considers the ES is defective in that there is a lack of transparency in the ES and the failure without explanation to identify businesses and resources.</p> <p>Camden Council disputes the assessment in table 13 and considers that all 93 business premises facing acquisition will experience major adverse effects. Camden Council acknowledges that some businesses may be able to relocate and resume business operations elsewhere, but the assessment fails to take into account the human impacts to the individuals affected by the disruption, stress and inconvenience of imposed acquisition.</p> <p>The Cottage Hotel, 67-75 (odd) Euston Street is situated on the south side of the street to the west of the Stephenson Way junction. The properties comprise three adjoining 3 storey masonry townhouses in an early 19<sup>th</sup> century terrace incorporating an historic shopfront at No 67, and are candidates for the Camden Local List. 77-79 Euston Street forms the western end of the early 19<sup>th</sup> terrace, situated at the junction with Cobourg Street. It comprises a 3 storey masonry building (with a retail unit on the ground floor and a residential unit above), and is a candidate for the Camden Local List.</p> <p>The entirety of this terrace consisting of 67-75 (odd) and 77-79 (odd) Euston Street will be demolished to allow for the westward expansion and remodelling of Euston Station. No mention has</p>
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			been made of these non-designated heritage assets in the Cultural heritage section. No heritage assessment has been made or justification given for the total demolition of these non-designated heritage assets, which is considered to be wholly unacceptable in heritage terms
		10.4.21 – 10.4.22	<p>Camden Council considers the ES is defective in the limited scope of the assessment criteria at 10.4.21 and 10.4.22. Camden Council considers that HS2 Ltd have failed to take into account the wider implications of business acquisitions on individuals, communities, access to services, business clusters and sectors focusing only on the ability to relocate or displacement of jobs against the scale of wider economic activity. Camden Council considers the assessment to be highly flawed in this respect, the result being that the impacts have been underestimated.</p> <p>Camden Council considers that a great many more businesses in the wider area will experience severe amenity effects during that result in permanent effects.</p>
		10.4.24	Camden Council agrees with the assessment that impacts on businesses within Euston Station and forecourt will be major adverse.
		10.4.25	Camden Council disagrees with the assessment that impacts on the Royal Mail depot and offices at Barnby Street is moderate adverse when the premises is being demolished. This business employs a large number of people and has very specific operational and site needs. Suitable alternative premises in the area are in extremely short supply and the Council therefore considers the impacts on this business to be major adverse.
		10.4.26	Camden Council disagrees with HS2's assertion that the effect on the business premises at 132 – 140 Hampstead Road will be moderate adverse. The occupier, UCL are to utilise the premises temporarily during works to their original site. The Council considers that further disruption to this academic function to be major adverse.
		10.4.27	<p>Camden Council considers that the effect on all three hotels – The Ibis, Thistle and Cottage Hotels - that are to be demolished in Euston will be major adverse. The bespoke nature of hotel accommodation and shortage of supply means that finding alternative premises will be challenging. Camden Council considers the ES is defective in the lack of transparency as to why impacts on the Ibis and Thistle hotel are considered major adverse and impacts on the Cottage hotel are only considered to be moderate. Camden Council request clarification on this assessment.</p> <p>Camden Council anticipates that four other hotels in close proximity will also be adversely impacted</p>



			as result of the proposed scheme- the Wesley Hotel, The Travelodge Euston, Euston Square Hotel and North Grower Apartments. With a further hotel potentially impacted in Swiss Cottage, hotels affected by HS2 in Camden are estimated to provide 1,259 rooms or 5.72% of the London Borough of Camden's hotel rooms stock. Any loss of hotel accommodation will have significant impacts both directly on the businesses and employees affected but also on the local supply chain and visitor economy. Camden Council has previously requested that HS2 Ltd carry out a full hotel/visitor impact assessment. Camden Council considers this to be essential to understanding the full socio-economic impacts in Camden that welcomes many millions of visitors each year.
		10.4.28	Camden Council agrees with HS2's assertion that the effect on Wolfson House, which houses offices and technical services for UCL, will be major adverse. Camden Council notes, that due to the specialist function of UCL services at Wolfson House, relocation would ordinarily take three years which may conflict with HS2's timetable with demolition currently programmed for 2016.
		10.4.29	Camden Council disagrees with HS2's assertion that the effect on Calumet Photographic Ltd, located at 93 – 103 Drummond Street will be moderate adverse. This is a specialist creative and technical equipment centre for which alternative local accommodation is scarce. Camden Council considers the impact relating to this business as being major adverse.
		10.4.30	Camden Council disagrees with the assertion that the impacts of construction and demolition will not have a significant effect on Grant Thornton House, One Euston House and Walkden House. Camden Council acknowledges alternative office accommodation may be available but it may not be available locally and the impacts on the individuals affected and the local economy will be major adverse.
		10.4.31	<p>Camden Council does not agree with the assessment at 10.4.31 that estimates that only 3,090 jobs are at risk in the Euston area. The Council considers that the full scale of impacts on the Euston economy has not been assessed and that this figure is an underestimation. Camden Council strongly opposes the assumption that impacts in terms of job losses are relatively modest. Camden Council considers the loss of jobs is significant both for the individuals affected and the wider economy. Camden Council considers the ES is defective in that there is no information provided on actual types of jobs losses, the breakdown of job losses by sector and how these job losses will impact upon the community.</p> <p>Camden Council considers the ES is defective in that the impact to the economy has only been assessed against the number of jobs at risk. Camden Council notes that whilst this is an important factor, a wider assessment needs to be undertaken to understand the true implications. Camden</p>



			Council requests that an assessment should be provided against the impacts on economic output, effects by sector, inward investment, the competitiveness of the local business environment and links with the wider business community.
		10.4.32	Full details of the Camden Council's response relating to development sites can be found in relation to the technical appendices.
		10.4.33	<p>Camden Council considers the ES is defective in that 'cumulative' and 'combined' permanent socio-economic effects have been inadequately assessed. Camden Council is of the view that it is not acceptable to omit cumulative effects at each CFA level. Instead HS2 Ltd has bundled these important cumulative effects into the route-wide assessment (Volume 3) where it is impossible to interrogate the analysis or findings at a local level. Camden Council contends that this is further evidence of a lack of transparency in the ES and that the findings in terms of the socio-economic effects are flawed.</p> <p>Camden Council considers that the reporting of the cumulative effects on employment at route wide level only, and not at CFA level, is a serious flaw in the assessment.</p> <p>Camden Council considers the ES is defective in that the cumulative effects section fails to take into account the implications raised under other environmental assessments. Camden Council considers that co-ordination between environmental factors is required</p>
		10.4.34-37	<p><b><u>Other mitigation measures</u></b></p> <p>Camden Council advises that as the assessment of socio-economic impacts is flawed and underestimates the true magnitude and significance of effects, its resulting recommendations relating to mitigation are inappropriate. In order to develop appropriate mitigation Council is willing to work with HS2 Ltd and local communities to develop a comprehensive programme of mitigation and compensation that should include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Design and construction modifications</li> <li>• HS2 Specific Business Advice and Support Service</li> <li>• Formal mechanisms for engaging with businesses in Camden Town</li> <li>• Access to enhanced business compensation package</li> <li>• Specialist commercial property support</li> <li>• Open for business, marketing &amp; promotion campaigns/ events</li> </ul>

			<ul style="list-style-type: none"> <li>• Hoardings and artwork</li> <li>• Visitor information</li> <li>• Property modifications</li> <li>• Meanwhile uses</li> <li>• Employment, job brokerage and training support</li> <li>• Maintaining access &amp; way-finding.</li> </ul>
		10.4.35	<p>Camden Council considers the ES is defective in that the limited mitigation proposed in this section is still largely focused around compensation, despite the Council's previous comments in response to the draft ES and discussions with HS2 Ltd through the Business and Employment Mitigation Working Group for the need for HS2 Ltd to put in place a comprehensive mitigation strategy. Camden Council would like to stress that the compensation and mitigation currently proposed by HS2 Ltd for businesses is inadequate to mitigate the significant effects of the scheme and results in significant residual effects remaining (see response to 'residual effects').</p> <p>Camden Council considers that HS2 Ltd. should provide a commitment in the Environmental Statement and commit to ensuring displaced businesses are provided with options to relocate close to their existing location and are guaranteed to remain locally if the business wishes to. Camden Council considers that further clarification should be provided by HS2 Ltd on what additional property support will be provided to displaced businesses.</p> <p>Camden Council considers clarification should have been provided on the definition and scope to 'offset' the impacts of the proposed scheme. Camden Council welcomes the opportunity to work with HS2 through the Business and Employment Mitigation Group so that HS2 Ltd can put in place and fully fund offsetting measures as part of a comprehensive mitigation and compensation strategy.</p>
		10.4.36	<p>Camden Council welcomes the specific reference to reducing and eliminating impacts on Drummond Street businesses. However, the Council considers the ES is defective in that local business representations and Council recommendations have not been taken on board by HS2 Ltd in relation to the scale of impacts or required mitigations at Drummond Street. Camden Council considers measures through the CoCP and LEMP to be only one element and that this should form part of a wider comprehensive package of mitigation for Drummond Street.</p>
		10.4.37	<p>Camden Council notes that the scheme will generate opportunities for employment and training associated with construction. Opportunities are also likely to arise in terms of local procurement, supply chain and supporting industries. Camden Council requests that these opportunities are</p>

			<p>maximised through holistic support programmes developed in conjunction with the council and local communities.</p> <p>Camden Council remains opposed to HS2 but if the scheme goes ahead stresses the requirement that a more comprehensive programme of mitigation, compensation and local management be put in place to support local businesses throughout the construction and operation of HS2.</p>
		10.4.38	<p>As outlined above, Camden Council does not consider that the likely residual effects of the scheme have been adequately assessed. The Council considers that residual effects will to be significantly greater than those outlined in the ES. For example, measures outlined in the CoCP and LEMP may assist to some degree with mitigating construction related disruption on Drummond Street, but will not eradicate completely the extensive disruption that will affect businesses. The council considers that residual effects could be reduced by a more comprehensive approach to mitigation, compensation and off-setting.</p>
	10.5	10.5.1 – 10.5.3	<p>Camden Council disagrees with the assumptions at 10.5.1- 10.5.3, stating that there will be no direct significant impacts or changes in business amenity resulting from operation and that no mitigation is required. Without thorough noise assessments having taken place and with no definitive design proposals agreed it is not possible to know at this stage whether significant effects will occur and require mitigation or compensation.</p>
		10.5.4- 10.5.5	<p>Camden Council notes that 500 gross jobs relating to operation may be generated at Euston with a further 45 in associated retail. Camden Council considers the ES is defective in the methodology and also defective in the transparency in generating employment figures in response to the 'Route Wide' section. Camden Council urges HS2 Ltd to take a pro-active approach to enabling Camden residents to access these jobs through committing to put in place and fund an employment, education and training strategy including end-user recruitment. This should target in particular under-represented groups in the labour force and deprived communities that will experience some of the worst adverse effects of HS2 and build on Camden Council's best practice in this area.</p>
		10.5.6	<p>Camden Council considers the ES is defective in that it has failed to seize the potential regeneration and growth opportunity at Euston by proposing an inappropriate scheme for Euston station. This scheme fails to realise regeneration and growth potential in this local area and support community aspirations as outlined in the Euston Area Plan, whilst having a potentially devastating impact on Euston communities from the construction of HS2. Camden Council maintains a more</p>

			comprehensive and better designed scheme at Euston could generate in the region of around 14,500 jobs, 50% of the 30,000 jobs potential the ES has identified around the HS2 stations.
		10.5.7-10.5.8	Camden Council acknowledges that the operation of the scheme would generate supply chain opportunities. Camden Council requests that HS2 develop a comprehensive local procurement strategy to ensure that local businesses can benefit from these opportunities that may lead to further local employment opportunities being generated.
		10.5.10	Camden Council notes that the cumulative effects of operation do not appear to have been assessed. Hs2 should provide this assessment.
		10.5.11 – 10.5.12	Camden Council considers that without a fully developed scheme it is not yet possible to determine if additional mitigation is required.
11	11.1		Camden Council considers that the reference to Quiet Areas is too restrictive and does not adequately account for the value of urban spaces which may not be identified or designated as Quiet Areas. Camden Council considers that a wider definition should be used in order to account for the relative quiet and tranquillity of spaces within urban areas such as Camden.
	11.1		Camden Council note that reference has been made to the draft national planning practice guidance, presenting an interpretation of its requirements, and consider that as this guidance is not an approved document that HS2 should review any assessments made in relation to this guidance at such time that the guidance is formally adopted or otherwise. Camden Council considers that a failure to review and amend the relevant outcomes following the formal publication of this guidance would render the ES deficient.
	11.1		Camden Council considers the proposed amendments to the appeal provisions under the Control of Pollution Act 1974, and the available defences under statutory nuisance provisions, could make it more difficult for affected persons to be effectively protected from noise and statutory nuisance and for appropriate remedies to be implemented quickly and effectively. The Council therefore considers this to be an unsuitable proposal which should not be implemented and the current legislative proposals should remain as they are currently.
		11.1.4	Camden Council considers there needs to more consideration given to those effects which will last longer than 6 months but will not be permanent and that they should not all be grouped together as a “temporary” effect as this underplays the real impact of the effect.

	11.2		<p>Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the purported access restrictions to certain monitoring locations in LB Camden. The Council disputes that access was restricted to its own property assets across the borough. In fact the Council gave permission for access some time ago, subject to the usual Access Licenses being entered into by HS2 Ltd. However, to date HS2 Ltd. has not entered into these documents. Any fault due to lack of access can squarely be attributed to HS2 Ltd.'s own actions, not the Council's. With respect to private properties, the point still remains that if there were difficulties with access, they should have been resolved before the Environmental Statement was submitted to ensure the information within the Environmental Statement is based on accurate data.</p> <p>Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London – Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon.</p> <p>Raw data has not been made available for any detailed review at this time, as a result the Council cannot agree with the declaration that the baseline levels are robust. Because the Council has not had sight of the missing raw data the Council considers the ES is defective in that there may be the possibility of under reporting on significant effects.</p> <p>Camden Council reserves its rights to comment once the required data has been received.</p>
	11.3		<p>Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse construction noise and vibration effects in this community.</p>
		11.3.2	<p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers that temporary re-housing can have an impact on both physical and mental health. Camden Council suggests that the frequency and duration of any such measures is considered further or work is scheduled to minimise this impact.</p> <p>Camden Council considers that a robust assessment should be made when assessing the medical condition of residents who may qualify for noise insulation and temporary re – housing and ensure</p>

			<p>it is based on suitable criteria. Camden Council considers there is evidence available which suggests that noise has a particular impact on people with mental health conditions so we suggest that mitigation would seek to particularly address this concern.</p>
		11.3.8	<p>Camden Council is of the view that consideration should also be given to non-residential historic structures which may also be affected by the noise implications of construction works. Camden Council considers that any historic structures affected should be protected appropriately during the works.</p> <p>The ES refers to the “Noise Insulation and Temporary Re-housing Policy” which has been omitted from the ES and the draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information to enable a thorough assessment of impacts and mitigation measures.</p>
		11.3.10	<p>Camden Council note that there is evidence to suggest that noise from night time working has been linked with impacting upon mental health, reduction in educational attainment and exacerbating existing health conditions. Camden Council considers that robust reasoning must be given to justify any night time working and it must be accompanied by an appropriate assessment of the likely impacts and proposed mitigation measures.</p> <p>Camden Council consider that particular attention must be given to those properties which will exceed the noise insulation trigger levels and are listed heritage assets, because conventional noise insulation packages might not be appropriate for such properties. Support and advice must be made available to residents who may be affected in this way and Camden Council consider that this specialised advice and support should be provided for and paid for by HS2. Support and advice could include for example professional technical advice on making a planning application or listed building consent application and paying for the application fees and associated consultants’ fees necessary for the preparation of a suitable scheme of mitigation measures.</p> <p>Camden Council consider that measures must be taken by HS2 to identify which properties could be affected in this way and early discussions held with the affected residents and the Council to determine how this issue might be overcome. Camden Council consider that these properties could be at a greater risk of temporary re - housing during the construction phase if the noise insulation packages would not be feasible due to the heritage status of the properties and consider that this should be noted and assessed within the ES.</p> <p>The ES refers to the “Noise Insulation and Temporary Re-housing Policy” which has been omitted</p>

			from the ES and the draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information to enable a thorough assessment of impacts and mitigation measures.
		11.4.1	<p>Camden Council notes that construction related night time working has been linked with impacting upon mental health, reduction in educational attainment, and exacerbating existing health conditions. Camden Council requests that 24hr working is kept to an absolute minimum and also consider how this would be managed at weekends.</p> <p>Camden Council is also disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time.</p> <p>Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of</p>

			<p>time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.1-11.4.2	<p>A total of 880 dwellings will experience day time noise levels &gt;75dBLeq 0800-1800. It is claimed, that the mitigation measures and possibly noise insulation will render indoor noise levels “not significant”. Camden Council considers that evidence should have been provided within the ES to support this statement. The result will be the need for ventilation systems which will need to be maintained. The night time construction noise levels are not quoted but it is stated in para 11.3.2 that this activity is limited to certain locations.</p> <p>Camden Council considers that evidence should have been provided within the ES to support this statement such as noise modelling and calculations to predict the internal noise levels post mitigation. An assessment of the predicted in combination effects at the dwellings post mitigation should also have been provided. Without this information, Camden Council are unable to determine whether the mitigation measures proposed are adequate and therefore consider the ES to be deficient in this regard.</p>
		11.4.9	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust</p>



			<p>and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.13	<p>Camden Council notes that Regent's Park Children's Centre has been assumed to experience significant construction noise over a period of 12 months. The Council believes that this could significantly impact on its operation. Children centres are an integral part of the borough's education and wider children's services strategies and the borough has made a significant investment in its early year's services to reflect these priorities. Camden Council is also disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> </ul>

			<ul style="list-style-type: none"> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time.</p> <p>Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Maria Fidelis school is noted as having daytime noise effects over a period of up to 41 months due to a range of works including demolitions, a new utility corridor, barrette piling of retaining walls, major earthworks and bridge construction. Camden Council believes that the school needs to be relocated from North Gower Street as a direct result of the proposed scheme and disagrees with the assumption made within the ES that the school will not suffer significant effects.</p>
		11.4.14	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> </ul>

			<ul style="list-style-type: none"> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.17	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be</p>

			<p>continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.18	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented and expect HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that</p>

			<p>appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.19	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>

	11.5		Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse operational airborne noise effects in this community.
	11.5.13		<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that a comprehensive management and monitoring regime should be put in place to assess and mitigate adverse environmental health effects of those living, working or using community facilities within the area identified.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
	11.5.14		<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction</li> </ul>

		<p>Practice.</p> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that a comprehensive management and monitoring regime should be put in place to assess and mitigate adverse environmental health effects of those living, working or using community facilities within the area identified.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
	11.5.16	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that a comprehensive management and monitoring regime should be put in place to assess and mitigate adverse environmental health effects of those living within the area identified.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>

		12.2.3- 12.2.5	<p>Camden Council appreciates the role of using models, such as Railplan, CLOHAM and PLANET. However, the limitations of these models need to be recognised, refinements made and appropriate care taken in interpreting their results. The Council considers the ES is defective in the way in which CLOHAM has been used. This is a strategic level model, for example and it is not appropriate to rely upon it to measure the sensitivity of impacts at individual junctions without further refinement referring to local data and testing. The Council's traffic data shows that the baseline traffic levels used are too low, and therefore that the impacts have been under-estimated. This is particularly important as the impacts would be more than pro-rata where the levels of traffic rise above critical thresholds and have not been accounted for by the modelling analysis. The Council's screenline data provide evidence that the baseline traffic levels used are too low.</p> <p>The Council considers the ES is defective in that the Railplan results have been interpreted in a selective way (as explained in greater detail below in response to paragraphs 12.5.13 – 25 in this section) to suggest that the sub surface Underground lines serving Euston Square can take the additional demand generated by HS2 without significantly impacting on passenger levels at Euston Underground Station. The additional demand generated by HS2 could not be accommodated by Euston Underground Station and although Railplan assigns egressing HS2 passengers to Euston Square Underground Station, this should not be interpreted as being acceptable or adequate.</p> <p>Further details regarding the under-estimation and misdirection of outcomes from the models are set out in the Council's response to the Transport Assessment, Volume 5, ref TR-001-000.</p> <p>With regard to 12.2.5, Camden Council considers the ES is defective in that there is only a focus on the transport of excavated material, since no mention is made of delivering construction materials. The re-development of Euston Station would generate large quantities of inbound traffic. The approach also fails to investigate the use of rail to transport construction material which should be at the forefront of any Construction Transport Strategy and included and assessed in the Environmental Statement. This issue has significant potential to reduce construction vehicle impacts in Camden and surrounding areas.</p>
	12.3		<p>Camden Council considers the ES is defective in that the baseline highway network is not accurately assessed in the Environmental Statement as is discussed in this Council's response to Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.5) and shows outcomes that under-estimate its operational performance. Details of the inadequacies and arising</p>



			<p>inaccuracies of the transport baseline that effects the ES are set out in the response to the Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.4. Camden Council considers the ES is defective in that the validity of the traffic surveys discussed in 12.3.2, given this was the period of the 2012 Olympic Games and the traffic conditions were not 'normal'/representative, due to the traffic management measures introduced by TfL at this time. Similarly for paragraph 12.3.3, Camden Council considers the ES is defective in that the movement of pedestrians / cyclists is not representative as September was the period of the Paralympic Games which had an impact on the numbers, method and mode for people travelling around central London.</p>
		12.3.9, 12.3.11	<p>Camden Council notes that the combined frequency of bus routes serving the Euston station area is a maximum of 137 per hour in each direction, not 127 as stated. There is also no mention in this paragraph of further bus routes which operate close to Euston station, mostly on A400 Hempstead Road. This underestimate of bus service frequency is considered to be an issue when modelling the impact of bus lane closures, bus stop removal or journey time increases as a result of traffic changes and construction impacts.</p> <p>The popularity of cycling in this area should have been noted within the Environmental Statement but hasn't. The absence of this information is crucial as Camden Council's screenline data shows cycling now accounts for over 32% of all peak traffic in the borough south of Euston Rd.</p>
		12.3.15	<p>Camden Council notes that the individual figures under "Morning peak period" and referring to passengers "from trains" add up to 12,690, not 12,700 as stated, and that under "morning peak hour" when referring to "to trains", the individual figures add up to 1,400 and not 1,390 as stated. In the "evening peak period" under "to trains", the individual figures add up to 12,730 and not 12,740 as stated.</p>
	12.4		<p>Camden Council is disappointed to note that many key derivatives of the assessment to determine construction effects are not provided in the ES. For example, construction trip generation does not show how the results have been evaluated and to which construction activities or cumulative impacts they relate. There is no evidence to suggest that sufficient representation of all construction activities and cumulative effects (Table 20) has been taken in to account and the loadings appear relatively low in comparison to other major schemes, such as Thames Tideway and CRL where much more information was required to be presented to support those planning processes. Another example is where a lorry holding area occupying the ZSL London Zoo car park (coaches park within the car park if there is space), does not include sufficient information on the proposal and how HS2 would mitigate</p>

			the parking of cars and coaches that would be displaced from this location. Inaccuracies and under-estimations in the construction assessment as outlined above, explain the modest mitigation measures that are proposed. Full details of their shortcomings are again referenced in the full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
		12.4.1- 12.4.6 Avoidance and mitigation measures	Camden Council considers that when assessing the effects and impacts of traffic and transport and the appropriate avoidance and mitigation measures, consideration must be given to the effects of noise from any transportation alterations.
		12.4.3	Camden Council notes that the travel plan indicates that workers will have no parking availability. However, in the note it indicates car sharing will be promoted. Camden Council also needs to consider if parking dispensations will be required as we need to forecast for that demand if indeed we permit their usage for this project. It is noted that there are parking spaces being made available for HGV and LGV vehicles. We would therefore expect construction works to utilise pay & display bays. But the pay & display bays are being used to accommodate permit holder bays during the construction phase. Accordingly, Camden Council there will be increased parking demand during these times. In relation to the above comment, Camden Council can see no evidence in the ES of how the construction scenarios (1,2 and 3) have been evaluated in terms of quantifiable trip generations and cumulative impacts. This therefore means the assessment that is presented is inconclusive and undermines the reliability of the impact and mitigation forecasts that HS2 proposes. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
		12.4.7- 12.4.9	The temporary effects are under-estimated and not accepted by Camden Council, because HS2 have been proven from comparative Camden Council data that they have significantly underestimated the operational performance of the highway network in the baseline and therefore also subsequent scenarios. The accuracy and sufficiency of the reported temporary effects are also inconclusive until Camden Council can review the derivation of the full construction activity site generations which should be in the ES but are not provided. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).

		12.4.12 - 12.4.15	<p>Table 20 shows the use of roads by construction traffic which is unacceptable in a number of locations. The use of Park Village East via Robert Street by the volume of traffic proposed, for example, would be totally unacceptable and would require significant mitigation. It should be demonstrated that the bridge for construction traffic serving the Granby Terrace construction site will be completed as soon as possible.</p> <p>Camden Council notes that the Environmental Statement proposes that a lorry holding area will be provided at ZSL London Zoo coach park during the Euston station construction works. However, the coach park is accessed from the Outer Circle of Regent's Park and restrictions currently exist that would prevent HGV's from entering the Royal Park. The Environmental Statement does not address this issue and therefore is absent any information on how this problem could be overcome.</p> <p>Furthermore, there is no provision made for the coaches which will be displaced by this activity. Camden Council considers the ES is defective in that the attractiveness of ZSL London Zoo for coach trips would be affected, and those trips that do take place may suffer from parking issues; this may not only affect the perception of the venue but may also cause traffic congestion if there are coaches looking for places to set down their passengers. Adequate arrangements must be made to deal with the volume of coach traffic to and from ZSL London Zoo during the construction period. The feasibility, impacts and mitigations for this need to be set out in the ES and relevant alterations funded by HS2. The impact of this holding area on lorry movements and consequent need for mitigations has not been adequately considered within the ES, should it even be feasible to use the Zoo's coach park as a lorry holding area. The ES is therefore defective.</p> <p>Drummond St is a local retail centre with business servicing and parking needs and an undesignated type 4 road. It is inappropriate for construction traffic. It is stated below that is unclear which land is required for construction purposes on mapbook CT-05-001. There is a lack of evidence given to justify the assertions made as to the traffic impacts on this sensitive retail and residential street.</p> <p>Construction traffic in this area is a major issue for Camden Council. 12.4.15 states that the Granby Terrace bridge will not be available until mid-2018 and table 20 indicates a maximum of up to 455 HGV's in an unspecified 10 month period from the Granby Terrace 'overbridge' compound site, for example (it should be noted that Camden Council considers the ES is defective in that insufficient information has been provided regarding the estimation of the number of construction vehicles- as explained in response to the Transport Assessment in Volume 5, London Assessments 3-5- and that the number of construction vehicles may have been under-estimated). Surprisingly, Park Village East</p>
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			<p>is not identified in a list of roads experiencing significant increases in daily traffic flow resulting in pedestrian severance and Robert St and Stanhope St are only identified as having 'moderate adverse' impacts. This is totally inadequate and will result in inadequate mitigations.</p> <p>The construction programme scenarios do not provide sufficient depth to assess cumulative impacts caused by the convergence of activities and the Council considers the ES is defective in that under-estimations, such as those of utilities, may cause further unanticipated impacts that have neither been assessed nor mitigated. Such problems as over-running and inadequately planned utilities works are cited in the joint borough document 'Lessons from Crossrail'; and need to be heeded if they are not to be repeated with this project.</p>
		12.4.18	<p>Camden Council considers the ES is defective in that the programming and impacts of utilities has generally been under-estimated and that these could have serious cumulative impacts on the overall programme and impacts, indeed this Table 21 Utilities section incorrectly refers to Albert St instead of Albany St, where a 42inch Water Main is to be diverted.</p>
		12.4.19	<p>Camden Council considers the ES is defective in that the utility works proposed for the A503 Delancey Street will have an adverse impact on bus services 274 and C2 which use this route. There is no mention of the potential for bus service delays as a result of these works in this section of the ES, and Camden Council urge that due consideration is given to the potential impact on these bus services. Camden Council notes the number of utility works being undertaken. There are concerns that the taxi facility needs to be moved across to Eversholt Street but a number of utility works are being undertaken in the same area. Camden Council needs clarification in how these works will be planned and with assurances that they will be undertaken and completed prior to move of the taxi facilities to Eversholt Street.</p>
		12.4.20	<p>Partial or full road closures will apparently be limited to 4 weeks. This is a serious underestimate for diverting a 42 inch water main along Albany St and Robert St. The effect of this will be substantial and on a major bus route.</p>
		12.4.21	<p>The Environmental Statement indicates that utility works described in Eversholt St, Phoenix Rd and Chalton St are apparently not considered significant and therefore no further assessment is done. Camden Council considers that utility works proposed to A4200 Eversholt Street will cause significant delays to buses on this key route between Euston and the north of the Borough. It is not considered that these works will "not be significant" as stated as there is the potential for widespread disruption</p>

			<p>across the bus network as a result of partial closure. Camden Council notes the number of utility works being undertaken. There considers that the taxi facility needs to be moved across to Eversholt Street but a number of utility works are being undertaken in the same area. Camden Council considers the ES is defective in that no information on how these works will be planned were included within the Environmental Statement nor were assurances that the works will be undertaken and completed prior to move of the taxi facilities to Eversholt Street.</p> <p>The Council considers the ES is defective in that the impact on roads such as Chalton St which has an important street market and business community with Council proposals to further regenerate this area, has not been properly considered. Utility works have the potential to seriously harm businesses and residents in this area, and these impacts would be compounded if the works continue for periods longer than assumed in the Environmental Statement and compounded with other utility and construction works in the area, particularly with regard to works and related impacts in the vicinity of Eversholt St.</p> <p>The Council considers the ES is defective in that the duration of these works may have been underestimated (a problem from past projects, as noted in the Inter-borough 'Lessons from Crossrail' referred to elsewhere in this response) at under 4 weeks for the replacement of a gas main and 'possibly' a sewer as a general estimate. Further comments are contained in response to the Transport Assessment, Vol 5 paragraph 6.4.49)</p>
		12.4.25-12.4.28	<p>Major adverse effects identified on most roads. Camden Council considers the ES is defective in that a significant number of the junctions where significant disruption is expected due to construction traffic will impact on the reliable operation of bus services. Delays at a number of major junctions in the Euston area will impact on a large number of services radiating across central, west, north and east London, particularly if simultaneous with construction impacts at other junctions on the network. Coupled with the effect of additional construction traffic on key links between these junctions, Camden Council considers the ES is defective in that the potential for major and sustained disruption to the Borough's bus network has not been properly assessed.</p> <p>Camden Council considers the ES is defective in that construction traffic from the proposed scheme has been under-estimated, as is set out in the response to the Transport Assessment in Volume 5 (London Assessments 3-5 in respect of CFA1-3). It therefore contests that the impacts upon areas including residential areas such as the Regent's Park Estate and areas with sensitive business communities, such as Chalton St and Drummond St will be greater than is set out in the</p>

			<p>Environmental Statement as well as areas outside of the immediate vicinity, resulting in greater pedestrian severance, for example, than indicated in this section and the attached tables (23 and 24). In turn, these greater impacts have not been addressed, nor their mitigation. This is unacceptable and Camden Council considers that these should be reassessed such that appropriate consideration can be given to the impacts on the area and their mitigation.</p> <p>Table 22 needs clarification and explanation, as it contains some surprising results in terms of impacts with some roads a significantly greater distance from the main areas of construction activity stated as experiencing greater adverse impacts than roads closer to the construction sites that would carry significantly higher construction traffic volumes, such as Robert St, Stanhope St, Granby Terrace and Park Village East, where the impacts on the roads appear to have been underestimated. This needs explanation and validation, and mitigations identified where greater impacts emerge.</p>
		12.4.32	Camden Council notes that the TS refers to a loss of 29 parking bays on the southbound lane of Eversholt Street. There are two loading bays on this stretch. Accordingly, Camden Council needs clarification if the street name is correct.
		12.4.33	Camden Council notes the number of utility works being undertaken. The Council considers the ES is defective in that the taxi facility needs to be moved across to Eversholt Street but a number of utility works are being undertaken in the same area. No assessment of these impacts has been undertaken. The ES is deficient as it should have clarified how these works will be planned and with assurances that they will be undertaken and completed prior to move of the taxi facilities to Eversholt Street.
		12.4.34	Camden Council notes there is no information in the ES on where the vehicles that utilize public or private off street parking spaces are lost will be relocated to. This is an impact that should have been assessed in the ES.
		12.4.35	Camden Council notes there is no information in the ES on where the vehicles that utilize public or private off street parking spaces are lost will be relocated to. This is an impact that should have been assessed in the ES.
		12.4.36	Camden Council notes there is no information in the ES on where the vehicles that utilize public or private off street parking spaces are lost will be relocated to. This is an impact that should have been

			assessed in the ES.
		12.4.41	Camden Council considers that the removal of bus lanes in the Euston area will have a detrimental impact on bus reliability, just at the time when they would be most valuable due to congestion in general traffic lanes. Removal of bus lanes on Eversholt Street, Hampstead Road and Euston Road is expected to cause delay to buses, lengthening journey times and resulting in lower layover time at termini and a potential increase in PVR, none of which has been adequately mitigated. There is potential for significant costs to be incurred in order to maintain current frequencies, which should be borne by the promoters of HS2. We have commented in Volume 5 that the removal and relocation of bus stops may have significant impacts on the mobility impaired and those carrying heavy luggage, as even short distances can make journeys significantly more difficult. HS2 must ensure that changes to bus stop locations are adequately signed and publicised to avoid confusion and disruption.
		12.4.42	This paragraph does not appear to be supported by technical analysis and is not adequate. In addition there is no assessment or analysis of the potential impact a 10% increase in journey time has on reliability, vehicle requirement and cost. The impacts of journey time increases will be felt right across London, not just in Camden, and the number of bus routes expected to be significantly affected means that the costs of providing the same frequency of service could be considerable. The impact on service reliability, PVR, costs and ultimately the damage to the perception of London's bus network have not been adequately assessed in the ES.
		12.4.43	As previously stated, Camden Council considers that relocation of bus stops can have adverse effects for the mobility impaired and those carrying heavy luggage/shopping, as even short additional distances can place extra strain on the journey. Camden Council request that HS2 use all practical endeavours to ensure that bus stop relocation is handled correctly and that relocation distances and periods are kept to an absolute minimum. The Silverdale bus stops are a particular concern given the close proximity of a large area of social housing.
		12.4.44	Camden Council notes that the closures of Adelaide Road and Chalk Farm Road will cause adverse effects to bus routes C2, 168, 24 and 31. Camden Council contend that it is not only northbound services 24 and 168 which are affected because the closure of Chalk Farm Road bridge will also necessitate the closure of Castlehaven Road; this will affect southbound buses as well as northbound. Both directions will have to take the same diversionary route as a result. If both Adelaide Road and Chalk Farm Road bridges are to be closed concurrently, then this will have major



			impact on service 31 as it is the only route which passes under both bridges. Camden Council is keen to ensure that no bus routes are required to be split during the construction phase, in order to minimise disruption for passengers.
		12.4.45 – 12.4.48	Camden Council request that all endeavours are made by HS2 to keep rail possessions to an absolute minimum and to ensure that there are no engineering overruns to impact on the network at peak hours. Longer closures should be kept to a minimum to avoid significant disruption to travel patterns.
		12.4.49	Camden Council considers that a journey time increase of 10% on a journey from the outer suburbs to Central London cannot be described as a minor impact.
		12.4.50	Camden Council notes that an increase of travel distance of up to 200m can be significant for a proportion of users, including the mobility impaired and those carrying heavy luggage. Therefore Camden Council does not consider this a “minor impact”.
		12.4.51	Camden Council considers that, further to comments on paragraph 12.4.50 above, greater distances incurred of up to 250m will present a potential issue for the mobility impaired and those with heavy luggage.
		12.4.52	This paragraph highlights issues of substantial crowding and congestion at Euston and failure of facilities to provide adequate capacity and how this situation will become more acute in the future. The proposal will add significantly to demand for interchange to the underground station and will further exacerbate the problems unless adequate additional capacity, remedial action and facilities are provided. The Environmental Statement does not adequately address how overcrowding and congestion at Euston Station will be addressed or overcome and is defective as a result.
		12.4.53 - 12.4.55	<p>No reference is made to TfL’s emerging plans to upgrade the Northern Line of the Underground. Although proposals are at an early stage, TfL consider that construction of this project (which will improve services on the Northern Line and would therefore be expected to ease existing congestion) could commence as early as 2018. This needs to be taken into account in the construction of HS2 at Euston.</p> <p>Camden Council considers the ES is defective in that the closure of the northbound Victoria and Northern (Bank) Line platforms at Euston for a 5 month period has not been properly assessed.</p>



			Pressure on the Northern Line Charing Cross branch will be markedly increased and at this point there are no additional bus services proposed to cater for additional displaced traffic. The impact of these closures appears to be dismissed by HS2 as relatively minor when in practice they will have a significant and long lasting impact on travel patterns on the entire public transport network in central London. Ditto, the 3 month closure of both Charing Cross branch platforms will shift additional trips to the already crowded Victoria and Northern (Bank) Lines, with no adequate mitigation proposed for this situation.
		12.4.57	Camden Council refers to our previous comment in paragraph 12.4.55 above discussing the significant impact on the Northern Line Charing Cross branch.
		12.4.59	Camden Council considers the ES is defective in that the increase in passenger numbers at Camden Town as a result of the closure of Northern Line (Charing Cross) platforms at Euston will have a significant detrimental impact on the operation of the station, and that no mitigation measures are proposed to prepare for this additional movement or cater for it once it takes place.
		12.4.60	Camden Council urge HS2 and TfL to adopt a common approach to publicising the alterations well in advance, not only on the London transport network but also on main line routes to and from Euston, St Pancras and King's Cross. In addition, the statement that bus services "could" be modified as mitigation for the disruption provides little confidence that a solution will actually be implemented in this regard.
		12.4.62 - 12.4.64	<p>Camden considers the ES does not properly consider nor assess the impact that temporary road closures would have in isolating residential areas and access to important community facilities such as schools (such as Maria Fidelis School) and access to commercial areas (such as Drummond St). Significant access routes must be maintained in a safe, well lit and attractive state and be of sufficient size. The effects at Granby Terrace bridge and Drummond St are of particular concern. This is compounded by the impacts of major volumes of construction traffic, for example on roads within the Regent's Park Estate. The ES is defective in not considering or evaluating these impacts.</p> <p>Significant investment has been made by Camden Council and TfL in the development of the cycle network in the borough, reflecting its importance as a transport mode in the the Council's transport hierarchy. Construction traffic should avoid disruption and creating potential hazards to cyclists on the Central London cycling grid and Quietways in Camden. Disruption to the following routes are of particular issue:</p>

			<ul style="list-style-type: none"> <li>• GNS1 quietway route that runs along Park Village East, Stanhope Street, Varndell Street, Cardington Street, Melton Street, Gordon Street, Malet Street and Newton Street. Barnby St also provides an important informal link to this route, which should be kept open until the new bridge over the railway is ready for use for cyclists. These routes will be impacted especially as a result of traffic generated from Granby Terrace Overbridge, carriage shed and Park Village East plus Hampstead Rd Overbridge satellite compounds. Two way cycle accesses should be maintained on Park Village East and the remainder of this cycle route.</li> <li>• GNS2: Arlington Road, Mornington Crescent, Hampstead Road, Cardington Street, Melton Street, Gordon Street. , especially as a result of traffic generated from Granby Terrace Overbridge, carriage shed and Park Village East satellite compounds, Mornington St, Mornington Terrace and National Temperance Hospital Compounds.</li> <li>• QW 31: Elsworthy Road, King Henry's Road, Gloucester Avenue, Regents Park Road to the Delancey/Parkway/Prince Albert Road junction.</li> <li>• GEW1: Delancey Street-Pratt Street.</li> </ul> <p>The Gordon St satellite compound would also impact on roads such as Esuton Rd, Endsleigh Gardens, Gordon St and Gower Place plus other roads in the vicinity and will impact upon cyclists in an area heavily used by cyclists and students of UCL who cycle</p> <p>Sections of Cycle Quietways GNS1 and GNS2 would be lost as a result of the closure of Cardington Street and Melton Street. A cycle route should be retained on a similar alignment that avoids crossing Euston Road at Euston Circus.</p> <p>Also, measures should also be adopted to protect cyclists from HGV's (for example driver training, adaption of vehicles etc)</p> <p>Cycle access should be maintained in the vicinity of construction sites, particularly where they impact on a recognised cycle route.</p> <p>Camden Council notes that the removal of taxis to A4200 Eversholt Street will cause a "minor adverse effect" for taxi users according to the ES, but it may also have a significant impact on</p>
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			congestion on the route which in turn will have an impact on the frequent bus routes which serve Eversholt Street. HS2 must demonstrate more fully that the removal of taxis to Eversholt Street, prior to the construction of the new northern standing area, will not have adverse impacts, such as on bus users or operations, highway congestion and safety, pedestrians and cyclists, nor upon residential amenities or businesses. It is a matter of concern to Camden Council that it is stated in the ES that this has not been considered further as part of the assessment of the highway network. Further comments are made in response to the Transport Assessment, Volume 5 (paragraphs 6.4.183-199).
		12.4.65	Camden Council considers the ES is defective in that relocation of Barclays Cycle Hire docking stations will further impact on the reduction of parking spaces and there is no information in the ES on how relocation will be managed.
		12.4.67	This very brief description of the cumulative effects that are claimed to have been assessed is again inconclusive, until Camden Council can review the derivation of the accumulated construction activity site generations and other key sources of impact such as utilities works, which should be contained within the ES but are not provided in anywhere near sufficient detail. Notwithstanding this gap in information, the outcomes reported in section 12.4.68 which states that CFA2 and CFA3 will each generate just 60 daily vehicles and that this is the level that has been assumed as being the cumulative impact is simply not accepted because of its under-estimated order of scale. It is also noticeable that the corresponding section of CFA2 (Vol 2 CFA2 section 12.4.40) does not quote the corresponding cumulative effects for CFA1 and 3 and neither does CFA3 quote those for CFA1 and CFA2 (Vol 2 CFA3 section 12.4.37). This inconsistency and key missing information seems to confirm a significant under-estimation in impacts and cumulative impacts. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
		12.4.70 – 12.4.74	The <i>other mitigation measures</i> are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures.

		12.4.70	It is stated that the implementation of the CoCP will mitigate the transport related effects, and yet there is no real evidence that this conclusion can be supported. The travel plan measures are suggested as providing further mitigation, again without evidence described.
		12.4.71	Camden Council request confirmation that the provision of rail replacement bus services during railway possessions will not have an adverse impact on the local bus network, either by occupying stands in the bus station meant for local bus services, or by obstructing local streets where buses are attempting to pass. Rail replacement bus services must be kept away from local bus services to avoid congestion, delay and confusion amongst the general public, and must be clearly signed as such.
		12.4.74	The ES states that movement of excavated material by rail will be investigated further. Camden Council considers this to be especially weak and would expect this to be at the forefront of any reasonable Construction Transport Strategy
		12.4.75	Camden Council strongly considers that a substantial proportion of the many residual construction effects, that are predicted in this section of the ES and that are also an under-estimate in any event because of the earlier comments regarding issues with the transport (and ES) assessments, could be eradicated by a better scheme as referred to in 2.1 above of this response. On a more specific basis, Camden Council does not accept the closure of the Northern Line and Victoria Lines due to the lengthy severe disruption it will cause and more so when there are no meaningful mitigating capacity improvements being proposed on these overcrowded LU lines for access to and onward travel from HS2 services.
	12.5	12.5.2, 12.5.4	<p>Camden Council objects to the lack of detailed plans for the new HS2 concourse, platforms and associated walkways. No details are given about the implications of these structures on the rest of the station. No dimensions are given for the new areas, so the Council cannot make an assessment of their adequacy. The Council considers the ES is defective in that the ES states (but does not demonstrate this) that Euston station has been designed <i>“to meet Network Rail and LUL station design criteria and meets these requirements by providing concourse and platform space to accommodate rail passenger demand up to 2041, including the HS2 Phase Two demand.”</i></p> <p>Camden Council seek clarification on a potentially major issue that emerges from the Railplan modelling approach and subsequent outcomes reported in the ES regarding its prediction of HS2</p>

			<p>demands and impacts on the LU network (CFA1 to 3). This was not immediately noticeable, because HS2 curiously elected to combine the demand trips for Euston Station with Euston Square when presenting the respective impacts of each station in Tables 6-118 and 6-119. All other stations were shown separately. Camden Council detected that Railplan has loaded the majority of the additional HS2 operational demand on the LU lines served by Euston Square, such as the Metropolitan Line rather than those at Euston Station (Northern and Victoria Lines), because it is understood that Railplan places demand where there is less crowding, due to weighting factors) even if those lines are serving lesser demand catchments that the high demand lines where trips will gravitate to and from. Conversely, Railplan has evidently and inaccurately not placed any additional demand from HS2 on the critical Northern and Victoria lines served by Euston Station (in fact a reduction is shown in 6-116 and 6-117 for the AM and PM peak periods in 2026 respectively) probably for no other reason that they are already severely crowded. This explains why the impacts in Part 4 on the LU network are entirely distorted away from the crowded Northern and Victoria LU lines and towards lines with relatively more capacity. While this methodology is convenient for absorbing the demand of HS2 for onward travel, unfortunately however it is an unrealistic in reality and therefore incorrect for determining environmental impacts, because users can not just switch their journey purpose and origin/destination route of travel from densely populated catchment areas in and around London, or mainline interchanges such as Victoria, Waterloo or Kings Cross (as relate directly to the Northern and Victoria Lines) to a less crowded route, for instance the sub-surface lines and CRL. Camden Council considers that HS2 have also realised this, because HS2 main capacity building mitigation measures for LU to accommodate the main increase in passengers correspond to Euston Station (ticket hall expansion etc.) and not Euston Square other than the too narrow underpass link, even though the model states otherwise and that Euston Square will increase by c.9000 passengers in the 2026 peaks and Euston Station will strangely reduce by c.400 as a direct result of HS2 demand. This mitigation at Euston Station is only realistically provided up to a point, because the modelled results (Tables 6-118 and 6-119) then wrongly show that there is little to no passenger demand impact on many of the Northern and Victoria Line LU stations, where of course additional access to and onward travel from Euston Station because of HS2 services, will be felt profoundly. Through this approach, HS2 have avoided the need to mitigate critical pinch points on the NL and VL which will mean that passengers will undoubtedly suffer even worse crowding discomfort than currently and in future year baselines, primarily because the model has wrongly reassigned demand via Euston Square services in an east-west orientation, rather north-south via Euston Station LU services. This may explain why there are noticeable discrepancies/omissions in Table 6-118 for the AM peak relating to LU stations on the VL and NL, such as: Euston Station showing a reduction in demand of 459 trips rather than any increase, Goodge St showing a reduction in demand of 260 trips rather than any increase, Bank</p>
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			<p>showing a reduction in demand of 570 trips rather than any increase, Warren St showing only a modest increase of 140 trips, Mornington Crescent showing only 30 additional trips, Charing Cross, Kentish Town, Oxford Circus, Chalk Farm and Highbury &amp; Islington amongst many others are all omitted because they are alleged to not generate more or less than 100 trips. By contrast, Liverpool St which is linked by the Metropolitan, Circle and H&amp;C lines, shows 1,330 additional trips, as does Farringdon showing 1190 extra trips and Euston Square (Table 6-116) taking all the immediate LU demand at Euston with an increase of 8790 trips. CRL linkage is also a factor in increased capacity. Tables 6-119 and 6-117 for the PM peak follow similar trends, most noticeably with Euston Square shouldering virtually all the increase in HS2 trips of 9610 and Euston Station this time showing a decrease of 370 trips. Camden Council considers the ES is defective in that HS2 have not detected the obvious demand increases arising from HS2 that have an impact on the higher demand LU lines that directly run through and serve Euston Station /HS2. This major oversight to a very obvious outcome is considered to reflect a major flaw in the transport and ES assessment that informs the impacts and areas in need of mitigation. Without this being fully reassessed this assessment is not considered to be fit for purpose.</p> <p>Cycle parking should be provided in convenient locations in and around the station, but should not take areas of open space, such as on Euston Square Gardens, but where appropriate be properly integrated into the public realm.</p>
		12.5.5	<p>Camden Council considers the ES is defective in that Crowndale Road and Camden Street are earmarked as being main construction traffic routes for the proposed scheme, without a proper assessment of the impact that this will have on Richard Cobden Primary school, especially whether it will have the ability to continue to operate and offer a full curriculum. The increased construction traffic is likely to impact on noise and pollution in the area and the Council is concerned at how safe routes to schools are being maintained throughout the construction of the proposed scheme. Camden Council considers there will therefore be an effect on the school as a result of the proposed scheme and the ES does not properly assess this.</p>
		12.5.6, 12.5.7	<p>Para 12.5.6 states all the supposed benefits of HS2 such as improving journey times to the Midlands and north, justifying the reasons for the scheme, having briefly described the impacts in the preceding paragraph. Camden Council considers that this contrast emphasises well, that the benefits are largely national, while the adverse impacts are mainly felt locally within the Borough, especially when taken in to account with the Construction impacts. The Council objects to the lack of details given anywhere in the ES about pedestrian modelling that HS2 has conducted, though it is</p>

			<p>understood from TfL that some work has been undertaken (bullet 6). No information is given about Fruin Levels of Service for the new station and in any case a static analysis of pedestrian volumes against station dimension is insufficient to understand dynamic effects through simulation modelling. Such modelling should examine design robustness not only for 'normal' train operation but also when train services are perturbed due to incidents that may range in severity. Passenger densities should be measured from the perspective of pedestrian movements, some of which occur in surges as trains arrive. When surges occur flows are impeded while pedestrian densities are higher, so the effect of mass movement of pedestrians is to have impacts that are non-linear in terms of Fruin levels. These impacts can only be estimated and assessed through a dynamic analysis.</p> <p>The Council considers the ES is defective in that there is a lack of detail inadequate presentation of information: Table 26 only deals with passengers alighting at Euston, not those boarding. No information is given about the profile of projected passenger number on HS2 during the day and the relative volumes during the week and at weekends. No information is directly presented about the effect that HS2 is projected would have on relieving congestion on classic rail services into Euston, although our analysis of the data in Table 26 is that in the morning peak in 2026 and 2041 the numbers of passengers travelling on classic services into Euston will fall by only 9.9% and 7.7% respectively. The Council requests that HS2 provides its assessment of what the congestion relief of classic services is projected to be. The Council considers the ES is defective in that the proposed HS2 scheme will increase congestion on the classic services serving Euston, as the numbers of passengers moving from 'classic' services' to HS2 is insufficient to justify the reduction of platforms by 61% (from 18 platforms to 11) for classic services at Euston.</p>
		12.5.10 – 12.5.11	<p>Table 26 shows that 'with HS2' the number of people boarding Underground services in the morning – at Euston and Euston Square – will increase substantially. In 2026 an additional 6,190 passengers are techniques forecast to board LU service due to HS2, an increase of 17% (not 8% as stated in table 26). In 2041 the increase is 14,920 additional passengers due to HS2, an increase of 36%. The Council considers the ES is defective in that the Underground will not be able to handle this volume of additional passengers and that the proposals do not demonstrate that it will be able to do so, particularly whether the platforms at Euston and Euston Square Undergrounds stations will be able to accommodate the extra passengers.</p> <p>The Underground lines at Euston Station are severely overcrowded and there is very limited potential to disperse passengers onto these lines. With HS2, Railplan modelling directs the vast majority of passengers to Euston Square Underground station, The lines serving Euston Square are overcrowded the severity of which will be better understood when Railplan has been updated to</p>



			<p>account for London's population increase. There are no details about the connection to Euston Square Station or an assessment of the ability of this link to move the quantity of passengers expected and requests that HS2 demonstrates this. The Council considers the ES is defective in that if this link cannot handle passengers then there Euston Road could present major severance impacts which has not been assessed. In addition Euston Square does not provide the same connections to the West End and to the City and the assumption that the vast majority of HS2 passengers will use Euston Square is fundamentally flawed. An implication of the Railplan assignment directing dispersing passengers away from Euston Underground station questions whether the station can operate without resort to station management involving temporary closure of the Underground stations due to congestion.</p>
		12.5.13 – 12.5.25	<p>Camden Council objects to the inaccurate impression of the relatively low impacts that HS2 would have on access to the Underground and the dispersal of passengers from Euston station. The current position is that the Underground and other rail lines in London are overcrowded and that pedestrian movements within Euston Underground station are constrained by capacity. TfL's consultation material about Crossrail 2 (Crossrail 2: Summary of Option Development, TfL May 2013, p3-4) states this position clearly:</p> <p><i>"overcrowding [on the Underground] is particularly evident on the Victoria, Northern and Piccadilly lines but also will be significant on suburban rail services, adding to congestion at London rail termini. Furthermore, by 2026, the first phase of the new high speed line (HS2) is expected to be in operation to the West Midlands, delivering significant numbers of additional passengers to Euston station, where the Underground station is already at capacity. The second phase of HS2, due to complete in 2033, would add further demand for dispersal at Euston. If London is to continue to grow and avoid its rail and underground networks becoming seriously congested, there is a need for further investment beyond that already committed. It is believed that the additional capacity offered by Crossrail 2 could contribute to the relief of all of the above overcrowding issues."</i></p> <p>The Plan of LUL and DLR Crowding ref: 'RT 025AE00 – 2026 Reference Case', appended as Appendix 1 shows the projected levels of morning overcrowding on Underground lines in 2026 without HS2.</p> <p>The plan shows, for example, that the southbound Victoria line will be subject to the highest level of overcrowding on trains (shown in black on the key) from Finsbury Park to Oxford Circus. Under this scenario, passengers waiting on platforms affected, including Euston station; will experience</p>



			<p>difficulties boarding trains that arrive. As overcrowding becomes worse, some passengers may not be able to board arriving trains, and it becomes difficult for passengers wishing to alight to egress from the increasingly congested platforms. Walkways to and from platforms becoming increasingly congested leading to blocking back.</p> <p>Under this scenario the ability of platforms to clear will depend on the extent to which subsequent trains are overcrowded, and how many passengers are accessing the affected platform from outside the station (and also how many access it from interchange services within the station).</p> <p>As platforms becoming increasingly congested it takes longer for passengers to alight and board trains, leading to longer platform dwell times and subsequent trains being held at signals. The throughput of trains (the service levels in terms of tph) will fall in consequence. There comes a point when station management is required that attempts to limit or control the throughput of passengers through a station and ultimately to the closure of ticket gates so that passengers wishing to access platforms are held back until platforms clear. Under this extreme situation some passengers will not wait outside the ticket gates but will seek alternatives to complete their journey, going via other stations available nearby or via some other means. If gate closure becomes a regular occurrence, some passengers may choose to change their travel habits and rather than go via the nearest and most convenient station that experiences regular gate closure, will make a second best choice.</p> <p>‘With HS2’ Underground boarders at Euston are forecast to increase by 17% in 2026 above ‘without HS2’ levels. In 2041 the increase is forecast to be 36%. In a situation where the Northern and Victoria line will be already suffering severe overcrowding levels in 2026, entry into Euston Underground station may not always be possible due to regular ticket gate closures.</p> <p>The Railplan modelling results given in paragraphs 12.5.13 to 12.5.20 reflect the second best choices that many passengers will have to make, and that the first choice (dispersal via Euston Underground station) is a link that is not effectively available due to congestion.</p> <p>The model assigns flows between the possible routeing choices of different OD pairs based on the time it takes to make the journey, including the time it takes to move through walkways and make interchanges at stations where possible. The model compares the loads it assigns with train capacity on each section and recalculates journey times based on these constraints and makes a revised assignment. The model recalculates assignments iteratively until it converges onto a solution when changes to assignments are within certain tolerances.</p> <p>The increased passenger volumes that the model assigns to subsurface Underground lines in</p>
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			<p>Figures 11 and 12 simply reflect the amount of second best choices that many passengers will have to make given the high levels of overcrowding on the Northern and Victoria lines at Euston Underground station. It is inaccurate to assert, as HS2 does in paragraph 12.5.13, that “Euston Square underground station and the Metropolitan, Circle and Hammersmith and City lines are much less well used [than the Northern and Victoria lines at Euston Underground station]. A key part of the Proposed Scheme is to improve access to Euston Square underground station, which will capitalise on this available capacity and reduce pressure on the current underground lines directly serving Euston, providing an attractive alternative route to the City.” A more accurate statement is that the subsurface lines are less overcrowded than the Northern and Victoria lines and Railplan makes its assignment accordingly.</p> <p>Railplan produces macro outputs relating to a given scenario. One such output is the ‘Nominally Accumulated Customer Hours’ or NACHS which is the aggregate amount of time spent by passengers in making the journeys modelled by a given run. Higher levels of NACHS in one scenario compared to another measures the amount of extra time that passengers take in the run involved, and therefore the poorer passenger outcome. The Council objects to the inaccurate and distorted description of the impacts of HS2 in these paragraphs and requests that NACHS values are given. The difference in NACHS values can be compared to those in NACHS tables that have been prepared for measuring pre-estimates of incidents on the Underground (such as partial line closures), which were used in monitoring PPP contract.</p> <p>There is no escaping the fact that the additional passengers from HS2 (especially for Phase Two) who wish to use Euston Underground station would so overload the Underground platforms as to make this choice undesirable for many passengers. Regular travellers arriving at Euston, familiar with platform overloading that HS2 will cause, will resort to second best solutions. For example, passengers wishing to go to Oxford Circus or Victoria as their final destinations may travel to Kings Cross on eastbound subsurface lines to pick up southbound Victoria line services at this station rather than attempt to use this line from Euston Underground station due to platform overcrowding. The greater use of subsurface lines forecast by Railplan is an inevitable outcome of severe platform overcrowding at Euston Underground station – and this is what the Railplan results in Figures 11 and 12 are pointing to. Increasing passenger journey times via circuitous routes on the Underground is not a benefit, nor in this context should the “larger increase in use of the Circle, Hammersmith &amp; City and Metropolitan lines” (paragraph 12.5.18) or capitalising on available capacity of subsurface line (paragraph 12.5.13) be considered as a benefit.</p>
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			<p>Additional mass transit capacity is required at Euston to disperse the increased number of passengers that will arise from HS2, such as Crossrail 2. The role of such additional capacity is vital. Without it, TfL estimates that in 2033 (with HS2 phase 2) southbound Victoria Line passengers might have to let 8 trains pass before boarding with average wait times of 15 minutes and a maximum of 31 minutes, and for southbound Northern Line Bank branch passengers might have to let 4 trains pass before boarding with average wait times of 7 minutes and a maximum of 21 minutes (<i>London Councils Update</i> presentation slides, January 2012, TfL).</p> <p>TfL has yet to update Railplan to take account of London's enlarged population revealed by the 2011 census. What this means is that Underground overcrowding shown on the plan above is underestimated. This emphasises the importance of Crossrail 2 in relieving overcrowding at Euston.</p>
		12.5.22	<p>Camden Council considers that this paragraph neatly sums up the issues with the HS2 scheme at Euston and the lack of a suitable, coherent mitigation strategy for onward travel into and around London. LU crowding is exacerbated on all lines, particularly the Northern and Victoria Lines which are already at critical levels. Journey times for passengers could be extended by up to 10% which could be a substantial amount of time in real terms. The "minor adverse" (2026) and "moderate adverse" (2041) status of the increased crowding does not accurately reflect the situation as it will be on the ground, when passengers conveniently ignore Railplan's pre-determined destinations and head for where they actually wish to travel.</p>
		12.5.23 – 12.5.24	<p>Camden Council accepts that there would be unacceptable levels of crowding on some LU lines even without the Proposed Scheme. However, this in itself is not a valid reason for HS2 to add further passengers to the network on the pretext that the problem was already there and therefore someone else is responsible for its mitigation. Whilst Camden Council also accept that mitigation measures are proposed for accesses to LU stations, this does not extend to the platforms or trains and therefore the crowding problem is simply being moved elsewhere. HS2's failure to properly mitigate its impacts on the LU network is one of the major drawbacks of the Proposed Scheme as it stands.</p>
		12.5.30 – 12.5.51	<p>Camden Council considers the impacts that are reported regarding the forecast changes to delay for the highway network are under-estimated. This is because of issues arising from the transport assessment work, Volume 5, Part 2, section 5 regarding the optimistic baseline modelling of the highway network for CFA1-3, which showed free flow conditions and optimistic levels of queues and therefore delay at many of the junctions tested that Camden Council simply know by observation alone to not be the case. This is also supported by Camden Council own non-anecdotal evidence.</p>

		12.5.34	Camden Council considers the ES is defective in that the reduction in pay & display bays, which are further impacted by a reduction in off street car park spaces. Camden Council has a policy to promote the use of sustainable transport but there are motorists who may need to drive to the station to drop those passengers who may not be able to use public transport. Although a drop off and pickup area is provided this does not allow motorists to leave their vehicle to assist passengers.
		12.5.48- 12.5.51, 12.5.54	<p>Sections of Cycle Quietways GNS1 and GNS2 would be lost as a result of the closure of Cardington Street and Melton Street. A cycle route should be retained on a similar alignment that avoids crossing Euston Road at Euston Circus.</p> <p>Measures will be needed to protect cyclists at either end of the proposed east-west bridge, for example in crossing Hampstead Rd and against buses, taxis and service vehicles in the vicinity of Eversholt St.</p> <p>As set out above under construction mitigation, Camden Council considers that the other mitigation measures are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures.</p>
		12.5.56	A station travel plan will be developed to improve access to and from the station. The objective of the travel plan is to encourage non-car mode access to the station, but it is these public transport facilities which are potentially over-capacity, according to the assessment. Therefore a Travel Plan will have little effect unless significant capacity improvements for access to and onward travel from Euston station are proposed.
		12.5.59	Confirms the delay caused to buses, and underground passengers, so Camden Council question why attempts have not been made to mitigate the demands of HS2, subject to more accurate modelling forecasts.

13	13.2		Camden Council accepts that 500m may be an appropriate distance to consider for surface water impact provided the impact of directly entering the urban drainage system is considered for a wider range as its impact can often be significantly further downstream.
	13.3		The Environmental Statement discussed attenuation or surface water drainage systems; however, it never explicitly refers to SuDS. As a major piece of infrastructure which should be building in exemplary adaptation to climate change, the Council considers the Environmental Statement should explicitly mention of SuDS designs being incorporated, and is deficient with this lacking. The fact that there are risks of groundwater 'perching' i.e. water trapped in ground deposits close to the surface which can cause flooding in neighbouring buildings cellars reinforces the need to use SuDS to keep water onsite.
	13.5		Camden Council notes that all surface runoff must be attenuated sufficiently to ensure a 50% reduction in immediate drainage to the Thames Water system, as mandated by Camden Planning Guidance 3, and that it should look to ensure that, wherever possible, attenuation uses more sustainable options such as green roofs and swales.
14	14.1		Camden Council considers that the current Proposed Scheme fails to properly incorporate proper planning for above station development and the public realm and that the Environmental Statement is deficient because it does not consider this fundamentally important component of the railway proposals and their interface requirements. Whilst Camden Council welcomes the consideration of some ancillary works to allow for OSD, these do not reflect the scale of ambition in the EAP. The station and development are inherently linked, but the current proposals currently fail to deliver a comprehensive approach. An alternative, fully integrated, scheme needs to be developed with Network Rail whose principles ensure incorporation of a new station for both HS2 and classic train services with above station development, and which reflects the needs of local communities and addresses the objectives and principles of the Euston Area Plan.
	14.2		Figure 15 and para 14.2.3: Camden Councils considers the Environmental Statement to be fundamentally deficient in not recognising and not assessing the need for appropriate interfaces for the railway scheme to enable subsequent OSD plans to emerge with the probability and confidence that they could be built in association with the railway scheme, albeit approved under different processes. The Council considers the approach taken in the Environmental Statement, characterised by the wording in this section, namely "Opportunities for OSD and any associated enabling works

			<p>above the existing classic platforms are not assessed in this report, as these are beyond the scope of the Hybrid Bill”, is an abrogation of responsibility for ensuring the prospects of an integrated development are kept central to the overall Euston scheme. Including the HS2-specific components, this reflects the lack of comprehensive thinking that is a fundamental shortcoming of the current approach to the design and construction of Euston Station. A properly integrated approach that includes planning for development above both the HS2 and classic tracks is required in order to deliver on the major potential of Euston as a growth area, to transform connectivity and the local environment in the area and to meet Euston Area Plan objectives and principles.</p> <p>Camden Council considers that development plots should not be discounted for viability reasons until an assessment has been carried out regarding how potential development areas above both HS2 and classic track areas could be developed together, rather than just HS2 areas in isolation.</p>
	14.3		<p>The current approach looks at works to HS2 areas in isolation, risking a piecemeal approach. As indicated above, Camden Council considers that these works are inadequate as they do not address development potential above the whole station site.</p>
	14.4	14.4.4	<p>Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
		14.4.9 – 14.4.10	<p>Camden Council would like to stress that no actual ecological surveys were completed for Camden sites, and without detailed surveys the environmental baseline cannot be accurately reported and impacts cannot be sufficiently assessed.</p>
		14.4.11	<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of</p>

			<p>contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
		14.4.13 – 14.4.23	<p>Camden Council considers the Environmental Statement's assessment deficient in this regard because it fails to consider the overall visual impact of the current 'Option 8' in providing for ancillary works above the HS2 platforms and tracks in isolation rather than in an integrated and comprehensive way for the whole station site. Camden Council considers that this approach could lead to negative visual impacts through the creation of a piecemeal development over part of the station only, entirely separate to any development above the classic tracks and platforms, should this take place.</p>
		14.4.24	<p>Camden Council considers the Environmental Statement assessment deficient in this regards because it fails to consider the overall economic impact of the 'Option 8' in providing for ancillary works above the HS2 platforms and tracks and addresses them in isolation rather than in an integrated and comprehensive way for the whole station site. There could be significantly more economic benefits through an approach that considered a comprehensive approach to station redevelopment and associated economic gains in terms of development quanta and environmental improvements.</p>
		14.4.26 – 14.4.32	<p>Camden Council considers that to be robust, this assessment must be quantitative and not qualitative and therefore consider the conclusions noted could be subject to change.</p>
		14.4.33 – 14.4.39	<p>A comprehensive redevelopment of Euston Station could enable the creation of new east-west routes across the station site (either through ground floor links if platforms and tracks were lowered, or</p>



			<p>through the provision of a raised link). As the ancillary works relate to potential development above the HS2 station and tracks in isolation, they would not address how above station development could enable improved east-west connections across the station site as a whole. Camden Council considers this to be inadequate.</p> <p>A comprehensive approach to development above the whole station site would enable an integrated approach to sustainable travel in conjunction with development.</p>
		14.4.37	<p>Camden Council feels it would be useful if HS2 could provide information about how the split of construction vehicles of 90% HGV and 10% LGV and cars, has been derived. It is suspected that the expansion and remodelling of the station will generate a substantial number of LGVs given that this aspect of the work will include a significant fit-out work component. Furthermore, it would be helpful at this point to include details of the anticipated parking provision for LGVs, as trades tend to rely heavily of this class of vehicle for transporting and storing their equipment.</p>
		14.4.40 – 14.4.41	<p>As a result of HS2, St James's Garden will be permanently reduced, and Euston Square Gardens (which is identified as high risk by the Environment Agency surface water maps) will be temporarily reduced. Therefore, both areas will need to have permanent SuDS (Sustainable Drainage Systems) in place to compensate for the loss of permeable surface and, as with all developments in central London, redevelopment must be taken as an opportunity to decrease the pressure on Thames Water systems which are over capacity.</p>
	14.5	14.5.1	<p>Camden Council considers that the Local Environmental Management Plan produced must have the flexibility to be amended to account for any alterations to the design of the scheme such as the implementation of ancillary works and any modifications required to the LEMP to account for such works must be discussed with the local authority and the community prior to its publication.</p>

### **CFA 01 map book: Euston Station and approach (Ref ES 3.2.2.1)**

<b>Map number</b>	<b>London Borough of Camden response</b>
CT-05-001 – Construction Phase	<p>Camden Council considers the ES is defective in that the extensive impact on the immediate area and wider district of the many construction traffic routes shown has not been properly assessed and cumulative effects are not adequately considered. The Council considers that the need for so many routes is in part a consequence that the ES is silent on the opportunities for using rail transport to</p>



	<p>move construction materials, spoil etc. This is a railway project with good rail access and rail should be utilised as a first principle before road transport is even considered. Where road transport is nevertheless required construction routes should, as recognised elsewhere in the ES, be first agreed with the Highway Authority (in most cases Camden Council); the Council therefore considers and records that the routes shown on the maps cannot be taken as being prescriptive since those agreements with the Highway Authority are not in place. The Council notes the intention to use the National Temperance Hospital site as the main compound. HS2 Ltd is aware that this site is directly opposite high density housing and the impact of what is acknowledged elsewhere in the ES as 24 hour activity on this site must be effectively mitigated if it is to be used for the purpose. More generally, the scheme is shown to use a large number of works compounds within the area. The distribution and sum of these only accentuates the local adverse impacts from traffic movements, noise, dust and disturbance within this densely populated area. The need for so many compounds should be reconsidered and the working methods reviewed accordingly.</p> <p>Camden Council considers the ES is defective in that a significant number of residential roads have been identified as construction routes and a great number of residents will be severely impacted as a result but this has not been properly addressed in the ES. Construction routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these construction routes and traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the road hierarchy in the Council's Network Management Duty Report, rather than residential roads and town centres. Many of these residential roads contain residential parking which reduce road width and are also cycle routes. Camden Council do not consider that sufficient information has been provided to demonstrate that highway safety of vulnerable road users has been mitigated on construction routes.</p> <p>A significant number of roads surrounding Euston Station are identified as 'Land potential required during construction'. Camden Council considers the ES is defective in that that no detail has been provided to specify why they might be required. An example of this is the signalised junction on the A501 Euston Road with the A400 Hampstead Road and A400 Tottenham Court Road.</p> <p>Roads are identified that are off of the TLRN or SRN, including type 3 and 4 roads which is unacceptable however the types and volumes of traffic using these roads are inadequately assessed</p>
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in the ES. Some roads proposed for construction traffic and are proposed for traffic diversions, but the combination of these impacts is inadequately assessed in the ES. Main construction traffic routes should be limited to the TLRN, only using the SRN if the TLRN is not available. Strategic lorry routes should not include roads such as Camden High St, Albany St or Parkway. Inadequate account has been taken of the restricted flow there would be on Hampstead Rd during the construction period. Drummond Street is also an inappropriate road for construction traffic, for example, being a type 4 undesignated road and it is unclear which land is required for construction and for what purpose.

A number of satellite construction compounds are identified adjacent to the tracks works, although these are also situated on residential roads. Camden Council considers the ES is defective in that the cumulative impact of HGV traffic associated with these sites together with wider construction vehicle movements on Construction Traffic Routes has not been considered in the context of these residential roads. An example of this is the residential road of Park Village East, which is identified to accommodate east-west construction traffic via Mornington Street and Granby Street and could also become an alternative route between Gloucester Gate and Roberts Street.

Camden Council considers the ES is defective in that the Map CT-05-001 CFA 01 Map Book shows two satellite compounds to be located on the east and west side of Euston Square Gardens, but no assessment is made of their impact on the London square, the Bloomsbury Conservation Area or the setting of designated and non-designated assets in the vicinity.

Camden Council considers the ES is defective in that the Map CT-05-001 shows the western corner of Harrington Square, to the east of Hampstead Road, potentially required for construction; however Camden Council has had confirmation from HS2 that this land will in fact be used for utility works. This is a London Square, situated within the Camden Town Conservation Area, but no mention is made of the potential impacts and effects on this important non-designated heritage asset.

Camden Council considers the ES is defective in that parts of Amptill Open Space and Harrington Gardens have now been identified as land potentially required for construction, however Camden Council has had confirmation from HS2 that these spaces will in fact be used for utility works. The Euston area is already losing a significant amount of open space, and this is very inaccurate. The Environmental Statement should have made this clear and assessed the impact of this.

Camden Council notes that para 6.3.2 is contrary to map CT-05-001 CFA 01 Map Book, which

	shows the York and Albany PH as outside the construction zone, although the adjacent roads and buildings are included in the zone.
CT-06-001 – Proposed Scheme	<p>Camden Council questions the role of the open space shown north of Langdale. The ES does not provide enough information to understand its intended role. Camden Council would be unlikely to consider that it is an appropriate site to compensate for the loss of St James' Gardens if that is HS2 Ltd.'s intention. The land adjacent to Park Village East released by demolition of the carriage Shed and not required for active rail use is problematic as shown. No after use is shown for it even though, because of the demolition of the Carriage Shed, it is clearly within the scope of the HS2 project – greater clarity is required on the proposed after use.</p> <p>Camden Council points out that the proposed Cobourg Street Vent Shaft is located at a prime site in the core of what should become an integrated development area with the station. Its design and physical form should therefore not be developed independently of over-site development associated with that site and with the active frontage requirements set out in the Euston Area Plan.</p> <p>Other comments include:</p> <ul style="list-style-type: none"> <li>• Taxi pick up on Cobourg Street – concerned regarding impact the impact of significant taxi movements on public realm, severance of Drummond Street. The Euston Area Plan seeks to ensure that the impacts of taxis are managed, and seeks to guide taxi movements to the station footprint wherever possible, keeping main vehicular movements away from the Cobourg Street/ Drummond Street area</li> <li>• The proposed station entrance to the north west of the station is supported as it would help to encourage pedestrian movement to the north (e.g. to and from Camden Town). However there is a need to reconsider how the public realm and vehicular access would work in this vicinity</li> <li>• Taxi set down area and north western station approach – concern regarding what appears to be a multi-lane highway approaching the station. It would create a very poor public realm/ local environment, sterilising a large area of land and I think we should oppose this.</li> <li>• Welcome the new station entrance aligning with Drummond Street. Subject to relocating taxi pick up, this entrance could help to connect Drummond Street in the station area and the area beyond to the east</li> <li>• The east-west overbridge (pedestrian/ cycle) – support this link in principle, although consideration must be given to the creation of a safe, well-overlooked connection. The provision of over-station development could help to ensure adequate overlooking of this</li> </ul>

	<p>space. This reinforces the need for alternative, fully integrated, scheme that incorporates a new station for both HS2 and classic train services with above station development</p> <p>Camden Council notes that the new HS2 station will occupy a substantial footprint to the west of the existing station, requiring the demolition and/or relocation of a number heritage assets, both designated and non-designated. Photomontages in CFA 01 Map Book show the new Euston HS2 terminus due to its location, footprint, height, bulk, scale and architectural treatment negatively affecting the setting of the grade II* listed 1-9 Melton Street, plus the setting of heritage assets including the remaining elements of the existing Euston Station, Euston Square Gardens, the grade II listed entrance lodges, and the wider Bloomsbury Conservation Area context. The proposed design as portrayed in the photomontages pays little respect to the setting of these assets, and fails to appreciate the sensitive historic urban context.</p>
CT-10-003a – Environmental Baseline	<p>Camden Council considers the ES is defective in that part of Harrington Gardens and Amptill Open Space is mapped as potential land required during construction; however, Camden Council has received confirmation from HS2 that this land will definitely be used for utility works. This is very inaccurate and the impacts of these works should have been properly identified and assessed in the Environmental Statement.</p> <p>Camden Council is concerned that the Adelaide Local Nature Reserve is mapped as potential land required during construction.</p> <p>Camden Council considers the ES is defective in that the Heritage assets affected by the Proposed Scheme are under-represented on the Environmental Baseline maps in the three CFA map books in Camden.</p> <p>The number of listed buildings is inaccurate, as the system employed of one dot per list entry fails to show each individual building where an entry covers multiple listings. Group listings are widespread in an urban area such as Camden, ranging from the numerous terraces of townhouses to groups of railway heritage structures as found in Stables Market. Each individual building which belongs to a group listing should be marked separately on the maps.</p> <p>Camden Council considers the ES is defective in that conservation area status is shown on the maps, but the individual conservation areas and their boundaries are not included. Positive contributors in conservation areas are not depicted.</p>

	<p>Camden Council considers the ES is defective in that buildings on the Camden draft Local List are not shown on the maps.</p> <p>Camden Council considers the ES is defective in that squares protected by the London Squares Preservation Act 1931 are not shown.</p> <p>Camden Council considers the ES is defective in that there are inaccuracies on the heritage maps regarding the grade of some listed buildings, with a number of grade II* listed buildings recorded as grade II listed. Some listed building entries have been omitted from the maps completely (see below). The following listed buildings have been omitted from the Environmental Baseline maps:-</p> <ul style="list-style-type: none"> <li>- Regency Lodge, Adelaide Road (grade II listed) (CFA 03).</li> <li>- Former Jack Taylor School, Ainsworth Way (grade II listed) (CFA 03).</li> </ul> <p>The following listed buildings have been given an incorrect grade on the Environmental Baseline map:-</p> <ul style="list-style-type: none"> <li>- Horse Hospital, Stables Market, Chalk Farm Road (grade II* listed) - wrongly shown as grade II listed (CFA 02).</li> </ul>
Verifiable Photomontages	<p>Photomontages in CFA 01 Map Book show the new Euston HS2 terminus due to its location, footprint, height, bulk, scale and architectural treatment negatively affecting the setting of the grade II* listed 1-9 Melton Street, plus the setting of heritage assets including the remaining elements of the existing Euston Station, Euston Square Gardens, the grade II listed entrance lodges, and the wider Bloomsbury Conservation Area context. The proposed design as portrayed in the photo montages pays little respect to the setting of these assets, and fails to appreciate the sensitive historic urban context.</p> <p>Photomontages in CFA 01 Map Book illustrate the western side of the new HS2 terminus incorporating a new entrance on an extended Cobourg Street, as seen from Hampstead Road across the cleared sites of the National Temperance Hospital and St James's Gardens. The images show an open and exposed environment, with all traces of the former gardens and burial ground removed. The images support the point that the gardens will have lost their integrity, setting and sense of enclosure currently provided by boundary railings and mature trees.. Little detail is shown in the views towards Drummond Street, Melton Street and Euston Road. Strong concerns are raised that all traces of the existing historic environment will be wiped out with few mitigation measures to compensate.</p>

	<p>Photomontages in CFA 01 Map Book show views west over the railway cutting from the northern end of Mornington Terrace (south of the grade II listed Edinburgh Castle PH) looking towards the grade II* listed Nash villas in Park Village East (within the Regent's Park Conservation Area). The setting of the grade II* listed villas and conservation area will be harmed by the replacement parapet wall (and barrette) which in the images is out keeping in terms of construction, dimensions (including increased height), materials and general detailed design. The setting of the villas and the conservation area will be affected by the large bulk and mass of the portal/headhouse structure in the cutting.</p>
LV-01-003 – Verifiable Photomontage Operation Year 1 (2026) – Summer Viewpoint 003-2-010	<p>Camden Council considers the ES is defective in that the location of this view is a flat-on view, therefore showing no more info than an elevation, and not showing the 3D presence of the proposal. The view is also very close, which will always obscure the proposals being foreground objects, leading to a false impression of the effect. Further views are needed from oblique and more distance views which Camden Council considers will show a more adverse effect.</p>
LV-01-004 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-1-010	<p>Camden Council notes the lack of detail in this proposal which makes it difficult to assess. The design of this building must be sympathetic to the historic context. The building obscures views of Park Village East, which Camden Council considers to be harmful to the character of the area. Camden Council considers the ES is defective in that the location of this view as it is a flat on view, therefore showing no more info than an elevation, and not showing the 3D presence of the proposal. The view is also very close, which will always obscure the proposals being foreground objects, leading to a false impression of the effect. Further views are needed from oblique and more distance views which Camden Council considers will show a more adverse effect.</p>
LV-01-267 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-1-008	<p>Yet another flat on view. Camden Council considers the ES is defective in that the location of this view is a flat on view, therefore showing no more info than an elevation, and not showing the 3D presence of the proposal. The view is also very close, which will always obscure the proposals being foreground objects, leading to a false impression of the effect. Further views are needed from oblique and more distance views which Camden Council considers will show a more adverse effect. Camden Council considers the ES is defective in that the prominent object shown in view LV-01-04 has been placed just out of shot to the right of this photo. How can it be that what seems to be the most major visual intervention into the area can cut off of this otherwise broad panorama shot? These images do not reflect a comprehensive or clear representation of the proposals.</p>
LV-01-005 – Verifiable Photomontage Operation Year 1 (2026) – Summer Viewpoint 004-2-004	<p>Camden Council considers that this views shows an unacceptable urban environment. The loss of building frontage on the western side results in a non-place, a gap in the city without overlooking or ownership. The approach looks like an urban motorway without consideration to pedestrian safety or</p>

	<p>quality of experience. The two bridge approach introduces considerable structure into a central reservation area on the road which obscures views and movement across the road. Camden Council rejects that this proposed bridge has been designed to be in keeping with the local landscape as stated in the Non-Technical Summary 7.9. This is an industrial bridge design inappropriate for a central London location. This view and experience could be considerably improved by a single elegantly design bridge. Buildings lining the road would provide a sense of place and continuity to the city whilst reducing the prominence of the bridge.</p> <p>Yet again, Camden Council considers the ES is defective in that the location of this view. It is firstly a flat on view, therefore showing no more info than an elevation, and not showing the 3D presence of the proposal. The view is also very close, which will always obscure the proposals being foreground objects, leading to a false impression of the effect. Further views are needed from oblique and more distance views which Camden Council considers will show a more adverse effect. Mover over the view is taken from a dip in the road where the visual effect will is lessened. Camden Council rejects that this is a honest or comprehensive position to show the visual effects of the bridge. This is a very exposed and large structure which will be visible from a range of local points, and from further north along the railway cutting. To choose a point in a dip which is flat on to the narrowest point of the bridge is entirely disingenuous. This element requires a comprehensive set of verified views from points in a 360 degree arc. This should include but not be limited to views from the proposed north entrance forecourt; Amptill Estate, the proposed replacement open space, Park Village East, Granby Terrace and other locations where it is visible. Granby Terrace Bridge just sneaks into this shot, and as above full views are required of this.</p>
LV-14-001 – Illustration of Euston Station: view from the south	Camden Council considers this image to represent an uncohesive and unresolved urban environment. The station fails to integrate into the urban environment. This image presents a jarring and muddled urban environment which is harmful to heritage assets such as the Gardens. Camden council considers the ES is defective in that the turning into the bus station is placed in front of the main entrance causing a severance between pedestrians and their destination, whilst wasting public realm. The image is particularly effective in showing how dominant buses and the infrastructure required to carry them has on the entrance to a major London railway terminus. The station is a cluttered mess of structure making it illegible for anyone trying to find an entrance, which should be clearly legible and defined at this distance.
LV-14-002 – Illustration of Euston Station: view from the north-east	Camden Council considers this view to show no meaningful improvement over the existing undesirable situation. The station is hidden and illegible, even from this close view.
LV-14-003 – Illustration of Euston Station: view from the south-west	Camden Council considers that that there is a strong east-west permeability desire line at this point which has not been expressed meaningfully in this view. There is structure blocking the entrance



	and the entrance is no greater expressed than the neighbouring shop frontage. This is a confusing and illegible proposal.
LV-14-004 – Illustration of Euston Station: view from the north-west	Camden Council considers this to be an entirely uninspiring view which fails to recognise its central London location or provide an appropriate entrance approach for a major station. It is traffic dominated landscape which fails to recognise the needs or desires of pedestrians. The residue pieces of green space are unlikely to survive the demands placed on the space, but without this softening the space would be a harsh space without townscape merit. The building form is unwelcoming and does not express entrance or terminus station. This could be a view or a 1960's new –town swimming pool. Camden Council rejects that this is a credible design solution for an entrance and forecourt of a major London terminal.
CT-20-004 – A400 Hampstead Road overbridge	Camden Council notes that these elevations show the gigantic scale of the bridge (length of 20 double decker buses and twice as high), which the disingenuously located verified view LV-01-005 fails to show the comprehensive visual effects of. In fact it barely shows any bridge, and yet the view from the proposed replacement open space is likely to show the entire long elevation. This bridge requires a comprehensive set of verified views from points in a 360 degree arc. This should include but not be limited to views from the proposed north entrance forecourt; Ampthill Estate, the proposed replacement open space, Park Village East, Granby Terrace and other locations where it is visible.
CT-20-005 – Construction Phasing Maps	<p>Camden Council notes the sequencing shown on maps CT-20-005 to 008. It considers that such sequencing maps need to be fully described and considered alongside the overall programme planning for both the sequence and the full spectrum of actual construction works activities. Whilst it is clearly helpful to have the sequencing maps they are only one dimension of a complex range of impacts that need to be presented, assessed and considered in the round before the Council and its communities can fully understand and comment on the proposals.</p> <p>Camden Council considers the ES is defective in that the signalised junction on the A501 Euston Road with the A400 Hampstead Road and A400 Tottenham Court Road is identified within the potential 2015-2026 works, however no further details have been provided.</p> <p>Camden Council considers the ES is defective in that while Map CT-20-005 provides indicative phased utility works, there is no indication as to their detail, such are the need for full or partial road closure. This could have a significant effect on the ability to travel by all forms to transport as well as causing direct disruption to residents that live in the affected roads together with local businesses. An example of a residential road that is considered to experience significant disruption from utilities works is Augustus Street. This road contains residential permit parking and is identified to be affect by utilities works for two years.</p>

<p>CT-20-006 – Construction Phasing Maps</p>	<p>Camden Council notes the sequencing shown on maps CT-20-005 to 008. It considers that such sequencing maps need to be fully described and considered alongside the overall programme planning for both the sequence and the full spectrum of actual construction works activities. Whilst it is clearly helpful to have the sequencing maps they are only one dimension of a complex range of impacts that need to be presented, assessed and considered in the round before the Council and its communities can fully understand and comment on the proposals.</p> <p>Camden Council considers the ES is defective in that while Map CT-20-006 provides indicative phased utility works. There are, however, no details of the utility works therefore or whether there would be a need for full or partial road closure. This could have a significant effect on the ability to travel by all forms to transport as well as causing direct disruption to residents and businesses on the affected roads. An example of this is the A501 Euston Road between Gower Street and Gordon Street which is a strategic highway through the Borough and forms part of the TfL Road Network (TLRN).</p> <p>During both 2019 and 2020 a period of excavation coincides with utilities works on the A400 Hampstead Road as well as structural work to the rail overbridge and demolition of the existing A400 overbridge. Camden Council requests further detail is provided on phasing to ensure that the cumulative effect of these works on existing vehicle movements and also construction routing is not mitigated.</p> <p>Camden Council considers the ES is defective in that the signalised junction on the A501 Euston Road with the A400 Hampstead Road and A400 Tottenham Court Road is identified within the potential 2015-2026 works, however no further details have been provided.</p>
<p>CT-20-007 – Construction Phasing Maps</p>	<p>Camden Council notes the sequencing shown on maps CT-20-005 to 008. It considers that such sequencing maps need to be fully described and considered alongside the overall programme planning for both the sequence and the full spectrum of actual construction works activities. Whilst it is clearly helpful to have the sequencing maps they are only one dimension of a complex range of impacts that need to be presented, assessed and considered in the round before the Council and its communities can fully understand and comment on the proposals.</p> <p>Camden Council considers the ES is defective in that while Map CT-20-007 provides indicative phased utility works, there is no indication as to their detail, such are the need for full or partial road closure. This could have a significant effect on the ability to travel by all forms to transport as well as causing direct disruption to residents and businesses on the affected roads. An example of this is the</p>

	<p>A400 Hampstead Road to the north and south of the rail over-bridge</p> <p>Camden Council considers the ES is defective in that the signalised junction on the A501 Euston Road with the A400 Hampstead Road and A400 Tottenham Court Road continues to be identified within the potential 2015-2026 works, however no further details have been provided.</p>
CT-20-008 – Construction Phasing Maps	<p>Camden Council notes the sequencing shown on maps CT-20-005 to 008. It considers that such sequencing maps need to be fully described and considered alongside the overall programme planning for both the sequence and the full spectrum of actual construction works activities. Whilst it is clearly helpful to have the sequencing maps they are only one dimension of a complex range of impacts that need to be presented, assessed and considered in the round before the Council and its communities can fully understand and comment on the proposals.</p> <p>In 2026, an indicative phased utilities work is shown between Barnby Street and the A400 Hampstead Road. Camden Council request clarification of these work, which it is noted do not appear in the 2026 key that support the drawing.</p>
CT-20-009 – Sections Showing Decks for Over Site Development Ancillary Works	<p>Camden Council considers this diagram to be inaccurate and incomplete. The diagram is predicated upon the prospect of over station development but it gives no indication at all of the constraints or opportunities for OSD based on the current station scheme. Deck diagrams are of no purpose unless they identify zones for building heavy supporting structures or, alternatively, zones where these are restricted for a defined reason. Such indications need to be included in the fundamental planning of the site to have any effect. Their omission in this diagram is further evidence that HS2 Ltd have not adequately taken the concept of integrated development into any account within their design or project concept.</p>
LV-03-001 – Construction Phase Significantly Affected Viewpoints	<p>Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important and greater than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 9 Operational Phase Significantly Affected Viewpoints for the whole of the Euston area. The Hampstead Road bridge alone requires this degree of assessment viewpoints. The Euston Square Gardens area likewise. Camden Council would also like to stress that many of the views are taken very close to the station, which is known to distraught images, lessening any proposal's visual effect. Close up views remove context and exaggerate the size of foreground buildings, helping to obscure any proposal. A compressive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently in is not possible to have a meaningful understanding to</p>

	the visual effects of the proposal.
LV-03-002a – Construction Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints for the whole of this map area. Camden Council would also like to stress that many of the views are taken very close to the bridge, which is known to distraught images, lessening any proposal's visual effect. Close up views remove context and exaggerate the size of foreground buildings, helping to suggest a limited effect from any proposal. A compressive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently in is not possible to have a meaningful understanding to the visual effects of the proposal.
LV-04-001 – Operational Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important and greater than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 9 Operational Phase Significantly Affected Viewpoints for the whole of the Euston area. The Hampstead Road bridge alone requires this degree of assessment viewpoints. The Euston Square Gardens area likewise. Camden Council would also like to stress that many of the views are taken very close to the station, which is known to distraught images, lessening any proposal's visual effect. Close up views remove context and exaggerate the size of foreground buildings, helping to obscure any proposal. A compressive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently in is not possible to have a meaningful understanding to the visual effects of the proposal.
LV-04-002a – Operational Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoint for the temporary construction period than the operational phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints for the whole of this map area. Camden Council would also like to stress that many of the views are taken very close to the bridge, which is known to distraught images, lessening any proposal's visual effect. Close up views remove context and exaggerate the size of foreground buildings, helping to suggest a limited effect from any proposal. A compressive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently in is not possible to have a meaningful understanding to the visual effects of the proposal.
SV-05-INDEX-CFA1 – Index Map of:	Camden Council considers that the maps are of limited use at the current scale, and do not readily

Operational Noise and Vibration Impacts and Likely Significant Effects	allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures
SV-05-001 – Operational Noise and Vibration Impacts and Likely Significant Effects	Camden Council considers that the maps are of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures. Camden Council notes that the CFA report suggests that properties will qualify for noise insulation packages and query why this information has not been detailed on this map.

### **CFA 02 report: Camden Town and the HS1 link (Ref: ES 3.2.1.2)**

Section	Sub section	Paragraph	London Borough of Camden response
1	1.1		<p>It remains Camden Council's preferred option that the link from HS2 to HS1 is omitted entirely from this scheme because of the severe and devastating economic and social impacts it will have upon the borough, especially in Camden Town.</p> <p>Camden Council offers no other comment on this section apart from paragraph 1.1.3 where it records that no business case has been made for the HS1 Link.</p>
2	2.1		Camden Council considers that section 2.1 is deficient as it fails to make reference to the vibrant Camden Markets and more generally the business environment of Camden Town that will suffer devastating disruption and economic degradation as a result of the construction of the Link as proposed.
		2.1.5 – 2.1.9	Camden Council has provided transport comments relating to the existing transport infrastructure in: Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline Conditions, section 5.4
		2.1.10	Camden Council considers the ES is defective in that the overview of the area fails to reflect the special socio-economic character of Camden Town quoting only general statistics. Camden Town is a major Town Centre with a diverse residential population and thriving commercial core. Over 800

			<p>businesses are estimated to operate from the designated town centre area alone. Camden Town has a reputation for its alternative shops, multiple Camden Markets and entertainment venues that make the area one of London's top year round visitor and tourist destinations. Camden Town has a thriving creative industries sector and is an important cultural destination. Camden Council considers that the overview of the area demonstrates that the ES is not based upon an understanding or appreciation of the unique socio-economic character of Camden Town that is a crucial context for understanding the impacts of the HS2 scheme.</p> <p>Camden Council considers the baseline community overview does not demonstrate sufficient consideration of equality issues such as income, health, gender, belief and ethnic differences. For this reason, Camden Council is not confident the mitigation measures proposed are tailored towards the local community.</p>
		2.1.12	<p>Camden Council considers the ES is defective in that this statement does not fully represent the extent of the proposed redevelopment of Hawley School which, as part of the school's relocation, will be expanded from an infant school to a one form entry primary school.</p>
		2.1.19 – 2.1.29	<p>Camden Council has provided transport related comments on the Transport Policy at Transport Assessment (TR-001-000) Traffic and Transport Part 1: Introduction, section 2</p>
		2.1.21	<p>Camden Council considers that additional relevant Camden Planning Policy to be noted includes our supplementary planning documents (SPDs) which play an important role in our planning decisions by providing more information on how we apply planning policies in Camden. SPG's include conservation area appraisals and management strategies, sites of nature conservation importance and Camden Planning Guidance (especially CPG 5 Town Centres, Retail and employment, which includes special guidance for Camden Town). Some of this guidance has recently been reviewed and reference is made to the review in this section –the most appropriate guidance at the time of writing should be used, it appears that because it was under review it has been omitted completely.</p> <p>Camden Council notes that while planning policy has been identified it is not clear how it will be taken into consideration and how it has informed designs/ development of the scheme, especially with reference to avoidance of harm to local communities. Camden Council requests that HS2 Ltd refer to the Council's latest policies when working up detailed designs and programmes to take into account special characteristics and identified communities. Camden Council would also like to note that a new Action Plan has also been produced, to be published in summer 2013. The appropriate</p>

			reference for this should be London Borough of Camden (2013) Camden Biodiversity Action Plan 2013-18.
		2.1.22	<p>Camden Council notes that Para 2.1.22 outlines key planning designations affected by the Proposed Scheme, including the Camden Broadway, Jeffreys Street and Regent's Canal Conservation Areas. However, the only grade II listed building mentioned is Camden Road Station, although mention is made of the grade II* Roundhouse and the Camden Incline Winding House., no mention is made of the grade II* Horse Hospital in Stanley Sidings (Stables Market).</p> <p>No mention is made in the Cultural heritage section of the importance of non-designated heritage assets which are positive contributors in conservation areas or buildings on the Camden draft Local List. Such buildings contribute to the richness of the historic urban environment in Camden Town.</p> <p>More detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway and canal heritage (both above and below ground). The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES and so the need for a specialist integrated industrial heritage assessment should be emphasised.</p>
		2.1.28	<p>Camden Council notes that the ES states that discussions are being held regarding the impact of the proposed scheme on Hawley Primary school. However, to date no agreements have yet been reached regarding how the impacts of the scheme would be mitigated against. The impact of the scheme is significant as it will involve permanent land take from an already constrained school site due to the widening of the viaduct as well as additional temporary land take whilst these works are being undertaken. Camden Council therefore remains extremely concerned over the impact of HS2 on Hawley primary school.</p> <p>Camden Council disagrees with the assumptions made in the ES which states that the temporary land take from the school site and the construction works relating to the widening of the viaduct will not have a significant effect on the school. Any construction works on the viaduct being undertaken during school term time will have serious implications for the running of the school due to the disturbance this will cause. Permanent and temporary landtake will have a serious impact on the outside learning and play provision at the school. The impact on the school cannot be addressed by simply re-organising the outside learning and play environment.</p>



	2.2		<p>Camden Council notes and objects that there is no description of the intended construction sequence or programme mentioned in this overview section. Given the tight urban grain of the area, the active and fast growing London Overground services and the rail freight trains, all of which will be severely affected by the impact of construction works, blockade of rail lines and the impact of traffic diversions the Council would have expected to see at least recognition of these impacts feature in any "Description of the Scheme". The diversions to freight and their impacts on service provision (both for freight and passenger services), related impacts on communities and whether there would need to be transfer to less sustainable freight provision using the road network need to be identified. Such Description should have included these issues to give a more complete picture of the scheme since they are fundamental to it and to its environmental assessment. The fact of omission in the Description suggests that little weight was given to them by the scheme promoters. The more detailed descriptions of construction given in 2.3 do not overcome the apparent underweighting of them as key issues for strategic consideration within the HS2 project.</p> <p>Camden Council has provided transport comments on the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 1: Introduction, section 3.1; and at Part 3: London assessment, section 6.1</p>
		2.2.4	<p>Camden Council is considers the ES is defective in that impact of construction on Agar Children's Centre situated at Wrotham Road where the ES considers there will be significant effect due to construction noise has not been properly considered. The Children's Centre is situated near landtake area for the Wrotham Road equipment platform and the Camley Street main compound, as well as demolition of 75 dwellings in the locality (on Baynes Street, A5202 St Pancras Way and Wrotham Road) and the Council believes that there will be a significant impact on the children's centre whilst construction works are taking place around the site. The cumulative impact of all of these effects has not been assessed within the ES rendering it defective. Children centres are an integral part of the borough's education and wider children's services strategies and the borough has made a significant investment in its early years services to reflect these priorities.</p>
		2.2.11	<p>Camden Council considers the ES is defective in that in the Photomontages in Map Book CFA 02 (the view from St Pancras Way to the proposed Baynes Street bridges), the works include the loss of the distinctive 19<sup>th</sup> century cast-iron bridges and brick abutments which are integral to the historic townscape, and their replacement with a bland concrete and steel design with modern brick piers and lower parapets which show no sensitivity to the historic environment, including the 19<sup>th</sup> century NLL Viaduct and setting of the adjacent Camden Broadway Conservation Area. The proposed</p>

			<p>works involve the loss of important non-designated heritage assets to make way for crude and basic-looking bridges paying no respect to the context. However, no mention or assessment is made in the Cultural heritage section of works which are unacceptable in terms of their impact on the historic environment.</p> <p>Camden Council notes that no detailed information is provided in the Cultural heritage section on the proposed works to the northern section of Camden Road Station, impacting on the historic fabric of the grade II listed building and the setting of the Jeffreys Street Conservation Area. No written information or visual images have been provided at this stage of the platforms 3 and 4 proposals, so it is not possible to comment on the appropriateness of the canopy and lift designs in this historic setting.</p> <p>Camden Council disputes the 'low' value of the Up Empty Carriage Tunnel, due to its strategic importance in the overall railway layout and its indirect connection with the grade II* listed Camden Incline Winding Engine vaults, located a short distance away under the WCML. The partial demolition and sealing of the tunnel will therefore have a high adverse effect rather than a moderate adverse effect.</p> <p>Para 2.2.11 outlines the replacement of the metal decks of the disused and operational connecting bridges that cross the St Pancras Way and Baynes Street, involving a sizeable loss of historic fabric. It should be noted that these non-designated heritage assets are candidates for the Camden Local List. Similar situations occur with the bridges at Randolph Street, Camden Road, Kentish Town Road and Chalk Farm Road bridges.</p>
		2.2.13	<p>The works to the section of the NLL Viaduct west of Camden Road Station include the loss of a substantial amount of historic fabric from the non-designated heritage assets, notably the robust brick north face of the viaducts and the Kentish Town Road bridge. This historic brickwork plays an integral role in the historic townscape, and is visible in views from the Jeffreys Street Conservation Area. Photomontages in Map Book CFA 02 of the proposed works show the view looking south over Camden Gardens towards the Kentish Town Road arched brick bridge. The image indicates that the widening works will require the rebuilding of one arch. Although a brick face is shown, the arch appears to be supported by a concrete rather than a traditional arched brick lintel as found elsewhere in the NLL Viaduct arches. The historic brick parapet and cornice detail will also be lost, to be replaced by an oversimplified steel parapet paying no respect to the context. The proposed works involve the substantial demolition and re-facing of important non-designated heritage assets</p>

		<p>to make way for crude and basic-looking engineering structures paying no respect to the context of adjacent heritage assets, including the sensitive setting of Camden Gardens, which is a protected London Square (on the Camden draft Local List, and an invaluable public open space in Camden Town. However, no mention or assessment is made in the Cultural heritage section of works which are unacceptable in terms of their impact on the historic environment.</p> <p>Camden Council notes that no mention is made in the Cultural heritage section of proposed works to the Kentish Town Road bridge and adjoining viaduct adjacent to Camden Gardens. The viaduct and bridges are all candidates for the Camden Local List, as this section of the NLL Viaduct plus the Camden Street and Kentish Town Road bridges fall just outside the Jeffreys Street and Regent's Canal Conservation Areas.</p> <p>Camden Council notes the Cultural heritage section makes no mention of the replacement of the Chalk Farm Road bridge, constituting the loss of a positive contributor, with potentially harmful impacts on grade II listed buildings in Stables Market, a number of positive contributors in the Regent's Canal Conservation Area, including in Chalk Farm Road, Camden Lock Place and Stables Market, plus the impact on the Hawley Arms PH in Castlehaven Road (on the Camden draft Local List).</p> <p>Camden Council considers Photomontages in Map Book CFA 02 show an unacceptable loss of historic fabric resulting from the demolition of major sections of the bridge, including the 19<sup>th</sup> century cast-iron deck and parapets, abutments, piers and coping stones. These historic engineering components give the bridge its landmark value and positive contributor status in the Regent's Canal Conservation Area. The image of the replacement bridge shows a poor replica of the existing bridge, with 'smooth' steel sheets replacing the riveted cast-iron parapet, of different proportions to the existing resulting in the replacement 'Camden Lock' lettering being too squat. The rebuilt abutments are topped by concrete pad stones and the new brickwork lacks the patina of age of the existing bridge and adjacent structures. The photomontages therefore demonstrate an unacceptable loss of historic fabric and the replacement design shows a lack of understanding of the existing railway heritage and its context. In the absence of an assessment of the impacts and effects on all relevant heritage assets, no satisfactory replacement scheme, and no indication of potential mitigation measures, the proposed demolition works are considered wholly unacceptable.</p>
	2.3	<p>Camden Council considers the ES is defective in that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden</p>

			<p>Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. Camden Council considers the ES is defective in that utility searches to date do not include Camden owned gas infrastructure and no discussions have been held with the council to date, a major gas transporter in the borough. Camden Council therefore considers that HS2 have not taken into consideration the full utility infrastructure in Camden. Utility diversions are likely to have a significant effect on a wide area, therefore have an impact on a lot of people who live, work and travel through Camden. Camden Council considers the ES is defective in that the level of disruption of critical services (water, heating, lighting, etc.) and the effect this will have on residents as well as pressure on council services on managing assets and the welfare of residents has not been properly considered. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council requests for discussions between Camden Council and HS2 to commence at the earliest opportunity and an approach agreed for any work required. Camden Council will require HS2 to undertake full risk assessment and monitoring of all utilities in the vicinity of HS2 sites (should we include when/how often these are done?). Camden Council will require compensation for any break in service cause by HS2 utility diversion works or construction works. Camden Council requests that all interface with affected utilities is managed in a timely manner by HS2 and that Camden is compensated for any additional burden imposed. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other way leaves affected by the proposals.</p> <p>Camden Council requests that HS2 manage all other statutory provision associated with the impact to property including but not limited to party wall matters. Camden Council requests that the Council is indemnified in perpetuity against any and all claims or action that may arise consequential to the use of high frequency radiation. Camden Council will require compensation where the siting of towers/cables impinges on the ability to deliver services e.g. by restricting use of cranes, mobile platforms and other high access equipment. Camden Council requests working digital files of HS2 plans and sections in facilitate Camden Council/HS2 discussions of effected areas and mitigation work required.</p> <p>Camden Council considers the ES is defective in that the impact of HS2 arising from utility diversions and construction work on the health and well-being of local communities and the</p>
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			<p>Council's ability to manage services in affected areas in Camden has not been properly assessed. Camden Council services include, but are not limited to, deliver of housing repairs and capital works, management of housing voids, mechanical and electrical services, and caretaking services. Camden Council considers the ES is defective as it has not properly assessed the health and safety impacts of access disruption and would therefore require HS2 to work with Camden Council to ensure HS2 construction works will not interfere with the delivery of services e.g. meals on wheels to vulnerable residents, refuse collection, estate cleaning, and ensure safe working conditions are maintained throughout council estates. Camden Council would require that HS2 works will not interfere with the delivery of council estate services and ensure safe working conditions are maintained throughout Camden Council estates. Camden Council would require that standards of habitability are maintained throughout construction work, including all aspects of health and safety (e.g. fire safety, pest control etc.) are maintained. Camden Council would require that an overview of HS2 works is provided 5 years in advance in line with projected expenditure of the Council's capital programme and 2 years' notice of detailed works in order to allow the Council to respond to the impact on services and communities and meet health and safety regulations. There are significant resources needed to ensure these impacts are managed safely and Camden Council will require compensation for increase costs to housing management and contractor resources incurred to maintain standards where disruption has been caused by HS2.</p> <p>Camden Council requests that HS2 have an Emergency Response plan in place to deal with any utility failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time. Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.</p>
		2.3.1 – 2.3.4	Camden Council considers that the full construction stage impacts on local people and local economies have not been adequately appreciated by adopting the form of works proposed and the consequences that flow from that. It considers that the construction stage description fails fully to recognise those severely adverse impacts and to propose adequate amelioration or alternative construction approaches.
		2.3.3	Camden Council notes that HS2 Ltd requires land from the new Hawley primary school site on a permanent basis in order to widen the viaduct to provide the HS1/1 link route. Camden Council

			remains extremely concerned over the impact of HS2 on Hawley primary school. Although discussions have taken place with HS2 Ltd regarding mitigating against the impact of the temporary and permanent loss of land from the new school site, no agreements have been reached. Camden Council disagrees with the assumptions made in the ES which states that the temporary land take from the school site and the construction works relating to the widening of the viaduct will not have a significant effect on the school. Any construction works on the viaduct being undertaken during school term time will have serious implications for the running of the school due to the disturbance this will cause. Permanent and temporary landtake will have a serious impact on the outside learning and play provision at the school. The impact on the school cannot be addressed by simply re-organising the outside learning and play environment.
		2.3.5 – 2.3.6	Camden Council has provided transport comments on the Construction of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.
		2.3.7 – 2.3.8	The general description of identified utilities may not be the only ones needing diversion and more critically there is no forecast of phasing of the works which is imperative when trying to establish construction impacts. Therefore, without this being inherent within the assessment, the construction impact on transport is likely to be significantly underestimated.
		2.3.9 – 2.3.93	Camden Council has provided transport comments on the Construction of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.
		2.3.20 – 2.3.26	Generally, the description contained within this section and the number of construction personnel at each compound which are significant does not feed in to any Construction Trip Generation assessment which would be expected to be contained in Vol 5 Part 3 or a related annexe. Without this derivation then the prediction of construction impacts is not fit for purpose. This paragraph also indicates that there will be limited storage space for construction materials at the construction compounds, which will presumably lead to a large number of smaller just-in-time (JIT) deliveries. To avoid a reliance on JIT deliveries, Camden Council feels there is an opportunity here for HS2 to examine innovative methods of materials management such as the use of consolidation centres, developing and adopting Materials Logistics Plans as set out by WRAP (Waste and Resource Action Programme) and agreeing a suitable Construction Logistics Plan with TfL. More comments on the inadequacy of the construction impact assessment within the ES are contained at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5

		2.3.47	<p>Para 2.3.47 states that the existing three-span iron bridges with two abutments and two rows of distinctive intermediate iron supporting columns (10 in total) will be replaced by two-span steel bridges supported by new brick abutments, which will involve a sizeable loss of historic fabric. It should be noted that these non-designated heritage assets are candidates for the Camden Local List, and run through the Camden Broadway Conservation Area.</p> <p>Camden Council notes that the Photomontages in Map Book CFA 02 show the view from St Pancras Way to the proposed Randolph Street bridges. The works include the loss of the distinctive 19<sup>th</sup> century cast-iron bridges and brick abutments which are integral to the historic townscape, and their replacement with a bland concrete and steel design with modern brick piers and lower parapets which show no sensitivity to the historic environment, including the 19<sup>th</sup> century NLL Viaduct and the Camden Broadway Conservation Area. The proposed works involve the loss of important non-designated heritage assets to make way for crude and basic-looking bridges paying no respect to the context. However, no mention or assessment is made in the Cultural heritage section of works which are unacceptable in terms of their impact on the historic environment.</p>
		2.3.57	<p>Camden Council notes that no detailed information is provided in the Cultural heritage section on the proposed works to the northern section of the station, impacting on the historic fabric of the grade II listed building and the setting of the Jeffreys Street Conservation Area. No written information or visual images have been provided at this stage of the platforms 3 and 4 proposals, so it is not possible to comment on the appropriateness of the canopy and lift designs in this historic setting.</p>
		2.3.59	<p>Para 2.3.59 states there will be no demolition associated with construction managed from the Camden Road (South) Satellite Compound; however, this information is incorrect as substantial demolition works are proposed for platform 1 of Camden Road Station and its canopy.</p>
		2.3.62	<p>Camden Council notes that no assessment is made in the Cultural heritage section of the impacts this compound will have, temporarily or permanently, on the sensitive setting of Camden Gardens. It is therefore not possible to comment fully on the impacts on Camden Gardens during construction, but concerns are raised regarding the implications for its setting.</p>
		2.3.65	<p>The works include the loss of a substantial amount of historic fabric from the NLL viaduct and bridge, both non-designated heritage assets, notably the robust brick north face of the viaducts and the Kentish Town Road bridge. This historic brickwork plays an integral role in the historic townscape, and is visible in views from the Jeffreys Street Conservation Area. Photomontages in Map Book</p>



			<p>CFA 02 of the proposed works show the view looking south over Camden Gardens towards the Kentish Town Road arched brick bridge. The image indicates that the widening works will require the rebuilding of one arch. Although a brick face is shown, the arch appears to be supported by a concrete rather than a traditional arched brick lintel as found elsewhere in the NLL Viaduct arches. The historic brick parapet and cornice detail will also be lost, to be replaced by an oversimplified steel parapet paying no respect to the context. The proposed works involve the substantial demolition and re-facing of important non-designated heritage assets to make way for crude and basic-looking engineering structures paying no respect to the context of adjacent heritage assets, including the sensitive setting of Camden Gardens, which is a protected London Square (on the Camden draft Local List, and an invaluable public open space in Camden Town. However, no mention or assessment is made in the Cultural heritage section of works which are unacceptable in terms of their impact on the historic environment.</p>
		2.3.67	<p>No assessment is made in the Cultural heritage section of the impacts and effects of the Proposed Scheme on non-designated heritage assets at 6 and 8 Torbay Street (candidates for the Camden Local List). This pair of two-storey residential properties is situated on land potentially required for construction on the south side of the proposed Hawley Primary School. It is not considered acceptable to omit an assessment on the grounds that the properties already have permission to be demolished as part of the committed scheme. An assessment should be undertaken by HS2 Ltd at this stage as the Proposed Scheme will impact on the non-designated heritage assets regardless of the committed development. Furthermore, the Proposed Scheme, if implemented, will remove the viability of developing large sections of the committed scheme, meaning that the non-designated heritage assets in Torbay Street may still be standing in 2017.</p>
		2.3.72 (and 9.4.14)	<p>Camden Council notes that no mention is made in the Cultural heritage section of the proposed modifications to the railway viaduct. No assessment is made of the impacts and effects on the historic urban context which includes the Regent's Canal Conservation Area, positive contributors in the conservation area, grade II listed buildings and buildings on the Camden draft Local List. As such, it is unclear as to from which side and to what extent existing brick parapets will be removed from the viaduct, and no information is provided on the design of the new steel walkways and replacement parapets and how they will visually impact on the historic context. This information is vital to allow a proper assessment of the impacts of the scheme and without it the ES is defective.</p>
		2.3.73	<p>Camden Council notes that map CT-05-003a in Map Book CFA 02 shows the compound occupying the eastern end of Camden Lock Place, within the Camden Lock Market which is situated south of</p>

			the viaduct. No assessment has been made in the Cultural heritage section of the impact of scaffolding and construction activity on the setting of a number of positive contributors in the Regent's Canal Conservation Areas which are situated in Camden Lock Place and no consideration is made of the historic granite sett surface.
		2.3.74	Camden Council would like clarification whether in 2.3.74 "Camden Village Market" should read "Camden Lock Village Market".
		2.3.77	Camden Council notes that Para 2.3.77 is incorrect as there will be demolitions linked to this compound: the removal of the existing Chalk Farm Road bridge.
		2.3.84	Camden Council considers the ES is defective in that that the tunnel portal headhouse and the two substations will be new above-ground structures in close proximity to the Regent's Canal Conservation Area and the grade II* listed Roundhouse performing arts venue, a substantial mid-19 <sup>th</sup> century brick former engine turntable shed located immediately to the east of the Chalk Farm Viaduct on the west side of Chalk Farm Road. No mention is made of these structures in the Cultural heritage section. No assessment is made of the potential impacts and effects of the design of these structures on the settings of the grade II* Roundhouse and the Regent's Canal Conservation Area.
		2.3.95	Camden Council would like more information about how the demolition, construction and worker accommodation site waste will be transported around the site for reuse, recycling and recovery and how this may impact on noise, dust and other environmental factors.
		2.3.97	Camden Council understands at least a third of the excavation waste chemically unsuitable for reuse will need to be removed off site for treatment. Camden Council would like to see more detail on how and where the waste that is chemically unsuitable for reuse will be transported for disposal and any impacts it will have on increased vehicle movements and other environmental factors. Camden Council would also like assurance that all possible on site reuse and recycling options have been pursued before off-site disposal to landfill happens.
		2.3.101	Camden Council has provided transport comments on the Construction of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.
		2.3.102	Camden Council has provided transport comments on the Construction of the Proposed Scheme at

			Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.
		2.3.102	Camden Council considers it surprising and unacceptable that section 2.3 has no indicative programme of alternative provision for the consequential displacement of London Overground passengers or for rail freight needs (the Council's comments in section 2.2 above also apply here). The programme shown is internally focused solely to HS2 project construction needs without taking account of those consequential programme requirements for alternative facilities for those displaced from transport modes during construction. The council further considers that with such complex works taking place in a congested area and the fundamental need to adapt old infrastructure with the risks associated with that, some indication of a programme risk profile should have been included in the document. As shown, the construction profile shows no contingency or how slippage would be accommodated, together with its consequences for works, rail activities and community impacts.
	2.4		Camden Council understands the operational tonnages generated in the Camden Town area are low (25 tonnes p/a) and welcomes the low level of waste confined to landfill.  Camden Council has provided transport comments on the Operation of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.6.
		2.4.1	Camden Council is aware that discussions have taken place between HS2 and the Roundhouse about developing specific mitigation plans (such as anti-vibration sprung track) to reduce the noise impact to the Roundhouse once HS2 trains start running. Camden Council support the Roundhouse in seeking mitigation of noise and/or vibration impacts on the running of their operations and expects HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.
	2.5		Camden Council considers it important to reflect the difficulties that the Camden Town Community forum have had in dealing with HS2 Ltd, not least HS2 Ltd.'s unwillingness to accept the forum's terms of reference, which led to them withdrawing from the process. Camden Council notes that there is no community forum representation for the Camden Town CFA. Therefore, the Council considers that details of HS2's approach to community engagement in the area should be provided. Camden Council requests that this includes a comprehensive standard format for recording and

			<p>responding to key concerns of the community. The Council requests that record of engagement outside of the community forum structure and any key messages from this engagement is be referenced. For example, engagement at the Castlehaven Community Centre, engagement with the operators of Camden Markets and the developers of Hawley Wharf.</p> <p>Camden Council notes that the document only describes engagement relating to the formal community forum structure from which participants opted out. Details of how HS2 Ltd intends to engage with the local community going forward should be provided in order to demonstrate that the views of the local community will be considered.</p>
	2.6		<p>Camden Council considers it completely inadequate and unacceptable for alternative proposals to be described, apparently assessed and rejected before any consultation has taken place with the local authority concerned. The Environmental Statement is fundamentally deficient because the reasons given in section 2.6 for rejecting alternatives are only asserted and not evidenced and nor has detailed assessment work been presented elsewhere to the council. It is completely unacceptable that HS2 Ltd has unilaterally and arbitrarily rejected those alternatives without the local authority concerned even knowing about them let alone having any input whatsoever. The selected, viaduct, scheme has devastating economic construction stage impacts on Camden and the fundamental deficiency of the Environmental Statement in this regard is compounded because HS2 Ltd have selected it from a narrow viewpoint without proper balancing of the pros and cons of the full range of schemes inclusive of the local Council's close involvement. It is not for HS2 Ltd alone to make the judgement of what may be the best, or least-worst, scheme at option review stage when it is clear from section 2.6 that they at least acknowledge that any results in the Environmental Statement being fundamentally deficient.</p>
3			<p>Camden Council considers the ES is defective in that the ES does not take into consideration the activities of providing and maintaining Camden's urban forest. Urban forests are well recognised as a collective resource and have an essential function for things like air temperature regulation, cleaning pollutants from the air through filtration as well as supporting biodiversity. Urban forestry is a recognised discipline, and trees and woodlands in towns and cities should not be considered in isolation, but as a collective resource in the same way rural forests are.</p> <p>Camden Council points out that the ES does not establish a baseline for Camden's urban forest (trees and woodlands) and its functions. It does not provide any information on the number, species and locations of trees to be affected and what proportion of Camden's overall tree resource and</p>

			canopy cover will be affected.
4	4.1		<p>Camden Council questions the use of 2017 air pollution estimations as a baseline for all construction; whilst we accept that to use 2017 data as the baseline for the entire 10 years could be classed as conservative, past experience indicates that 2017 data is likely to be an underestimation of levels in 2017, as in the past, emissions have entirely failed to reduce in line with predictions. Camden Council demands that all boilers used for the station during the in use phase should be "Ultra Low Emission" and energy demands should be minimised through energy efficient building and where possible the use of renewables.</p>
	4.3		<p>Camden Council considers the ES is defective in that that the environmental baseline for air quality does not consider the contribution of Camden's urban forest (trees and woodland) to alleviating local air pollution. The Environmental Statement gives no indication of the amount of trees that will be affected by the scheme, which makes it impossible to assess the impacts. Camden Council stresses that loss of trees due to the proposed scheme should also be included in any assessment of the impacts and effects of the scheme on air quality.</p> <p>Camden Council also strongly questions the use of the DEFRA background maps to predict emissions in 2017 and 2026 as this is not likely to be the worst case scenario. The DEFRA background maps are highly likely to significantly under-estimate emissions in these years. These maps assume reductions based on improved vehicle emissions which have yet to be realised, and in the past, have not materialised as hoped. Usual industry practice, when undertaking assessments of this kind, is to include current levels as an additional baseline representing a worst case scenario. The absence of this relevant baseline renders the ES defective in this regard.</p>
		4.3.7	<p>Camden Council would like to stress that as well as the residential/commercial businesses, there are a number of children's services in close proximity to where construction activity is taking place and/or roads where traffic flows will change.</p> <p>Camden Council believes that the wider impacts of the HS2 route on children's services such as noise, dust, proximity to construction sites, lorry routes and traffic route changes could impact adversely on the health and safety of children and their families and staff and risk of loss of funding due to pupil number reductions either as a direct result of residents being forced to leave local communities or as a result of families experiencing difficulties at the beginning and end of the school day to access the schools safely. Camden Council is disappointed to note that the proposed</p>

		<p>development will cause these significant effects to local children's services.</p> <p>Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	4.4	<p>Camden Council strongly refutes the Environmental Statement's classification of those areas where, even after mitigation where the impact becomes 'Slight Adverse', the Environmental Statement classes this as 'Insignificant.' Within the IAQM Guidance, if the impact is still 'Slight Adverse' this is actually the worst designation (which only offers two options – insignificant and slight adverse, after mitigations are in place), so the Council does not agree that a 'Slight Adverse' rating is insignificant.</p> <p>Camden Council believes the overall assessment of significance for this area seems low given the scale of works proposed. There has not been time for Camden to engage a technical consultant to scrutinise the methodology in full, and this may be required. The Council reserves the right to further scrutinise this point should it be necessary in the future.</p> <p>Camden Council considers the predicted adverse impacts on numerous roads and receptors during construction as a result of road closures and construction traffic, to be highly significant. There is no clear indication of the duration of these effects. Camden Council would expect the Environmental</p>

			<p>Statement to give some indication of the time frames of predicted construction impacts, given that these could be anything from a few weeks to ten years. The lack of detail and information on this point is a crucial omission.</p> <p>Camden Council feels that is unclear exactly which receptors are at risk from construction and the reason why these properties have been identified as receptors and others as near to the construction have not.</p> <p>Camden Council considers there is a lack of sufficient analysis of and mitigation for locations suffering from combination and/or cumulative impacts – cumulative impacts of dust and road traffic have not been properly considered and profiled.</p> <p>Camden Council considers that Air Quality impacts have been significantly under-estimated, due to the under-estimation of congestion within the transport assessment.</p> <p>Camden Council considers the ES is defective in that the impact on static receptors has been considered, but no thought has been given to the impact on pedestrians and cyclists using these areas, who will be exposed to significantly increased pollution levels over a long period of time.</p> <p>Camden Council also considers that it is not clear that the works required for utilities have been scoped into the ES, if they have not, there will be resultant increases in traffic disruption and pollution levels and therefore the impacts of the ES not fully assessed.</p> <p>In addition to the comments on the CoCP, Camden requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas (see below table). This would be all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust</li> </ul>
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			<p>and NO2) during the construction phase, and to continue to fund monitors in Euston during the in use phase</p> <ul style="list-style-type: none"> <li>Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM10, PM2.5 and NO2. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU”).</li> </ul> <p>Camden Council considers that Air Quality impacts have been significantly under-estimated, due to the under-estimation of congestion within the transport assessment. Many of the baseline and future year scenarios during the construction phase are predicted by HS2 to have ‘free-flow’ conditions on the highway network. However, this is not the case and therefore the congestion from additional vehicles and the impact of construction on the highway network will result in poorer air quality results than predicted in the ES.</p>
		4.4.5	<p>Camden Council notes that there is no mention in this section of the houses along Kentish Town Road that are being demolished. These properties are adjacent to the new Hawley Primary school site and therefore any dust and noise from the demolition of these properties have particular sensitivities in view of the close proximity to the new school site. Camden Council considers the ES is defective in that this demolition work has therefore not been mentioned as one of the main dust generating activities that has been assessed. Camden Council is disappointed to note that the proposed development will cause these significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>noise insulation at non-residential premises,</li> <li>real time noise and vibration monitoring; and</li> <li>other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against</p>

			noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.
	4.5		Camden Council considers the Environmental Statement deficient because operational impacts from the train and tunnel itself are roundly dismissed without such dismissal being justified and evidenced through further research, as some current industry research indicates that particulate and other pollution can be emitted from wheels, brakes etc. on electric trains.
	5.1		<p>Camden Council considers the ES is defective in that the cumulative effects on the Agar Grove Estate, where the council is proposing a regeneration development scheme, starting in 2017 has not been noted or assessed.</p> <p>Camden Council considers the ES is defective in that the negative impacts on the Hawley Wharf development and expects no loss of community facilities, open space and affordable housing due to HS2. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	5.3		Camden Council is concerned that HS2 uses the terms “community facilities” and “community resources” to refer to retail (including provision of food and drinks, and services such as Doctor and dental surgeries) premises, education premises and faith / religious premises, as well as tenant halls and voluntary sector run community centres. Each of these facilities provides a different offer to the community, and these differences should be identified and considered in the Environmental Statement. HS2 should make direct contact with every affected property in these categories and address any requests for mitigation and / or compensation.
		5.3.8	Camden Council would like to point out that there is an error in 5.3.8 – reference should be made to Holy Trinity and St Silas C of E Primary School, not Holy Trinity and St Giles C of E Primary School.
		5.3.11	Camden Council considers the ES does not properly assess the negative impacts HS2 on Maiden Lane regeneration proposals. The Maiden Lane Estate is currently being redeveloped and refurbished and will deliver new homes that can raise investment for the estate and provide new housing for local people. The regeneration scheme will also support a range of community projects to deliver more immediate benefit for residents.

			<p>Camden also considers the ES does not properly assess the impacts from the Camley Street main construction compound (the land potentially required during construction identified in the ES surrounding the estate), on traffic on roads and road closures affecting access for construction traffic to enable development, and potential HS2 utility works. Camden Council would welcome discussions on the design and programming of HS2's proposals.</p> <p>Camden Council notes that in the Draft ES Consultation Summary Report, HS2 has acknowledged resident concern over the potential closure of the Camley Street link, a pedestrian and cycle route linking Camley Street to Agar Grove in Camden and said it will "seek to configure the proposed construction compound at Camley Street to minimise the duration of any closures to this route." Camden Council would like to reiterate that the closure of the Camley Street cycle route will be a great loss to the local area and Agar Grove Estate and Maiden Lane regeneration projects which rely on local cycling and pedestrian routes. Camden Council requests that this route should not be closed at any time. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council considers the ES is defective in that it does not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired.</p> <p>Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents.</p> <p>Camden Council believes that leaseholders should be included in scope for rehousing, and for all residents to be rehoused as close as possible to requested need and location noted in the Housing Need Survey carried out by the council.</p> <p>Camden Council is concerned that HS2 do not have an understanding leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p>
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		5.3.13	Camden Council is concerned about the negative impacts on the Hawley Wharf development which forms part of the future baseline. It is important that HS2 Ltd.'s proposals do not result in a loss of community facilities, open space and affordable housing. Camden Council does not consider that the Environmental Statement adequately assesses the impact of its proposals on the Hawley Wharf development. Further comments are provided against 5.4.17, 5.4.28 and 5.4.44 of this response.
		5.3.14	<p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example in Agar Grove. The ES defined what it means by "additional committed development" and has omitted Camden Council's Agar Grove Regeneration Scheme which is due to commence in 2014. The ES identifies the 'Wrotham Road Equipment Platform' and North London Line (North) Satellite Compound within proximity of the Agar Grove Regeneration Scheme and highlights the potential land take on a site which will be developed into 38 residential dwellings by March 2016. The development of this site unlocks the land within the whole estate and allows Camden Council to deliver 493 homes with the least disruption and house moves for local residents.</p> <p>Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council's Cabinet as part of the borough's Community Investment Programme. The Council's Community Investment Programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include Agar Grove, Hawley Wharf, and Maiden Lane regeneration schemes. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council reiterates that The Agar Grove Estate will be regenerated and redeveloped starting in Oct 2014 and will include 493 new homes once completed. Cabinet have approved the regeneration strategy for the Agar Grove Estate and a planning application has been submitted. Camden Council considers the ES is defective in that HS2's plans around the Agar Grove Estate will significantly impact the Council's ability to deliver this regeneration scheme and requests regular and timely discussions with HS2 on mitigation options to minimise negative impacts. These impacts are not assessed in the ES.</p> <p>Camden Council would welcome discussions on the design and programming of HS2's proposals</p>

			<p>including platform design, footbridge positioning and design, nearby construction site compound, alternative locations, access, reinstatement of damaged property as part of temporary land take, construction works coordination, noise, and other issues arising.</p> <p>Camden Council notes that in the Draft ES Consultation Summary Report, HS2 has acknowledged resident concern over the potential closure of the Camley Street link, a pedestrian and cycle route linking Camley Street to Agar Grove in Camden and said it will “seek to configure the proposed construction compound at Camley Street to minimise the duration of any closures to this route.” Camden Council would like to reiterate that the closure of the Camley Street cycle route will be a great loss to the local area and Agar Grove Estate and Maiden Lane regeneration projects which rely on local cycling and pedestrian routes. Camden Council requests that this route should not be closed at any time. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	5.4		<p>Camden Council considers that this list of mitigation measures is not exhaustive and therefore the mitigation measures noted here would be inadequate as they stand. Camden Council considers that reference should also be made to the Local Environmental Management Plans in addition to the Code of Construction Practice as these will be the key documents demonstrating the local and site specific controls.</p>
		5.4.1	<p>Camden Council finds the demolition of residential property unacceptable because of the unjustified impact on existing communities. The HS2 HIA identifies that moving home has an impact upon health, especially for older people and children. The mitigation in the ES suggests that re-housing options will be provided. However, the Council’s experience in re-housing suggests that often people need a range on mitigation measures to counter the effects of moving home and from their communities including access to services and ongoing support. This is particularly the case for people that feel they were not part of the decision to move. Camden Council that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden</p>

			<p>Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 18 months be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers the ES is defective in that the usage surveys are not reflective of actual open space visitor numbers. Camden Council considers the ES is defective in that HS2 Ltd.'s methodology for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant. Camden Council considers that the ES is defective as that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers an assessment of cumulative impacts and baseline surveys to be undertaken in advance of works should have been included within the ES and it is defective in the absence of the same.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p>
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			<p>Camden Council considers the ES is defective in the data and method used. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impacts of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as supporting document) there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example, Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage, Kilburn, Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more</p>
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			<p>significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA). Camden Council considers the ES is defective in the reduction of disabled housing from the demolished blocks (2 in Silverdale). Camden considers the ES is defective in that there are a number of residents with mental health issues that could potentially be compounded by the relocation. This would involve coordination with support services, all of which is not mentioned in this analysis.</p> <p>Please refer to comments made regarding the cumulative impact of all works as noted within the transport chapter 12.</p>
		5.4.1 – 5.4.2	<p>Camden Council is not satisfied that the avoidance and mitigation measures listed are sufficient to deal with the significant adverse effects of the construction of the HS1 Link for businesses. Camden Council has made a detailed response to the Code of Construction Practice which should be referred to.</p>
		5.4.2 – Randolph	<p>Camden Council considers that adequate mitigation and compensation should be provided to those properties where adverse effects will occur.</p>
		5.4.2 – Community relations	<p>Community Relations: Camden Council requests HS2 to manage all resident enquiries about disruption in services and manage the interface with utilities and service providers and to provide information to residents about all temporary and permanent impacts to service through effective communication channels.</p> <p>The Council is a provider of social housing and health care. Where the works impact on the ability of residents to use the property as tenants. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p>

			<p>Camden Council considers HS2 Ltd.'s methodology in predicting combined effects to be limited and insufficient. Camden Council expects full survey of before and after, with full assessment and mitigation of cumulative impacts.</p> <p>The ES refers to the "Noise Insulation and Temporary Re-housing Policy" which has been omitted from the ES and the draft CoCP. The lack of this policy is a significant omission from the ES and there is insufficient information to enable a thorough assessment of impacts and mitigation measures as a result.</p> <p>Where rehousing necessary – a solution needs to be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least two years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in that that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions has not been assessed in the ES.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council would require that any mitigation measures be proposed and agreed at least two years in advance of works to ensure that the impact on residents, including their health and well-being is properly considered and managed.</p>
		5.4.12	<p>Camden Council considers that the loss of one dwelling is a significant impact which should not be underestimated. The occupants of the property must be adequately compensated.</p>
		5.4.12	<p>Camden Council finds the demolition of residential property unacceptable due to the unjustified impact on existing communities. Camden Council considers the ES is defective in that that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently</p>

			<p>consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehouse as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council considers that the ES has not fully assessed the impacts of the scheme on leaseholders in Camden, and as a result the assessment of effects is deficient. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p>
		5.4.13	<p>Camden notes that although it is positive that the gardens will be remaining open throughout construction, there will still be amenity impacts as the space will not be a pleasant space during this time</p> <p>Camden Council finds the demolition of residential property unacceptable due to the unjustified impact on existing communities. Camden Council considers the ES is defective in that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehouse as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council considers that the ES does not properly assess the impacts of the scheme on leaseholders in Camden; as a result the assessment of effects is deficient. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p>
		5.4.17	<p>Camden Council considers the ES is defective in that the impact of HS2 on Hawley primary school has not been properly assessed. Although discussions have taken place with HS2 Ltd regarding mitigating against the impact of the temporary and permanent loss of land from the new school site, no agreements have been reached. Camden Council disagrees with the assumptions made in the</p>

			ES which states that the temporary land take from the school site and the construction works relating to the widening of the viaduct will not have a significant effect on the school. Any construction works on the viaduct being undertaken during school term time will have serious implications for the running of the school due to the disturbance this will cause. Permanent and temporary land-take will have a serious impact on the outside learning and play provision at the school. The impact on the school cannot be addressed by simply re-organising the outside learning and play environment.
		5.4.21	Camden Council considers the ES is defective in that there is no detail contained within the ES that explains what is considered a permanent and what is considered a temporary effect within the assessment methodology. The length of construction works means that generations of pupils stand to have their education disrupted as a direct result of the proposed HS2 works. Camden Council considers this to be a permanent effect on both those pupils and the children's services themselves.
		5.4.28	Camden Council considers the ES is defective in that over the impact of HS2 on Hawley primary school. Although discussions have taken place with HS2 Ltd regarding mitigating against the impact of the temporary and permanent loss of land from the new school site, no agreements have been reached. Camden Council disagrees with the assumptions made in the ES which states that the temporary land take from the school site and the construction works relating to the widening of the viaduct will not have a significant effect on the school. Any construction works on the viaduct being undertaken during school term time will have serious implications for the running of the school due to the disturbance this will cause. Permanent and temporary land-take will have a serious impact on the outside learning and play provision at the school. The impact on the school cannot be addressed by simply re-organising the outside learning and play environment.
		5.4.29	<p>Camden Council is disappointed that no mention is made of the non-residential properties affected, such as the Hawley Arms. Camden Council assumes that properties will also be significantly affected by the combination of effects for nine months. Camden Council expects HS2 Ltd. to carry out a thorough assessment of all potential impacts on these non-residential properties. Camden Council would like HS2 to note that the Hawley Arms is of significant cultural value, playing an important role in contemporary music history.</p> <p>Camden Council considers HS2 Ltd.'s methodology in predicting combined effects to be limited and insufficient. Camden Council expects a full assessment to be carried out on all affected properties prior to and after HS2 intervention and for residents to be fully compensated for necessary mitigation</p>

			measures.
		5.4.31- 5.4.32	Camden Council is alarmed at the inaccurate statements at 5.4.31-5.4.33 that bridge works are predicted to cause 'some disruption to market stall holders and users' and that 'the construction works will not affect the ability of the market as a whole to function and the Proposed Scheme will not have significant land requirement, isolation or amenity effects'. Camden Council refutes these statements and considers that these works will have devastating impacts on Camden Markets and Camden Town Centre as a whole. Further details of Camden Council's concerns can be found in response to section 10 Socio-Economics of this CFA.
		5.4.37 – 5.4.40	Camden Council challenges the need for the tunnel portal construction to require an 8 year period as stated in 5.4.37. That is about as long as it will take Crossrail to build the entire line through London and out to the suburbs including much more, and more complex, tunnelling work. HS2 Ltd should fundamentally review its tunnelling methodology and timescale. This is especially pertinent since the ES acknowledges that there will be major and significant adverse impacts on the amenities of residents.
		5.4.41- 5.4.45 Other mitigation measures	<p>Camden Council would like to stress that although Regent Canal is an open space and not a green space, so it should not be considered to replace the green space lost within Camden Gardens.</p> <p>Camden Council notes that the opening of Baynes Street as an alternative space for mitigation will require extra management, the costs of which we would expect to be met as part of the mitigation.</p> <p>Camden Council notes that other properties have been identified to us by residents that are not listed here, so this list does not seem to be up to date.</p>
6	6.131		Camden Council notes that Chalk Farm Viaduct is a positive contributor in the Regent's Canal Conservation Area, and is a candidate for the Camden Local List. In order to carry the HS1 Link it will be necessary to install new tracks on the viaduct, one track for freight use and one for the Link. Para 2.3.72 states modifications will include the removal of brick parapets, plus the installation of access and maintenance walkways and solid parapets. Para 9.4.14 of the Landscape and visual assessment section states part of the brick parapet along the Chalk Farm Viaduct will be removed on one or both sides to accommodate the external maintenance walkways. No mention is made in the Cultural heritage section of the proposed modifications.

			<p>Camden Council considers the ES is defective in that no assessment is made of the impacts and effects on the historic urban context which includes the Regent's Canal Conservation Area, positive contributors in the conservation area, grade II listed buildings and buildings on the Camden draft Local List. As such, it is unclear as to from which side and to what extent existing brick parapets will be removed from the viaduct, and no information is provided on the design of the new steel walkways and replacement parapets and how they will visually impact on the historic context.</p> <p>Camden Council notes that Chalk Farm Road Bridge with its distinctive mural on one side and its white lettering on a blue background on the other, is a local landmark and a positive contributor in the Regent's Canal Conservation Area. Like the other bridges and viaducts of the NLL Railway, it is also a candidate for the Camden Local List. Para 2.2.13 states the realignment of tracks for the HS1 Link will require the removal of the existing 19<sup>th</sup> century cast-iron bridge and its replacement with a wider deck. Para 2.3.76 states the works to the bridge will also include the installing of new piled foundations for the widening of the southern abutments, and for the removal and reinstatement of brick pilasters at the four corners of the bridge and associated capping stones, plus abutment underpinning and widening. No mention is made in the Cultural heritage section of the replacement of the Chalk Farm Road bridge, constituting the loss of a positive contributor, with potentially harmful impacts on grade II listed buildings in Stables Market, a number of positive contributors in the Regent's Canal Conservation Area, including in Chalk Farm Road, Camden Lock Place and Stables Market, plus the impact on the Hawley Arms PH in Castlehaven Road (on the Camden draft Local List).</p> <p>Camden Council notes that as this is largely an over-ground section under the current proposals there are not likely to be significant archaeological effects, although service diversions are noted as potentially minor adverse impacts for which mitigation would be expected.</p>
		6.3.3 – 6.3.4	<p>Camden Council disputes the 'low' value rating of the viaduct. Rather the Council considers it has 'moderate' value. The viaducts and bridges making up the NLL Viaduct are candidates for Camden's Local List. Even though some sections run through conservation areas (with some stretches being positive contributors in conservation areas), local listing aims to ensure consistent heritage recognition for the entire length of these heritage assets. It is of great concern that potential impacts and effects from the construction of the HS1 Link on the 19<sup>th</sup> century railway infrastructure, particularly the NLL Viaduct and bridges (non-designated heritage assets in their own right) are not assessed in detail in the Cultural heritage section.</p>

			<p>Camden Council notes that the Camden Road Station Compound will affect the settings of a number of 19<sup>th</sup> century townhouses, including a terrace of grade II listed buildings and a terrace of positive contributors in the Jeffreys Street Conservation Area.</p> <p>Camden Council considers the ES is defective in that no mention is made of grade II listed properties and positive contributors in Prowse Place or Jeffreys Street, also situated in the Jeffreys Street Conservation Area. No assessment is made of the potential impacts and effects on these properties during construction. Para 2.3.59 states there will be no demolition associated with construction managed from the compound; however, this information is incorrect as substantial demolition works are proposed for platform 1 of Camden Road Station and its canopy, one of few surviving 19<sup>th</sup> examples.</p> <p>Camden Council considers the ES is defective in that no assessment has been made in the Cultural heritage section of the impact of heavy construction vehicles on grade II listed early 19<sup>th</sup> century townhouses in Jeffreys Street. In response to local concerns that vibrations could cause structural damage to historic buildings, reference is made to ES Vol 1 Para 6.7.4 which states that where it is agreed with the local authority that there is no best practicable means to reduce predicted or measured vibration, a condition survey of building foundations/third party assets will also be undertaken prior to and after the relevant works. It is requested that this path of action is taken by HS2 Ltd.</p> <p>Camden Council notes that para 6.3.3 states the grade II listed Stanley Sidings stables (Stables Market) within the Regent's Canal Conservation Area, are designated heritage assets located partially or wholly within the land required, temporarily or permanently, for construction. No assessment is made of impacts and effects of the proposed works to the viaduct upon these listed buildings, plus four vaults and the entrance to the Horse Tunnel, which are positive contributors in the Regent's Canal Conservation Area.</p> <p>Camden Council considers the ES is defective in that that no mention is made of the grade II* Horse Hospital on the Stables Market site, assuming that all buildings are grade II listed, and there is no indication that there are actually five separate buildings of 19<sup>th</sup> century industrial archaeological significance under the grade II listing.</p> <p>Camden Council considers the ES is defective in that that no mention is made of the impacts and</p>
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			<p>effects on the grade II listed The Stable in Stables Market, situated immediately to the north-west of the Chalk Farm Viaduct and Chalk Farm Bridge, which could be at risk from structural impacts or the loss of historic fabric due to the proposed piling and underpinning works to the bridge.</p> <p>Camden Council considers the ES is defective in that no assessment is made regarding the impact on the grade II* listed Horse Hospital in Stanley Sidings in terms of impact on setting. These are major omissions, twice failing to address the setting of grade II* listed buildings, which are designated heritage assets of outstanding national significance.</p> <p>Camden Council notes that para 6.3.4 states 110 Camden Road, a non-designated heritage asset of low value, is located partially or wholly within the land required, temporarily or permanently, for construction. The rating of 110 Camden Road as a non-designated heritage asset of 'low' value is considered to be inappropriate, as it is part of a terrace of positive contributors in the Camden Broadway Conservation Area; rather it should be of 'moderate' value. The 'moderate' adverse effect resulting from the demolition of this non-designated heritage asset is disputed. The demolition involves the loss of a positive contributor and directly affects the setting of the adjacent positive contributors at 112-116 (even) Camden Road and the integrity of the wider terrace, which will have a high adverse effect.</p> <p>Camden Council notes that para 6.3.3 states the grade II listed Camden Road Station which is located within the Jeffreys Street Conservation Area is a designated heritage asset to be located partially or wholly within the land required, temporarily or permanently, for construction. Land also potentially to be required during construction includes Bonny Street immediately to the south, the site of the Camden Road Station Construction Compound, and Jeffreys Street and Prowse Place to the north.</p> <p>Camden Council notes that the Camden Road (South) Satellite Compound will affect the settings of a number of 19<sup>th</sup> century townhouses, including a terrace of grade II listed buildings and a terrace of positive contributors in the Jeffreys Street Conservation Area.</p> <p>Camden Council considers the ES is defective in that no mention is made of grade II listed properties and positive contributors in Prowse Place or Jeffreys Street, also situated in the Jeffreys Street Conservation Area. No assessment is made of the potential impacts and effects on these properties during construction.</p>
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			<p>Camden Council is disappointed that pursuant to the draft ES a greater amount of demolition is proposed in connection with the widening of the Kentish Town Road Bridge, with the addition of 53 and 53a as the opposite semi-detached pair to 51 which was already subject to demolition. The loss of an additional heritage asset (and candidate for the Camden Local List) is not welcomed.</p> <p>Camden Council notes that in para 6.3.3 of the Cultural heritage section, which lists designated heritage assets located partially or wholly within the land required, temporarily or permanently, for construction, fails to include the grade II* listed Roundhouse, although Map CT-05-003a shows the section of Chalk Farm Road outside the grade II* listed Roundhouse, a grade II listed cattle trough and drinking fountain, and the boundary wall of Stables Market (protected by the grade II listing), within the land potentially required for construction. However, no assessment has been undertaken of the potential impacts and effects from construction.</p> <p>Camden Council considers the ES is defective in that no detailed assessment has been made of Primrose Hill Station and 200 Regent's Park Road, non-designated heritage assets which are candidates for the Camden draft Local List or the heritage value of the existing buildings or of the impacts and effects of their demolition at track and street level on the surrounding environment, including in views from the nearby Primrose Hill Conservation Area, located south of the railway cutting.</p> <p>Camden Council notes that west of Kentish Town Road, the NLL services follow the Kentish Town Viaduct north and the HS1 Link continues west on the Chalk Farm Viaduct towards Primrose Hill. Both viaducts cross the Hawley Wharf site, which is subject of a committed development for a major mixed use commercial, residential and school development, planning permission ref 2012/4628/P, conservation area consent ref 2012/4641/C and listed building consent 2012/4642/L granted December 2012. This committed development will bring a sizeable number of heritage benefits to the area (including the restoration and reuse of the viaduct arches, the restoration of the grade II listed 1 Hawley Road currently on the English Heritage "<i>Heritage at Risk Register</i>", the refurbishment of 1-6 (consec) Chalk Farm Road (positive contributors in the Regent's Canal Conservation Area) and improvements to the canal towpath). If the committed scheme is not implemented, it is highly likely that the area will not receive these long-awaited heritage benefits.</p> <p>Camden Council considers the ES is defective in that there is no mention of a potential committed</p>
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			<p>development adjacent to the HS1 Link at 100, 100A and 100B Chalk Farm Road. Consideration needs to be made in the Committed Development section to the redevelopment proposals for 100, 100A and 100B Chalk Farm Road, a later 20<sup>th</sup> century office building situated immediately to the south-east of the Roundhouse]. Planning, listed building consent and conservation area consent applications for a mixed use scheme including 63 residential units are currently being processed by LB Camden, and are recommended for approval, refs 2013/5403/P, 2013/5448/L, 2013/5449/C.</p> <p>Camden Council notes that the suggestion that the setting of the Camden Incline Winding Engine House is not significant simply because this is a below ground asset does not accord with published English Heritage guidance on the setting of heritage assets.</p>
		6.3.7	<p>It is assumed the properties highlighted in this paragraph are the 19<sup>th</sup> century villas at 23-49 (odd) Adelaide Road, to the west of the junction with Regent's Park Road, and 1 and 2 Bridge Approach, to the north-west of 200 Regent's Park Road, all of which are on the draft Local List; however, no assessment has been made on the impact of the Proposed Scheme, temporarily or permanently, on these non-designated heritage assets.</p> <p>Similarly no assessment has been made of the impacts on the grade II listed Chalk Farm Underground Station at the eastern end of Adelaide Road which is mentioned only by name.</p>
	6.4	6.4.2	<p>Camden Council notes that a wide range of structural measures are likely to be required either during or as a result of construction works, which warrant a more comprehensive assessment at this stage of structural issues likely to affect heritage assets including existing viaducts and associated infrastructure. Remedial works should include like-for-like repairs arising from construction, as well as a conservation-led programme of works to enhance existing heritage assets in order to mitigate against potential harm caused by the Proposed Scheme.</p>
		6.4.7	<p>For Camden Road Station, the 'low' value and 'moderate' adverse impact and effect ratings are disputed. The station is of national significance as a grade II listed building, situated within the Jeffreys Street Conservation Area, so is considered to be of more than moderate value. Not only will Camden Road Station platforms be partly demolished, causing substantial harm to the grade II listed building and the Jeffreys Street Conservation Area. The listed platform and canopies will no longer be in use by NLL services or any stopping passenger trains, making large areas of the grade II listed station redundant and separated from its functions as a station for local passenger services. In particular, platforms 1 and 2, offices, waiting rooms, platform staircases and new lifts (installed to</p>

			<p>give level access for the 2012 Olympics) will become redundant. On this account, it will be necessary to consider adding the grade II listed building to the English Heritage “<i>Heritage at Risk Register</i>”.</p> <p>No assessment has been made of the architectural hierarchy of the listed building. There is no appreciation that platforms 3 and 4 are of an open nature on the northern side of the station and do not contribute to the special interest of the grade II listed building, whereas platform 1, the canopy and associated accommodation are of high historic significance. Platform 1 should therefore be kept in its current form and retain its original use as a passenger platform; likewise for platform 2, although it has lost its original canopy. In the absence of information on the proposed demolition and remedial works to platform 1 and its canopy, and a written assessment of the impacts and effects, the proposed works are considered wholly unacceptable.</p>
		6.4.8	<p>Camden Council notes that pursuant to the draft ES a greater amount of demolition is proposed in connection with the bridge widening works at Kentish Town Road, with the addition of 53 and 53a as the opposite semi-detached pair to 51 which was already subject to demolition. The loss of an additional heritage asset is not welcomed. The ‘low’ value of these heritage assets outlined in Para 6.4.8 is disputed since they are high quality 19<sup>th</sup> century residential buildings, which share common characteristics with adjacent grade II listed buildings at 55-63 Kentish Town Road and contribute to the setting of Camden Gardens. The ‘moderate’ adverse effect of demolition is disputed; rather, there will be a high adverse effect arising from total demolition.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 showing the view south over Camden Gardens following the demolition of the heritage assets above, show a gap in the streetscape dominated by the crudely designed new viaduct, with the grade II 55 Kentish Town Road and its listed neighbours at 57-59 (odd) isolated and detached from their historic setting. No written assessment is made on the impacts of effects of the demolition on the two non-designated heritage assets, and no mitigation measures are considered, including those to improve the setting of adjacent grade II listed buildings. In the absence of this information and an appropriate replacement design, the proposed demolition works are considered wholly unacceptable.</p> <p>Camden Council notes that no mention is made in the Cultural heritage section of the group of four grade II listed buildings (19<sup>th</sup> century villas) at 55-61 (odd) Kentish Town Road and one grade II listed 19<sup>th</sup> villa at 1 Hawley Road. The setting of these properties will be affected by the demolition works at Nos 51, 53 and 53a Kentish Town Road. The setting of 55 will be directly affected by the</p>

			<p>demolition of the adjacent 51, 53 and 53a, which share common architectural characteristics with the listed buildings including height, bulk, footprint, scale and building line. No assessment has been made of the impacts and effects the demolition will have on these designated heritage assets, including temporarily or permanently during construction.</p> <p>Camden Council disputes the 'low' value of the Up Empty Carriage Tunnel, due to its strategic importance in the overall railway layout and its direct connection with the grade II* listed Camden Incline Winding Engine vaults, located a short distance away under the WCML. The partial demolition and sealing of the tunnel will therefore have a high adverse effect rather than a moderate adverse effect.</p>
		6.4.9	<p>The rating of 110 Camden Road as a non-designated heritage asset of 'low' value is considered to be inappropriate, as it is part of a terrace of positive contributors in the Camden Broadway Conservation Area; rather it should be of 'moderate' value. The 'moderate' adverse effect resulting from the demolition of this non-designated heritage asset is disputed. The demolition involves the loss of a positive contributor and directly affects the setting of the adjacent positive contributors at 112-116 (even) Camden Road and the integrity of the wider terrace, which will have a high adverse effect.</p>
		6.4.10	<p>Camden Council considers the ES is defective in that no detailed assessment is made of the heritage value of the existing buildings of Primrose Hill Station and 200 Regent's Park Road or of the impacts and effects of their demolition at track and street level on the surrounding environment, including in views from the nearby Primrose Hill Conservation Area, located south of the railway cutting.</p>
		6.4.15	<p>Photomontages in Map Book CFA 02 show replacement railway infrastructure which is out-of-keeping due to the basic design approach. Although fundamental design issues need to be addressed at this stage, it is imperative that comprehensive mitigation measures are put in place to protect historic fabric wherever possible, covering the re-use of materials and architectural components in accordance with conservation principles.</p> <p>Para 6.4.15 states that mitigation measures will be considered at detailed design stage to reduce the impact on the grade II listed Camden Road Station. For instance, architectural features and building materials which are characteristic of the building could be retained where practicable. This could include retaining the drinking fountain in the bridge abutment and the platform canopy. The canopy</p>

			<p>could be trimmed and refitted to the timber fascia without disturbing the support columns or brackets, or significantly affecting the appearance.</p> <p>The suggested mitigation measures, whilst generally appropriate, are not at this stage sufficiently extensive or detailed for comment. The proposed demolition works and operational changes are likely to have an extreme impact on the grade II listed building, justifying the need for sizeable benefits to compensate for the harm caused. Further options should be explored at this stage, including the reconfiguration of the station at street level to return it to its original form as a larger and more open entrance hall better able to accommodate the increased number of passengers using this station since the introduction of the London Overground service.</p>
		6.4.17	<p>In the absence of basic written and visual information at this stage on the proposed demolition works at Camden Road Station to platform 1 and its canopy, the proposed works are considered wholly unacceptable.</p> <p>The 'low' value of the Up Empty Carriage Tunnel is disputed, due to its strategic importance in the overall railway layout and its direct connection with the grade II* listed Camden Incline Winding Engine vaults, located a short distance away under the WCML. The partial demolition and sealing of the tunnel will therefore have a high adverse effect rather than a moderate adverse effect.</p> <p>It should be noted that pursuant to the draft ES a greater amount of demolition is proposed as a result of the widening of the Kentish Town Road bridge, with the addition of 53 and 53a as the opposite semi-detached pair to 51 which was already subject to demolition. The loss of an additional heritage asset is not welcomed.</p> <p>No detailed assessment is made of the heritage value of the Primrose Hill Station and 200 Regent's Park Road, or of the impacts and effects of their demolition at track and street level on the surrounding environment, including in views from the nearby Primrose Hill Conservation Area, located south of the railway cutting.</p>
7	7.2	7.2.4	Camden Council would like to point out that an access license was issued to HS2 Ltd, but it was not signed and returned.
	7.3		Camden Council would like to stress that the methodology used to assess impacts on ecology

			at Camden sites is flawed since no surveys were completed on sites, and without detailed surveys the environmental baseline cannot be accurately reported and impacts cannot be sufficiently assessed.
	7.4		Camden Council would like to point out commitments within the Camden Biodiversity Action Plan to maintain the extent of Camden's network of Sites of Importance to Nature Conservation(SINC), and reporting commitments to DEFRA on SINCs under positive conservation management, both of which are compromised by the loss of 36% of the North London Line SINC, alongside the loss of all of St James Gardens SINC, plus 37% of Chalk Farm Embankment and Adelaide Road Local Nature Reserve SINC.
		7.4.17	Camden Council considers the ES is defective in that the proposed mitigation for the loss of habitat at the North London Line Site of Importance to Nature Conservation (SINC) is not like-for-like. Camden Council points out that open mosaic transition habitats that exist at the North London Line SINC are rare in London and a national, regional and local priority habitat and loss of 36% at this site severely impacts on the integrity of this site and habitat extent through Camden and London. Camden Council stresses that habitat mitigation at this site should seek to replace and enhance the open mosaic transitional habitat that is lost due to the proposed scheme.
8			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of</p>



			contamination. Camden Council considers the ES to be deficient in this regard.
9	9.3	9.3.1	Camden Council rejects the contention that rail infrastructure dominates this landscape. This is an area which does have a many rail route through it, and they form part of the character of the landscape, however Camden Council considers the dominant character of this area to be 19 <sup>th</sup> and 20 <sup>th</sup> century housing.
		9.3.8	The Roundhouse is not just a local landmark; it has national significance and its presence is intrinsic to the Regent's Canal Conservation Area. Its setting may have been altered in the 20 <sup>th</sup> century, but this is not a reason to allow further insensitive development, which will adversely affect its setting.
	9.4	9.4.9	As with other NLL bridges, the works will involve a substantial loss of historic fabric, causing sizeable harm to the Camden Road and Jeffreys Street Conservation Areas (and positive contributors within both conservation areas), and impacting negatively on the setting of the grade II listed Camden Road Station. Photomontages in Map Book CFA 02 show the replacement design for the Camden Road bridges. Although it would appear more effort has been put into a more scholarly replacement of the existing cast-iron bridges than at Baynes and Randolph Street Bridges, the proportions have altered in particular the reduction in the parapet height, and the scheme involves the loss of valued well-detailed historic fabric with the replacement parapet having an oversimplified detailed design which detracts from the historic environment. The distinctive 'Camden Road' lettering in white on a blue background has been replicated using the wrong proportions. The substantial 19 <sup>th</sup> century brick piers with moulded stone copings have been lost, to be replaced by piers with a plainer brick detail. It is evident in the photomontage that the eastern section of the grade II listed platform 1 canopy has been demolished. Also, the flank wall of the three storey end-terrace 19th century property at 178a Royal College Street to the south is not shown in the photomontage of the proposed works, giving the impression that is to be demolished; the photomontage is therefore incorrect and contradictory.
	9.5		Camden Council considers that the ES is deficient in that details of the numbers and locations of trees to be removed has not been provided; since trees play an important role in landscape character and visual amenity, it is therefore considered that the assessment is incomplete.
10	10.1		Camden Council anticipates that impacts of constructing the HS1 link will have severe impacts on Camden businesses, economy and the community. Camden Council considers the socio-economic cost of these impacts to significantly outweigh any benefits of the link, for which there is no

			<p>demonstrated need, business case or clear benefits.</p> <p>Camden Council therefore considers that the most appropriate avoidance measure is the removal of the HS1 link in its current form entirely from the proposals.</p>
		10.1.1-10.1.3	<p>Camden Council considers the ES is defective the narrow scope of the socio-economic assessment. Camden Council considers that the scope fails to take into account the full socio-economic impacts of the scheme and that the impacts have therefore been underestimated.</p> <p>Camden Council considers the ES is defective in that that the introduction does not make any reference to mitigation proposals to overcome the adverse effects on businesses, the local economy and the community.</p>
		10.1.4	<p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account the significant blight and uncertainty on businesses and the local economy both in terms of those directly affected and in impacts in the wider area. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated.</p>
		10.1.5-10.1.6	<p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account noise, vibration and other factors that could impact upon businesses ability to operate. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated.</p>
	10.2	10.2.1	<p>Camden Council considers that the socio-economic scoping and methodology is defective and fails to provide an adequate basis for assessment. The full socio-economic impacts of the scheme have therefore been underestimated.</p> <p>Camden Council notes the absence of a local policy review section within the socio-economic chapter of each CFA report and within the CFA report as a whole. Camden Council highlights the importance of policy in establishment of a baseline and assessment of effects.</p>
	10.3	10.3.1 – 10.3.3	<p>The Environmental Statement fails to provide a comprehensive or adequate socio-economic baseline for Camden Town and the HS1 Link CFA. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline</p>

			<p>assessment does not follow the approach set out in the Scope and Method report at Volume 5 and therefore fails to provide an adequate basis for the assessment of impacts of the scheme. In particular, the baseline has failed to consider stakeholder views and has failed to cover an adequate range of socio-economic indicators and has failed to take on board local information and intelligence.</p> <p>Camden Council notes that no detail is provided in the Equalities Impact Assessment relating to Camden Town and that this represents a serious flaw both in terms of the EqIA and the Socio-economic baseline for Camden Town.</p>
		10.3.4	<p>In Camden Town, the creative/ cultural and professional, scientific and technical sectors are strongly represented, reflecting a number of established businesses. For example, the well-known professional, scientific and technical sector in Camden makes up over 20% of all occupations across all three CFA areas.</p>
		10.3.5 – 10.3.11	<p>Camden Council considers that, based on the information in this section, the ES is based upon a narrow set of statistics which do not provide an adequate baseline in that they do not provide sufficient information about the communities in the DCAs; such as levels of deprivation, disability, sex, age and ethnicity. For example the Camden Town / Primrose Hill ward has four LSOAs that are within 20% of the nations most deprived.</p> <p>Key statistics for the Camden Town/Primrose Hill ward include that 22% of all households have one person who has a long term problem or disability, 22% of workers who live in the ward work part-time (less than 30 hours per week) and its population is home to a large and diverse population. Camden Town also covers parts of Regents Park ward, which as reported in the Euston CFA also has high levels of deprivation.</p> <p>The Environmental Statement does not adequately to identify baseline data of Camden's visitor economy, the scale of creative and cultural industries, and the scale of cultural heritage and unique locations/venues/sculptures that fall into the affected area – an issue raised in the Council's response to Volume 5 Scope and methodology report (Ref: CT-001-000/1); section 7; paragraph 7.5; Volume 2 Community Forum Area report, CFA2 Camden Town and HS1 Link; section 10. Socio-economics; paragraph 10.4.4; and in London Borough of Camden consultation comments made on Draft Code of Construction Practice November 2013 paragraph 8.1.1. This lack of data reflects the Environmental Statement failure to recognise the importance of Camden's visitor offer,</p>

			<p>its failure to assess the scale of the impact on the visitor economy or put in place any mitigation strategies.</p> <p>This data shows that Camden Town, although a major visitor and cultural economy centre, contains areas of high deprivation and high population of disabled residents. The effects of the Proposed Scheme could be significant for these communities. In addition to this the relocation of big employers within the neighbouring Euston area and the effect on Camden Town including the markets, could mean residents of the area will have less employment opportunities as consequence of HS2's construction.</p> <p>Camden Council considers that the assessment is defective as the adverse effects on the local employment market (e.g. on part-time work) including an assessment of how many local people are likely to lose their jobs as a result of the relocation of businesses, and an assessment of the effects on businesses outside the safeguard zone have not been included.</p> <p>The ES fails to provide a comprehensive or adequate socio-economic baseline. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline assessment does not follow the approach set out in the Scope and Method report at Volume 5. In particular, the baseline has failed to consider stakeholder views, has failed to cover in adequate depth a range of socio-economic indicators such as ethnic composition of communities, vulnerable groups and local enterprise and has failed to take on board local information and intelligence. The baseline therefore fails to provide a discerning basis for the assessment of impacts of the scheme.</p> <p>Camden Council believes that HS2 need a more comprehensive understanding on the Camden Town CFA area and further environmental baseline analysis should be conducted in order to do so. The ES should consider the following:</p> <ul style="list-style-type: none"> <li>• Review how the scheme will impact on small areas of deprivation and important business clusters, for example, Camden Markets</li> <li>• Assess the kinds of jobs that will be lost to the area and in what numbers</li> <li>• Consider the direct and indirect (supply chain) adverse impacts on key sectors</li> <li>• Assess the impact on residents/ local communities of the disruption to smaller, retail or service based businesses</li> <li>• Carry out a thorough skills gap analysis to consider whether there will be a skills mismatch</li> </ul>
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			<p>between jobs lost and jobs created</p> <ul style="list-style-type: none"> <li>• Carry out an Equalities Impact Assessment to consider how the Proposed Scheme will impact on particularly vulnerable groups such as lone parents, people with disabilities via impact on community facilities or those with part time jobs</li> <li>• Consider how the disruption and noise from the scheme impact home workers/shift workers</li> </ul>
		10.3.12 – 10.3.13	Camden Council accepts the findings within this section
		10.3.14 – 10.3.16	<p>Camden Council does not consider that the future baseline has been adequately assessed. It therefore provides an unsatisfactory basis for determining the significance of effects.</p> <p>Camden Council considers the ES is defective in that impacts of the proposals on the Hawley Wharf development site have not been fully considered within this section. Camden Council would like to again reiterate that planning permission was granted in 2013 for a comprehensive redevelopment of the large site with a mixed use scheme. This site now forms part of the safeguarded area, is directly affected by the viaduct widening proposals and is potentially blighted by HS2. The ES acknowledges that this redevelopment scheme has the potential to create many jobs in the area however Camden Council is concerned that if the redevelopment of this site does not proceed as intended, this would represent a major lost opportunity for the regeneration of Camden Town centre. Camden Council would like to stress that a new school, homes, new indoor market and commercial area, many jobs and improvements to the town centre would be lost, to the detriment of Camden Town, its community and its visitors.</p> <p>Camden Council requests detailed information on which development consents and land allocations are taken into calculation. Camden Council would like to stress that land allocation might not necessarily result in development proposals and the anticipated growth in number of jobs by 2017.</p>
		10.4.1 – 10.4.2	<p>If the Link was to go ahead as planned, Camden Council considers the outlined avoidance and mitigation measures to be wholly inadequate. The mitigation proposed, is considered inadequate in addressing the significant effects identified. The failure of the assessment to identify the true breath and magnitude of impacts implies that substantial additional mitigation is required.</p> <p>Camden Council has made a detailed response to the Code of Construction Practice which should be referred to. Generic provisions set out in the CoCP and a vague reference to the maintenance of access to businesses premises during construction are the only provisions identified. Such</p>

			<p>measures would completely fail to prevent or mitigate the significant socio-economic effects of the scheme. Camden Council considers this to be unacceptable and a failure on the part of HS2 to protect the communities most directly affected by the scheme.</p> <p>Camden Council is disappointed that the independent consultant's report provided to HS2 Ltd on 'Best Practice in Blight Mitigation for Business and Employment', has not been taken into account in developing socio-economic mitigation for HS2. This report was shared with HS2 in the hope they would draw on the industry best practice identified including examples from the Olympics, Crossrail, Kings Cross Central and a variety of other relevant projects. Camden Council is disappointed that this industry best practice has not been utilised by HS2 to develop an appropriate mitigation strategy for Camden Town.</p> <p>The proposed mitigation fails to take into account feedback from consultations and engagement or industry best practice.</p> <p>If the HS1 link scheme is to go ahead, Camden Council requests that HS2 Ltd commit to deliver a significantly enhanced comprehensive mitigation and compensation strategy that deals with, blight and uncertainty, loss of business and commercial trade, transport disruption and reduced accessibility and degraded environment.</p> <p>This should include but not be limited to funding and delivery of projects for:</p> <ul style="list-style-type: none"> <li>• HS2 Business Advice and Support Service</li> <li>• Formal mechanisms and capacity building for engaging with businesses/ business groups in Camden Town</li> <li>• Access to enhanced business compensation package</li> <li>• Specialist commercial property support</li> <li>• Open for business, marketing &amp; promotion campaigns and events</li> <li>• Hoardings and artwork</li> <li>• Visitor information</li> <li>• Property modifications</li> <li>• Meanwhile uses</li> <li>• Employment, job brokerage and training support</li> <li>• Maintaining access &amp; way-finding.</li> </ul>
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			<p>Camden Council acknowledges that there is a role for the CoCP in minimising effects on businesses, but advises that this should be in addition to robust mitigation measures. Camden Council highlights the necessity for local business engagement in the development of LEMP's. This further highlights the need for HS2 to build capacity of local business representative organisations and establish formal mechanisms for engaging with the business community to ensure that this can be achieved.</p> <p>Camden Council considers the assessment of effects arising during construction in Camden Town to have been severely underestimated. The information provided is incomplete, lacks transparency and is inaccurate.</p>
		10.4.3	Camden Council reiterates that impacts 'will' amount to significant amenity impacts.
		10.4.4	<p>Camden Council considers the ES is defective in that the Environmental Statement only specifically identifies three businesses (Porky's BBQ restaurant and bar, Inhibition coffee shop and Thanh Binh restaurant) as likely to experience significant effects from noise, visual and construction traffic, when other businesses operating within the immediate proximity to these premises have not been recognised within the Environmental Statement.</p> <p>Camden Council considers this a gross underestimate. There are many more businesses both within and outside of the safeguarding area will experience significant amenity effects. This reveals a serious defect in the assessment within the Environmental Statement of the impacts of HS2.</p> <p>Camden Council considers the ES is defective in that the major works outlined under section 12 'Traffic and transport' includes major bridge rebuilding and viaduct works, thousands of vehicle movements, lengthy road closures and public transport and pedestrian diversions in Camden Town spanning a period of 8 years, have not been considered in terms of their socio-economic implications, adding significantly to the miscalculated severity of amenity effects.</p> <p>Camden Council considers that the amenity, isolation and cumulative impacts of the scheme would have severe socio-economic impacts resonating throughout Camden Town centre. Based on current information, Camden Council understands that approximately 80 businesses are located within the safeguarding area along the Camden Town Link. Camden Council has shared evidence of the businesses and areas likely to be affected by HS2 with HS2 Ltd which has not been reflected</p>



			<p>in the CFA. The Council considers that all of these businesses and many more in the wider area including Camden Town's iconic markets will be severely affected in terms of amenity as a result of the construction of the link. Camden Council notes that the severity of amenity impacts on businesses may result in complete closure or need for relocation of the businesses identified and others in the wider area. This has not been assessed.</p> <p>An independent report carried out by Camden Town Unlimited estimated the cost of HS2 Ltd to Camden's creative economy as being over £600 million whilst estimating 9000 job losses. Camden Council considers it regrettable that HS2 Ltd has made no attempt to generate their own calculations of the costs to the economy from the HS1 Link.</p> <p>Camden Council considers that the assessment is defective in that it does not consider the blight effect of the scheme and its implication for individual businesses, local investment and future growth. Camden Town is a growing creative and cultural industries hub. A key factor in attracting investment in this sector is location and environment. Major disruption and changes in amenity would impact on commercial investment in the area and is likely to see the flight of investment and growth. Camden Council considers that if the scheme goes ahead comprehensive mitigation to minimise blight, uncertainty and vacant property impacts needs to be put in place.</p> <p>Camden Council considers the ES is defective in that it fails to provide appropriate mitigation and compensation to address amenity impacts of the scheme.</p>
		10.4.6	<p>Camden Council contends that businesses in Camden Town 'will' experience significant isolation effects as a result of the construction of the scheme.</p>
		10.4.7	<p>Camden Council considers this section of Environmental Statement contains severe deficiencies, specifically the CFA analysis on the impacts on Camden Markets. The markets and wider Camden Town commercial centres are one of London's top international visitor attractions and a major hub for creative industries.</p> <p>Camden Council considers there to be clear deficiencies in the estimation of the impacts on Camden Markets which have been severely misjudged in terms of permanent impacts, amenity and isolation effects and require urgent preventative mitigation proposals to be put forward by HS2 Ltd.</p>

			<p>Camden Council considers there to be clear deficiencies within the CFA as it CFA fails to identify the number of market stalls that will be removed or severely disrupted during construction. The impacts on traders, jobs and visitors have not therefore been properly assessed.</p> <p>Camden Council considers there to be clear deficiencies within the 'Traffic and Transport' assessment of the CFA report at section 12, which identifies the Chalk Farm Road Satellite construction compound, comprising part of Camden Lock and Stables Markets and their main entranceway. This compound is described as being in use for four years from 2018, with estimated duration of busy vehicle movements lasting one year and 6 months. This alarming proposal will potentially have devastating impacts on Camden Lock market and significant effects on Stables Market. The proposals are also in clear contradiction with the unduly conservative construction programmed outline in the socio-economic section, which only references a 3 week closure of the road and markets and occupation of the pavements for 'several weeks.</p> <p>Camden Council points out that it is major deficiency of the ES that information addressing this contradiction, which has major implications for the validity of the socio-economic assessment, is absent.</p>
		10.4.9	<p>Camden Council considers the ES is defective in that the planned closure at Chalk Farm Bridge of pedestrian access to the markets and road closures for a three week period expected in late December 2019 and early January 2020. Closure of pedestrian access to the markets at any time would have devastating impacts on market traders and other commercial activity throughout Camden Town Centre, but planning this work at Christmas, one of the busiest periods for the Markets is astonishing and highlights the lack of regard the Environmental Statement has given to the impacts the HS2 scheme has on the communities it affects. As outlined in Camden Council's response to the draft Environmental Statement, markets operate on tight profit margins and their transient nature makes markets a highly sensitive receptor. Closure over the Christmas period, where market trade is likely to peak would exacerbate these issues, and have serious impacts on the livelihood of affected traders and other economic activities across the town centre that rely on the markets as a visitor draw.</p> <p>Camden Council considers the ES is defective in that the socio-economic assessment of impacts is inadequate and severely downplays the effect HS2 bridge/viaduct work will have on the various Camden Markets. Camden Council would like clarification on how the statement in section 2.3.74 stating that "commercial premises within arches 1-16 of the Chalk Farm Viaduct within Camden</p>

			<p>Village Market will be inaccessible for four weeks per unit. "Tallies with 10.4.10 which states that "Some market stall operators in the vicinity of the bridge may suffer some restricted access or a loss of access for a few days while scaffolding is installed" but makes no mention of the commercial premises within the arches.</p> <p>Camden Council notes a similar discrepancy in Camden Stables market, with section 2.3.79 stating "The commercial premises within arches 1-4 within Camden Stables Market will be inaccessible for approximately three weeks per arch." While no mention is made of this in section 10.</p> <p>Camden Council considers the ES is defective in that no mention is made of the effect the proposed construction plans will have on the Hawley Arms which is situated within the safeguarding zone. This pub is of significant cultural value, playing an important role in contemporary music history.</p> <p>Camden Council also requests improved assurances that pedestrian activity will not be affected, within the day or night time economy. We are especially concerned about any potential increase in night time footfall in the adjacent residential side streets.</p>
		10.4.10	<p>Camden Council disagrees with the assumptions at 10.4.10 stating that viaduct works including the erection of scaffolding and direct impacts on market stalls, pedestrian and servicing access would only result in possible minor effects. Camden Council notes that HS2 Ltd. has been repeatedly informed by the operators of the market that the Camden Lock Place access route is essential for servicing and emergency vehicle access. Blocking this access may prevent the entire market from operating. Camden Council is disappointed that this vital assessment has been disregarded in the ES assessment. Camden Council considers these impacts to be highly disruptive and to be a significant adverse effect.</p>
		10.4.11	<p>Camden Council completely disagrees with the assessment at 10.4.11, which states that customers are unlikely to be deterred as a result of the construction works as they come from a wide catchment area. As outlined in Camden Council's response to the draft Environmental Statement amenity and isolation factors will deter visitors, as demonstrated following the 2008 Camden fire when a significant drop in visitor numbers is reported to have occurred despite the markets remaining open. Camden Council considers these factors to be extremely harmful to the reputation of Camden Town as a top visitor attraction.</p>
		10.4.12	<p>Camden Council notes that Buck Street, Inverness Street and other Camden Markets will be</p>

			<p>affected by road closures, pedestrian and public transport diversions along with all other businesses within Camden Town Centre. The direct demolition, amenity and isolation impacts at the Chalk Farm Road Bridge at the commercial visitor core of Camden Town and others throughout the town centre will deter visitors and disrupt local community access to services resulting in reduced trade, potential job losses and other socio-economic impacts across the town centre. These impacts have not been adequately assessed.</p> <p>Camden Council is highly concerned that the full extent of construction, transport and utilities works proposals has not been adequately assessed in terms of their socio-economic implications and considers there to be lack of co-ordination between the 'Traffic and Transport' assessment and the socio-economic assessment within the CFA report.</p>
		10.4.14	<p>Camden Council considers the ES is defective in that no attempt has been made to quantify the effect on employment at CFA level resulting from temporary effects. Given that the extent of works in Camden and that the temporary effects of the scheme are likely to last over 10 years, there will be major implications on local employment over an extended period of time. Camden Council considers the failure to assess these employment factors as unacceptable and lacking in transparency leading to an under-assessment of significant effects. Camden Council request that these figures are provided.</p> <p>Camden Council also notes that no attempt has been made to quantify temporary amenity impacts in terms of lost or delayed economic output. Again Camden Council considers this to be a major flaw in the assessment leading to an under-assessment of significant effects.</p>
		10.4.15 - 10.4.17	<p>Camden Council notes that the construction compounds in Camden Town CFA could generate 90 full-time equivalent jobs and potential opportunities in the supply-chain. Camden Council has urged HS2 Ltd to put in place an employment, skills and training strategy and procurement support as soon as practicable to enable local residents and businesses to access these opportunities, otherwise there will be no benefits to the localities that will experience the significant adverse effects. This strategy should align with the objectives of the Camden Plan and also look at supporting NEETS and adult populations not in work.</p>
		10.4.18	<p>Camden Council notes the inaccuracy at 10.4.18 that states that no committed developments interact with the proposed scheme. Full details of the Camden Council's response relating to development sites can be found at section 10.3.14 and in the response to the technical appendices.</p>

		10.4.19	<p>Camden Council considers the ES is defective in that ‘cumulative’ and ‘combined’ socio-economic effects have been inadequately assessed. Camden Council is of the view that it is unacceptable not to report the cumulative effects at each CFA level. Instead HS2 Ltd has bundled these important cumulative effects into the route-wide assessment (Volume 3) where it is impossible to interrogate the analysis or findings at a local level. Camden Council contends that this is further evidence of a lack of transparency in the ES and that the findings in terms of the socio-economic effects are flawed.</p> <p>Camden Council considers that the reporting of the cumulative effects on employment at route wide level only, and not at CFA level, is incorrect and a serious flaw in the assessment.</p> <p>Camden Council considers the ES is defective in that the cumulative effects section fails to take into account the implications raised under other environmental assessments. Camden Council considers that co-ordination between environmental factors is required.</p> <p>Camden Council considers the ES is defective in that the cumulative effects section fails to take into account the implications raised under other environmental assessments. Camden Council considers that greater co-ordination between environmental topic assessments, ES volumes and associate Hybrid Bill documents is required.</p>
		10.4.21	<p>Camden Council considers the ES is defective in that the full extent of permanent business impacts has not been assessed. Assessment is focused on premises that will be subject to compulsory purchase. No assessment has been made of the permanent socio economic, business or employment impacts beyond the safeguarding area where significant harmful effects will occur.</p> <p>Camden Council considers the ES is defective in that no consideration has been given to the residual and permanent effects on businesses resulting from severe isolation, amenity and construction impacts. No consideration has been given to the actual and reputational impacts on Camden Town’s visitor and creative industries sectors that will result from major disruption spanning 8 years or the resulting impacts on jobs and economic output.</p>
		10.4.22 – 10.4.24	<p>10.4.22 Camden Council considers the way businesses are grouped together to form defined resources to be unclear and inaccurate and therefore renders the assessment defective. The ES should include a more detailed breakdown in each respective CFA. The failure to do so make it impossible to evaluate the soundness of the assessment evasively downplays the scale of impacts</p>

			<p>and causes ambiguity as to the actual effects</p> <p>Camden Council notes that paragraph 10.4.22 states that 35 businesses will be directly impacted by the scheme i.e. subject to compulsory purchase and that these have been grouped together to form twelve defined resources. The ES fails to identify the 35 businesses or the 12 resources. Of the twelve resources, it is advised that only four will be significantly affected. HS2 should identify all businesses directly impacted and explain the reasoning for the grouping of resources and assessment of significant effects. The failure to include this information makes it impossible to understand the assessment; resulting in serious concerns that impacts have been downplayed. Camden Council is deeply concerned about the lack of transparency in the ES and the failure without explanation to identify businesses and resources.</p> <p>Camden Council disputes the assessment in table 9 and considers that all 35 business premises facing acquisition will experience major adverse effects. The Council acknowledges that some businesses may be able to relocate and resume business operations elsewhere, but the assessment fails to take into account the human impacts to the individuals affected by the disruption, stress and inconvenience of imposed acquisition.</p> <p>Camden Council considers the ES is defective in that the limited scope of the assessment criteria at 10.4.23 and 10.4.24. Camden Council considers that HS2 Ltd have failed to take into account the wider implications of business acquisitions on individuals, communities, access to services, business clusters and sectors focusing only on the ability to relocate or displacement of jobs in the context of wider economic activity. Camden Council considers the assessment to be highly flawed in this respect, the result being that the impacts have been underestimated.</p> <p>Camden Council considers that a great many more businesses in the wider area will experience severe amenity effects during the construction period that may result in permanent effects.</p>
		10.4.26-10.4.27	<p>Camden Council disagrees with the assessment at 10.4.26-10.4.27 and considers that the impact on the businesses at Camley Street will be major adverse. These premises are car and taxi repair garages. Availability of alternative premises within a reasonable distance is highly constrained. Businesses and employees are unlikely to be able to relocate locally, resulting in a loss of jobs for the individuals concerned, a particular type of service to the local community and a particular type of employment within the jobs market. Camden Council considers this impact to be major adverse.</p>

		10.4.28-10.4.29	<p>Camden Council is seriously concerned at the comments at 10.4.28-10.4.29 which state that businesses at Baynes Street, Randolph Street and Kentish Town Road will be inaccessible for periods up to 3 years. Camden Council refutes the assessment of effects as moderate adverse in these cases. Whilst the Council accepts that the premises will become available for commercial use again post construction, the impacts on the existing businesses in this location will force relocation and potential closure and are therefore considered to be major adverse.</p> <p>Camden Council is alarmed that premises at Prowse Place and Camden Street are also identified in section 2.3 as having access removed during construction, but that assessment of these commercial resources has not been carried out in the socio-economic assessment.</p> <p>Camden Council considers the ES is defective in that the majority of businesses around Camden Town and the HS1 link area, who are anticipated to experience significant effects, either through demolition or construction works, are light industrial/warehousing units. Camden Council is aware and concerned that the vacancy rate for industrial and warehousing property is low at only 2%, thereby making it difficult for businesses to relocate locally. Camden Council has made representations to HS2 Ltd that appropriate mitigation and support must be put in place, for example to assist businesses find similar, alternative accommodation with and within the London Borough of Camden.</p>
		10.4.30	<p>Camden Council is incredulous with the assessment at 10.4.30 that estimates that only 130 jobs are at risk in the Camden Town area. The Council considers that given that the full scale of impacts on the Camden Town economy has not been adequately assessed, this figure is a significant underestimation. Camden Council strongly opposes the assumption that impacts in terms of job losses are relatively modest. Camden Council considers the loss of jobs to be significant both for the individuals affected and the wider economy. The council considers the ES is defective in that no information is provided on actual types of jobs losses, the breakdown of job losses by sector and how these job losses will impact upon the community.</p> <p>Camden Council considers the ES is defective in that the impact to the economy has only been assessed against the number of jobs at risk. Camden Council notes that whilst this is an important factor, a wider assessment needs to be undertaken to understand the true implications. The council requests that an assessment should be provided against the impacts on economic output, effects by sector, inward investment, the competitiveness of the local business environment and links with the wider business community.</p>



		10.4.31	Camden Council notes the inaccuracy at 10.4.18 that states that no committed developments interact with the proposed scheme. Full details of the Camden Council's response relating to development sites can be found at section 10.3.14 – 10.3.16 and in relation to the technical appendices.
		10.4.32	<p>Camden Council considers the ES is defective in that 'cumulative' and 'combined' socio-economic effects have been inadequately assessed. Camden Council is of the view that it is unacceptable not to report the cumulative effects at each CFA level. Instead HS2 Ltd has bundled these important cumulative effects into the route-wide assessment (Volume 3) where it is impossible to interrogate the analysis or findings at a local level. Camden Council contends that this is further evidence of a lack of transparency in the ES and that the findings in terms of the socio-economic effects are flawed.</p> <p>Camden Council considers the ES is defective in that the cumulative effects section fails to take into account the implications raised under other environmental assessments. Camden Council considers that greater coordination between environmental assessment topics, ES volumes and associated Hybrid Bill documentation is required.</p>
		10.4.33-35	<p><b>Other mitigation measures</b></p> <p>The proposed socio-economic mitigation is entirely insufficient. The mitigation proposed, is considered inadequate in addressing the significant effects identified. The failure of the assessment to identify the true breath and magnitude of impacts implies that substantial additional mitigation is required.</p> <p>The limited mitigation proposed focusses largely on compensation and the CoCP. The Council has repeatedly outlined to HS2 Ltd that the proposed compensation relating to businesses is completely inadequate and is not fit for purpose. The CoCP is generic and is too limited scope to address the full range of socio-economic implications. The Council does not therefore consider that the significant impacts of the scheme can be satisfactorily mitigated through these measures alone.</p> <p>The proposed mitigation fails to take into account feedback from consultations and engagement or industry best practice.</p>

			<p>The Council advises that further mitigation is required. This may include but not be limited to design and construction modifications; HS2 Business Advice and Support Service; Formal mechanisms and capacity building for engaging with businesses/ business groups; Access to enhanced business compensation package; Specialist commercial property support; Open for business, marketing &amp; promotion campaigns and events; Hoardings and artwork; Visitor information; Property modifications such as triple glazing; Meanwhile uses; Employment, job brokerage and training support; Maintaining access &amp; way-finding.</p> <p>Notwithstanding the serious reservations regarding mitigations proposals, the Council notes the commitment of HS2 Ltd to work with the Council and partners to identify measures to offset the impacts of the scheme on local businesses.</p>
		10.4.34	<p>Camden Council considers the ES is defective in that the limited mitigation proposed in this section is still largely focused around compensation, despite the Council's previous comments in response to the draft ES and discussions with HS2 Ltd through the Business and Employment Mitigation Working Group for the need for HS2 Ltd to put in place a comprehensive mitigation strategy. Camden Council would like to stress that the compensation currently proposed by HS2 Ltd for businesses is inadequate.</p> <p>Camden Council welcomes commitment that HS2 Ltd will provide additional support over and above statutory requirements to assist displaced businesses to relocate. Camden Council welcomes that HS2 Ltd has listened to the representations made by Camden Council in this regard however urges HS2 Ltd to go further than this to commit to ensuring displaced businesses are provided with options to relocate close to their existing location and are guaranteed to remain locally if the business wishes to. Camden Council would welcome further clarification from HS2 Ltd on what additional property support will be provided to displaced businesses.</p> <p>Camden Council requests clarification on the definition and scope to 'offset' the impacts of the proposed scheme. Camden Council welcomes the opportunity to work with HS2 through the Business and employment mitigation group to develop these measures.</p>
		10.4.35	<p>Camden Council notes that the scheme will generate opportunities for employment and training associated with construction. Opportunities are also likely to arise in terms of local procurement, supply chain and supporting industries. The council requests that these opportunities are maximised through holistic support programmes developed in conjunction with the council and local communities.</p>

			Camden Council remains opposed to HS2 and the HS1 Link in its current form and demands that a more comprehensive programme of mitigation, compensation and local management be put in place to support local businesses throughout the construction and operation of HS2.
		10.4.36-10.4.37	As outlined above, Camden Council does not consider that the likely residual effects of the scheme have been adequately assessed. The Council believe that residual effects will to be significantly greater than those already outlined within the ES. For example, the major adverse effects that construction will have across the Camden Markets. The Council considers that residual effects could be reduced by a more comprehensive approach to mitigation, compensation and off-setting.
	10.5	10.5.1-10.5.10	<p>Camden Council disagrees with the assumptions at 10.5.1- 10.5.3, stating that there will be no direct significant impacts or changes in business amenity resulting from operation and that no mitigation is required. Without through noise assessments having taken place and with no definitive design proposals agreed it is not possible to know at this stage whether significant effects will occur and require mitigation.</p> <p>Camden Council is of the view that businesses immediately adjoining the viaduct such as the iconic Hawley Arms Pub may experience increased noise, vibration or other impacts that affect their level of amenity and ability to operate. Further detailed assessment of operation impacts and required mitigation and compensation is required.</p>
	11.1		Camden Council has provided detailed comments against the Technical Appendices to the individual CFA reports
	11.1		Camden Council note that reference has been made to the draft national planning practice guidance, presenting an interpretation of its requirements, and consider that as this guidance is not an approved document that HS2 should review any assessments made in relation to this guidance at such time that the guidance is formally adopted or otherwise. Camden Council considers that a failure to review and amend the relevant outcomes following the formal publication of this guidance would render the ES deficient.
	11.1		Camden Council considers the proposed amendments to the appeal provisions under the Control of Pollution Act 1974, and the available defences under statutory nuisance provisions, could make it more difficult for affected persons to be effectively protected from noise and statutory nuisance and

			for appropriate remedies to be implemented quickly and effectively. The Council therefore considers this to be an unsuitable proposal which should not be implemented and the current legislative proposals should remain as they are currently.
		11.1.4	Camden Council considers there needs to more consideration given to those effects which will last longer than 6 months but will not be permanent and that they should not all be grouped together as a “temporary” effect as this underplays the real impact of the effect.
	11.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of ‘generic’ noise levels (i.e. those based upon a broad categorised estimate of London – Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
	11.3		Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse construction noise and vibration effects in this community.
		11.3.2	Camden Council note that there is evidence to suggest that noise from night time working has been linked with impacting upon mental health, reduction in educational attainment and exacerbating existing health conditions. Camden Council considers that robust reasoning must be given to justify any night time working and it must be accompanied by an appropriate assessment of the likely impacts and proposed mitigation measures.
		11.3.5	Camden Council is of the view that consideration should also be given to non-residential historic structures which may also affected by the noise implications of construction works.  Camden Council considers that any historic structures affected are protected appropriately during the works.
		11.3.7	Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.

		<p>Camden Council considers that temporary re-housing can have an impact on both physical and mental health. Camden Council suggests that the frequency and duration of any such measures is considered further or work is scheduled to minimise this impact.</p> <p>Camden Council considers that a robust assessment should be made when assessing the medical condition of residents who may qualify for noise insulation and temporary re-housing and ensure it is based on suitable criteria. Camden Council considers there is evidence available which suggests that noise has a particular impact on people with mental health conditions so we suggest that mitigation would seek to particularly address this concern.</p> <p>Camden Council consider that particular attention must be given to those properties which will exceed the noise insulation trigger levels and are listed heritage assets, because conventional noise insulation packages might not be appropriate for such properties. Support and advice must be made available to residents who may be affected in this way and Camden Council consider that this specialised advice and support should be provided for and paid for by HS2. Support and advice could include for example professional technical advice on making a planning application or listed building consent application and paying for the application fees and associated consultants' fees necessary for the preparation of a suitable scheme of mitigation measures.</p> <p>Camden Council consider that measures must be taken by HS2 to identify which properties could be affected in this way and early discussions held with the affected residents and the Council to determine how this issue might be overcome. Camden Council consider that these properties could be at a greater risk of temporary re - housing during the construction phase if the noise insulation packages would not be feasible due to the heritage status of the properties and consider that this should be noted and assessed within the ES.</p>
	11.4	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p>

			<ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p> <p>Camden Council was concerned to note that the Roundhouse and neighbouring businesses will be affected by significant noise and vibration, with daytime noise levels rising at times to 83dB over a period of approximately 6 months in 2017 during the construction of the HS1-HS2 Link tunnel portal. Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against</p>
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			<p>noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council also expects HS2 to carry out a thorough assessment of all potential impacts on this important community facility, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p> <p>Camden Council considers the ES should have contained an assessment of all impacts on a property by property basis to test the habitability of those living in close proximity to the works, in order to fully understand the impacts of the scheme. For example those properties near bridge works, vent shaft and portal construction works such as on Chalk Farm Road, Camden Road and Regent's Park Road. These impacts should be assessed cumulatively and based on a wide range of factors, not just noise, vibration and dust but also such factors as ventilation, visual, amenity, daylight, air pollution and access routes to ensure a safe and habitable environment is maintained for all residents living near construction for a prolonged period of time. Camden Council considers the ES to be deficient in not considering the impacts in a cumulative basis when determining habitability or triggers for temporary re-housing.</p> <p>Furthermore whilst the ES refers to a "Noise Insulation and Temporary Re-housing Policy" this document has not been included in the ES or draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information is available to enable a thorough</p>
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			<p>assessment of impacts and mitigation measures.</p> <p>Camden Council notes that properties that will experience a significant amenity effect have not been properly identified and assessed in the ES. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys. Camden Council considers the ES defective as it does not publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>The ES has identified mitigation for severe noise impacts to include both sound insulation and re-housing. The ES refers to the “Noise Insulation and Temporary Re-housing Policy” which has been omitted from the ES and the draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information to enable a thorough assessment of impacts and mitigation measures.</p> <p>Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions. Camden Council considers the ES is defective in that where noise insulation is dependent on windows remaining closed, this presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p>
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			<p>Camden Council requests that appropriate compensation should be provided to residents for disruption due to mitigation measure installation. The Council is a provider of social housing and health care. Where the works impact on the ability of residents to use the property as tenants. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p> <p>Camden Council notes that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council considers the ES is defective in that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council considers that the ES is defective due to insufficient and inconsistent information about the impact of the HS2 project on properties. Camden Council cannot therefore provide accurate comments on ES.</p> <p>It is impossible for Camden Council to assess which properties will be affected by the HS2 scheme. The information is unclear, inconsistent and there is a lack of detail and clarity about the assumptions made. The impacts and lack of detail make it very difficult to identify buildings and locations affected, for this reason Camden Council deems the ES to be defective in this respect. The ES does not provide the necessary detail to understand impacts on both individual dwellings and effects considered to be significant on a community basis.</p> <p>Camden Council have scrutinised several reports on each CFA to help the Council produce a list of possible properties affected. The ES is not at all clear or consistent in identifying specific or approximate addresses for the properties affected. Examples are set out below:-</p> <ul style="list-style-type: none"> <li>• The maps in Volume 5 Community sections are misrepresentative of the possible impacts in each area. The maps use dots to provide approximate locations, but these are too generic to provide a true understanding of the properties at stake, for example a single dot on a map does not sufficiently illustrate which “approximately 20 residential properties A5202 St Pancras Way, Baynes Street and Wrotham Road”.</li> </ul>
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			<ul style="list-style-type: none"> <li>Camden Road properties are included under different sections and are forecast to experience a number of adverse effects. However, from the descriptions in the ES and the ways the impact on properties is clustered with other roads, it's impossible to gather which and how many properties are affected. CFA 2 described individual dwellings "16 buildings (32 dwellings) on the A503 Camden Road that are forecast to experience noise levels higher than the noise insulation trigger levels." Under community basis "Approximately 60 dwellings on Camden Road: cause Camden Road North bridge site preparations and works" are subject to adverse effects on a community basis and under the community impact assessment record sheet "approximately 10 properties on A503 Camden Road and Royal College Street are predicted to experience in-combination effects arising from significant visual and noise effects during the construction works for the replacement of Camden Road Bridge." In this case, it is not clear if a total of 60 dwellings are affected or 60+32+10 resulting in a total of 102 properties. It's impossible for LBC to assess which properties (even approximately) will be affected by the scheme. The blue dot on the Volume 5 Community Data maps on Camden Road given no indication of which properties are approximately affected. Grouping roads together differently under different categories makes it even more difficult to identify approximate properties. In this case, it is not clear how many and where on Royal College Street the properties in question are located. LBC would expect a street by street, and block by block breakdown with addresses, especially under 'individual dwellings' where specific properties are in question. This is also true for many other sections, for example with Chalk Farm Road which is sometimes reported on its own and in another section reported together with Castlehaven Road.</li> <li>Inconsistent and poorly presented information makes it difficult to understand the impact on properties. The impact on Regent's Park Road is inconsistently reported in CFA 2 and CFA 3. The impact of demolition of 200 Regent's Park Road is reported in the Volume 5 CFA 2 Community Data community impact assessment record sheet section 2.15 "Residential property on Regent's Park Road", however the loss of amenity on the wider community is reported in Volume 5 CFA 3 Community Data community impact assessment record sheet section 2.1 "Residential properties on B509 Adelaide Road and Regent's Park Road" with regards to the construction works at the HS2-HS1 Link portal. The two types of impact from demolition and loss of amenity in a specific location should be reported together, and the impacts on surrounding properties properly identified and described.</li> <li>Not all units are counted in each block that is marked on the relevant map as affected. It's unclear which flats and in many cases which buildings are affected and what methodology and</li> </ul>
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			assumptions are used for the broad range of properties identified.
		11.4.8	<p>Camden Council notes that significant noise and vibration effect has been identified for Hawley primary school during 2018 and is concerned about the impact that this will have on the school. Camden Council would like to see any demolition of houses adjacent to the school undertaken where possible outside of school term time hours and assurances that the health and safety of children, staff and families will not be affected as a result. Camden Council expects appropriate mitigation measures to be put in place to ensure that the operation of the school is not adversely impacted whilst these works are being undertaken.</p> <p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>

			<p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p> <p>Camden Council considers the ES is defective in that the impacts reported for Hawley Primary School and consider it imperative that such impacts are minimised to as low as is possible and do not have an impact on pupil learning and wellbeing.</p>
		11.4.2	<p>Camden Council considers the ES is defective in that the impact of construction on Agar Children's Centre situated at Wrotham Road where the ES considers there will be significant effect due to construction noise. The Children's Centre is situated near possible land-take area for the Wrotham Road equipment platform and the Camley Street main compound and the Council believes that there will be a significant impact on the ability of the children's centre to remain in operation whilst construction works are taking place around the site.</p> <p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse</p>

			<p>environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.4.3	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. The Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>

			Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.
		11.4.12	Camden Council considers the ES is defective in that the impact of construction on Agar Children's Centre situated at Wrotham Road where the ES considers there will be significant effect due to construction noise. The Children's Centre is situated near land-take area for the Wrotham Road equipment platform and the Camley Street main compound, as well as demolition of 75 dwellings in the locality (on Baynes Street, A5202 St Pancras Way and Wrotham Road) and the Council believes that there will be a significant impact on the children's centre whilst construction works are taking place around the site. Children centres are an integral part of the borough's education and wider children's services strategies and the borough has made a significant investment in its early years services to reflect these priorities.
	11.5		<p>Camden Council is concerned at the extent and severity of the reported significant adverse operational airborne noise effects in this community.</p> <p>Camden Council is concerned that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. A number of council led regeneration schemes listed in other sections could be affected during operation, for example through noise. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
		11.5.15	<p>Camden Council is disappointed to note that the proposed development will cause these effects. Camden Council considers the ES is defective in that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council therefore consider that it could be possible that there could be additional mitigation measures which could be implemented for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> </ul>



			<ul style="list-style-type: none"> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice,</li> </ul> <p>and expect HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.5.18	<p>Camden Council is extremely concerned about the impact of construction on Agar Children's Centre situated at Wrotham Road where the ES considers there will be significant effect due to construction noise. The Children's Centre is situated near land-take area for the Wrotham Road equipment platform and the Camley Street main compound, as well as demolition of 75 dwellings in the locality (on Baynes Street, A5202 St Pancras Way and Wrotham Road) and the Council believes that there will be a significant impact on the children's centre whilst construction works are taking place around the site. Children centres are an integral part of the borough's education and wider children's services strategies and the borough has made a significant investment in its early year's services to reflect these priorities.</p> <p>The Council disagrees with the statement made in the ES that the assessment of operational noise and vibration indicates that significant direct effects on non-residential receptors are unlikely to occur in this area. Camden Council feels that the proposed development will cause significant effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul>

			The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.
12	12.1		Unfortunately the impacts and related mitigation and outcomes set out in this key section of the ES are undermined by fundamental transport assessment issues that Camden Council has identified and raised in response to the transport assessment for London contained in Volume 5 (Parts 1 to 5). The TA is intended to underpin the ES. Significant gaps and inaccuracies in the assessment leading to operational performance and road safety issues on the highway network in the Construction phase; and inaccurate forecasting of impacts and mitigation where severe over-crowding and bottlenecks on key public transport services will actually take place, are the headline issues. These fundamentally undermine the assessment and make it not fit for purpose. Where HS2 have seemingly reported appropriate elements of the assessment like for example Construction Generations, there has been no evidence of supporting derivation, meaning that the quantities appear unfounded and therefore meaningless to be able to review properly. Detailed comments prepared by Camden Council sit behind this overview and can be found in the full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
	12.2		While Camden Council recognise the logic in using CLoHAM and RailPlan to assist forecast highway and rail demands, it has major concerns with the under-estimated and mis-directed outcomes that these models have generated without appropriate refinement. Camden Council's own data sets demonstrate more significant outcomes and larger figures which indicate larger impacts and this is not anecdotal evidence. With regard to construction impacts, Camden Council is concerned that there is only a focus on the transport of excavated material, since no mention is made of delivering construction materials. The re-development of Euston Station would generate large quantities of inbound traffic that will have cumulative impacts with works in this area. The approach also discounts the use of rail to transport construction material which should be at the forefront of any Construction Transport Strategy.
	12.3		Camden Council considers the ES lacks sufficient clarification on the extent of works affecting Camden Town, particularly Chalk Farm Road closure, pedestrian activity and bus routes affected. The Council considers the ES is defective in that such an exceptionally busy and key part of the borough could clearly be affected from a Community Safety perspective if plans have not been

			thoroughly set out.
	12.3	12.3.2	The baseline highway network is not accurately assessed in the ES as is discussed in this Council's response to Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.5), and shows outcomes that under-estimate its operational performance. Camden Council is also concerned about the validity of the traffic surveys discussed in 12.3.2, given this was the period of the 2012 Olympic Games and the traffic conditions were not 'normal', due to the traffic management measures introduced by TfL at this time. Similarly for paragraph 12.3.3, Camden Council considers the ES is defective in that the movement of pedestrians / cyclists is not representative as September was the period of the Paralympic Games which had an impact on the numbers, method and mode for people travelling around central London. Camden Council provide full details of their issues with the transport baseline that effects the ES in Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.4.
		12.3.8	<p>Camden Council notes that this section emphasises the extensive number of bus routes that operate within Camden and that will be severely disrupted over many years due to the construction of the HS1 Link and HS2 vent shafts etc. Given that traffic data and modelling is an underestimate we believe the delays to bus users will be more significant.</p> <p>Camden Council note the long list of bus routes which will be disrupted by bridge works in the Camden CFA2 area. Eleven separate bus routes, each operating at a high frequency, will be diverted around Camden to avoid various closures during the construction phase, resulting in large scale disruption across the Borough to the detriment of our residents. It should be noted that only northbound services are affected by the Kentish Town Road partial closure; and only southbound services by the Camden Street partial closure. It is understood that "partial closure" in this context means weekends and overnight, which will still cause disruption to bus services in the area, many of which still run at a high frequency during these times. Camden Council also note that route 214 will be affected by both the Camden Street and Kentish Town Road partial closures, and not just the latter as stated in the ES. These closures are solely related to delivery of the HS2-HS1 Link which Camden Council is opposed to on the grounds that it will have a significant detrimental impact on North London Line services which are an essential mode of transport for the Borough.</p>
	12.4		Many key derivatives of the assessment to determine Construction effects are not provided in the ES. For example, Construction trip generation does not show how the results have been evaluated and to which construction activities or cumulative impacts they relate. There is no evidence to

			<p>suggest that sufficient representation of all construction activities and cumulative effects have been taken in to account and the loadings appear relatively low in comparison to other recent major schemes, such as Thames Tideway, Olympic Park and CRL, where much more information was required to be produced to support the planned proposals and safeguard against threats of major impacts. The claim that the draft CoCP will be implemented to reduce the effects of the deliveries of materials and equipment needs to be effective and consulted upon further to ensure the mitigation is adequate and identified in sufficient time. In relation to the above comment, Camden Council can see no evidence in the ES of how the construction scenarios (1,2 and 3) have been evaluated in terms of quantifiable trip generations and cumulative generations and associated impacts. This therefore means the assessment that is presented is inconclusive and undermines the reliability of the impact and mitigation forecasts that HS2 proposes. Camden Council notes that excavated material will be reused wherever reasonably practical along the alignment of the Proposed Scheme. In this regard the Council would like more information how this would be applied to the work proposed for the Borough. For example, it presumes that such materials would be removed from the work by rail, but it would be helpful if more detail could be provided around this approach. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).</p> <p>Inaccuracies and under-estimations in the construction assessment as outlined above, explain the modest mitigation measures that are proposed. Full details of their shortcomings are again referenced in the full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3). It is noted by Camden Council that under the paragraphs addressing "Avoidance and mitigation measures", there is no mention as to whether an assessment has been made of using the Regent's Canal as a possible method for transporting materials, excavations and waste. Currently an open site on Kentish Town Road where it crosses the Regent's Canal at Hawley Lock provides access to the canal and Camden Council feels that opportunities to use the canal should not be automatically discounted, but first be examined. This was indeed the case with Crossrail for their western portal at Westbourne Park, where it was shown barge transport was a feasible option for some materials. Barges can carry up to 85 tonnes of cargo (bulk materials or otherwise) on the Regent's Canal, equivalent to removing five tipper vehicles or two articulated lorries.</p>
		12.4.3	<p>Camden Council notes that the travel plan indicates that workers will have no parking availability. However, in the note it indicates car sharing will be promoted. Camden Council opposes any parking provision being provided for site workers, as the area is highly accessible by public transport.</p>

		12.4.6	The temporary effects are under-estimated and not accepted by CC. This has been proven from comparative reviews of Camden Council data, meaning that HS2 have significantly underestimated the operational performance of the highway network in the baseline and therefore, subsequent scenarios with construction trips added. The accuracy and sufficiency of the reported temporary effects are also inconclusive until Camden Council can review the derivation of the full construction activity site generations which should be in the ES but are not provided. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5, Part 2, section 5.4 and Part 3 section 6.5.
		12.4.11- 12.4.13	Camden Council considers the ES is defective in that the serious and unacceptable combined impacts of works across the CFA areas and the assessment of them, as detailed in its response to Section 6.5 of the Transport Assessment in Volume 5. It considers the ES is defective in that the impact and programming of utility works has not been adequately assessed and their impacts under-estimated, as detailed in its response to the Transport Assessment in Volume 5. Camden Council considers the ES is defective in that the lack of planned mitigation measures to deal with disruption to pedestrian activity. Accidental or planned re-routing of NTE patrons to residential side streets would be a serious cause of distress to local residents which the community safety service would be left to deal with.
		12.4.14	Camden Council considers that work on the Chalk Farm Road bridge will cause significant disruption to bus services by itself, and therefore a situation where it is combined with other road closures (such as Adelaide Road) is not palatable to the authority. Whilst there has been some (limited) assessment of the diversion routes necessary for each individual closure in the Camden Town/Camden Road area, no assessment has been undertaken of the impact that a cumulative road closure would have on the local bus network and the diversion routes that would be necessary in this instance. The Council considers the ES is defective in that the impact on access and movement for emergency services (the Royal Free Hospital is located not far to the north of Camden Town for example and would be impacted by road closures and diversions, particularly around Camden Town and around Adelaide Rd). Significant effects could be expected on reliability (especially in the light of combined construction traffic flows), journey time, PVR, cost and perception of the bus network, which are not acceptable to Camden Council. Given that traffic data and modelling provide an underestimate, Camden Council considers the delays to bus users will be more significant.

		12.4.15	Camden Council believe that it is clearly not the case that if two partial road closures are implemented simultaneously there will be “minimal” impact on the highway network. In public transport terms, buses will be subject to extensive delay and disruption which has not been adequately examined within the ES. Baseline data used for journey time assessment is incorrect and estimates of delay time for some diversions appear to be based on a 20mph constant speed which is neither realistic nor achievable given the diversion routes envisaged. Much more analysis of the impact on bus services by closures – either partial or full – is required before Camden Council can be satisfied they represent a true picture of the potential situation.
		12.4.18	Camden Council note that HS2 has indicated that the split between HGVs and LGVs is estimated to be 80% and 20% respectively, which is different to that quoted in “12.4.22 – CFA Report – Euston – Station and Approach/No 1   Traffic and transport”. Camden Council would be most interested to learn why this difference exists and what evidence is used to arrive at these different assumptions. On a separate issue, Camden Council has not been able to locate derivations of the construction trip generation relating to a breakdown of construction activities and material types etc. that are partially summarised here. This undermines the construction impact assessment and makes it not fit for purpose.
		12.4.20	Camden Council is concerned that the use of Adelaide Road and Chalk Farm Road as primary HGV access routes will have a significant impact on bus services and pedestrian and cycle safety.
		12.4.21	(As per 12.3.8) Camden Council note the long list of bridge works in the Camden CFA2 area. Eleven separate bus routes, each operating at a high frequency, will be diverted around Camden to avoid various closures during the construction phase, resulting in large scale disruption across the Borough to the detriment of our residents. It is understood that “partial closure” in this context means weekends and overnight, which will still cause disruption to bus services in the area, many of which still run at a high frequency during these times. Many of these closures are solely related to delivery of the HS2-HS1 Link which Camden Council is opposed to on the grounds that it will have a significant detrimental impact on North London Line services which are an essential mode of transport for the Borough, plus the unacceptable construction impacts.
		12.4.24	Camden Council considers that many of the road closures listed here are not accurate in terms of durations and will cause severe impacts to local residents, especially when further delays occur because not all cumulative effects have been taken in to consideration.

		12.4.27	Camden Council considers that it is highly unlikely that a diversion of 1.5km could be achieved in 3 minutes. The ES assumes a constant average speed of 20mph in making this calculation, which is much greater than can be achieved in practice. The diversion routes for the Chalk Farm Road closure use more minor routes than the usual route, and a number of junctions. Coupled with the additional construction traffic scheduled to use the same routes as the buses, Camden Council believe that the assessment of bus journey time effects is inadequate.
		12.4.29	Camden Council would like to stress that the impact of traffic diversions may require more suspensions to open the road and this should be factored in the assessment.
		12.4.34 – 12.4.38	<p>Camden Council note the requirement for bus stop relocations or suspensions but would note that there is potential for these to cause disruption to a significant majority including the mobility impaired, who may have to travel further to access the public transport network. No assessments are shown of the impact of bus stop locations on accessibility or impacts on parking loading or road safety.</p> <p>Significant investment has been made by Camden Council and TfL in the development of the cycle network in the borough, reflecting its importance as a transport mode in the the Council's transport hierarchy. Construction traffic should avoid disruption and creating potential hazards to cyclists on the Central London cycling grid and Quietways in Camden. Cycling routes are heavily used in and around Camden Town and routes such as Royal College Street, Goodsway and Pancras Road (all on the Central London Cycling Grid) and Quietway 46 ( Jamestown Road, Arlington Road, Castlehaven Road, Hawley Road, Agar Grove and Camley Street) are particularly popular cycle routes, for example.</p> <p>Comments in respect of impacts on pedestrian and cycling access and severance arising from works at Camley St are set out in paragraph 5.3.11 of the CFA2 report above. Comments in respect of Randolph St are set out in respect of the London Assessment to the Transport Assessment in Volume 5 (such as 6.5.23 – 6.5.27). Comments in respect of pedestrian and cycle access and issues are also provided in the sections on compounds and construction sites and construction lorry routes in the London Assessment to the Transport Assessment in Volume 5, paragraphs 6.5.11- 6.5.58.</p> <p>The assessment of impacts of rail possessions makes no reference to the consideration and minimising of impacts upon nearby communities (residents, businesses and services).</p>



			<p>No reference is made to the impact on the London Underground. In this respect, it should be noted that plans are being developed to upgrade the Northern Line, which would involve significant works at Camden Town. Although this project is only at its early stages of development, construction may coincide with the construction period of HS2, as it is currently anticipated by TfL that works at Camden Town may commence in 2019. Such a project would aim to improve services on the Northern Line and amongst the benefits of such improvements would be relieve congestion at stations, including Euston Underground Station. The impact of construction of the HS2/HS1 Link at times that may coincide with works at Camden Town in association with the Northern Line Underground upgrade should be considered and assessed in terms of their construction impacts and the potential to delay the upgrade to the Northern Line at Camden Town and the arising consequences.</p>
		12.4.39, 12.4.40	<p>Camden Council notes that it appears the ES contains no investigation as to whether it would be feasible to use the canal to assist in carrying material during the construction process in order to minimise vehicular movements. This lack of assessment of alternative modes of transport for this scheme renders the ES defective.</p> <p>This very brief description of the cumulative effects that are claimed to have been assessed is again inconclusive, until Camden Council can review the derivation of the accumulated construction activity site generations and other key sources of impact such as utilities works, which should be contained within the ES but are not provided in anywhere near sufficient detail. Notwithstanding this gap in information, the outcomes reported in section 12.4.68 of Vol 2 CFA1, which stated that CFA2 and CFA3 will each generate just 60 daily vehicles and that this is the level that has been assumed as being the cumulative impact, is simply not accepted because of its under-estimated order of scale. It is also noticeable that this corresponding section of CFA2 (Vol 2 CFA2 section 12.4.40) does not quote the corresponding cumulative effects for CFA1 and 3. This inconsistency and key missing information seems to confirm a significant under-estimation in impacts and cumulative impacts. Full details of this and other shortcomings are referenced in CC's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).</p>
		12.4.44 – 12.4.46	<p>The <i>other mitigation measures</i> are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction</p>

			<p>impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures. It is stated that the implementation of the CoCP will mitigate the transport related effects, and yet there is no real evidence that this conclusion can be supported. The travel plan measures are suggested as providing further mitigation, although these should be in any baseline as good practice. They also rely heavily on utilising local public transport provision, but without evidence of how capacity will meet the demand.</p>
		12.4.47 – 12.4.54	<p>Camden Council strongly consider that a substantial proportion of the many significant residual construction effects, that are predicted in this section of the Environmental Statement are also an under-estimate because of the earlier comments regarding issues with the transport assessments. Notwithstanding, Camden Council considers many could be eradicated by a better proposed scheme for Euston as referred to by Camden Council in 2.1 of Vol 2 CFA1 response. By way of an example of Camden Council's concern on the residual impacts, it is emphasised that CFA2 contains critical and very sensitive routes within the Borough including Camden Road, Kentish Town Road, Camden St and of course Camden High St. They combine massively to the local economy and form the local access network and circulatory system within the heart of Camden Town and also serve links to the wider strategic corridors to the north including the TLRN roads of the A1 and the A41 and to the south towards Central London via the A400 and A4200. They each contain very congested junctions and not just in the peak hours, that have been assessed in the ES. They also accommodate several bus routes and large housing, tourist and local business populations served directly off them and also frequent minor access roads, such as Mornington Crescent, Parkway, Delancey Street, Jamestown Road, Crowndale Road, Hawley Road, Prince of Wales Road, etc. The route has narrow sections of streets created along it, whereby over the years Camden Council have prioritised pedestrian movement over through traffic to reflect the value of the surrounding visitor attractions such as Camden Market and the local residential community. Camden Council is therefore concerned that these routes are both earmarked for significant periods of closure, due to the proposed HS1 Link works which will have major impacts on access for residents, trade, schools, tourism etc.; and that they are identified as construction routes for inappropriate HGV traffic rather than using appropriate strategic routes on the TLRN or SRN identified. The traffic reassignment impact and direct threat to road safety from using Camden Road, Kentish Town Road, Camden St and most sensitively, Camden High St (with its immense pedestrian activity and mitigating measures</p>

			that have been introduced by Camden Council over recent times for good reason) as construction routes is a major issue for Camden Council and seeks that alternative options should be pursued with adequate mitigation.
		12.4.52	Camden Council reiterates previous comments concerning bus route diversions in the Chalk Farm Road area and the potential significant effect on the public transport network both within the Borough and further afield.
	12.5		<p>As set out above under construction mitigation, Camden Council considers that the other mitigation measures are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures.</p> <p>Camden Council is deeply concerned, that the imperfect HS1 Link proposal will have a severe impact in strangling future growth potential of the North London Line to meet projected and committed demands, resulting from London's population growth and regeneration improvements within the NLL catchment areas. This has not been addressed anywhere in the transport and ES assessment but is considered to be a fundamental issue in adversely impacting this important radial rail asset.</p> <p>Camden Council considers that cycle and pedestrian connectivity improvements are not sufficiently provided to meet the demands of the HS2 scheme in this area of the Borough. These modes will be incredibly valuable in relieving pressure on more heavily investable modes and HS2 have not embraced this opportunity expansively enough for a scheme of this scale.</p>
		12.5.6	Camden Council considers the ES is defective in that there is a lack of detailed information with regards to the Camley St 'permissive path/cycle track' and that there is poorly planned integration of cycle road and pedestrian access can lead to crime and community safety as well as general safety issues and pedestrian and cycle routes need to connect effectively with nearby residential areas (for

			example in repositioning the pedestrian bridge) and cycle networks. Camden wishes to influence the design and programming of this work. Any closure of the cycle route would be opposed.
		12.5.8 – 12.5.12	Camden Council considers the impacts that are reported regarding the forecast changes to delay for the highway network are under-estimated. This is because of issues arising from the transport assessment work, Volume 5, Part 2, section 5 regarding the optimistic baseline modelling of the highway network for CFA1-3, which showed free flow conditions and optimistic levels of queues and therefore delay at many of the junctions tested that Camden Council simply know by observation alone to not be the case. This is also supported by Camden Council own non-anecdotal evidence.
		12.5.13	No information is provided here on what the cumulative effects are, both descriptively and in quantifiable terms. This is not provided in any comprehensive form with sufficient detail in other parts of the ES either, so Camden Council cannot review its derivation and accuracy of forecasts.
		12.5.15	See earlier comments on inappropriate nature of proposed mitigation measures.
		12.5.17 – 12.5.22	The residual effects reported in the ES incorrectly exclude growth stagnation for the North London Line as a result of the HS1 Link. Camden Council considers the ES is defective in that the imperfect HS1 Link proposal will have a severe impact in strangling future growth potential of the North London Line to then not be able to meet projected and committed demands resulting from London's population growth and regeneration improvements within the NLL catchment areas. The impacts of this has not been addressed anywhere in the transport and ES assessment but is considered to be a fundamental issue in adversely impacting this important radial rail asset. Any closure to Camley St cycle route would be opposed and the Council would wish to be closely involved in any changes to this route.
13	13.2		Camden Council accepts that 500m may be an appropriate distance to consider for surface water impact provided the impact of directly entering the urban drainage system is considered for a wider range as its impact can often be significantly further downstream.
	13.5		Camden Council welcomes the commitment to ensuring that all surface runoff is attenuated but insists that it must meet the requirements of Camden Planning Guidance 3 that new developments' drainage is a 50% improvement on the previous brownfield development is met. This would still be less than the London Plan's aim that it should replicate greenfield. It should look to ensure that, wherever possible, attenuation uses more sustainable options such as green roofs and swales.

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## CFA 02 map book: Camden Town and the HS1 link (Ref: ES.3.2.2.2)

Map number	London Borough of Camden response
CT-05-INDEX-CFA2 – Index Map of: Construction Phase	Camden Council notes this map.
CT-05-003a – Construction Phase	<p>Camden Council considers the ES is defective in that a significant number of residential roads have been identified as construction routes. A great number of residents will be severely impacted as a result. Construction routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these construction routes and traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, rather than residential roads and town centres. Many of these residential roads contain residential parking which reduce road width and are also cycle routes. Camden Council does not consider that sufficient information has been provided to demonstrate that highway safety of vulnerable road users has been mitigated on construction routes.</p> <p>A significant number of roads within Map CT-05-003a are identified as 'Land potential required during construction'. Camden Council is concerned that no detail has been provided to specify why they might be required. An example of this is Gloucester Road, which is a residential road, which is not identified as a construction traffic route or a road with Main utility works.</p> <p>Map CT-05-003a in Map Book CFA 02 shows the compound occupying the eastern end of Camden Lock Place, within the Camden Lock Market which is situated south of the viaduct. No assessment has been made in the Cultural heritage section of the impact of scaffolding and construction activity on the setting of a number of positive contributors in the Regent's Canal Conservation Areas which</p>

	<p>are situated in Camden Lock Place and no consideration is made of the historic granite sett surface.</p> <p>Para 6.3.3 of the Cultural heritage section, which lists designated heritage assets located partially or wholly within the land required, temporarily or permanently, for construction, fails to include the grade II* listed Roundhouse, although Map CT-05-003a shows the section of Chalk Farm Road outside the grade II* listed Roundhouse, a grade II listed cattle trough and drinking fountain, and the boundary wall of Stables Market (protected by the grade II listing), within the land potentially required for construction. However, no assessment has been undertaken of the potential impacts and effects from construction.</p>
CT-05-143 – Construction Phase	<p>Camden Council considers the ES is defective in that a significant number of residential roads have been identified as construction routes, such as Rousden Street, which is unacceptable. Construction routes should be limited to appropriate roads on the TLRN or SRN. Many of these residential roads off of the TLRN or SRN contain residential parking which reduce road width and are also cycle routes. A great number of residents will be severely impacted as a result. Construction routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these construction routes and traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, rather than residential roads and town centres. Camden Council do not consider that sufficient information has been provided to demonstrate that highway safety of vulnerable road users has been mitigated on construction routes.</p> <p>Camden Council considers that this drawing provides insufficient phasing information, therefore it cannot be determined if cumulative works associated with viaduct widening and bridge replacement would constitute a significant effect on the local highway network.</p> <p>Camden Council considers the ES is defective in that adding 1km to the route of northbound buses serving Royal College Street during the Camden Road bridge closure will have a significant impact on the ability of the route to operate reliably and without recourse to additional vehicles. The diversion route, whilst currently used by buses, is tortuous and will add significant amounts of journey time well in excess of what statements in the ES would indicate. A full analysis of the journey time penalty and impact on the bus routes serving this area should be undertaken to show the effects in</p>

	<p>more detail, including the potential need for additional PVR to maintain punctuality.</p> <p>Camden Council has reservations regarding the use of Georgiana Street and Lyme Street to accommodate diverted buses and there will be a considerable loss of parking in Lyme Street if two-way working is to be established in this street (northbound for buses, southbound for other vehicles). This will have a significant impact on local residents. Again the diversion route is 1km and is a slow and tortuous route, which will take much longer than envisaged in the Environmental Statement. A full analysis of the journey time penalty and impact on the bus routes serving this area should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality.</p>
CT-05-004a – Construction Phase	<p>A significant number of roads within Map CT-05-004a are identified as 'Land potential required during construction'. Camden Council considers the ES is defective in that no detail has been provided to specify why they might be required. An example of this is King Henry's Road which is a residential road, which is not identified as a construction traffic route or a road with Main utility works.</p> <p>Camden Council considers that this drawing provides insufficient phasing information, therefore it cannot be determined if cumulative works associated with viaduct widening and bridge replacement would constitute a significant effect on the local highway network.</p> <p>Camden Council note the diversion route of 1.1km to avoid bridge works at Chalk Farm Road. Whilst all the routes to be used are suitable for double decker buses, the journey time penalty is considered to be in excess of what is envisaged in the ES. A full analysis of the journey time penalty and impact on the bus routes to operate this diversion should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality.</p> <p>Camden Council considers that the diversion of nearly 0.5km for bus services on Adelaide Road will have a minor impact on the ability of the route to remain punctual; however it is still believed that the excess journey time will be greater than that envisaged in the ES. The route via England's Lane is also envisaged to be used by construction traffic, which is likely to result in significant congestion on this stretch of road despite the suspension of the parking bays.</p> <p>There is an absence of information in the ES showing how conflict between public transport and construction traffic can be avoided. A full analysis of the journey time penalty and impact on the bus routes to operate this diversion should have been undertaken to show the effects in more detail,</p>



	including the potential need for additional PVR to maintain punctuality. The absence of this information renders the ES inadequate.
CT-06-INDEX-CFA2 – Index Map of: Proposed Scheme	Camden Council notes this map.
CT-06-003a – Proposed Scheme	Camden Council request clarification why Main utilities works are identified within this ‘Proposed Scheme drawing.
CT-06-004a – Proposed Scheme	Camden Council would like clarification about the ecological enhancements proposed for Adelaide Nature Reserve and would like to stress that there will be significant impact for Adelaide Nature Reserve during construction and mitigation will be required. Camden Council would like to stress that the Adelaide vent shaft should be built in keeping with the landscape and consist of green walls and roofs. Camden Council considers the ES is defective in that no mitigation planting is proposed for Camden Gardens. Camden Council recognises opening to the public and appropriate landscaping of the existing closed network rail nature reserve land next to the vent shaft site post construction to be appropriate mitigation to the impacts of the vent shaft on Adelaide Nature Reserve. Camden Council seeks assurances from HS2 Ltd that they will take this proposed mitigation forward.
CT-10-002 – Environmental Baseline	<p>Camden Council considers the ES is defective in that there is green space/woodland north of Freight Lane that has been identified as potentially being required during construction.</p> <p>Camden Council considers the ES is defective in that part of Harrington Gardens has now been identified as land potentially required during construction, and confirmation from HS2 states that it will be used for utility works. This fact is excluded from the Environmental Statement which is very inaccurate, and an assessment of impact for this should have been made.</p> <p>Camden Council would like to point out that many of these replacement bridges are in conservation areas, and that this should be a consideration in the redesigns.</p> <p>Camden Council considers the ES is defective in that heritage assets affected by the Proposed Scheme are under-represented on the Environmental Baseline maps in the three CFA map books in Camden.</p> <p>Camden Council notes that the number of listed buildings is inaccurate, as the system employed of one dot per list entry fails to show each individual building where an entry covers multiple listings.</p>

	<p>Group listings are widespread in an urban area such as Camden, ranging from the numerous terraces of townhouses to groups of railway heritage structures as found in Stables Market. Each individual building which belongs to a group listing should be marked separately on the maps.</p> <p>Camden Council points out that conservation area status is shown on the maps, but the individual conservation areas and their boundaries are not included. Positive contributors in conservation areas are not depicted. Buildings on the Camden draft Local List are not shown on the maps.</p> <p>Camden Council notes that squares protected by the London Squares Preservation Act 1931 are not shown.</p> <p>Camden Council considers the ES is defective in that there are inaccuracies on the heritage maps regarding the grade of some listed buildings, with a number of grade II* listed buildings recorded as grade II listed. Some listed building entries have been omitted from the maps completely.</p>
CT-10-003b – Environmental Baseline	<p>Camden Council considers the ES is defective in that the Adelaide Local Nature Reserve is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required.</p> <p>Camden Council considers the ES is defective in that there are two areas within the open space in Alexandra and Ainsworth Estate that are part of the potential land required for construction. Camden Council would like commitment that this area will not be used.</p> <p>Camden Council notes that the following listed buildings have been omitted from the Environmental Baseline maps:-</p> <ul style="list-style-type: none"> <li>- Regency Lodge, Adelaide Road (grade II listed) (CFA 03).</li> <li>- Former Jack Taylor School, Ainsworth Way (grade II listed) (CFA 03).</li> </ul> <p>Camden Council notes the following listed building has been given an incorrect grade on the Environmental Baseline map:-</p> <ul style="list-style-type: none"> <li>- Horse Hospital, Stables Market, Chalk Farm Road (grade II* listed) – wrongly shown as grade II listed (CFA 02).</li> </ul> <p>Camden Council notes that heritage assets affected by the Proposed Scheme are under-represented on the Environmental Baseline maps in the three CFA map books in Camden.</p>

	<p>Camden Council notes that the number of listed buildings is inaccurate, as the system employed of one dot per list entry fails to show each individual building where an entry covers multiple listings. Group listings are widespread in an urban area such as Camden, ranging from the numerous terraces of townhouses to groups of railway heritage structures as found in Stables Market. Each individual building which belongs to a group listing should be marked separately on the maps.</p> <p>Camden Council notes that conservation area status is shown on the maps, but the individual conservation areas and their boundaries are not included. Positive contributors in conservation areas are not depicted.</p> <p>Camden Council notes that buildings on the Camden draft Local List are not shown on the maps.</p> <p>Camden Council notes that squares protected by the London Squares Preservation Act 1931 are not shown.</p> <p>Camden Council notes that there are inaccuracies on the heritage maps regarding the grade of some listed buildings, with a number of grade II* listed buildings recorded as grade II listed. Some listed building entries have been omitted from the maps completely (see below).</p>
Photomontages	<p>Camden Council notes that photomontages in Map Book CFA 02 show replacement railway infrastructure which is out-of-keeping due to the basic design approach. Although fundamental design issues need to be addressed at this stage, it is imperative that comprehensive mitigation measures are put in place to protect historic fabric wherever possible, covering the re-use of materials and architectural components in accordance with conservation principles.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 show the view from St Pancras Way to the proposed Baynes Street and Randolph Street bridges. The works include the loss of the distinctive 19<sup>th</sup> century cast-iron bridges and brick abutments which are integral to the historic townscape, and their replacement with a bland concrete and steel design with modern brick piers and lower parapets which show no sensitivity to the historic environment, including the 19<sup>th</sup> century NLL Viaduct and setting of the adjacent Camden Broadway Conservation Area.</p> <p>Camden Council considers the ES is defective in that the proposed works involve the loss of important non-designated heritage assets to make way for crude and basic-looking bridges paying no respect to the context. However, no mention or assessment is made in the Cultural heritage section</p>

	<p>of works which are unacceptable in terms of their impact on the historic environment.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 showing the view south over Camden Gardens following the demolition of the heritage assets, show a gap in the streetscape dominated by the crudely designed new viaduct, with the grade II 55 Kentish Town Road and its listed neighbours at 57-63 (odd) isolated and detached from their historic setting.</p> <p>Camden Council considers the ES is defective in that no written assessment is made on the impacts of effects of the demolition on the two non-designated heritage assets, and no mitigation measures are considered, including those to improve the setting of adjacent grade II listed buildings. In the absence of this information and an appropriate replacement design, the proposed demolition works are considered wholly unacceptable.</p> <p>Camden Council notes that 110 Camden Road is a positive contributor in the Camden Broadway Conservation Area, its demolition will affect the setting of the adjacent 112 and the remainder of the terrace (all positive contributors), 178b Royal College Street is a one-storey structure of no heritage value which houses Camden IT Service; however its demolition will affect the setting of the three-storey adjacent building at No 178a which is an early 19<sup>th</sup> century terraced property with a café on the ground floor and residential accommodation above. The flank wall of the three storey end-terrace 19<sup>th</sup> century property at 178a Royal College Street to the south is not shown in the photomontage of the proposed works, giving the impression that is to be demolished; the photomontage is therefore inaccurate and contradictory. No written assessment is made regarding the impacts of demolition on the affected heritage assets, and no mitigation measures are considered for making good adjacent positive contributors. In the absence of this information and an appropriate replacement design, the proposed demolition works are considered wholly unacceptable.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 show the replacement design for the Camden Road bridges. Although it would appear more effort has been put into a more scholarly replacement of the existing cast-iron bridges than at Baynes and Randolph Street bridges, the proportions have altered, in particular the reduction in the parapet height; and the scheme involves the loss of valued well-detailed historic fabric with the replacement parapet having an oversimplified detailed design which detracts from the historic environment. The distinctive 'Camden Road' lettering in white on a blue background has been replicated using the wrong proportions. The substantial 19<sup>th</sup> century brick piers with moulded stone copings have been lost, to be replaced by piers with a plainer brick detail. It is evident in the photomontage that the eastern section of the</p>
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	<p>grade II listed platform 1 canopy has been demolished.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 of the proposed works show the view looking south over Camden Gardens towards the Kentish Town Road arched brick bridge. The image indicates that the widening works will require the rebuilding of one arch. Although a brick face is shown, the arch appears to be supported by a concrete rather than a traditional arched brick lintel as found elsewhere in the NLL Viaduct arches. The historic brick parapet and cornice detail will also be lost, to be replaced by an oversimplified steel parapet paying no respect to the context.</p> <p>Camden Council considers the ES is defective in that the proposed works involve the substantial demolition and re-facing of important non-designated heritage assets to make way for crude and basic-looking engineering structures paying no respect to the context of adjacent heritage assets, including the sensitive setting of Camden Gardens, which is a protected London Square (on the Camden draft Local List, and an invaluable public open space in Camden Town. However, no mention or assessment is made in the Cultural heritage section of works which are unacceptable in terms of their impact on the historic environment.</p> <p>Camden Council notes that photomontages in Map Book CFA 02 show an unacceptable loss of historic fabric resulting from the demolition of major sections of the bridge, including the 19<sup>th</sup> century cast-iron deck and parapets, abutments, piers and coping stones. These historic engineering components give the bridge its landmark value and positive contributor status in the Regent's Canal Conservation Area. The image of the replacement bridge shows a poor replica of the existing bridge, with 'smooth' steel sheets replacing the riveted cast-iron parapet, of different proportions to the existing resulting in the replacement 'Camden Lock' lettering being too squat. The rebuilt abutments are topped by concrete pad stones and the new brickwork lacks the patina of age of the existing bridge and adjacent structures. The photomontages therefore demonstrate an unacceptable loss of historic fabric and the replacement design shows a lack of understanding of the existing railway heritage and its context. In the absence of an assessment of the impacts and effects on all relevant heritage assets, no satisfactory replacement scheme, and no indication of potential mitigation measures, the proposed demolition works are considered wholly unacceptable.</p>
<p>LV-01-006 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-2-018</p>	<p>Camden Council would like to stress that this is an entirely flat on view which in the image reduces the visual effects of depth and therefore does not express the increase in width of the bridge and therefore the proposals impact. More views are required from a range of location including ones</p>

	from oblique angles, which would demonstrate the proposed increase in width, and ones at greater distance. The design looks utilitarian and industrial without attempt to contextualise it. More views are required from a range of location including ones from oblique angles in order to assess the effect of this bridge fully.
LV-01-007 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-2-020	Camden Council would like to stress that this design look utilitarian and industrial without attempt to contextualise it. The images suggest that a solid supporting wall will be placed on the pavement, which is unacceptable.
LV-01-009 – 04Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-1-034	Camden would like to stress that this is an entirely flat on view which in the image reduces the visual effects of depth and therefore does not express the increase in width of the bridge and therefore the proposals impact. We understand that houses to the right of the picture will be demolished to make way for a widened bridge, and yet the flatness of the images suggests no change. More views are required from a range of location including ones from oblique angles, which would demonstrate the proposed increase in width. One from the centre of the square looking towards the houses proposed for demolition for example would give a more useful view. The loss of the houses in townscape terms is undesirable and replacement development for and gap should be considered to reinstate the street.
LV-01-010 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 004-2-024	Camden council rejects that this is a verified view. The proposed image is not working off of the same baseline image as existing. The base image for the proposal has been shrunk by about 10% so that the enlarged bridge reads as being the same as exiting, when intact in is larger. This image is dishonest and unprofessional. To accommodate the fact the proposed image has been reduced, an additional section of townscape to the left of the image is visible and a much greater quantity of foreground pedestrian crossing. The principle consistent element in the drawing, the station building, measures at 10% smaller in the proposed drawing. The level of distortion is also very concerning. This is a straight bridge, and yet the images distort it so that it is curved, thus entirely disingenuous and inaccurate. Honest professional views are required of this bridge from a range of locations including views from Royal college Street and both sides of Camden Road.
LV-01-013 – Verifiable Photomontage Operation Year 1 (2026) – Winter Viewpoint 006-3-004	More views are required from a range of location in order to assess the effect. The proposed bridge does not have the level of detail as the existing and therefore is contextually less appropriate.
LV-03-002b – Construction Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effect of the proposal in many

	<p>areas is significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.</p>
LV-03-003 – Construction Phase Significantly Affected Viewpoints	<p>Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.</p>
LV-03-004a – Construction Phase Significantly Affected Viewpoints	<p>Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.</p>
LV-04-002b – Operational Phase Significantly Affected Viewpoints	<p>Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase</p>



	Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.
LV-04-003 – Operational Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.
LV-04-004a – Operational Phase Significantly Affected Viewpoints	Camden Council considers the ES is defective in that there are more viewpoints for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area. All new bridges require a number of views. Camden Council would also like to stress that many of the views are taken in locations that distort the real impact of the proposals. A comprehensive and honest approach would not just have a greater number of viewpoints both perpendicular and obliquely angled towards key elements of the proposal, but also set them at a range of distances. Currently it is not possible to have a meaningful understanding of the visual effects of the proposal.
SV-05-071 – Operational Noise and Vibration Impacts and Likely Significant Effects	Camden Council considers the ES is defective in that the maps are of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures.
SV-05-002a – Operational Noise and Vibration Impacts and Likely Significant	Camden Council considers that the maps are of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and

Effects	extent of significant adverse effects; and avoidance and mitigation measures.
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### CFA 03 report: Primrose Hill to Kilburn (Camden) (Ref: ES 3.2.1.3)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1		<p>Camden Council points out that Primrose Hill also provides valuable wildlife habitat as well as recreational open space, with a project running to restore 1.6ha of rare acid grassland. Camden Council also points out that access to Adelaide Road Local Nature Reserve is also arranged by appointment throughout the week for schools and community groups, the site being well used as a community and educational resource</p> <p>Camden Council also points out that this section fails to acknowledge or describe the business and commercial context of the area. The economic impacts of the HS2 project are considerable and it is incumbent on the project promoter to recognise this. It is disappointing that it has failed to do so in the area overview</p> <p>Camden Council has provided transport comments relating to the existing transport infrastructure in: Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline Conditions, section 5.5</p> <p>Camden Council has provided transport related comments on the Transport Policy at Transport Assessment (TR-001-000) Traffic and Transport Part 1: Introduction, section 2.3</p>
		2.1.4 – 2.1.6	<p>Camden Council notes that apart from Primrose Hill and the Adelaide Local Nature Reserve, this area has limited public green space. Camden Council considers the ES is defective in that the Adelaide Local Nature Reserve and two areas within Alexandra and Ainsworth Estate Open Space is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required. The space on Alexandra &amp; Ainsworth has just received heritage lottery funding for improvements so will have a significant impact if utility works occur.</p> <p>Camden Council considers the ES is defective in that there is no mention within this section of the</p>

			two children's services that are closest to the proposed scheme – Langtry Children's Centre (Langtry Road) and the Camden Centre for Learning facility (Ainsworth Way) that is due to become an FE college for 16-25 year olds with severe and complex needs.
		2.1.14	Camden Council considers the ES is defective in that there is no mention within this section of the two children's services that are closest to the proposed scheme - Langtry Children's Centre (Langtry Road) and the Camden Centre for Learning facility (Ainsworth Way) that is due to become an FE college for 16-25 year olds with severe and complex needs. Camden Council considers the baseline community overview does not demonstrate sufficient consideration of equality issues such as income, health, gender, belief and ethnic differences. For this reason, Camden Council is not confident the mitigation measures proposed are tailored towards the local community.
		2.1.16 – 2.1.17	<p>Camden Council notes that Adelaide Nature Reserve is a not only an ecological site but also a community facility which is used for Forest Schools for children and Green Gym, a health and wellbeing volunteer programme.</p> <p>Camden Council notes that the land adjacent to Adelaide Local Nature Reserve (i.e. where the proposed vent shaft will be) is a Site of Nature Conservation Interest and is considered by Camden as a Private Nature Reserve.</p> <p>Camden Council considers the ES is defective in that the Adelaide Local Nature Reserve is now mapped as potential land required during construction and Camden Council would like commitment that this will not be the case. At no stage should the Local Nature Reserve be disturbed from construction onsite as the ecological impact will be significant, especially with the cumulative effect of losing the private nature reserve adjacent.</p> <p>Camden Council considers the ES is defective in that there is an open space in Alexandra &amp; Ainsworth Estate that is not listed here, but has just received heritage funding for improvements. Camden Council is concerned that part of this open space has been highlighted as land potentially required during construction.</p>
		2.1.18 – 2.1.27	Camden Council considers that additional relevant Camden Planning Policy to be noted includes our supplementary planning documents (SPDs) which play an important role in our planning decisions by providing more information on how we apply planning policies in Camden. SPG's include conservation area appraisals and management strategies, sites of nature conservation importance

			<p>and Camden Planning Guidance. Some of this guidance has recently been reviewed and reference is made to the review in this section – the most appropriate guidance at the time of writing should be used, it appears that because it was under review it has been omitted completely.</p> <p>Camden Council notes that while planning policy has been identified it is not clear how it will be taken into consideration and how it has informed designs/ development of the scheme, especially with reference to avoidance of harm to local communities. Camden Council requests that HS2 Ltd refer to the Council's latest policies when working up detailed designs and programmes to take into account special characteristics and identified communities. Camden Council would also like to note that a new Action Plan has also been produced, to be published in summer 2013. The appropriate reference for this should be London Borough of Camden (2013) Camden Biodiversity Action Plan 2013-18.</p>
	2.2		<p>Camden Council notes the changes reported in 2.2.4. The changes to the Adelaide Road vent shaft are welcome in principle. The Council considers (2.2.15 refers) that the architectural design of the Vent Shaft and not just its materials and finishes should be able to be influenced by the Council, and it so requests. The Council holds the same view in regard to the Alexandra Place Vent Shaft. Both shafts are located in residential areas where their visual impact will be significant and it is reasonable to request local Council input to their design. Camden Council considers that a better description should have been given, in section 2.2, of the proposed tunnelling works. The sum of the three tunnels and their cross passages, when taken together, constitutes major tunnelling activity. The impact of this on local communities should have been acknowledged in the Overview by way of better description of predicted ground settlement impacts during and after construction. The Overview should be a place to recognise the great concerns and apprehensions of the community living above the tunnels about this matter.</p> <p>Camden Council has provided transport comments on the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 1: Introduction, section 3.1; and at Part 3: London assessment, section 6.1</p>
		2.2.4	<p>Camden Council notes that the revised alignment of the Euston tunnel will require the installation of a replacement sewer along Princess Road to St Mark's Square. The Council is concerned about the disruption that this will cause to Primrose Hill Primary School which is accessed from Princess Road and how safe routes to the school will be maintained whilst construction works are taking place. Camden Council believes that the impacts on Primrose Hill school have not been assessed and</p>

			<p>taken into account within the ES as the school is not mentioned within the document, it is therefore considered to be inadequately informed and therefore defective.</p> <p>Para 2.2.4 states that, following the publication of the draft ES, the location of the Adelaide Road vent shaft and associated headhouse has been moved eastwards so it is no longer situated in the Adelaide Local Nature Reserve. Para 6.4.2 states measures have been incorporated into the design to reduce impacts on the character of the Eton and Primrose Hill Conservation Areas: the headhouse was previously proposed as a two storey structure (approximately 8m high and has been amended to a single storey structure (approximately 4.5m high), but it states the footprint has not changed. The site will include a permanent fenced compound, with security fencing, hardstanding and lighting.</p> <p><u>Response:</u> Para 9.5.8 states the facades will be blank, except for emergency access doors and ventilation louvres. Photomontages in CFA 03 Map Book show the vent shaft and headhouse as a utilitarian dark brick bunker with a flat roof, with the only relief being recessed brick panels as seen from the road side. Para 2.2.14 states that the materials and finishes of the headhouse will be subject to detailed design and agreement with the local planning authority. Photomontages in CFA 03 Map Book show a utilitarian galvanised steel gate to the east of the headhouse, which detracts from the setting of the Eton Conservation Area. Para 2.24 contradicts Para 6.4.2, as it states the footprint of the headhouse has not changed since the draft ES; its dimensions are taken to be approximately 20m by 30m. Fundamental issues of footprint, height, bulk, mass and scale need to be resolved at this stage prior to the implementation of the provisions of the Heritage and Planning Memoranda. In order to fit into the local surroundings, a radical redesign is necessary at this stage, as the existing design causes harm to the surrounding area, particularly to the setting of the Eton Conservation Area; it should be noted that LB Camden suggested in its response to the draft ES that a turf roof and walls would mitigate the visual impacts caused by the shaft, but this has not been addressed in the ES. The proposed headhouse design fails to comply with LB Camden LDF Core Strategy policies on development in conservation areas: policy CS14 requires that development preserves <u>and</u> enhances the character and appearance of conservation areas.</p>
		2.2.13	<p>Para 9.3.1 states the site is bounded on the southern side of Adelaide Road by a long and substantial red brick wall with solid piers and recessed panels, which is likely to be contemporary with the railway and is of historic townscape value (a candidate for the Camden Local List). Photomontages in CFA 03 Map Book show a sizeable section of the wall removed as the vent shaft will require a piled retaining wall. Para 2.2.13 states the replacement wall will be approximately 44m long. However Para 9.5.8 of the Landscape and visual assessment states approximately 90m of the red brick boundary wall will be rebuilt. There are discrepancies as to extent of demolition and rebuilding works.</p>

			Notwithstanding, the demolition of a sizeable section of this wall will cause harm to this non-designated heritage asset, and to the setting of the Eton Conservation Area; no assessment has been made of the impacts and effects of the loss of this historic wall, and the replacement design illustrated in the photomontage is unsatisfactorily detailed. In the absence of information, it is assumed that works to the wall could also affect the setting of 23-49 (odd) Adelaide Road, a group of 13 mid-19 <sup>th</sup> century semi-detached villas which feature on the Camden draft Local List.
		2.2.14	Camden Council points out that this description does not take into account the setting of the Eton Conservation area, and it is important that the design does not cause visual to the surrounding area.
		2.2.20	Regarding the design of the proposed Alexandra Place vent shaft headhouse; fundamental issues of footprint, height, bulk, mass and scale need to be resolved at this stage prior to the implementation of the provisions of the Heritage and Planning Memoranda. The proposed headhouse design fails to comply with LB Camden LDF Core Strategy policies on development in conservation areas: policy CS14 requests that development preserves <u>and</u> enhances the character and appearance of conservation areas.
		2.2.21	The Cultural heritage section needs to stipulate at this stage that the reinstated ramp and integral planting bed in Alexandra Place/Langtry Walk should match the existing in terms of overall design and detail, to be in keeping with the grade II* listed estate and the conservation area. It is imperative that specialist shuttered concrete is used for the main structure, produced using authentic construction and manufacturing techniques. The detailed design of the replacement concrete ramp and integral planting bed needs to be subject of the Heritage Memorandum, so details are agreed by the local planning authority in conjunction with English Heritage.
	2.3		<p>Camden Council notes this section.</p> <p>Camden Council has provided transport comments on the Construction of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.</p> <p>The general description of identified utilities may not be the only ones needing diversion and more critically there is no forecast of phasing of the works which is imperative when trying to establish construction impacts. Therefore, without this being inherent within the assessment, the construction impact on transport is likely to be significantly underestimated.</p>

			<p>Generally, the description contained within this section and the number of construction personnel at each compound which are significant does not feed in to any Construction Trip Generation assessment which would be expected to be contained in Vol 5 Part 3 or a related annexe. Without this derivation then the prediction of construction impacts is not fit for purpose. This paragraph also indicates that there will be limited storage space for construction materials at the construction compounds, which will presumably lead to an large number of smaller just-in-time (JIT) deliveries. To avoid a reliance on JIT deliveries, Camden Council feels there is an opportunity here for HS2 to examine innovative methods of materials management such as the use of consolidation centres, developing and adopting Materials Logistics Plans as set out by WRAP (Waste and Resource Action Programme) and agreeing a suitable Construction Logistics Plan with TfL. More comments on the inadequacy of the construction impact assessment within the ES are contained at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.</p> <p>Camden Council has provided transport comments on the Construction of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.5.</p> <p>Camden Council requests that HS2 have an Emergency Response plan in place to deal with any utility failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time. Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.</p> <p>Camden Council is concerned as to the impact of the road closures related to the construction works on the borough. The ES lacks justification of the periods of construction that would necessitate road closures to ensure that these are demonstrably no longer than absolutely necessary.</p>
		2.3.7 – 2.3.8, 2.3.22, 2.3.29-38	<p>Camden Council is concerned that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES.</p> <p>Camden Council notes that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts</p>



			<p>(planned or precautionary utility works) and the assessment by HS2 of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council is concerned that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council considers that the ES is defective due to insufficient and inconsistent information about the impact of the HS2 project on properties. Camden Council cannot therefore provide accurate comments on the ES.</p> <p>It is impossible for Camden Council to assess which properties will be affected by the HS2 scheme. The information is unclear, inconsistent and there is a lack of detail and clarity about the assumptions made. The impacts and lack of detail make it very difficult to identify buildings and locations affected, for this reason Camden Council deems the ES to be defective in this respect. The ES does not provide the necessary detail to understand impacts on both individual dwellings and effects considered to be significant on a community basis.</p> <p>.</p> <p>Camden Council have scrutinised several reports on each CFA to help the council produce a list of possible properties affected. The ES is not at all clear or consistent in identifying specific or approximate addresses for the properties affected.</p> <p>Inconsistent and poorly presented information makes it difficult to understand the impact on properties. The impact on Regent's Park Road is inconsistently reported in CFA 2 and CFA 3. The impact of demolition of 200 Regent's Park Road is reported in the Volume 5 CFA 2 Community Data community impact assessment record sheet section "2.15 Residential property on Regent's Park Road", however the loss of amenity on the wider community is reported in Volume 5 CFA 3 Community Data community impact assessment record sheet section 2.1 "Residential properties on B509 Adelaide Road and Regent's Park Road" with regards to the construction works at the HS2-HS1 Link portal. The two types of impact from demolition and loss of amenity in a specific location should be reported together, and the impacts on surrounding properties properly identified and described.</p> <p>The description of impacts in CFA 3 makes it particularly difficult for the reader to determine the areas affected. Adelaide Road and Loudon Road are major roads with hundreds of properties. The ES states that "approximately 10 residential buildings on the B509 Adelaide Road and Loudon</p>
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		<p>the borough. Camden Council therefore considers that the ES is deficient in that the baseline assessment does not include the full utility infrastructure in Camden.</p> <p>Utility diversions are likely to have a significant effect on a wide area, therefore have an impact on a lot of people who live, work and travel through Camden. Camden Council considers the ES is defective in that the level of disruption of critical services (water, heating, lighting, etc.) and the effect this will have on residents as well as pressure on council services on managing assets and the welfare of residents. Camden Council expects provision to be maintained through HS2 works, and for HS2 to be responsible and liable for all cost for emergency provision and compensation for disturbance. Camden Council considers discussions between Camden Council and HS2 should commence at the earliest opportunity and an approach agreed for any work required. Camden Council will require HS2 to undertake full risk assessment and monitoring of all utilities in the vicinity of HS2 sites (should we include when/how often these are done?). Camden Council will require compensation for any break in service cause by HS2 utility diversion works or construction works. Camden Council requests that all interface with affected utilities is managed in a timely manner by HS2 and that Camden is compensated for any additional burden imposed. Camden Council requests that HS2 manage all temporary works and deals exclusively with stopping up of services / rights of way and other wayleaves affected by the proposals.</p> <p>Camden Council requests that HS2 manage all other statutory provision associated with the impact to property including but not limited to party wall matters. Camden Council requires that the Council is indemnified in perpetuity against any and all claims or action that may arise consequential to the use of high frequency radiation. Camden Council will require compensation where the siting of towers/cables impinges on the ability to deliver services e.g. by restricting use of cranes, mobile platforms and other high access equipment. Camden Council requests working digital files of HS2 plans and sections in facilitate Camden Council/HS2 discussions of effected areas and mitigation work required.</p> <p>Camden Council considers the ES is defective in that the impact of HS2 arising from utility diversions and construction work on the health and well-being of local communities and the Council's ability to manage services in affected areas in Camden has not been properly assessed. Camden Council services include, but are not limited to, deliver of housing repairs and capital works, management of housing voids, mechanical and electrical services, and caretaking services. Camden Council is concerned about the health and safety impacts of access disruption and would require HS2 to work with Camden Council to ensure HS2 construction works will not interfere with the delivery of services</p>
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			<p>e.g. meals on wheels to vulnerable residents, refuse collection, estate cleaning, and ensure safe working conditions are maintained throughout council estates. Camden Council would require that HS2 works will not interfere with the delivery of council estate services and ensure safe working conditions are maintained throughout Camden Council estates. Camden Council would require that standards of habitability are maintained throughout construction work, including all aspects of health and safety (e.g. fire safety, pest control etc.) are maintained. Camden Council would require that an overview of HS2 works is provided 5 years in advance in line with projected expenditure of the Council's capital programme and 12 months' notice of detailed works in order to allow the Council to respond to the impact on services and communities and meet health and safety regulations. There are significant resources needed to ensure these impacts are managed safely and Camden Council will require compensation for increase costs to housing management and contractor resources incurred to maintain standards where disruption has been caused by HS2.</p> <p>Camden Council seriously questions why the aspects of the construction works centring around the construction of the proposed retaining wall need to be so long in duration and why these need to cause the closure of Adelaide Road for such long periods during the construction period, which will cause significant adverse impacts to the surrounding area, particularly in terms of impacts caused by traffic.</p> <p>In addition to the equipment inside the VS/head house at Alexandra Ventilation Shaft, there will be drainage tanks and utility connections for firefighting and tunnel building drainage.</p>
		2.3.38	<p>The Cultural heritage section needs to stipulate at this stage that a sensitive landscaping scheme should be reinstated in Alexandra Place/Langtry Walk in accordance with the original planting scheme by landscape architect Janet Jack, which was integral to the overall design of the grade II* listed estate. The detailed design needs to be subject of the provisions of the Heritage and Planning Memoranda, so details are approved by the local planning authority in conjunction with English Heritage.</p>
		2.3.44 – 2.3.50	<p>Camden Council recognises the vast quantities of excavation waste generated on this section of the development. Camden Council would like assurances that adequate mitigation is in place should a higher proportion of this waste be unacceptable for reuse and recycling, therefore requiring off-site disposal to landfill, with the associated impacts on transport and other environmental factors. Consideration should also be given to the potential impact this would have on the capacity of regional waste disposal facilities. From the data in appendix WM002 landfill capacity can be seen to decline</p>

			year on year from the baseline data.
		2.3.52 – 2.3.53	Camden Council considers that with such complex works taking place in a congested area and associated need adapt old infrastructure with the risks associated with the totality of the scope of work, some indication of a programme risk profile should have been included in the document. As shown, the construction profile shows no contingency or how slippage would be accommodated, together with its consequences for works, rail activities and community impacts.
	2.4		Camden Council has provided transport comments on the Operation of the Proposed Scheme at Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment, section 6.6.
	2.4	2.4.8 – 2.4.14	Camden Council understands the operational tonnages generated in the Primrose Hill – Kilburn area are low (15 tonnes p/a) and welcomes the low level of waste confined to landfill.
	2.5		<p>Camden Council considers it important to reflect the difficulties that the Primrose Hill to Kilburn Community forum have had in dealing with HS2 Ltd, not least HS2 Ltd.'s unwillingness to accept the forum's terms of reference, which led to them withdrawing from the process. Camden Council notes that there is no community forum representation for the Primrose Hill to Kilburn CFA. Therefore, the Council considers that details of HS2's approach to community engagement in the area should be provided. Camden Council requests that this includes a comprehensive standard format for recording and responding to key concerns of the community. The Council requests that record of engagement outside of the community forum structure and any key messages from this engagement is be referenced.</p> <p>Camden Council notes that the document only describes engagement relating to the formal community forum structure from which participants opted out. Details of how HS2 Ltd intend to engage with the local community going forward should be provided in order to demonstrate that the views of the local community will be considered.</p>
	2.6		Camden Council considers the Environmental Statement to be deficient because it did not adopt a suitable methodology for evaluating alternatives. In particular, it is at best unfortunate that HS2 Ltd did not consult Camden Council on alternatives in view of the tightly grained and complex urban area through which this section of the scheme runs. The local authority concerned has a better understanding of its area than does HS2 Ltd and its input may have changed the basis of parts of the proposed scheme, and thereby minimised its adverse impacts and community concerns. This

			omission is a methodological failing which has rendered as inadequate the basis of the Environmental Statement assessment and its conclusions. Many of those concerns in this area relate to tunnelling and potential subsidence and this is addressed in the Council's comments for section 2.2.
		2.6.16	<p>The alignment of the Euston tunnel has been revised since the draft ES between Euston tunnel portal and Adelaide Road vent shaft, locating it closer to the existing railway corridor, reducing the number of residential properties that could potentially be affected in the Gloucester Avenue area.</p> <p>2.6.16 This reduces the number of properties on Gloucester Avenue that the tunnel passes beneath and which may be affected by settlement, although some buildings still sit directly above or close to the tunnel. (Response: In Gloucester Avenue and Chalcot Square there are a number of grade II listed buildings (including The Engineer PH, 65 Gloucester Avenue) and positive contributors in the Primrose Hill Conservation Area.</p> <p>Para 2.6.16 states the re-alignment reduces the number of properties on Gloucester Avenue that the tunnel passes beneath and which may be affected by settlement, although some buildings still sit directly above or close to the tunnel. In Gloucester Avenue and Chalcot Square there are a number of grade II listed buildings which may still be at risk from settlement (including The Engineer PH at 65 Gloucester Avenue), in addition to as sizeable number positive contributors in the Primrose Hill Conservation Area. No mention is made of the impacts on the grade II listed Cecil Sharp House, situated at the junction of Gloucester Avenue and Regent's Park Road, home of the English Folk Dance and Song Society, in immediate proximity to the land potentially required for construction. Map CT-05-003a shows that a stretch of the Regent's Canal towpath west of Gloucester Avenue bridge could be potentially required during construction, adjacent to grade II listed The Engineer PH at 65 Gloucester Avenue and grade II listed Primrose Hill Primary School in Princess Road, all within the Primrose Hill Conservation Area. No mention is made of the impacts on these heritage assets. Map CT-05-003a shows two sections of highway in Berkley Road and Chalcot Road, potentially required for construction. No mention is made of the impact on heritage assets including grade II listed buildings in the adjacent Chalcot Square and positive contributors to the Primrose Hill Conservation Area.</p>
3			Camden Council considers the ES is defective in that the ES does not take into consideration the activities of providing and maintaining Camden's urban forest. Urban forests are well recognised as a collective resource and have an essential function for things like air temperature regulation, cleaning pollutants from the air through filtration as well as supporting biodiversity. Urban forestry is a

			<p>recognised discipline, and trees and woodlands in towns and cities should not be considered in isolation, but as a collective resource in the same way rural forests are.</p> <p>Camden Council points out that the ES does not establish a baseline for Camden's urban forest (trees and woodlands) and its functions. It does not provide any information on the number, species and locations of trees to be affected and what proportion of Camden's overall tree resource and canopy cover will be affected.</p>
4	4.1		<p>Camden Council questions the use of 2017 air pollution estimations as a baseline for all construction; whilst we accept that to use 2017 data as the baseline for the entire 10 years could be classed as conservative, past experience indicates that 2017 data is likely to be an underestimation of levels in 2017, as in the past, emissions have entirely failed to reduce in line with predictions.</p> <p>Camden Council demands that all boilers used for the station during the in use phase should be "Ultra Low Emission", and energy demands should be minimised through energy efficient building and where possible the use of renewables.</p>
	4.3		<p>Camden Council strongly questions the use of the DEFRA background maps to predict emissions in 2017 and 2026 as this is not likely to be the worst case scenario. The DEFRA background maps are highly likely to significantly under-estimate emissions in these years. These maps assume reductions based on improved vehicle emissions which have yet to be realised, and in the past, have not materialised as hoped. Usual industry practice, when undertaking assessments of this kind, also includes the use of current levels as an additional baseline representing a worst case scenario. The ES is considered defective without the inclusion of this worst case scenario.</p>
	4.4		<p>Camden Council strongly refutes the Environmental Statement's classification of those areas where, even after mitigation the impact is 'Slight Adverse', as 'Insignificant.' Within the IAQM Guidance, if the impact is still 'Slight Adverse' this is actually the worst designation (which only offers two options – insignificant and slight adverse, after mitigations are in place), so we do not agree that it is insignificant.</p> <p>Camden Council considers the ES is defective in that the predicted adverse impacts on numerous roads and receptors during construction as a result of road closures and construction traffic, as these are highly significant. There is also no clear indication of the duration of these effects.</p>



			<p>Camden Council feels that the analysis of exactly which receptors are at risk from construction and the reason why these properties have been identified as receptors and others as near to the construction haven't been is unclear.</p> <p>Camden Council would expect the Environmental Statement to give some indication of the time frames of predicted construction impacts, given that these could be anything from a few weeks to ten years, more information on this is essential.</p> <p>Camden council considers the ES is defective in that the lack of sufficient analysis of and mitigation for locations suffering from combination and/or cumulative impacts – cumulative impacts of dust and road traffic have not been properly considered and profiled.</p> <p>Camden Council considers the ES is defective in that traffic and congestion may be underestimated. Further research is required but if this is the case, then air quality impacts are also under-estimates. If the scrutiny of the Transport assumptions reveals under estimates of traffic disruption then there will be knock-on effects for air quality.</p> <p>Camden Council considers the ES is defective in that the impact on static receptors has been considered, but no consideration has been given to the impact on pedestrians and cyclists using these areas, who will be exposed to significantly increased pollution levels over a long period of time.</p> <p>Camden Council considers the ES is defective in that it is not clear that the works required for utilities have been scoped into the ES. If there have not been scoped, there will be resultant increases in traffic disruption and pollution levels.</p> <p>In addition to the comments on the CoCP, Camden requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA</li> </ul>
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			<p>emissions limits</p> <ul style="list-style-type: none"> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul> <p>Camden Council considers that Air Quality impacts have been significantly under-estimated, due to the under-estimation of congestion within the transport assessment. Many of the baseline and future year scenarios during the construction phase are predicted by HS2 to have 'free-flow' conditions on the highway network. However, this is not the case and therefore the congestion will result in poorer air quality results than predicted in the Environmental Statement.</p>
		4.4.5	<p>Camden Council considers the ES to be deficient as it has not taken account of future plans for children's services. In particular, Camden Council has plans in place to establish a new Further Education provision for 16-25 year olds with severe complex needs on the site of the former Jack Taylor special school site which is in close proximity to the Adelaide Road vent shaft and associated construction compound.</p> <p>Camden Council further believes that the methodology used for assessing construction dust emissions is inadequate. The ES states that, in line with the methodology, a single property cannot experience 'significant effects'. The assessment of impacts arising from construction dust emissions has been undertaken using the methodology based on that produced by the Institute of Air Quality Management (IAQM) the assessment of which is partly dependent on the approximate number of receptors within close proximity to the dust generating activities. Thus, a single property very close to a construction site cannot experience a 'significant effect' as defined by this methodology. In addition, the level of significance on a property is therefore driven by the number of properties affected. This doesn't allow scope to recognise the effects on individual schools, children's centres and other children's services where a significant number of children and staff could be affected.</p> <p>As a result of the above, Camden Council considers the ES is defective in that the level of dust</p>

			<p>emissions from the Adelaide Place vent shaft and the health and safety impacts on particularly vulnerable young people who will shortly be using the site.</p> <p>Camden Council notes that the Environmental Statement accepts there will be a significant impact on the Alexandra Road estate and the former Jack Taylor site is an integral part of this estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant.</p> <p>Camden Council therefore disagrees with the assumption within the Environmental Statement that there will not be a significant effect as a result of these works. Camden Council considers that the proposed development will in fact cause significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
		4.4.6	<p>Camden Council considers the ES to be deficient as it has not taken account of future plans for children’s services. In particular, Camden Council has plans in place to establish a new Further Education provision for 16-25 year olds with severe complex needs on the site of the former Jack Taylor special school site which is in close proximity to the Adelaide Road vent shaft and associated construction compound.</p> <p>Camden Council further believes that the methodology used for assessing construction dust</p>

			<p>emissions is inadequate. The ES states that, in line with the methodology, a single property cannot experience 'significant effects'. The assessment of impacts arising from construction dust emissions has been undertaken using the methodology based on that produced by the Institute of Air Quality Management (IAQM) the assessment of which is partly dependent on the approximate number of receptors within close proximity to the dust generating activities. Thus, a single property very close to a construction site cannot experience a 'significant effect' as defined by this methodology. In addition, the level of significance on a property is therefore driven by the number of properties affected. This doesn't allow scope to recognise the effects on individual schools, children's centres and other children's services where a significant number of children and staff could be affected.</p> <p>As a result of the above, Camden Council considers the ES is defective in that the level of dust emissions from the Adelaide Place vent shaft and the health and safety impacts on particularly vulnerable young people who will shortly be using the site.</p> <p>Camden Council notes that the Environmental Statement accepts there will be a significant impact on the Alexandra Road estate and the former Jack Taylor site is an integral part of this estate. The Council therefore believes that the impacts on the former Jack Taylor school should also be considered as significant.</p> <p>Camden Council therefore disagrees with the assumption within the Environmental Statement that there will not be a significant effect as a result of these works. Camden Council considers that the proposed development will in fact cause significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust</p>
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			and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.
		4.4.9	Camden Council considers the ES is defective in that the disruption to highways around Boundary Road as this will be the only access to and from the future 16-25 FE college on the former Jack Taylor site at Ainsworth Way.
	4.5		Camden Council considers the Environmental Statement deficient because operational impacts from the train and tunnel itself are roundly dismissed without such dismissal being justified and evidenced through further research, as some current industry research indicates that particulate and other pollution can be emitted from wheels, brakes etc. on electric trains.
		4.5.3 – 4.5.21	<p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers HS2 Ltd.'s methodology in predicting combined effects to be limited and insufficient. Camden considers the ES is defective in that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES to be defective without an assessment of cumulative impacts and baseline surveys to be undertaken in advance of works.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 18 months be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or</p>

		<p>people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council requests that appropriate compensation should be provided to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES is defective in that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehouse as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council is concerned that HS2 do not have an understanding leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p> <p>Camden Council would like to stress that construction over a five year period will cause disruption to the Adelaide Nature Reserve that is adjacent. Camden Council notes that the land where the vent shaft will be is considered a Site of Nature Conservation Importance and therefore destroying the woodland will have a significant adverse and permanent effect on the area's ecology.</p>
	5.1	<p>Camden Council finds the demolition of community, commercial, and residential property unacceptable due to the unjustified impact on existing communities. The HS2 HIA identifies that moving home has an impact upon health, especially for older people and children. The mitigation in the ES suggests that re-housing options will be provided. However, the Council's experience in re-housing suggests that often people need a range on mitigation measures to counter the effects of moving home and from their communities including access to services and ongoing support. This is particularly the case for people that feel they were not part of the decision to move.</p> <p>Camden Council considers that the number of homes across all tenures in public and private ownership negatively impacted by HS2 proposal have increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the</p>

			<p>extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden.</p> <p>Camden Council considers the ES is defective in that the Environmental Statement does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example in Abbey Road. The ES is not clear about defining “additional committed development” and has omitted Camden Council’s regeneration schemes in the area. Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council’s Cabinet as part of the borough’s Community Investment Programme and some have been granted detailed planning permission. The Council’s Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include Abbey Road, Alexandra and Ainsworth, Langtry Walk, and Adelaide Road regeneration schemes in CFA 3. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council would also like to stress that impact from the construction of a vent shaft within a Site of Natural Conservation Interest and adjacent to a Local Nature Reserve will also be a significant impact.</p> <p>Camden Council is concerned that the Adelaide Local Nature Reserve and parts of the Alexandra&amp; Ainsworth Estate Open Space are now mapped as potential land required during construction and Camden Council would like commitment that this will not be the case. At no stage should the Local Nature Reserve be disturbed from construction onsite as the ecological impact will be significant, especially with the cumulative effect of losing the private nature reserve adjacent.</p>
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	5.2		Camden Council would like clarification on what resources this section is specifically referring to, as for some local resources, as 1km to alternative resources is too large a distance.
	5.3		<p>Camden Council notes that the Adelaide Road regeneration scheme aims to deliver a new and improved health centre, 72 residential units, the opportunity to improve the environment and landscape throughout the estate, enhanced high quality open and play spaces for Blashford, enhancement of the surrounding area including better visual access to the Grade II listed tunnels, buildings and landscaping designed to reduce the opportunity for anti-social behaviour and crime.</p> <p>Camden Council considers the ES is defective as it fails to assess the negative impacts of the Adelaide Road vent shaft proposals on Adelaide Road regeneration proposals. The proposals include road closures affecting access for construction traffic to enable development and visual impact to new residential units leading to financial impact on sales values for private element. This includes impact of land potentially required during construction identified in the ES, traffic on roads and road closures affecting access for construction traffic to enable development, and potential HS2 utility works on the regeneration scheme. Camden Council considers the ES should have (but doesn't) identify mitigations for any impacts or compensation as an alternative so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council has been advised by HS2 engineers that the construction and depth of tunnelling will not adversely affect the development of the new scheme, however if once detailed design is complete, this is not the case; Camden Council would require financial compensation for loss of opportunity or delay. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council notes that the land adjacent to Adelaide Local Nature Reserve (where the proposed vent shaft will be) is a Site of Nature Conservation Interest and is considered by Camden as a Private Nature Reserve and should be considered in the environmental baseline. Camden Council would like to point out that there is a planned development for the Adelaide Road Regeneration Scheme which is on the other side of the Local Nature Reserve. Although planning permissions is yet to be sought, resident consultation is well under way and this ought to be a consideration for the future construction baseline.</p> <p>Camden Council is concerned about the impact of HS2 on the refurbishment and investment programme on the Grade II* listed Alexandra and Ainsworth estate due to be complete in December</p>

		<p>2014. Camden Council has secured lottery funding to the value of £ £2,128,568 to undertake a works including replacement of paving, play grounds, and improvement to entrances, exits and the landscape on the whole estate. Funding also covers a 5 year plan of activities in line with HLF requirements for community involvement. Camden Council would require that where HS2 works adversely affect this project that HS2 reinstate to conservation standards, in line with condition before HS2 works.</p> <p>Camden Council would require that all council owned utility infrastructure/ associated containment and routes of entry into property be surveyed before and after, and for HS2 to accept responsibility in perpetuity for any damages occurred during the construction or operation of the project. Camden Council would welcome discussions with HS2 so an agreed schedule of works can be programmed and co-ordinated to mitigate the impact to the community and reduce costs to HS2 scheme.</p> <p>Camden Council considers the ES is defective in that the vent shaft will compromise the access to the estate and potential utility works will cause damage to listed assets and this has not been properly assessed.</p> <p>Camden Council considers the ES is defective in that it does not assess the impact of the removal of facilities which the community relies on, especially the loss of a laundrette facility, at the location of the proposed Alexandra Place vent shaft and requests for this impact to be mitigated. The laundrette plays a significant service for local residents. This is due to the internal layouts of the grade II* listed interiors which do not accommodate washing machines. Many of the residents, especially tenants rely upon this facility to wash their laundry.</p> <p>The Council considers the ES is defective in that the loss of the artists' studios at the location of the proposed Alexandra Place vent shaft has not been properly assessed. Such a loss will be detrimental to the cultural wealth of the area.</p> <p>By removing all forms of activity from the site of the Vent Shaft building – especially ground floor commercial units – this key entrance to the Alexandra and Ainsworth Estate and Alexandra Road Park, and an important local route, will become unsafe and underused, and a magnet for anti-social behaviour, as there will be no passive surveillance or overlooking along a significant stretch of the route from Loudon Road to Rowley Way.</p> <p>Camden Council notes that the site of the Alexandra Place vent shaft is in council ownership and has</p>
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			<p>been identified as a site with development potential. The Council considers that the use of this large site at this prominent location at the entrance to the grade II* listed Alexandra and Ainsworth estate would have a permanent blighting effect that will prevent the regeneration of this local area and exacerbate existing issues of deprivation, social exclusion and community safety. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council notes that the Abbey Road regeneration schemes includes between 250-300 new homes built, with at least half of the space for affordable housing, a new community hub containing a community centre and health centre, shops and commercial facilities, new shops and office space, new recycling and waste facilities, improved roads and crossing points to make it safer for pedestrians, improved parks, gardens and outside space. The first phase of development will be on the site of the existing multi-storey car park on the junction of Belsize Road and Abbey Road. The footbridge from the car park across the railway line was successfully removed during Christmas 2012. Camden Council is planning to demolish the car park building in early summer 2014 and hope to start building towards the end of 2014.</p> <p>Camden Council considers the ES is defective in that it uses the terms “community facilities” and “community resources” to refer to retail (including provision of food and drinks, and services such as Doctor and dental surgeries) premises, education premises and faith / religious premises, as well as tenant halls and voluntary sector run community centres. Each of these facilities provides a different offer to the community, and these differences should be identified and considered in the Environmental Statement. HS2 should make direct contact with every affected property in these categories and address any requests for mitigation and / or compensation.</p>
		5.3.7	<p>Camden Council considers the ES is defective in that there is no mention in this section of the former Jack Taylor school site which is due become an FE college for 16-25 year olds with severe complex needs and which we believe will be significantly impacted by the proposed scheme. Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school should also be considered as significant.</p>
		5.3.8 – 5.3.9	<p>The ES is deficient in assessing the future baseline during construction and operation in that a wide range of development proposals spanning the years of construction and beyond have not been considered, for example in Abbey Road. The ES is not clear about defining “additional committed</p>

		<p>development” and has omitted Camden Council’s regeneration schemes in the area. Camden Council reiterates that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals that are omitted from the ES. These schemes are committed developments that have been approved by Camden Council’s Cabinet as part of the borough’s Community Investment Programme and, in the case of Abbey Road, have been granted detailed planning permission.</p> <p>Camden Council would like to reiterate that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals. The Council’s Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. These include Abbey Road, Alexandra and Ainsworth, Langtry Walk, and Adelaide Road regeneration schemes in CFA 3. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	5.4	<p>Camden Council requests HS2 to manage the interface with Utilities and to provide information to its residents about all temporary /permanent impact to service through effective communication channels.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES defective without an assessment of cumulative impacts and baseline surveys to be undertaken in advance of works.</p> <p>Camden Council considers the ES should have included a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>

			<p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council finds it unacceptable to comment on the ES's assessment of impacts and effects of sounds, noise, and vibration prior to reviewing the Noise Insulation and Temporary Re-housing Policy which has not been published. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES defective as full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions has not been properly assessed. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council is concerned that where noise insulation is dependent on windows remaining closed, this presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p> <p>Camden Council do not consider the avoidance and mitigation measures noted here to be exhaustive and considers that further avoidance and mitigation measures should be explored with a view to including within the Local Environmental Management Plan.</p> <p>Camden Council appreciates the moving of the vent shaft out of the Adelaide Nature Reserve, however the construction and operation of the vent shaft will still cause significant disruption to the ecological site. Camden Council notes that the design of the vent shaft should be in keeping with the landscape of the surrounding area, in this case with green walls and roofs.</p> <p>The HS2 HIA identifies that moving home has an impact upon health, especially for older people and children. The mitigation in the ES suggests that re-housing options will be provided. However, the Council's experience in re-housing suggests that often people need a range on mitigation measures to counter the effects of moving home and from their communities including access to services and ongoing support. This is particularly the case for people that feel they were not part of the decision to move. Camden Council that the number of homes across all tenures in public and private</p>
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			<p>ownership negatively impacted by HS2 proposal has increased significantly based on wider secondary impacts (planned or precautionary utility works) and the assessment by HS2 Ltd of the extent of noise and other environmental impacts during construction. This increase will put significant additional strain on local communities and council services, and exacerbates the issue of inadequate compensation currently proposed by HS2 which bears no relationship with the expanded affected area in Camden. Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being.</p> <p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers that HS2's methodology for assessing a combination of impacts on the community is not robust. Camden Council considers impacts on individual properties can be significant. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES to be defective without an assessment of cumulative impacts and baseline surveys to be undertaken in advance of works.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
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		<p>Camden Council considers the ES does not properly assess the impact of proposals on the local community, as evidenced in the omissions and generalisations within the HS2 Equality Impact Assessment and Health Impact Assessment. For example, there are generalisations within the EIA with reference to child poverty at paragraph 4.3.4 and female headed households 4.3.5. Omissions include: the lack of leaseholder data; and lack of information on deprivation and protected groups such as female-headed households and disabled and vulnerable adults/children.</p> <p>Camden Council considers the ES is defective in the data and method used. In the EIA impact analysis only a small amount of the data in the Euston Profile is included and analysis of more information is required to provide a greater understanding of the affected population and the specific impacts. HS2 mainly use descriptive forms of data analysis rather than a multilevel form of data analysis, such as using multivariate analysis and regression analysis to uncover the characteristics of the affected neighbourhood using indicators present in the Census 2011 and Deprivation Indicators. This would be most relevant when looking at correlations with poverty, tenure, health, age and ethnicity. There is no comment on social capital impacts as a result of demolition and relocation of the community. Numerous studies have found the benefits of maintaining social capital in deprived neighbourhoods and HS2 can refer to Camden's 2008 Social Capital Study as a reference point. HS2 has not mentioned specific housing impacts to the Euston households affected by the proposals and has not assessed the impact on leaseholders.</p> <p>Camden Council considers the ES has not properly assessed the impacts of HS2 on vulnerable residents, especially children and the elderly, and those suffering from mental or physical medical conditions. Although the HIA has been published (as supporting document) there is little evidence that the HIA has fed into the ES.</p> <p>The Council also considers health should have been further integrated within the ES. HIA does not identify significance or likelihood of health impacts or make clear the evidence behind proposed mitigation detailed in ES. For example, the displacement of residents from existing housing is likely to have an impact on health of residents. While the impact has been acknowledged, no attempt has been made to define the extent of the issue or provide potential mitigation options. For example, Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p>
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		<p>The community profiles within the HIA do not make best use of local health information on the communities impacted by the proposed scheme. Like many inner London boroughs the health profile of Camden residents can vary across the borough and between and within wards. The proposed scheme will go through many Camden wards: Regent's Park; St Pancras and Somers Town; Cantelowes; Camden Town with Primrose Hill; Swiss Cottage; Kilburn; Belsize and Haverstock. The profile of these communities vary and therefore the impacts are likely to be more significant on certain groups such as older people, people with long term conditions or with mental health issues. The impacts identified have not been applied to these communities to determine what the impact will be and more importantly what the mitigation is required. For example, there is little assessment of cardiovascular disease, mental health and coronary heart disease. All of these conditions can be impacted by various aspects of construction and operational activity of proposed scheme. Rates of circulatory diseases quoted and the commentary summarising cancer and respiratory disease compared to regional benchmarks cited from 2012 health profiles have been superseded by 2013 profiles; these were published in September 2013. Borough level rates mask large variation within Camden; more detailed information is available from health profiles and the joint strategic needs assessment (JSNA).</p> <p>Camden Council requests HS2 to manage the interface with Utilities and to provide information to its residents about all temporary /permanent impact to service through effective communication channels.</p> <p>Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys. Camden Council considers the ES defective as it does not publish a full list of affected properties including those identified for demolition and adverse effects from environmental impacts.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p>
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		5.4.3	Camden Council considers the ES is defective in that impacts on visitors, staff and patients to the Royal Free Hospital during the North London Line closures as a result of bridge constructions in Camden Town has not been assessed.
		5.4.9	Camden Council considers the ES is defective in that the impact of increased traffic and construction disturbance along Haverstock Hill. The Environmental Statement has identified the school as

			<p>suffering significant effects as a result of the proposed scheme with significant air quality, noise and HGV effects during construction, resulting in loss of amenity with varying intensity over an 11 year period. Camden Council considers that the Environmental Statement does not sufficiently show how the school would be able to continue to operate during this period of intense disruption with these significant effects, due to construction related impacts and remains concerned that the Environmental Statement does not adequately address this, nor does it set out how safe routes to schools will be established and maintained.</p> <p>Camden Council is disappointed to note that the proposed development will cause these significant effects. To date no discussions have been held with Camden Council over how HS2 intends to mitigate against impacts on the school.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking relevant assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
		5.4.11	<p>Camden Council rejects the conclusion that the Adelaide Road vent shaft will not affect the recreational and educational resource of Adelaide Road Local Nature Reserve. Camden Council points out that Adelaide Road Local Nature Reserve is identified in the map-books as land potentially required during construction, if used then significant impacts would occur. Camden Council requests commitment that this is not the case. Camden Council also points out the eastern part of the Site of Importance to Nature Conservation will be destroyed and remain a construction site for 5 years; the ensuing noise, traffic and visual landscape changes are likely to reduce the recreational value of the</p>

			Local Nature Reserve; furthermore – clearance of the site will have long term impacts on the ecological integrity of the entire Site of Importance to Nature Conservation, as restoration of the woodland will take many years to establish, and this is likely to lead to a reduction in the educational value of the Local Nature Reserve and this will reduce the recreational value of the adjacent Local Nature Reserve will further reduce the value of the site for nature and therefore access to nature
		5.4.12	Camden Council rejects the assessment that disturbance caused by construction is not significant. Camden Council stresses that the Local Nature Reserve is used extensively by community groups and schools throughout the week, by appointment, as well as public access at the weekend
		5.4.18	Camden Council considers the ES is defective in that there is no mention of the existing and future use of the former Jack Taylor site at Ainsworth Way which is an integral part of the Alexandra Road Estate. Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant in view of the impact construction works around the vent shaft will have on this site.
		5.4.18 – 5.4.26	Camden Council considers the ES is defective in that the removal of facilities which the community relies on, especially the loss of a laundrette facility, at the location of the proposed Alexandra Place vent shaft and requests for this impact to be mitigated. The laundrette plays a significant service for local residents. This is due to the internal layouts of the grade II* listed interiors which do not accommodate washing machines. Many of the residents, especially tenants rely upon this facility to wash their laundry. Camden Council notes that the site of the Alexandra Place vent shaft is in council ownership and has been identified as a site with development potential. The Council considers that the use of this large site at this prominent location at the entrance to the grade 2* listed Alexandra and Ainsworth estate would have a permanent blighting effect that will prevent the regeneration of this local area and exacerbate existing issues of deprivation, social exclusion and community safety. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2. Camden Council would like to reiterate that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals, including in Alexandra Place, Langtry Walk, and Adelaide. The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.
		5.4.21	Camden Council considers the ES is defective in that there is no mention of the existing and future use of the former Jack Taylor site at Ainsworth Way which is an integral part of the Alexandra Road

			Estate. Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant in view of the impact construction works around the vent shaft will have on this site.
		5.4.22	Camden Council expect that as further work is developed to identify effects and to identify mitigation measures these are discussed with the school and the Council through the Children's Services mitigation working group and the detailed construction management plan.
		5.4.24	Camden Council has also learned from residents on the Alexandra and Ainsworth Estate that the laundrette on the vent shaft site is a vital facility for them, as many of the flats have small kitchens that cannot accommodate a washing machine. Therefore they are very dependent on the laundrette, the loss of which needs to be mitigated through reprovision in the immediate vicinity. Camden Council considers the ES is defective in that the lack of reference to the important location of the vent shaft at the entrance to the estate and the effect that this could have upon communities. Current proposals detract further from what is already an unwelcoming entrance to the listed estate. Camden Council's own consultation has identified concerns with having a dead frontage in this location – this should be identified in the communities section as it could impact upon the way residents use their estate and surrounding local facilities. This effect is likely to be felt throughout construction and operation unless innovative design solutions are considered and implemented.
	5.5	5.5.2	Camden Council disagrees with the statement that there will be no significant effects during operation. It is of concerned that the current proposals for the vent shaft do not include an active frontage. Current proposals detract further from what is already an unwelcoming entrance to the listed estate. Camden Council's own consultation has identified concerns with having a dead frontage in this location – this should be identified in the communities section as it could impact upon the way residents use their estate and surrounding local facilities. This effect is likely to be felt throughout construction and operation unless innovative design solutions are considered and implemented.
6			Camden Council notes that with regards to 6.4.Alexandra Place, no assessment is made in the Cultural Heritage section of the harm caused to the conservation area or listed buildings by the loss of key landscape features which in this case are an integral part of the historic environment, since the concrete ramp by way of its attachment to the concrete mega-structure is covered by the grade II* listing. The photomontages in the CFA 03 Map Book provide no assurances that the existing shuttered retaining wall running along the ramped pedestrian access to the estate will be rebuilt to match the existing. The Cultural heritage section needs to stipulate at this stage that the reinstated

			<p>ramp and integral planting bed should match the existing in terms of overall design and detail, to be in keeping with the grade II* listed estate and the conservation area. It is imperative that specialist shuttered concrete is used for the main structure, produced using authentic construction and manufacturing techniques. The detailed design of the replacement concrete ramp and integral planting bed needs to be subject of the Heritage Memorandum, so details are agreed by the local planning authority in conjunction with English Heritage. The Cultural heritage section needs to stipulate at this stage that a sensitive landscaping scheme should be reinstated in accordance with the original planting scheme by landscape architect Janet Jack, which was integral to the overall design of the grade II* listed estate. The detailed design needs to be subject of the provisions of the Heritage and Planning Memoranda, so details are approved by the local planning authority in conjunction with English Heritage.</p>
	6.3	6.3.3	<p>Camden Council considers the ES is defective in that no mention is made of the impacts on the grade II listed Cecil Sharp House, situated at the junction of Gloucester Avenue and Regent's Park Road, home of the English Folk Dance and Song Society, in immediate proximity to the land potentially required for construction. The ES must consider these impacts in order to properly understand the effect of the scheme on the grade II properties.</p> <p>Designated heritage assets located partially or wholly within the land required, temporarily or permanently, for construction include grade II listed buildings at 1 to 15 (consecutive) Prince Albert Road (only 8 and 9) are within the land required to construct the Proposed Scheme. This is unclear, as map CT-05-003 does not indicate that the land at 8 and 9 may be required for construction, but it indicates that settings of 1 to 9 (consecutive) are affected by the potential requirement of the highway immediately in front during construction.</p> <p>Swiss Cottage Library is an important example of post-war 20<sup>th</sup> century architecture by Sir Basil Spence and the Hampstead Figure Sculpture by FE McWilliam is contemporaneous. A more detailed heritage assessment and information on any necessary mitigation measures is needed at this stage to address structural impacts (including from tunnelling), pertinent since the library suffered from settlement at its southern end prior to its restoration in 2004. The adjacent Regency Lodge, an interwar block of flats situated to the west on Adelaide Road in the Swiss Cottage triangle, is grade II listed, but no assessment of the impacts and effects has been made of this designated heritage asset and Regency Lodge is not shown as a grade II listed building on the Environmental Baseline map CT-10-003b.</p>



			<p>The grade II listed Primrose Hill Tunnels western entrance is a designated heritage asset and South Hampstead Station is a non-designated heritage asset located partially or wholly within the land required, temporarily or permanently, for construction. Only the platforms and retaining walls in the cutting are of interest; the above ground entrance building, dating from the later 20<sup>th</sup> century, is of no heritage value; there will be no impact on the setting of the structures in the cutting from construction activity at street level.</p> <p>In relation to the impacts of the Alexandra Place vent shaft headhouse, Para 6.3.3 contains two inaccuracies, as there are five conservation areas affected, but no mention is made of Priory Road Conservation Area (situated to the north of the Proposed Scheme to the east of Kilburn High Road), and Belsize Conservation Area should read South Hampstead Conservation Area (situated north of the proposed scheme between Finchley Road and West End Lane).</p> <p>In Gloucester Avenue and Chalcot Square there are a number of grade II listed buildings which may still be at risk from settlement (including The Engineer PH at 65 Gloucester Avenue), in addition to a sizeable number of positive contributors in the Primrose Hill Conservation Area. No mention is made of the impacts on the grade II listed Cecil Sharp House, situated at the junction of Gloucester Avenue and Regent's Park Road, home of the English Folk Dance and Song Society, in immediate proximity to the land potentially required for construction.</p> <p>Map CT-05-003a shows that a stretch of the Regent's Canal towpath west of Gloucester Avenue bridge could be potentially required during construction, adjacent to grade II listed The Engineer PH at 65 Gloucester Avenue and grade II listed Primrose Hill Primary School in Princess Road, all within the Primrose Hill Conservation Area. No mention is made of the impacts on these heritage assets. Map CT-05-003a shows two sections of highway in Berkley Road and Chalcot Road, potentially required for construction. No mention is made of the impact on heritage assets including grade II listed buildings in the adjacent Chalcot Square and positive contributors to the Primrose Hill Conservation Area.</p> <p>No assessment has been made on the potential impacts and effects on the grade II* Camden Incline Winding House, resulting from tunnelling directly beneath. Para 6.3.51 in ES Vol 1, covering ground settlement, states that excavation for the tunnels will potentially lead to small ground movements at the surface and below ground. The extent will depend on depth and volume of works below ground, soil and groundwater conditions and building foundations. These factors need to be taken into</p>
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			<p>consideration when assessing the suitability of tunnelling under this valuable piece of railway heritage. Para 6.3.52 states the nominated undertaker will assess potential settlement along the route of the railway and include the risk of damage to all buildings within the zone affected by settlement, and act accordingly, including monitoring and protective measures. If re-routing the tunnel is not an option, HS2 Ltd is urged to take the necessary steps outlined in Para 6.3.52 to avoid structural damage to the grade II* listed structure.</p> <p>The grade II listed Primrose Hill Tunnels western entrance is a designated heritage asset and South Hampstead Station is a non-designated heritage asset located partially or wholly within the land required, temporarily or permanently, for construction. Only the platforms and retaining walls in the cutting are of interest; the above ground entrance building, dating from the later 20<sup>th</sup> century, is of no heritage value; there will be no impact on the setting of the structures in the cutting from construction activity at street level.</p>
		6.3.4	<p>Para 6.3.4 is incorrect where it states that St Dominic's Priory is a grade II* listed building situated in the Parkhill and Upper Park Conservation Area, as it actually falls just outside the conservation area boundary. It should be noted that nowhere within the Cultural heritage section is reference made to the significance of non-designated heritage assets including positive contributors in conservation areas and buildings on Camden's draft Local List.</p>
		6.3.6	<p>Camden Council notes that the following non-designated assets of low value lie wholly or partially within the land required, temporarily or permanently, for construction: Swiss Cottage Odeon forms part of an asset grouping with the grade II listed Regency Lodge (and is a candidate for the Camden Local List) and is of heritage and landmark value as an interwar cinema designed in a "Moderne" style. . No mention is made either of non-designated assets St John's Court, Finchley Road, an interwar block of flats, also situated in the Swiss Cottage triangle, which is on the Camden draft Local List, or the landmark Ye Olde Swiss Cottage Public House, also candidate for the Camden Local List. No assessment has been made either in terms of impacts from tunnelling or the effects on their setting during if the adjacent highway is potentially required during construction.</p> <p>Camden Council notes that the early 21<sup>st</sup> century Swiss Cottage Leisure Centre (designed by Terry Farrell &amp; Partners), situated to the east of the library on Adelaide Road, is on the Camden draft Local List. The setting for the library, leisure centre and sculpture is the early 20<sup>th</sup> century Swiss Cottage Park (landscape by Gustafson Porter), also on the Camden draft Local List. No mention is made of either of these non-designated heritage assets or the potential impacts and effects resulting from</p>

			<p>tunnelling or during the construction period.</p> <p>Camden Council considers the ES is defective in that no mention is made in the Cultural heritage section of any other potential impacts during construction. However, Map CT-10-004a of Map Book CFA 03 indicates land in the Kilburn area which will be potentially required during construction. The area affected includes the southern part of the Priory Road Conservation Area, including a small section of Belsize Road immediately north of Kilburn High Road Overground Station and stretching into the southern part of Kilburn Vale.</p> <p>Camden Council notes that during the construction period, the setting could be potentially affected of the Priory Road Conservation Area including positive contributors in the conservation area, plus three buildings on the Camden draft Local List: Priory Works at 252 Belsize Road, 254 Belsize Road and the former Ebenezer Chapel at 17 Kilburn Vale. In the absence of assessments, it is not possible to comment on the impacts and effects on a number of heritage assets in Kilburn.</p> <p>Camden Council notes that para 6.3.6 fails to state that land potentially required for construction in Belsize Road and Kilburn Vale falls within the Kilburn Priory Archaeological Priority Area (a short distance north of the proposed tunnel). In the absence of an assessment, it is not possible to comment on potential impacts and effects on the Kilburn Archaeological Priority Area. Camden Council does not have in-house archaeological expertise to fully comment on archaeological issues, although note is made of survey work and mitigations measures set out in sections 6 and 8 of ES Vol 1. Please refer to the detailed response to the ES from the Greater London Archaeological Service (GLAAS).</p> <p>Camden Council notes that in Gloucester Avenue and Chalcot Square there are a number of grade II listed buildings which may still be at risk from settlement (including The Engineer PH at 65 Gloucester Avenue), in addition to as sizeable number positive contributors in the Primrose Hill Conservation Area. No mention is made of the impacts on the grade II listed Cecil Sharp House, situated at the junction of Gloucester Avenue and Regent's Park Road, home of the English Folk Dance and Song Society, in immediate proximity to the land potentially required for construction.</p> <p>Camden Council notes that map CT-05-003a shows that a stretch of the Regent's Canal towpath west of Gloucester Avenue bridge could be potentially required during construction, adjacent to grade II listed The Engineer PH at 65 Gloucester Avenue and grade II listed Primrose Hill Primary School in Princess Road, all within the Primrose Hill Conservation Area. No mention is made of the impacts on</p>
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			<p>these heritage assets. Map CT-05-003a shows two sections of highway in Berkley Road and Chalcot Road, potentially required for construction. No mention is made of the impact on heritage assets including grade II listed buildings in the adjacent Chalcot Square and positive contributors to the Primrose Hill Conservation Area.</p> <p>Camden Council notes that paras 6.3.3 and 6.3.6 state that the grade II listed Primrose Hill Tunnels western entrance is a designated heritage asset and South Hampstead Station is a non-designated heritage asset located partially or wholly within the land required, temporarily or permanently, for construction. Only the platforms and retaining walls in the cutting are of interest; the above ground entrance building, dating from the later 20<sup>th</sup> century, is of no heritage value; there will be no impact on the setting of the structures in the cutting from construction activity at street level.</p>
		6.3.7	<p>No detailed assessment has been made regarding the impacts and effects of the proposed Adelaide Road vent shaft and headhouse on the surrounding historic environment. Photomontages in CFA 03 Map Book demonstrate that the headhouse will have a negative impact on views in and out of the Eton and Primrose Hill Conservation Areas, and will harm the setting of 8-54 (even) King Henry's Road, 19<sup>th</sup> century villas which are situated immediately south of the railway cutting and are on the Camden draft Local List.</p> <p>No reference is made to the impacts of the headhouse on views of the grade II* listed Primrose Hill Tunnel East Portals, despite concerns raised in response to the draft ES that views from Adelaide Road of this important railway structure would be obstructed. An assessment of possible impacts and effects should be included in the Cultural heritage section, as the tunnel portals are a designated heritage asset of outstanding national significance located in close proximity to the vent shaft site.</p>
		6.3.17	<p>Camden Council notes that volume 5 Appendix CT-004-000 (referred to in Para 6.3.17) does not include details of a potential committed development which could be affected by the construction of the Adelaide Road vent shaft and headhouse, and which is likely to be implemented by 2017. Reference should be made to LB Camden planning advice ref 2013/4424/PRE, for the redevelopment with residential accommodation of the Medical Centre, 110-112 Adelaide Road, which lies immediately to the west of the site.</p> <p>Camden Council notes that volume 5 Appendix CT-004-000 (referenced by Para 6.3.17) does not mention the proposed restoration of Alexandra Park, which has received HLF funding and is subject of planning permission ref 2012/5883/P granted 07/02/2013 for the refurbishment of the park</p>

			including the installation of play facilities, associated access alterations and landscaping. This committed development is projected to commence in 2014 with completion prior to 2017. The potential take-up of access roads north and south of the park between Rowley Way and Ainsworth Way, during construction of the Proposed Scheme, could prohibit the implementation of the planning permission.
		6.3.51	<p>No assessment has been made on the potential impacts and effects on the grade II* Camden Incline Winding House, resulting from tunnelling directly beneath. Para 6.3.51 in ES Vol 1, covering ground settlement, states that excavation for the tunnels will potentially lead to small ground movements at the surface and below ground. The extent will depend on depth and volume of works below ground, soil and groundwater conditions and building foundations. These factors need to be taken into consideration when assessing the suitability of tunnelling under this valuable piece of railway heritage. Para 6.3.52 states the nominated undertaker will assess potential settlement along the route of the railway and include the risk of damage to all buildings within the zone affected by settlement, and act accordingly, including monitoring and protective measures. If re-routing the tunnel is not an option, HS2 Ltd is urged to take the necessary steps outlined in Para 6.3.52 to avoid structural damage to the grade II* listed structure.</p> <p>Para 6.3.51 in ES Vol 1, covering ground settlement, states that excavation for the tunnels will potentially lead to small ground movements at the surface and below ground. The extent will depend on depth and volume of works below ground, soil and groundwater conditions and building foundations. These factors need to be taken into consideration when assessing the suitability of tunnelling under this significant 20<sup>th</sup> century estate.. Local sources inform that there may be a hidden underground river running below the Alexandra Road Estate. Whilst this is not the official knowledge of the LB Camden, HS2 is urged to investigate this matter when assessing the potential impact from settlement on the estate caused by tunnelling.</p> <p>The unusual structural design of the estate, comprising a monolithic mega-structure constructed from pre-cast concrete, should also be taken into consideration when assessing the potential impacts and effects from tunnelling.</p>
	6.4	6.4.1 – 6.4.2	<p>The Local Environmental Management Plans must be sufficiently detailed to provide site specific safeguards against the impacts of construction.</p> <p>Para 2.2.4 states that, pursuant to the draft ES, the location of the Adelaide Road vent shaft and</p>

			<p>associated headhouse has been moved eastwards so it is no longer situated in the Adelaide Local Nature Reserve. Para 6.4.2 states measures have been incorporated into the design to reduce impacts on the character of the Eton and Primrose Hill Conservation Areas: the headhouse was previously proposed as a two storey structure (approximately 8m high and has been amended to a single storey structure (approximately 4.5m high), but it states the footprint has not changed. The site will include a permanent fenced compound, with security fencing, hardstanding and lighting. Para 9.5.8 states the facades will be blank, except for emergency access doors and ventilation louvres. Photomontages in CFA 03 Map Book show the vent shaft and headhouse as a utilitarian dark brick bunker with a flat roof, with the only relief being recessed brick panels as seen from the road side. Para 2.2.14 states that the materials and finishes of the headhouse will be subject to detailed design and agreement with the local planning authority. Photomontages in CFA 03 Map Book show a utilitarian galvanised steel gate to the east of the headhouse, which detracts from the setting of the Eton Conservation Area. Para 2.24 contradicts Para 6.4.2, as it states the footprint of the headhouse has not changed since the draft ES; its dimensions are taken to be approximately 20m by 30m. Fundamental issues of footprint, height, bulk, mass and scale need to be resolved at this stage prior to the implementation of the provisions of the Heritage and Planning Memoranda. In order to fit in to the local surroundings, a radical redesign is necessary at this stage, as the existing design causes harm to the surrounding area, particularly to the setting of the Eton Conservation Area; it should be noted that LB Camden suggested in its response to the draft ES that a turf roof and walls would mitigate the visual impacts caused by the shaft, but this has not been addressed in the ES. The proposed headhouse design fails to comply with LB Camden LDF Core Strategy policies on development in conservation areas: policy CS14 requires that development preserves <u>and</u> enhances the character and appearance of conservation areas.</p>
		6.4.4	<p>The building proposed for demolition at 1-8 (consec) Langtry Walk and 61-83 (odd) Loudoun Road contains six commercial (retail/services) units and two residential units. In particular, the loss of the launderette has direct implications on the grade II* listed Estate, including the kitchen interiors in each residential unit which are protected by the listing. They have purpose-built kitchens which cannot easily accommodate washing machines, and a launderette is essential for the community of this architecturally and socially iconic post-war housing estate, and a launderette is essential for the community of this architecturally and socially iconic post-war housing estate. No strategy in mitigation terms has been put in place to find alternative accommodation for the launderette which is vital for the hundreds of residents of the estate.</p> <p>The hoarding height of 20m is the equivalent of a 6-storey building, approximately twice the height of</p>

			<p>the existing building. There is a discrepancy over the hoarding height as Para 9.4.13 of the Landscape and visual assessment states the construction site will be surrounded by hoardings 10m high.</p> <p>It is disputed that this non-designated heritage asset has 'low' value; it is an important positive contributor in the Alexandra Road Conservation Area which respects the setting of the grade II* Alexandra Road Estate and shares many characteristics in its architectural treatment as outlined in Para 6.4.4. The assessments of impacts and effects in Paras 6.4.7 and 6.4.9 are confusing and contradictory: the demolition of this building will have a high adverse impact and high adverse effect. Furthermore, they go against Para 6.4.18 which states the temporary and permanent impacts on the setting of the Alexandra Road Estate will have significant impacts. The demolition of the existing building, judged on its own merits and the poor quality of the replacement building, is therefore considered to be unacceptable in principle, harming the Alexandra Road Conservation Area and the setting of the adjacent grade II* listed Estate and a number of other heritage assets.</p>
		6.4.7	<p>Camden Council disputes that the non-designated heritage asset at 1-8 (consec) Langtry Walk and 61-83 (odd) Loudoun Road has 'low' value; it is an important positive contributor in the Alexandra Road Conservation Area which respects the setting of the grade II* Alexandra Road Estate and shares many characteristics in its architectural treatment as outlined in Para 6.4.4.</p> <p>Camden Council notes that the assessments of impacts and effects in Paras 6.4.7 and 6.4.9 are confusing and contradictory: the demolition of this building will have a high adverse impact and medium adverse effect depending on whether it is about demolition or setting.</p>
		6.4.10	<p>Camden Council notes that the ES contains no detailed written assessment on the impact and effect of the proposed headhouse at Adelaide Road on the setting of the grade II* listed Estate. In the absence of such an assessment and in line with previous comments, the ES is considered to be defective and the proposed design is considered to be unacceptable in terms of the harm it causes to adjacent designated and non-designated heritage assets.</p>
		6.4.11	<p>Camden Council considers the ES to be defective as it contains no detailed assessment of the impacts and effects of the proposals for the Adelaide Road vent shaft and headhouse on the surrounding historic environment. Photomontages in CFA 03 Map Book demonstrate that the headhouse will have a negative impact on views in and out of the Eton and Primrose Hill Conservation Areas, and will harm the setting of 8-54 (even) King Henry's Road, 19<sup>th</sup> century villas</p>



			<p>which are situated immediately south of the railway cutting and are on the Camden draft Local List.</p> <p>The Council considers the ES is defective in that no reference is made to the impacts of the headhouse on views of the grade II* listed Primrose Hill Tunnel East Portals, despite concerns raised in response to the draft ES that views from Adelaide Road of this important railway structure would be obstructed. An assessment of possible impacts and effects should be included in the Cultural heritage section, as the tunnel portals are a designated heritage asset of outstanding national significance located in close proximity to the vent shaft site.</p>
		6.4.14	<p>Para 6.4.14 states that current identified opportunities for mitigation for the Alexandra Place vent shaft and headhouse include: detailed design of the vent shaft headhouse, which could retain architectural features that are characteristic of the Alexandra Road Conservation Area. The use of materials and style could be designed to be in keeping with the Alexandra Road Estate; and the scale and mass of the Alexandra Place vent shaft headhouse will be similar to 1 to 8 Langtry Walk and 61 to 83 Loudoun Road (odd numbers only). This would ensure no significant impacts to: (grade II listed buildings) The Church of All Souls, Primrose Hill Tunnel; and Belsize, Alexandra Road and St John's Wood Conservation Areas. The fundamental issues of high quality design in a historic context have not been addressed at this stage. The current proposed design is of a poor quality, showing no respect for the surrounding context, lacking inspiration or innovation and making no attempt in landscape and urban design terms to create a new entrance to the grade II* listed Alexandra Road Estate. No mention is made of the impacts on the grade II* listed estate, or the impact on the surviving sister building at 2-62 Alexandra Place and 49-59 Loudoun Road, which is a positive contributor in the Alexandra Road Conservation Area and shares the same architectural vocabulary. Belsize Conservation Area is incorrectly mentioned, as Belsize Road is in the South Hampstead Conservation Area.</p>
		6.4.16	<p>Para 6.4.16 makes an overly general statement regarding the CFA, that there will be no significant effects on below-ground archaeological remains. Para 6.3.4 highlights Kilburn Archaeological Priority Area and the associated group of assets relating to medieval archaeology as designated assets located within the ZTV. Para 6.3.6 fails to state that land potentially required for construction in Belsize Road and Kilburn Vale falls within the Kilburn Priory Archaeological Priority Area (a short distance north of the proposed tunnel). In the absence of an assessment, it is not possible to comment on potential impacts and effects on the Kilburn Archaeological Priority Area. Camden Council does not have in-house archaeological expertise to fully comment on archaeological issues, although note is made of survey work and mitigations measures set out in sections 6 and 8 of</p>

			ES Vol 1. Please refer to the detailed response to the ES from the Greater London Archaeological Service (GLAAS).
		6.4.18	Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant.
7	7.2	7.2.5	<p>Camden Council would like to point out that an access license was issued to HS2 Ltd, but it was not signed and returned.</p> <p>Camden Council disputes the contention made that this non-designated heritage asset has 'low' value; it is an important positive contributor in the Alexandra Road Conservation Area which respects the setting of the grade II* Alexandra Road Estate and shares many characteristics in its architectural treatment as outlined in Para 6.4.4. The assessments of impacts and effects in Paras 6.4.7 and 6.4.9 are confusing and contradictory: the demolition of this building will have a high adverse impact and high adverse effect. Furthermore, they go against Para 6.4.18 which states the temporary and permanent impacts on the setting of the Alexandra Road Estate will have significant impacts. The demolition of the existing building, judged on its own merits and the poor quality of the replacement building, is therefore considered to be unacceptable in principle, harming the Alexandra Road Conservation Area and the setting of the adjacent grade II* listed Estate and a number of other heritage assets.</p>
	7.3		Camden Council would like to stress that the impacts from the construction of a vent shaft within a Site of Nature Conservation Interest and adjacent to a Local Nature Reserve will also be a key issue of significant impact. Mitigation will be required during the 5 year construction period. Camden Council considers the ES is defective in that the Adelaide Local Nature Reserve is now mapped as potential land required during construction and Camden Council would like commitment that this will not be the case. Camden Council notes that the land where the vent shaft will be is considered a Site of Nature Conservation Importance and therefore destroying the woodland will have a significant adverse and permanent effect on the area's ecological value. Camden Council notes that comprehensive ecological baselines were not established and surveys were not completed on site. Because the baselines for this are flawed, it is hard to effectively assess the Environmental Statement.

		7.3.11	Camden Council would like to stress that the methodology used to assess impacts on ecology at Camden sites is flawed since no surveys were completed on sites, and without detailed surveys the environmental baseline cannot be accurately reported and impacts cannot be sufficiently assessed. Camden Council points out that the desk scoping studies that have been completed indicate the presence of several protected species at Adelaide Local Nature Reserve, and so detailed protected species surveys will need to be completed in order to comply with planning legislation.
		7.3.12	Camden Council points out that there is a proposed development immediately north of Adelaide Local Nature Reserve, which is not included in the Environmental Statement assessment of cumulative effects and future baseline.
	7.4		<p>Camden Council would like to stress that construction over a five year period will cause disruption to the Adelaide Nature Reserve that is adjacent. The Council does not consider that the full impacts of this disruption have been properly considered by the ES, rendering it deficient.</p> <p>Camden Council notes that the land where the vent shaft will be is considered a Site of Nature Conservation Importance and therefore destroying the woodland will have a significant adverse and permanent effect on the area's ecology.</p>
		7.4.3	<p>Camden Council rejects that there will be no habitat loss in the Local Nature Reserve as a result of construction. Camden Council considers habitats in the Local Nature Reserve part of the Sites of Importance to Nature Conservation (SINC) are likely to be affected by the destruction of woodland covering the east part of the SINC, 5 years gap until habitat restoration commences and further time for plants to grow and for ecological connectivity and integrity to be restored.</p> <p>Camden Council would like to point out commitments within the Camden Biodiversity Action Plan to maintain the extent of Camden's network of SINC's, and reporting commitments to Defra on SINC's under positive conservation management, both of which are compromised by the loss of 37% of the Chalk Farm Embankment and Adelaide Road Local Nature Reserve, alongside the additional loss of all of St James Gardens SINC and 36% of the North London Line SINC</p>
		7.4.20	Camden Council welcomes further discussions with HS2 Ltd to explore the potential for a funding agreement for the maintenance and enhancement of the SINC. Camden Council rejects that any enhancements will make insignificant the effects of the destruction of the woodland. Camden Council considers that habitats in the Local Nature Reserve are likely to be significantly affected by the 5 year

			long destruction and clearance of the woodland and further time for plants to grow and for ecological connectively and integrity to be restored following commencement of mitigation.
		7.4.21 – 7.4.23	<p>Camden Council does not accept that the proposed enhancements will reduce the effects to a level which is not significant.</p> <p>Camden Council considers that habitats and species in the Local Nature Reserve are likely to be significantly affected by the 5 year long destruction and clearance of the woodland and further time for plants to grow and for ecological connectively and integrity to be restored following commencement of mitigation.</p> <p>Camden Council suggests that mitigation for the loss of Sites of Importance to Nature Conservation (SINC) and habitat should also include maximum possible greening of the vent shaft headhouse, hard standing and site boundaries to include green roofs, walls and planted permeable paving. This would assist in reducing the visual and ecological effects of the vent shaft and loss of land.</p>
8			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
	8.4	8.4.1	The Local Environmental Management Plans must be sufficiently detailed to provide site specific

			safeguards against the impacts of construction.
		8.4.26	Camden Council believe it is essential that they have the opportunity to agree any proposed remediation strategies which should be based on best practical , sustainable means and not just legal requirements. Camden Council will expect all land to be remediated appropriate to the future end user once HS2 is operational. Processes should be put in place to ensure that the Council is involved at the right time to ensure that the best solution with maximum benefits and minimum negative impacts is delivered for our communities. There should be an opportunity for Camden Council to have meaningful input into designs and proposals. Camden Council also refers to the comments provided on the individual CFA reports, environment topics and route wide effects for Land quality.
9	9.3	9.3.1	<p>Para 9.3.1 states the site is bounded on the southern side of Adelaide Road by a long and substantial red brick wall with solid piers and recessed panels, which is likely to be contemporary with the railway and is of historic townscape value (a candidate for the Camden Local List). Photomontages in CFA 03 Map Book show a sizeable section of the wall removed as the vent shaft will require a piled retaining wall. Para 2.2.13 states the replacement wall will be approximately 44m long. However Para 9.5.8 of the Landscape and visual assessment states approximately 90m of the red brick boundary wall will be rebuilt. There are therefore discrepancies as to extent of demolition and rebuilding works. Notwithstanding, the demolition of a sizeable section of this wall will cause harm to this non-designated heritage asset, and to the setting of the Eton Conservation Area; no assessment has been made of the impacts and effects of the loss of this historic wall, and the replacement design as illustrated in the photomontage is unsatisfactorily detailed. In the absence of more detailed information, it is assumed that works to the wall could also affect the setting of 23-49 (odd) Adelaide Road, a group of 13 mid-19<sup>th</sup> century semi-detached villas which feature on the Camden draft Local List.</p> <p>No reference is made to the impacts of the headhouse on views of the grade II* listed Primrose Hill Tunnel East Portals, despite concerns raised in response to the draft ES that views from Adelaide Road of this important railway structure would be obstructed.</p>
		9.3.5	Camden Council considers 1-8 Langtry Walk and 61-83 Loudoun Road to be of the same architectural style as the Alexandra Road estate and not different as stated. Although the building is of a different material, it employees the same language of stepping forms with landscaped terraces. It is an important building in the evolution of the estate.

			Camden Council considers tranquillity in this area to be medium.
	9.4	9.4.3 – 9.4.4	The Local Environmental Management Plans must be sufficiently detailed to provide site specific safeguards against the impacts of construction.
		9.4.13	<p>At Alexandra Place, no assessment is made in the Cultural heritage section of the harm caused to the conservation area or listed buildings by the loss of key landscape features which in this case are an integral part of the historic environment, since the concrete ramp by way of its attachment to the concrete mega structure is covered by the grade II* listing. The photomontages in the CFA 03 Map Book provide no assurances that the existing shuttered retaining wall running along the ramped pedestrian access to the Estate will be rebuilt to match the existing. The Cultural heritage section needs to stipulate at this stage that the reinstated ramp and integral planting bed should match the existing in terms of overall design and detail, to be in keeping with the grade II* listed Estate and the conservation area. It is imperative that specialist shuttered concrete is used for the main structure, produced using authentic construction and manufacturing techniques. The detailed design of the replacement concrete ramp and integral planting bed needs to be subject of the Heritage Memorandum, so details are agreed by the local planning authority in conjunction with English Heritage. The Cultural heritage section needs to stipulate at this stage that a sensitive landscaping scheme should be reinstated in accordance with the original planting scheme by landscape architect Janet Jack, which was integral to the overall design of the grade II* listed Estate. The detailed design needs to be subject of the provisions of the Heritage and Planning Memoranda, so details are approved by the local planning authority in conjunction with English Heritage.</p> <p>The hoarding height of 20m is the equivalent of a 6-storey building, approximately twice the height of the existing building. There is a discrepancy over the hoarding height as Para 9.4.13 of the Landscape and visual assessment states the construction site will be surrounded by hoardings 10m high.</p> <p>The Cultural heritage section needs to stipulate at this stage that a sensitive landscaping scheme should be reinstated in accordance with the original planting scheme by landscape architect Janet Jack, which was integral to the overall design of the grade II* listed estate. The detailed design needs to be subject of the provisions of the Heritage and Planning Memoranda, so details are approved by the local planning authority in conjunction with English Heritage.</p>
	9.5	9.5.8	In order to fit in to the local surroundings, a radical redesign is necessary at this stage, as the existing

			<p>design causes harm to the surrounding area – particularly the setting of the Eton Conservation Area – it should be noted that Camden Council suggested in its response to the draft ES that a turf roof and walls would mitigate the visual impacts caused by the shaft, but this has not been addressed in the ES</p> <p>Para 9.3.1 states the site is bounded on the southern side of Adelaide Road by a long and substantial red brick wall with solid piers and recessed panels, which is likely to be contemporary with the railway and is of historic townscape value (a candidate for the Camden Local List). Photomontages in CFA 03 Map Book show a sizeable section of the wall removed as the vent shaft will require a piled retaining wall. Para 2.2.13 states the replacement wall will be approximately 44m long. However Para 9.5.8 of the Landscape and visual assessment states approximately 90m of the red brick boundary wall will be rebuilt. There are discrepancies as to the extent of demolition and rebuilding works. Notwithstanding, the demolition of a sizeable section of this wall will cause harm to this non-designated heritage asset, and to the setting of the Eton Conservation Area; no assessment has been made of the impacts and effects of the loss of this historic wall, and the replacement design illustrated in the photomontage is unsatisfactorily detailed. In the absence of information, it is assumed that works to the wall could also affect the setting of 23-49 (odd) Adelaide Road, a group of 13 mid-19<sup>th</sup> century semi-detached villas which feature on the Camden draft Local List.</p>
		9.5.16	<p>Camden Council is concerned about the loss of activity and overlooking at the gateway to the Alexandra Road estate. Urban design good practice would have thus important transition from estate to street overlooked and active at ground floor level. The 10m height blank building would be intimidating and unsafe in this residential area. The proposed approach is utilitarian and the report does not present any architectural aspiration to mitigate its form.</p>
		9.5.19	<p>Due to its key location at the gateway to the estate, the effect on the area from the vent shaft is considered by Camden Council to be highly adverse.</p>
10	10.1	10.1.1-10.1.3	<p>Camden Council considers that the ES is defective in the narrow scope outlined for the need for a socio-economic assessment. Camden Council considers that the scope fails to take into account the full socio-economic impacts of the scheme and that the impacts have therefore been underestimated. Full details of Camden Council's concerns can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p> <p>Camden Council Camden Council considers that the ES is defective in that the introduction does not</p>



			make any reference to mitigation proposals to overcome the adverse effects on businesses, the local economy and community.
		10.1.5	<p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account the significant blight and uncertainty on businesses and the local economy both in terms of those directly affected and in impacts in the wider area. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated. Further details of Camden Council's concerns can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p> <p>Camden Council considers that the relevance of construction works outlined is too narrow and fails to take into account noise, vibration and other factors that could impact upon businesses ability to operate. The scope fails to take into account the full socio-economic impacts of the scheme and the impacts have therefore been underestimated. Further details of Camden Council's concerns can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p>
		10.2.1	<p>Camden Council considers that the ES is defective in that the socio-economic scoping and methodology has not been covered in full and fails to provide an adequate basis for assessment. The full socio-economic impacts of the scheme have therefore been underestimated. Further details of Camden Council's concerns can be found in response to Volume 5 Scope and Methodology Report, Section 13, Socio-Economics.</p> <p>Camden Council notes the absence of a local policy review section within the socio-economic chapter of each CFA report and within the CFA report as a whole. Camden Council highlights the importance of policy in establishment of a baseline and assessment of effects.</p> <p>Camden Council asserts that ES has not been prepared with sufficient engagement of stakeholders and community organisations to identify the socio-economic resources that may be impacted by the Proposed Scheme. Many of Camden Council's representations to HS2 Ltd on the impacts of HS2 on business and employment in Camden and the necessary measures needed to mitigated these impacts has not been listened to or reflected in the ES. Camden Council is aware of numerous businesses that have said their concerns are not being listened to by HS2 Ltd.</p>
	10.3		The Environmental Statement fails to provide a comprehensive or adequate socio-economic baseline. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline assessment does not follow the approach set

			<p>out in the Scope and Method report at Volume 5 and therefore fails to provide an adequate basis for the assessment of impacts of the scheme. In particular, the baseline has failed to consider stakeholder views and has failed to cover an adequate range of socio-economic indicators and has failed to take on board local information and intelligence.</p> <p>Camden Council notes that no detail is provided in the Equalities Impact Assessment relating to Camden Town and that this represents a serious flaw both in terms of the EqIA and the Socio-economic baseline for Primrose Hill to Kilburn.</p>
		10.3.3 to 10.3.9	<p>Camden Council considers the ES defective in that it only considers a narrow set of statistics which do not tell enough about the communities in the DCAs; such as levels of deprivation, disability, sex, age and ethnicity. Although Kilburn/Swiss Cottage is above the borough average for some indicators, the area does have pockets of very high deprivation, with Kilburn having 5 LSOAs within the top 20% most deprived areas within the nation.</p> <p>On average across the Swiss Cottage and Kilburn wards nearly 23% of all households have one person who has a long term health problem or disability, 20% of workers who live in the ward work part-time (less than 30 hours per week) and its population is home to a large mixed residential population. This data tells us that the area, although affluent, contains pockets of high deprivation that also have a high population of disabled residents. The effects of the Proposed Scheme could be significant for these communities. In addition to this the relocation of big employers within the neighbouring Euston area and the effect on Camden Town including the markets could mean residents of the wards within Primrose Hill/Kilburn will have less employment opportunities as consequence of HS2's construction.</p> <p>The ES fails to provide a comprehensive or adequate socio-economic baseline. Technical information is drawn from a limited number of sources including only basic employment/ business/ property data. The baseline assessment does not follow the approach set out in the Scope and Method report at Volume 5. In particular, the baseline has failed to consider stakeholder views, has failed to cover in adequate depth a range of socio-economic indicators such as ethnic composition of communities, vulnerable groups and local enterprise and has failed to take on board local information and intelligence. The baseline therefore fails to provide a discerning basis for the assessment of impacts of the scheme.</p> <p>Camden Council believes that HS2 need a more comprehensive understanding on the Primrose Hill</p>

			<p>to Kilburn CFA area and further environmental baseline analysis should be conducted in order to do so. HS2 should consider the following:</p> <ul style="list-style-type: none"> <li>• Review how the scheme will impact on small areas of deprivation and important business clusters – such as the Alexandra Park and Adelaide Road</li> <li>• Assess the kinds of jobs that will be lost to the area and in what numbers</li> <li>• Consider the direct and indirect (supply chain) adverse impacts on key sectors</li> <li>• Assess the impact on residents/ local communities of the loss of smaller, retail or service based businesses, for example, the loss of Swiss Cottage laundrette.</li> <li>• Carry out a thorough skills gap analysis to consider whether there will be a skills mismatch between jobs lost and jobs created</li> <li>• Carry out an Equalities Impact Assessment to consider how the Proposed Scheme will impact on particularly vulnerable groups such as lone parents, people with disabilities via impact on community facilities or those with part time jobs</li> <li>• Consider how the disruption and noise from the scheme impact home workers/shift workers.</li> </ul>
		10.3.10	<p>Camden Council agrees with the statement made in paragraph 10.3.10 which states that industrial, warehousing and retail premises is in limited supply within the Primrose Hill to Kilburn area.</p>
		10.3.13-14	<p>Camden Council considers that detailed information on which development consents and land allocations are taken into calculation is missing, making the impact of the HS2 scheme difficult to assess – this is a significant flaw of the ES.</p> <p>Camden Council stresses that land allocation might not necessarily result in development proposals and the anticipated growth in number of jobs by 2017.</p> <p>Camden Council considers that the future baseline has not been adequately assessed and does not provide an acceptable basis for determining the impacts of the scheme.</p>
	10.4		<p>Camden council anticipate that the impacts of construction will have a number of significant effects on businesses, economy and the community within Primrose Hill to Kilburn.</p> <p>The Council considers the outlined avoidance and mitigation measures to be wholly inadequate. Generic provisions set out in the CoCP and a vague reference to the maintenance of access to</p>

			<p>businesses premises during construction are the only provisions identified. Such measures would completely fail to prevent or mitigation the significant socio-economic effects of the scheme. Camden Council considers this to be unacceptable and a failure on the part of HS2 to protect the communities most directly affected by the scheme.</p> <p>Camden Council requests that HS2 Ltd commit to deliver a significantly enhanced comprehensive mitigation and compensation strategy that deals with blight and uncertainty, loss of business and commercial trade, transport disruption and reduced accessibility and degraded environment.</p> <p>This should include but not be limited to funding and delivery of projects for:</p> <ul style="list-style-type: none"> <li>• Significantly enhanced compensation for businesses</li> <li>• Access to specialist commercial property support- including local relocation of the Launderette</li> <li>• Formal mechanisms for engaging with businesses- in Primrose Hill and Kilburn</li> <li>• Business advice and support service</li> <li>• Property modifications- including support for business premises above tunnels</li> <li>• Employment, job brokerage &amp; training support- for those that lose their jobs as a result of HS2</li> </ul> <p>Camden Council is disappointed that the independent consultant's report provided to HS2 Ltd on 'Best Practice in Blight Mitigation for Business and Employment', has not been taken into account in developing socio-economic mitigation for HS2. This report was shared with HS2 in the hope they would draw on the industry best practice identified including examples from the Olympics, Crossrail, Kings Cross Central and a variety of other relevant projects. Camden Council is disappointed that this industry best practice has not been utilised by HS2 to develop an appropriate mitigation strategy for Euston.</p> <p>The proposed mitigation fails to take into account feedback from consultations and engagement or industry best practice.</p>
		10.4.1 – 10.4.2	<p>Camden Council considers that noise insulation packages should be provided to businesses that may be subject to noise impacts from the construction works. Camden Council considers that nuisances should be clearly defined, for example, noise, dust, lighting (paragraph 10.4.2)The Local Environmental Management Plans must be sufficiently detailed to provide site specific safeguards against the impacts of construction.</p>

		10.4.2	Camden Council acknowledges that there is a role for the CoCP in minimising effects on businesses, but advises that this should be in addition to robust mitigation measures. Camden Council highlights the necessity for local business engagement in the development of LEMP's. This further highlights the need for HS2 to provide a mitigation to build capacity of local business representative organisations and establish formal mechanisms for engaging with the business community to ensure that this can be achieved.
		10.4.3 – 10.4.4	<p>Camden Council considers paragraph's 10.4.3 – 10.4.4 to be incomplete as they do not provide an adequate assessment of the temporary socio-economic, business or employment impacts of HS2 in Primrose Hill and Kilburn beyond the safeguarding area.</p> <p>Camden Council strongly disagrees with the statements that no businesses have been identified in the area that is expected to experience change in business amenity or isolation.</p> <p>Camden Council has previously noted that commercial units at Gloucester Road, Parkway and Regents Park Road, as well as commercial units above tunnels, would be disrupted by the proposed scheme through construction and utility works and construction traffic. Camden Council estimates that there are approximately 43 businesses within these areas that fall within the safeguarding and sub-safeguarding area. Camden Council considers that the ES is defective in that these areas and impacts have not been assessed within the CFA.</p> <p>Camden Council notes that the construction compounds in this CFA could generate 30 full-time equivalent jobs and potential opportunities in the supply-chain. Camden Council has urged HS2 Ltd to put in place an employment, skills and training strategy, as soon as practicable, and procurement support to enable local residents and businesses to access these opportunities, otherwise there will be no benefits to the locality that will experience the significant adverse effects. This strategy should align with the objectives of the Council's Camden Plan and also look at supporting young NEETS and the adult population not in work.</p>
		10.4.10	<p>Camden Council maintains that the full extent of permanent business impacts from HS2 in the CFA has not been adequately assessed.</p> <p>Camden Council considers the way businesses are grouped together to form defined resources to be unclear and inaccurate. The ES should include a more detailed breakdown in each respective CFA.</p>
		10.4.11	Camden Council considers the way businesses are grouped together to form defined resources to be unclear and inaccurate. The ES should include a more detailed breakdown in each respective CFA.

			The failure to do so make it impossible to evaluate the soundness of the assessment evasively downplays the scale of impacts and causes ambiguity as to the actual effects.
		10.4.11 – 10.4.14	<p>Camden Council notes that paragraph 10.4.11 states 18 business accommodation units in the area will be directly impacted upon by the Proposed Scheme i.e. subject to compulsory purchase, and that these have been grouped together to form two defined resources. The ES fails to identify the 18 businesses or all of the resources. Of the three resources, it is advised that only two will be significantly affected. HS2 should identify all businesses directly impacted and explain the reasoning for the grouping of resources and assessment of significant effects. The failure to include this information makes it impossible to understand the assessment; resulting in serious concerns that impacts have been downplayed. Camden Council considers that the ES is defective in that the lack of transparency in the ES and the failure without explanation to identify businesses and resources.</p> <p>Camden Council disputes the assessment in table 9 and considers that all 18 business premises facing acquisition will experience major adverse effects. The Council is alarmed that HS2 Ltd.'s assessment does not consider this to be the case. The Council acknowledges that some businesses may be able to relocate and resume business operations elsewhere, but the assessment fails to take into account the human impacts to the individuals affected by the disruption, stress and inconvenience of imposed acquisition.</p> <p>Camden Council considers that the ES is defective in that there is limited scope of the assessment criteria at 10.4.15, 10.4.16 and 10.4.17. Camden Council considers that HS2 Ltd have failed to take into account the wider implications of business acquisitions on individuals, communities, access to services, business clusters and sectors focusing only on the ability to relocate or displacement of jobs in the context of wider economic activity. Camden Council considers the assessment to be highly flawed in this respect, the result being that the impacts have been underestimated.</p> <p>Camden Council considers that a great many more businesses in the wider area will experience severe amenity effects during the construction period that may result in permanent effects.</p>
		10 4.15	Camden Council strongly disagrees with HS2's assessment that impacts on Loudoun Road is moderate adverse when the 12 commercial units are being demolished, and the availability of alternative premises is constrained. The Council considers the impacts on these resources to be

			<p>major adverse.</p> <p>The Council Camden Council considers that the ES is defective in the lack of mitigations or solutions put forward to address the identified significant effects. Camden Council would like to stress that the low cost work units such as those at Loudoun Road provide much needed low cost start up space for businesses, a resource which is scarce in Camden. Camden Council has made representations to HS2 Ltd that appropriate mitigation and support must be put in place to assist businesses, for example to find similar, alternative accommodation with and within the London Borough of Camden.</p>
		10.4.16	<p>Camden Council disagrees with the assessment that impacts on Langtry Walk is moderate adverse when the 6 business units are being demolished, and the availability of alternative premises is constrained. The Council Camden Council considers that the ES is defective in the lack of mitigations or solutions put forward to address significant effects. Camden Council has made representations to HS2 Ltd that appropriate mitigation and support must be put in place, for example to assist businesses find similar, alternative accommodation with and within the London Borough of Camden.</p> <p>Camden Council would like to stress that the commercial units at Langtry walk provide vital services to the community including a laundrette, hairdressing and dry cleaning facilities. These businesses cater to very specific community needs and through community engagement, residents from Alexandra Estate have specifically expressed concern that the loss of Swiss Cottage laundrette, located at 7 Langtry Walk, will leave them without clothes washing facilities. Camden council would like to stress that it is absolutely imperative that HS2 ensure that a suitable alternative premises for the laundrette is found within the immediate catchment area to Alexandra Estate. This mitigation should be accompanied with a comprehensive compensation package and specialist property support. The Council considers the impacts on these businesses to be major adverse.</p> <p>Camden Council has noted that the landscape and visual assessment section at Chapter 9 states that commercial premises at 200 Regents Park Road, which the Council understands accommodates a yoga studio, would be demolished to make way for the proposed scheme. The loss of this business would have a significant impact on the workers and patrons of this business and Camden Council is highly concerned that this has not been included in the assessment of socio-economic impacts under section 10.4.</p>
		10.4.17	<p>Camden Council rejects HS2's assertion that the loss/displacement of 50 jobs will have a relatively</p>



			<p>modest impact. It is likely that jobs most at risk will be in some of the most deprived areas within Primrose Hill and Kilburn and therefore the council considers the loss of jobs to be significant for the individuals and businesses affected and the wider community. The council is also concerned that no information is provided on actual types of jobs losses, the breakdown of job losses by sector and how these job losses will impact upon the community</p> <p>Overall, Camden Council considers that the full scale of impacts on Primrose Hill to Kilburn have not been adequately assessed with an under-estimate of the true impacts.</p>
		10.4.18	<p>Camden Council is concerned that this section refers back to volume 3 for an assessment on cumulative effects in relation to job displacement/losses to the labour market and environmental effects on businesses. Camden Council raises concerns that cumulative effects are not fully considered and fail to provide an adequate basis for assessment.</p> <p>Camden Council considers that the reporting of the cumulative effects on employment at route wide level only, and not at CFA level, is inaccurate and a serious flaw in the assessment.</p> <p>Camden Council considers that the ES is defective in that the cumulative effects section fails to take into account the implications raised under other environmental assessments. Camden Council considers that greater co-ordination between environmental topic assessments, ES volumes and associated Hybrid Bill documentation is required.</p> <p>Camden Council would like to reiterate that the Langtry Walk vent shaft site is within Council ownership and has been identified as a site with development potential. The Council would like to stress that the regenerative benefits of such a development for this area would be significant. Camden Council considers that the use of this large site at this prominent location at the entrance to the grade 2* listed Alexandra and Anisworth estate could have a permanent blighting effect and exacerbate existing issues of deprivation, social exclusion and community safety.</p>
		10.4.20	<p>Camden Council welcome HS2 Ltd.'s commitment to provide additional business support to businesses that will be displaced as a result of the proposed scheme. Camden council request that HS2 Ltd work with the local Council and communities to develop an appropriate mitigation strategy to minimise impacts on displaced businesses including providing access to professional support and assistance in finding alternative local accommodation.</p>
		10.4.21	<p>Camden Council notes that the scheme will generate opportunities for employment and training</p>

			associated with construction. Opportunities are also likely to arise in terms of local procurement, supply chain and supporting industries. The council requests that these opportunities are maximised through holistic support programmes developed in conjunction with the council and local communities.
		10.4.22 – 10.4.23	As outlined above, Camden Council does not consider that the likely residual effects of the scheme have been adequately assessed. The Council believe that residual effects will to be significantly greater than those already outlined within the ES. The Council considers that residual effects could be reduced by a more comprehensive approach to mitigation, compensation and off-setting.
		10.4.23	<p>The Council anticipates the impacts of the proposed scheme will have significant impacts on the Primrose Hill and Kilburn area. These impacts will include the demolition of numerous industrial units at Loudoun Road (where alternative premises are limited), and commercial units that serve vital community needs at Langtry walk, not to mention the demolition of the commercial premises at 200 Regents Park Road.</p> <p>There is also potential for significant disruption to commercial areas at Gloucester Road, Parkway and Regents Park Road.</p> <p>HS2 Ltd must work with the Council and local communities to develop and commit to the delivery of a comprehensive programme of mitigation and compensation. For example, mitigation measures could include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Significantly enhanced compensation for businesses</li> <li>• Access to specialist commercial property support- including local relocation of the Launderette</li> <li>• Formal mechanisms for engaging with businesses- in Primrose Hill and Kilburn</li> <li>• Business advice and support service</li> <li>• Property modifications- including support for business premises above tunnels</li> <li>• Employment, job brokerage &amp; training support- for those that lose their jobs as a result of HS2</li> </ul> <p>Camden Council considers the ES is defective in that this section is still largely focused around compensation, despite the Council's previous comments in response to the draft ES and discussions with HS2 Ltd through the Business and Employment Mitigation Working Group for the need for HS2 Ltd to put in place a comprehensive mitigation strategy. Camden Council would like to stress that the compensation currently proposed by HS2 Ltd for businesses is inadequate.</p>
	10.5	10.5.1 –	Camden Council disagrees with the assumptions at 10.5.1- 10.5.3, stating that there will be no direct

		10.5.10	significant impacts or changes in business amenity resulting from operation and that no mitigation is required. Without through noise assessments having taken place and with no definitive design proposals agreed it is not possible to know at this stage whether significant effects will occur and require mitigation.
11	11.1		Camden Council has provided detailed comments against the Technical Appendices to the individual CFA reports. Camden Council considers the use of the definition of “Quiet Areas” to be too restrictive, and does not adequately account for the relative quiet and tranquillity of spaces within urban areas within urban areas such as Camden. Camden Council considers that noise impacts should be considered on all parks and open spaces.
	11.1		Camden Council note that reference has been made to the draft national planning practice guidance, presenting an interpretation of its requirements, and consider that as this guidance is not an approved document that HS2 should review any assessments made in relation to this guidance at such time that the guidance is formally adopted or otherwise. Camden Council considers that a failure to review and amend the relevant outcomes following the formal publication of this guidance would render the Environmental Statement deficient.
	11.1		Camden Council considers the proposed amendments to the appeal provisions under the Control of Pollution Act 1974, and the available defences under statutory nuisance provisions, could make it more difficult for affected persons to be effectively protected from noise and statutory nuisance and for appropriate remedies to be implemented quickly and effectively. The Council therefore considers this to be an unsuitable proposal which should not be implemented and the current legislative proposals should remain as they are currently.
		11.1.4	Camden Council considers that there needs to more consideration given to those effects which will last longer than 6 months but will not be permanent and that they should not all be grouped together as a “temporary” effect as this underplays the real impact of the effect.
	11.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of ‘generic’ noise levels (i.e. those based upon a broad categorised estimate of London – Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required

			data has been received and studies are completed at site specific areas of concern.
	11.3		<p>The ES does not provide sufficient detail to assess properties that will experience a significant amenity effect. Camden Council considers that evidence should have been included in the ES to support this statement such as noise modelling and calculations to predict the internal noise levels post mitigation. An assessment of the predicted in combination effects at the dwellings post mitigation should have been provided. Without this information, Camden Council are unable to determine whether the mitigation measures proposed are adequate and therefore consider that as we are unable to make this assessment, the ES is deficient in this regard.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council considers the ES deficient in that it does not provide an assessment of all impacts on a property by property basis to test the habitability of those living in close proximity to the works; in order to properly assess the impact of the scheme. For example those properties near vent shaft and portal construction work such as on Regent's Park Road, Adelaide Road and Loundoun Road. The impacts should be assessed cumulatively and based on a wide range of factors, not just noise, vibration and dust but also such factors as ventilation, visual, amenity, daylight, air pollution and access routes to ensure a safe and habitable environment is maintained for all residents living near construction for a prolonged period of time. Camden Council considers the ES to be deficient in not considering the impacts in a cumulative basis when determining habitability or triggers for temporary re-housing.</p> <p>Furthermore whilst the ES refers to a "Noise Insulation and Temporary Re-housing Policy" this document has not been included in the ES or draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information is available to enable a thorough assessment of impacts and mitigation measures.</p>

			<p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council finds it unacceptable to comment on the ES's assessment of impacts and effects of sounds, noise, and vibration prior to reviewing the Noise Insulation and Temporary Re-housing Policy which has not been published. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in that that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions. Camden Council considers the ES is defective in that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers the ES is defective in that where noise insulation is dependent on windows remaining closed, this presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p> <p>Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse construction noise and vibration effects in CFAs 1, 2 and 3 without proper assessment.</p> <p>Camden council notes the forecasted increase in way-side noise levels of approximately 6dB in the peak months and the effect this is likely to have on The Britannia Hotel. Camden Council would expect provision to be made to support The Britannia Hotel in order to mitigate against this impact.</p> <p>Camden Council considers that methodology for assessing vibration impacts should take into consideration the unique structure of grade II* listed concrete Alexandra and Ainsworth Estate.</p>
		11.3.3	<p>Camden Council note that there is evidence to suggest that noise from night time working has been linked with impacting upon mental health, reduction in educational attainment and exacerbating existing health conditions. Camden Council considers that robust reasoning must be given to justify any night time working and it must be accompanied by an appropriate assessment of the likely impacts and proposed mitigation measures. Camden Council considers that robust reasoning must</p>

			be given to justify any night time working and it must be accompanied by an appropriate assessment of the likely impacts and proposed mitigation measures.
		11.3.5	Camden Council is of the view that consideration should also be given to non-residential historic structures which may also be affected by the noise implications of construction works. Camden Council considers that any historic structures affected are protected appropriately during the works.
		11.3.6	The ES refers to the “Noise Insulation and Temporary Re-housing Policy” which has been omitted from the ES and the draft CoCP. The lack of this policy is a significant omission within the ES and there is insufficient information to enable a thorough assessment of impacts and mitigation measures.
		11.3.8	<p>Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council considers that temporary re-housing can have an impact on both physical and mental health. Camden Council suggests that the frequency and duration of any such measures is considered further or work is scheduled to minimise this impact.</p> <p>Camden Council considers that a robust assessment should be made when assessing the medical condition of residents who may qualify for noise insulation and temporary re-housing and ensure it is based on suitable criteria. Camden Council considers there is evidence available which suggests that noise has a particular impact on people with mental health conditions so we suggest that mitigation would seek to particularly address this concern.</p> <p>Camden Council consider that particular attention must be given to those properties which will exceed the noise insulation trigger levels and are listed heritage assets, because conventional noise insulation packages might not be appropriate for such properties. Support and advice must be made available to residents who may be affected in this way and Camden Council consider that this specialised advice and support should be provided for and paid for by HS2. Support and advice could include for example professional technical advice on making a planning application or listed building consent application and paying for the application fees and associated consultants’ fees necessary for the preparation of a suitable scheme of mitigation measures.</p>

			Camden Council consider that measures must be taken by HS2 to identify which properties could be affected in this way and early discussions held with the affected residents and the Council to determine how this issue might be overcome. Camden Council consider that these properties could be at a greater risk of temporary re-housing during the construction phase if the noise insulation packages would not be feasible due to the heritage status of the properties and consider that this should be noted and assessed within the ES.
		11.3.17	<p>Camden Council considers the ES is defective in that the effects of the project in this regard will give rise to impacts that have not been fully assessed. The Council consider that the ES should have detailed best practicable means to mitigate against noise impacts and provide for implementation of the same in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.3.19	Camden Council is disappointed to note the project will give rise to these effects and expect HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to



			<p>mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p> <p>Camden Council Camden Council considers the ES is defective in that there is no mention in this section of the former Jack Taylor school site at Ainsworth Way which is due become an FE college for 16-25 year olds with severe complex needs. This site is an integral part of the Alexandra Road estate. Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant.</p>
		11.3.20	<p>Camden Council is disappointed to note the project will give rise to these effects and expect HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
		11.3.21	<p>Camden Council is disappointed to note the project will give rise to these effects and expect HS2 to ensure that all best practicable means to mitigate against noise impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in</p>

			order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.
	11.4		<p>Camden Council Camden Council considers the ES is defective in that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council Camden Council considers the ES is defective in that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties. A number of council led regeneration schemes listed in other sections could be affected during operation, for example through noise. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse construction noise and vibration effects in CFAs 1, 2 and 3 has not been properly assessed.</p> <p>Camden Council considers that methodology for assessing vibration impacts should take into consideration the unique structure of grade 2 star * listed concrete Alexandra and Ainsworth Estate.</p>
12			Camden Council Camden Council considers the ES is defective in that the extent and severity of the reported significant adverse operational airborne noise effects in CFAs 1, 2 and 3 without assessment.
	12.1		Unfortunately the impacts and related mitigation and outcomes set out in this key section of the ES are undermined by fundamental transport assessment issues that Camden Council has identified and raised in response to the transport assessment for London contained in Volume 5 (Parts 1 to 5). The TA is intended to underpin the ES. Significant gaps and inaccuracies in the assessment leading to operational performance and road safety issues on the highway network in the Construction phase;

			and inaccurate forecasting of impacts and mitigation where severe overcrowding and bottlenecks on key public transport services will actually take place, are the headline issues. These fundamentally undermine the assessment and make it not fit for purpose. Where HS2 have seemingly reported appropriate elements of the assessment like for example Construction Generations, there has been no evidence of supporting derivation, meaning that the quantities appear unfounded and therefore meaningless to be able to review properly. Detailed comments prepared by Camden Council sit behind this overview and can be found in the full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
	12.1		While Camden Council recognise the logic in using CLoHAM and RailPlan to assist forecast highway and rail demands, it has major concerns with the under-estimated and mis-directed outcomes that these models have generated without appropriate refinement. Camden Council's own data sets demonstrate more significant outcomes and larger figures which indicate greater impacts - this is not anecdotal evidence. With regard to construction impacts, Camden Council Camden Council considers the ES is defective in that that there is only a focus on the transport of excavated material, since no mention is made of delivering construction materials. The re-development of Euston Station would generate large quantities of inbound traffic that will have cumulative impacts with works in this area. The approach also discounts the use of rail to transport construction material which should be at the forefront of any Construction Transport Strategy.
	12.3.2		The baseline highway network is not accurately assessed in the ES ES (as is discussed in this Council's response to Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.5), and shows outcomes that under-estimate its operational performance. Camden Council is also concerned about the validity of the traffic surveys discussed in 12.3.2, given this was the period of the 2012 Olympic Games and the traffic conditions were not 'normal', due to the traffic management measures introduced by TfL at this time. Similarly for paragraph 12.3.3, Camden Council Camden Council considers the ES is defective in that the movement of pedestrians / cyclists is not representative as September was the period of the Paralympic Games which had an impact on the numbers, method and mode for people travelling around central London. Camden Council provides full details of their issues with the transport baseline that affects the ES in Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions, section 5.5.
	12.3.9		Camden Council notes that Adelaide Road is in fact served by two daytime bus routes – the 31 and the C11.

		12.4.1	<p>Camden Council considers that the 4 month closure of Adelaide Road will cause significant disruption to bus route 31, which may have an impact on the route's reliability and/or potential effects of increasing the PVR of the route with the consequent costs falling on TfL. The closure will also cause significant disruption to adjacent roads , such as England's Lane, and may cause further disruption to other areas such as around Hampstead Town Centre and to other inappropriate residential roads in these areas. Mitigations will be needed to prevent vehicles using a minor number of east-west roads in the area between Adelaide Rd and Hampstead Town Centre which serve residential areas. Diversion routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, rather than residential roads and town centres or roads of inappropriate status in the road hierarchy for construction traffic and diverted traffic. The Council would also be concerned regarding the impact on access and movement of emergency vehicles (the Royal Free Hospital is located close to this area, for example).</p> <p>Diversion routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, rather than residential roads and town centres or roads of inappropriate status in the road hierarchy.</p> <p>Many key derivatives of the assessment to determine Construction effects are not provided in the ES. For example, Construction trip generation does not show how the results have been evaluated and to which construction activities or cumulative impacts they relate. There is no evidence to suggest that sufficient representation of all construction activities and cumulative effects have been taken in to account and the loadings appear relatively low in comparison to other recent major schemes, such as Thames Tideway, Olympic Park and CRL, where much more information was required to be produced to support the planned proposals and safeguard against threats of major impacts. The claim that the draft CoCP will be implemented to reduce the effects of the deliveries of materials and equipment needs to be effective and consulted upon further to ensure the mitigation is adequate and</p>
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			identified in sufficient time. In relation to the above comment, Camden Council can see no evidence in the ES of how the construction scenarios (1, 2 and 3) have been evaluated in terms of quantifiable trip generations and cumulative generations and associated impacts. This therefore means the assessment that is presented is inconclusive and undermines the reliability of the impact and mitigation forecasts that HS2 proposes. Camden Council notes that excavated material will be reused wherever reasonably practical along the alignment of the Proposed Scheme. In this regard the Council would like more information how this would be applied to the work proposed for the Borough. For example, it presumes that such materials would be removed from the work by rail, but it would be helpful if more detail could be provided around this approach. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
		12.4.1-12.4.5	The Local Environmental Management Plans must be sufficiently detailed to provide site specific safeguards against the impacts of construction.
		12.4.2	Inaccuracies and under-estimations in the construction assessment as outlined above, explain the modest mitigation measures that are proposed. Full details of their shortcomings are again referenced in the full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3). It is noted by Camden Council that under the paragraphs addressing "Avoidance and mitigation measures", there is no mention as to whether an assessment has been made of using the Regent's Canal as a possible method for transporting materials, excavations and waste. Currently an open site on Kentish Town Road where it crosses the Regent's Canal at Hawley Lock provides access to the canal and Camden Council feels that opportunities to use the canal should not be automatically discounted, but first be examined. This was indeed the case with Crossrail for their western portal at Westbourne Park, where it was shown barge transport was a feasible option for some materials. Barges can carry up to 85 tonnes of cargo (bulk materials or otherwise) on the Regent's Canal, equivalent to removing five tipper vehicles or two articulated lorries. Camden Council notes that HS2 states that project "includes measures which seek to reduce the impacts and effects of deliveries of construction materials and equipment", but we are concerned that overall there is no target for transporting materials by non-road modes, as was the case for the Olympic Park, is the case for Crossrail and will probably be the case for Thames Tideway Tunnel. Therefore, Camden Council would like to see a more definite commitment to using non-road modes for the movement of excavations and materials.
		12.4.3	Camden Council notes that the travel plan indicates that workers will have no parking availability.

			<p>However, it is indicated that car sharing will be promoted. The London Borough of Camden also needs to consider if parking dispensations will be required as we need to forecast for that demand if indeed we permit their usage for this project. It is noted that there are parking spaces being made available for HGV and LGV vehicles. Camden Council therefore expects construction works to utilise pay &amp; display bays. However, the pay &amp; display bays are being used to re-accommodate permit holder bays during the construction phase. Accordingly, there will be increased parking demand during these times.</p>
		12.4.6	<p>The temporary effects are under-estimated and not accepted by CC, because HS2 have been proven from comparative Camden Council data that they have significantly underestimated the operational performance of the highway network in the baseline and therefore also subsequent scenarios. The accuracy and sufficiency of the reported temporary effects are also inconclusive until Camden Council can review the derivation of the full construction activity site generations which should be in the ES but are not provided. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5, Part 2, section 5.5 and Part 3 section 6.5.</p>
		12.4.27	<p>Camden Council Camden Council considers the ES is defective in that the traffic disruption as a result of the proposed Alexandra Place vent shaft. The shaft is adjacent to the site of the former Jack Taylor school at Ainsworth Way which is due become an FE college for 16-25 year olds with severe complex needs. This building can only be accessed via Boundary Road. Camden Council notes that the ES accepts there will be a significant impact on the Alexandra Road estate. The Council therefore believes that the impacts on the former Jack Taylor school (due to become an FE college for 16-25 year olds with severe complex needs) should also be considered as significant.</p>
		12.4.28	<p>As per Camden Council's comments on paragraph 12.4.1, the 500m diversion around Primrose Hill Road, England's Lane and Haverstock Hill may be relatively short in distance but will have a significant impact on journey time due to the route being shared with construction traffic and having to negotiate additional junctions.</p> <p>Camden Council Camden Council considers the ES is defective in that that the diversion route specified and its consequent suspension of parking places will displace parking issues to the smaller streets.</p>
		12.4.32	<p>Camden Council request that changes to bus stops at key interchange locations such as Chalk Farm</p>

			Underground station are clearly signed and advertised locally, in order to minimise the inevitable disruption that these changes will cause.
		12.4.33	Camden Council agrees that the suspensions and re-provision of bus stops in the Adelaide Road area will be a major adverse effect. Bus users with mobility difficulties will be disadvantaged by these alterations, as 290m is a significant distance for people who have difficulty walking longer distances.
		12.4.40	This very brief description of the cumulative effects that are claimed to have been assessed is again inconclusive, until Camden Council can review the derivation of the accumulated construction activity site generations and other key sources of impact such as utilities works, which should be contained within the ES but are not provided in anywhere near sufficient detail. Notwithstanding this gap in information, the outcomes reported in section 12.4.68 of Vol 2 CFA1, which state that CFA2 and CFA3 will each generate just 60 daily vehicles and that this is the level that has been assumed as being the cumulative impact, is simply not accepted because of its under-estimated order of scale. It is also noticeable that this corresponding section of CFA3 (Vol 2 CFA3 section 12.4.40) does not quote the corresponding cumulative effects for CFA1 and 2. This inconsistency and key missing information seems to confirm a significant under-estimation in impacts and cumulative impacts. Full details of this and other shortcomings are referenced in Camden Council's full response to the Transport Assessment (TR-001-000): Traffic and Transport in Vol 5 (Parts 1 to 5 relating to CFA1 to 3).
		12.4.44	The other mitigation measures are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures. It is stated that the implementation of the CoCP will mitigate the transport related effects, and yet there is no real evidence that this conclusion can be supported. The travel plan measures are suggested as providing further mitigation, although these should be in any baseline as good practice. They also rely heavily on utilising local public transport provision, but without evidence of how capacity will meet the demand.



		12.4.47	See Camden Council comments on paragraph 12.4.1 concerning bus service disruption caused by the Adelaide Road closure.
		12.4.48	<p>See Camden Council comments on paragraph 12.4.33 concerning issues for the mobility impaired concerning closure and re-provision of bus stops during the construction phase.</p> <p>Camden Council strongly consider that a substantial proportion of the many significant residual construction effects that are predicted in this section of the ES are an under-estimate, because of the earlier comments regarding issues with the transport assessments. Notwithstanding, Camden Council considers many issues could be eradicated by a better scheme as referred to by Camden Council in 2.1 of Vol 2 CFA1 response.</p> <p>By way of an example of an unacceptable residual impact, Camden Council considers Adelaide Road to be an important east-west transport route within the Borough. It is identified as a borough distributor road in the Council's Network Management Plan. It connects to a major gyratory at Swiss Cottage (to the west) which serves the A41, a strategic north-south route on the TLRN between Central London and the M25. To the east it connects with Chalk Farm Road and beyond towards Camden Town where the route moves in to very congested junctions and not just in the peak hours that have been assessed. Adelaide road also accommodates several bus routes and large housing populations served directly off Adelaide Road and also frequent side arms such as Eton Road, Primrose Hill Road, Elsworthy Rise, Lower Merton Rise and Winchester Road/Harley Rd. The route has 20 mph zones along it, including along Adelaide Road itself, to reflect the surrounding residential areas it serves and to improve road safety.</p> <p>Camden Council Camden Council considers the ES is defective in that the proposed use of England's Lane as a bus route diversion and for other diverted traffic and construction traffic and the lack of mitigation to prevent traffic running minor residential roads through the area(for example the area between Adelaide Rd and Hampstead Town Centre). Camden Council is therefore concerned that it is both earmarked for a significant period of closure, due to the proposed scheme works which will have devastating major on access for residents, businesses, schools (such as Haverstock School), movement of emergency vehicles (for example, the Royal Free Hospital is located nearby) etc.; and that it is identified as one of the primary construction routes for HGV traffic with no other east-west appropriate strategic routes (on the TLRN or SRN, where possible having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report)</p>

			<p>identified, anywhere nearby, as alternatives (when cross referring to the CFA3 map book). England's Lane is unsuited to the traffic that would result (volumes and types of vehicles), which is likely to lead to congestion and potentially hazardous traffic conditions, especially for vulnerable users of the public highway such as pedestrians and cyclists. The traffic reassignment impact and direct threat to road safety of using Adelaide Road (which like other roads in Camden has a 20 mph speed limit) as a principal construction route is a major issue for Camden Council and it seeks alternative more appropriate routes be identified together with adequate mitigations to protect amenities of the area, its users and the transport network.</p>
	12.5		<p>As set out above under construction mitigation, Camden Council considers that the other mitigation measures are fundamentally wrong in that they are already in the baseline conditions, such as SCOOT and therefore should not be counted as mitigation measures. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share in favour of non-car modes. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures.</p> <p>Camden Council considers that cycle and pedestrian connectivity improvements are not sufficiently provided to meet the demands of the HS2 scheme in this area of the Borough. These modes will be incredibly valuable in relieving pressure on more heavily investable modes and HS2 have not embraced this opportunity expansively enough for a scheme of this scale.</p> <p>Camden Council considers the impacts that are reported regarding the forecast changes to delay for the highway network are under-estimated. This is because of issues arising from the transport assessment work, Volume 5, Part 2, section 5 regarding the optimistic baseline modelling of the highway network for CFA1-3, which showed free flow conditions and optimistic levels of queues and therefore delay at many of the junctions tested that Camden Council simply know by observation alone to not be the case. This is also supported by Camden Council own non-anecdotal evidence.</p> <p>No information is provided here on what the cumulative effects are, both descriptively and in quantifiable terms. This is not provided in any comprehensive form with sufficient detail in other parts of the ES either, so Camden Council cannot review its derivation and accuracy of forecasts.</p>

	13.2		Camden Council accepts that 500m may be an appropriate distance to consider for surface water impact provided the impact of directly entering the urban drainage system is considered for a wider range as its impact can often be significantly further downstream.
	13.3		Camden Council notes that there have been regular reports of cellars flooding in recent years in this area suggesting that there may be underground springs or tributaries of the river Westbourne that may still be active. In determining the flood risk for the area, this should be taken into consideration. It highlights the importance of considering the impact of the tunnelling on flood risk in the area through 'perching' i.e. water trapped in the upper surface of the ground unable to soak through the clay and the need for SuDS (Sustainable Drainage Systems) to be investigated to absorb and collect more of the rainwater than is done currently.
	13.4		The Local Environmental Management Plans must be sufficiently detailed to provide site specific safeguards against the impacts of construction.
	13.5		Camden Council requests that HS2 have an Emergency Response plan in place to deal with any utility failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time. Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.

### CFA 03 map book: Primrose Hill to Kilburn (Camden) (Ref: ES 3.2.2.3)

Map number	London Borough of Camden response
CT-05-003a	Map CT-05-003a shows that a stretch of the Regent's Canal towpath west of Gloucester Avenue bridge could be potentially required during construction, adjacent to grade II listed The Engineer PH at 65 Gloucester Avenue and grade II listed Primrose Hill Primary School in Princess Road, all within the Primrose Hill Conservation Area. No mention is made of the impacts on these heritage assets.

	<p>Map CT-05-003a shows two sections of highway in Berkley Road and Chalcot Road, potentially required for construction. No mention is made of the impact on heritage assets including grade II listed buildings in the adjacent Chalcot Square and positive contributors to the Primrose Hill Conservation Area.</p> <p>Para 6.3.3 states designated heritage assets located partially or wholly within the land required, temporarily or permanently, for construction include grade II listed buildings at 1 to 15 (consec) Prince Albert Road (only 8 and 9 are within the land required to construct the Proposed Scheme). This is unclear, as map CT-05-003a does not indicate that the land at 8 and 9 may be required for construction, but it indicates that settings of 1 to 9 (consec) are affected by the potential requirement of the highway immediately in front during construction.</p>
CT-05-003b	<p>Camden Council is concerned that a significant number of residential roads have been identified as construction routes. A great number of residents will be severely impacted as a result. Construction routes should take adequate account of Camden's road hierarchy that is used for the purpose of performing the Council's network management duty, as set out in the Council's Network Management Duty Report (<a href="http://www.camden.gov.uk/nmp">www.camden.gov.uk/nmp</a>). In many cases, these construction routes and traffic diversion routes would be better provided on appropriate roads on the Transport for London Road Network (TLRN) or, where not available, the Strategic Road Network (SRN) and other more suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, rather than residential roads and town centres. Many of these residential roads contain residential parking which reduce road width and are also cycle routes. Camden Council do not consider that sufficient information has been provided to demonstrate that highway safety of vulnerable road users has been mitigated on construction routes.</p> <p>A significant number of roads surrounding Euston Station are identified as 'Land potential required during construction'. Camden Council is concerned that no detail has been provided to specify why they might be required. An example of this is Parkway, which is known to suffer from existing congestion and Albert Street, which is a residential street with no identifiable construction traffic routing or mains utilities works.</p> <p>A number of satellite construction compounds are identified adjacent to the tracks works, although these are also situated on residential roads. Camden Council is concerned that the cumulative impact of HGV traffic associated with these sites together with wider construction vehicle movements</p>

	on Construction Traffic Routes has not be considered in the context of these resident roads. An example of this is the residential road of Mornington Terrace, which is identified to accommodate north-south construction traffic as well as potentially taking traffic from Park Village East and Parkway.
CT-05-004b	<p>A significant number of roads within Map CT-05-004b are identified as 'Land potential required during construction'. Camden Council is concerned that no detail has been provided to specify why they might be required. An example of this is King Henry's Road which is a residential road, which is not identified as a construction traffic route or a road with Main utility works.</p> <p>Camden Council considers that this drawing provides insufficient phasing information, therefore it cannot be determined if cumulative works associated with viaduct widening and bridge replacement would constitute a significant effect on the local highway network.</p> <p>Bus Routes (DH)</p>
CT-05-005	<p>Camden Council is concerned that a significant number of residential roads have been identified as construction routes. Many of these residential roads contain residential parking which reduce road width and are also cycle routes. Camden Council do not consider that sufficient information has been provided to demonstrate that highway safety of vulnerable road users has been mitigated on construction routes.</p> <p>Map CT-05-005 in Map Book CFA 03 indicates that the land potentially required for construction includes Langtry Walk, a small section of the walkway between Blocks A and B of Rowley Way (including an access point between the middle and eastern block of Block B), a short section at the eastern end of the service road behind Block A of Rowley Way, and the access road on the south side of Alexandra Park north of Ainsworth Way, all adjacent to and affect the setting of the grade II and grade II* listed buildings and the Alexandra Road Conservation Area. There is no assessment in the Cultural heritage section on the potential impacts and effects resulting from construction on the grade II and grade II* listed buildings and on the Alexandra Road Estate Conservation Area.</p>
CT-05-006a	<p>Camden Council is concerned that Langtry Walk has been marked as land potentially required for the proposed scheme. It is unclear from the map why this land is required. This road serves Langtry Children's Centre so the Council is concerned about access being maintained to the children's centre and disturbance that may take place whilst construction works for the proposed scheme are taking place.</p> <p>Map CT-05-006 in CA 03 Map Book shows the route of the twin-bore tunnel running east to west</p>

	<p>immediately below the grade II* listed Alexandra Road Estate, impacting on grade II* and grade II listed buildings and positive contributors in the Alexandra Road Conservation Area. The tunnel will run directly below a large section of the eastern end of the estate's concrete mega structure to the west of Alexandra Place, under the northern side of the grade II listed former Jack Taylor School building, under the easternmost section of the eastern terrace of the grade II* listed Block B in Rowley Way, under the linear Alexandra Park which is an integral part of the estate, and under the majority of the grade II* listed Ainsworth Way residential terrace. The Cultural heritage section provides a very low level of information on the estate as a designated heritage asset of national significance. Few assessments are made regarding potential impacts and effects of the Proposed Scheme on the estate, and little information is provided on the various heritage assets falling within the Alexandra Road Conservation Area which could be affected by the proposed tunnelling due to their position directly above the route. No reference is made to the grade II listed former Jack Taylor School building, either in written assessments or in the heritage map in the CA 03 Map Book.</p>
CT-06-003b	<p>Camden Council request clarification why Main utilities works are identified within this 'Proposed Scheme' drawing.</p>
CT-06-004b	<p>Camden Council would like to more clarification on the proposed grassland habitat creation and landscape mitigation planting for the Adelaide Nature Reserve and the vent shaft site. Camden Council would like to point out that the design of the vent shaft should be in keeping with landscape and therefore have green walls and roofs.</p> <p>Camden Council request clarification why Main utilities works are identified within this 'Proposed Scheme' drawing</p>
CT-10-003c	<p>Camden Council is concerned that the Adelaide Local Nature Reserve and two areas within Alexandra and Ainsworth Estate Open Space is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required.</p> <p>Regency Lodge is not shown as a grade II listed building on the Environmental Baseline map CT-10-003b.</p> <p>Heritage assets affected by the Proposed Scheme are under-represented on the Environmental Baseline maps in the three CFA map books in Camden.</p> <p>The number of listed buildings is inaccurate, as the system employed of one dot per list entry fails to</p>

	<p>show each individual building where an entry covers multiple listings. Group listings are widespread in an urban area such as Camden, ranging from the numerous terraces of townhouses to groups of railway heritage structures as found in Stables Market. Each individual building which belongs to a group listing should be marked separately on the maps.</p> <p>Conservation area status is shown on the maps, but the individual conservation areas and their boundaries are not included. Positive contributors in conservation areas are not depicted. Buildings on the Camden draft Local List are not shown on the maps.</p> <p>Camden Council is concerned to note that squares protected by the London Squares Preservation Act 1931 are not shown.</p> <p>It is also extremely concerning to note that there are inaccuracies on the heritage maps regarding the grade of some listed buildings, with a number of grade II* listed buildings recorded as grade II listed. Some listed building entries have been omitted from the maps completely (see below).</p>
CT-10-004a	<p>Camden Council is concerned that there are two areas within the open space in Alexandra and Ainsworth Estate that are part of the potential land required for construction. Camden Council would like commitment that this area will not be used.</p>
Photomontages	<p>Camden Council notes that the photomontages in the CFA 03 Map Book show a deadening structure with a 'functionless' appearance blighting the entrance to one of the country's most significant post-war low-rise housing estates, and harming the setting of the grade II listed former Church of All Souls, situated on the east side of Loudoun Road.</p> <p>Camden Council notes that no design considerations have been made to the remaining contemporaneous sister building by Tom Kay, at 3232-62 Alexandra Place and 49-59 Loudoun Road, also a positive contributor in the Alexandra Road Conservation Area. This can be seen in the photomontages in CFA 03 Map Book which show the view from the Belsize Road roundabout: the block has lifeless solid brick facades, including those facing Alexandra Place, Langtry Walk, Loudoun Road and the existing railway cutting. There is no activity in the street, due to the absence of mixed use business and residential uses on the site. Due to its bulky rectilinear form, the proposed building will have a more dominant presence than the existing, despite being of a comparable height. The proposed vent shaft headhouse will therefore have a negative impact on views in and out of three conservation areas: Alexandra Road Estate Conservation Area, South Hampstead Conservation</p>



	<p>Area, and St John's Wood Conservation Area (City of Westminster section).</p> <p>Camden Council notes that para 2.2.4 of Vol 2 CFA 03 report states that, pursuant to the draft ES, the location of the Adelaide Road vent shaft and associated headhouse has been moved eastwards so it is no longer situated in the Adelaide Local Nature Reserve. Para 6.4.2 states measures have been incorporated into the design to reduce impacts on the character of the Eton and Primrose Hill Conservation Areas: the headhouse was previously proposed as a two storey structure (approximately 8m high and has been amended to a single storey structure (approximately 4.5m high), but it states the footprint has not changed. The site will include a permanent fenced compound, with security fencing, hardstanding and lighting.</p> <p>Camden Council notes that para 9.5.8 states the facades will be blank, except for emergency access doors and ventilation louvres. Photomontages in CFA 03 Map Book show the vent shaft and headhouse as a utilitarian dark brick bunker with a flat roof, with the only relief being recessed brick panels as seen from the road side. Para 2.2.14 states that the materials and finishes of the headhouse will be subject to detailed design and agreement with the local planning authority. Photomontages in CFA 03 Map Book show a utilitarian galvanised steel gate to the east of the headhouse, which detracts from the setting of the Eton Conservation Area. Para 2.24 contradicts Para 6.4.2, as it states the footprint of the headhouse has not changed since the draft ES; its dimensions are taken to be approximately 20m by 30m. Fundamental issues of footprint, height, bulk, mass and scale need to be resolved at this stage prior to the implementation of the provisions of the Heritage and Planning Memoranda. In order to fit in to the local surroundings, a radical redesign is necessary at this stage, as the existing design causes harm to the surrounding area, particularly to the setting of the Eton Conservation Area; it should be noted that LB Camden suggested in its response to the draft ES that a turf roof and walls would mitigate the visual impacts caused by the shaft, but this has not been addressed in the ES. The proposed headhouse design fails to comply with LB Camden LDF Core Strategy policies on development in conservation areas: policy CS14 requires that development preserves <u>and</u> enhances the character and appearance of conservation areas.</p> <p>Camden Council notes that para 9.3.1 states the site is bounded on the southern side of Adelaide Road by a long and substantial red brick wall with solid piers and recessed panels, which is likely to be contemporary with the railway and is of historic townscape value (a candidate for the Camden Local List). Photomontages in CFA 03 Map Book show a sizeable section of the wall removed as the vent shaft will require a piled retaining wall. Para 2.2.13 states the replacement wall will be</p>
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	<p>approximately 44m long. However Para 9.5.8 of the Landscape and visual assessment states approximately 90m of the red brick boundary wall will be rebuilt. There are discrepancies as to extent of demolition and rebuilding works. Notwithstanding, the demolition of a sizeable section of this wall will cause harm to this non-designated heritage asset, and to the setting of the Eton Conservation Area; no assessment has been made of the impacts and effects of the loss of this historic wall, and the replacement design illustrated in the photomontage is unsatisfactorily detailed. In the absence of information, it is assumed that works to the wall could also affect the setting of 23-49 (odd) Adelaide Road, a group of 13 mid-19<sup>th</sup> century semi-detached villas which feature on the Camden draft Local List.</p>
LV-01-012	<p>Camden Council would like to stress that the woodland in this Private Nature Reserve has a valuable contribution to the area and the loss of trees and plants on this site will have a detrimental effect on ecology. Visually the 2026 viewpoint is in stark contrast to the site in its current form. Camden Council would like to stress that in order to reduce this visual impact, we would like to see a small number of semi-mature and mature trees planted to act as a visual screen. Camden Council would like HS2 Ltd to consult planting plans with our tree team.</p> <p>Camden Council also considers that a blank façade placed directly onto the back of pavement results in an undesirable street frontage which does not reflect urban design best practice. It will attract anti-social behaviour. It is also not fitting for the nature reserve context. Green walls should be introduced, also it should be set back being a continuous boundary road with high planting in between. More views are required from a range of location including ones from oblique angles, which would demonstrate the proposals full impact.</p>
LV-01-017	<p>Camden Council considers that the blank and unanimated façade of this vent shaft is a harmful intervention into this residential area. The building has blank facades and unanimated colonnade at the entrance to a residential estate and as such rejects urban design best practice and a common sense community safety approach. The design is utilitarian lacking in contextual consideration or aesthetic merit. More views are required from a range of location including ones from oblique angles, which would demonstrate the proposals full impact.</p>
LV-01-018	<p>Camden Council considers that the blank and unanimated façade of this vent shaft is a harmful intervention into this residential area. The building has blank facades and unanimated colonnade at the entrance to a residential estate and as such rejects urban design best practice and a common sense community safety approach. The design is utilitarian lacking in contextual consideration or</p>

	<p>aesthetic merit. More views are required from a range of location including ones from oblique angles, which would demonstrate the proposals full impact.</p>
LV-01-221	<p>Camden Council would like to stress that the woodland in this Private Nature Reserve has a valuable contribution to the area and the loss of trees and plants on this site will have a detrimental effect on ecology. Visually this viewpoint is in stark contrast to the site in its current form. Camden Council would like to stress that in order to reduce this visual impact, we would like to see a small number of semi-mature and mature trees planted to act as a visual screen. Camden Council would like HS2 Ltd to consult planting plans with our tree team.</p> <p>Camden Council considers that a blank façade placed directly onto the back of pavement results in an undesirable street frontage which does not reflect urban design best practice. It will attract anti-social behaviour. It is also not fitting for the nature reserve context. Green walls should be introduces, also it should be set back being a continuous boundary road with high planting in between. This 15 year on view, with its mature planting, further expresses the jarring nature of the shaft in the nature reserve and the need for reducing its impact through greening. More views are required from a range of location including ones from oblique angles, which would demonstrate the proposals full impact.</p>
LV-03-002c	<p>Camden Council would like to point out that the affected green spaces in this area are not highlighted, such as Camden Gardens. The viewpoints of houses overlooking these areas will see a significant change of view during construction. Camden Council would like to point out that this does not seem to reflect views that are affected from removal of greenery, such as all along Park Village East.</p>
LV-03-004b	<p>Camden Council would like to stress that the woodland in this Private Nature Reserve has a valuable contribution to the area and the loss of trees and plants on this site will have a detrimental effect on ecology. Camden Council is very concerned that visually, the viewpoint will be going from slightly overgrown greenery to a construction site, which will be a considerably stark contrast. Camden Council would like to see green walls on the construction hoardings to mitigate this. Camden Council is concerned that the Adelaide Local Nature Reserve is now mapped as potential land required during construction and Camden Council would like commitment that this will not be the case.</p> <p>Camden Council is also concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are</p>

	significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 3 Operational Phase Significantly Affected Viewpoints in this area.
LV-03-005	Camden Council is concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area.
LV-03-006a	<p>Camden Council points out that the potential land required for construction includes part of Alexandra &amp; Ainsworth Estate Open Space which has recently received lottery funding for improvements. Any changes to those sites will result in affected viewpoints of those overlooking the open space.</p> <p>Camden Council is also concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints in this area.</p>
LV-04-002c	Camden Council is concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only three Operational Phase Significantly Affected Viewpoints for this area.
LV-04-004b	<p>Camden Council would like to stress that the woodland in this Private Nature Reserve has a valuable contribution to the area and the loss of trees and plants on this site will have a detrimental effect on ecology. Visually this viewpoint is in stark contrast to the site in its current form. Camden Council would like to stress that in order to reduce this visual impact, we would like to see a small number of semi-mature and mature trees planted to act as a visual screen. Camden Council would like HS2 Ltd to consult planting plans with our tree team.</p> <p>Camden Council is also concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are</p>

	significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only two Operational Phase Significantly Affected Viewpoints for this area.
LV-04-005	Camden Council is concerned that there are more viewpoint for the temporary construction period than the operational phase. The permanent visual effects of the proposal in many areas are significantly more important than that of the construction phase. Camden Council would like to stress that it is disingenuous to propose that there are only 2 Operational Phase Significantly Affected Viewpoints for this area.
SV-05-002b	Camden Council considers that the maps are of limited use at the current scale and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures.
SV-05-003	Camden Council considers that the maps are of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures.

# **HS2 Phase One environmental statement volume 3: route-wide effects**

### Volume 3: route-wide effects of HS2 Phase One (Ref: ES 3.3.0)

Section number	Sub section	Paragraph	London Borough of Camden response
3			<p>Camden Council is concerned that the ES does not include an assessment of the impact of the proposed scheme on the urban forest. Camden Council points out that trees in streets, parks, gardens and urban woodlands play a vital and increasingly important role in climate, air quality and temperature regulation, biodiversity conservation, sense of place and landscape character in urban areas; and that local losses of trees can impact on the delivery of these ecosystem services over a wider areas (e.g. regulation of the urban heat island effect).</p> <p>Camden Council points out that the majority of people affected by the proposed route will be living in urban areas (particularly London and Birmingham) and so an assessment of the impact of the proposed scheme on the urban forest should be done, to include baseline data on the number of urban trees and the extend of urban tree canopy cover to be lost.</p>
4			<p>Camden Council rejects the idea that the changes to operational traffic emissions can be ignored because of anticipated changes in vehicle design given the lack of progress on these issues in recent years.</p> <p>Camden Council strongly repudiates the suggestion that no significant effects are predicted from construction when 6 sites within Camden will have the highest possible score for impact.</p> <p>Camden Council notes that 169 receptors have been identified to have adverse air quality effects from construction traffic and believes the suggestion that adverse air quality effects are confined to a limited number of roads is inaccurate.</p>
5	5.1	5.1.1	<p>Camden Council notes that it will be disproportionately affected by carbon emissions related to both the construction and operation of HS2 due to the location of Euston station in the borough. This means that HS2 will have a negative impact on the council's own borough-wide emissions targets up to 2020 and beyond. Camden believes a geographical breakdown of emissions should have been undertaken by HS2, especially in relation to station construction and modal shift of journeys to stations in the operational phase.</p>
	5.5	5.5.26	<p>Camden Council believes that the removal of modal shift for domestic flights at Heathrow is arbitrary,</p>



			given the high level assumptions made for other emissions throughout this foot printing exercise. Camden believes that this should still be included in the operational footprint for the scheme. As it stands the removal of this domestic flight modal shift has artificially reduced operational emissions.
	5.7	5.7.6	Camden Council notes the huge difference in the construction emissions estimate from the AoS to the ES. This further indicates the inadequacy of the AoS methodology. Camden therefore believes that the AoS as a consultation document was therefore not fit for purpose regarding construction carbon emissions.
6	6.1	6.1.1	Camden Council is concerned that there has been an under estimate of the impact the construction and operation would have. Due the national and international popularity of the area we feel that great consideration should be given for the overall impact the proposed scheme could have on Community Safety within the borough.
		6.1.2	Camden Council is concerned that HS2 has underestimated the effect that high numbers of densely accommodated construction workers will have on the borough. Such an increase in any type of population in an already densely populated area is bound to have impact on community safety issues.
7	7.1	7.1.1	Camden Council strongly disagrees with the statement set out in Para 7.1.1, which states, "The loss of individual heritage assets and effects on setting, are not considered to be of route-wide importance." Camden Council argues that the loss of any type of heritage asset, designated or non-designated, has a high impact and major adverse effect due to the total and irreversible loss of that asset. Impacts may have national or even international implications; this may be caused by the high value of an asset in its own right, or it may be caused by cumulative negative impacts which degrade a sensitive historic environment. Invariably mitigation measures cannot compensate for the loss of irreplaceable heritage assets. There is no evidence to show the positive benefits of the Proposed Scheme outweigh the loss of individual heritage assets, designated or non-designated.
		7.1.2	<p>Camden Council demonstrates below the enormity of the harm which will be caused to the heritage assets in the Borough, in the context of the statistics provided in Para 7.1.2:-.</p> <p>Camden Council notes that across the entire route of the Proposed Scheme, a number of designated heritage assets will be significantly affected through direct physical impact, including 18 grade II listed buildings comprising six to be demolished, four to be altered and eight to be removed and relocated.☐</p>

			<p>A disproportionately high number of these route-wide designated heritage assets are located in LB Camden, where 11 grade II listed buildings and one grade II* curtilage structure will suffer direct physical impact, comprising two grade II listed buildings which will be demolished, two grade II listed buildings which will be altered, seven grade II listed buildings which will be removed and relocated, and one grade II* listed building curtilage structure which will be demolished (Vol 2 CFA reports, 6.4 Assessment of impacts and effects; Vol 5, CFA impact and assessment tables). Ten of these listed buildings are situated in CFA 01 Euston Station and Approach alone, at the heart of LB Camden and central London. The impacts and effects will be irreversible; no mitigation measures will be able to compensate for the harm to Camden's built heritage, resulting in enormous residual effects.</p> <p>Camden Council notes that adding to the impacts outlined above there are also a disproportionately high number of non-designated heritage assets that will be significantly affected through direct physical impact, comprising 23 existing entries or candidates for the draft Local List which will be demolished, three positive contributors in conservation areas which will be demolished, eight existing entries or candidates for the draft Local List which will be altered, and one positive contributor in a conservation area which will be altered (as recorded in Vol 2 CFA reports, Assessment of impacts and effects sections; Vol 5 CFA impact and assessment tables). Several of these non-designated heritage assets have not been acknowledged anywhere in the Environmental Statement as having heritage significance (for instance the Baynes Street and Randolph Street railway bridges, and a 19<sup>th</sup> residential terrace at 67-79 Euston Street are overlooked in Vol 2 CFA reports as well as in Vol 5 CFA baseline reports and gazetteers of heritage assets), although they are recorded by LB Camden as positive contributors in conservation areas or feature on the Camden draft Local List. The failure to record these statistics plus the undervaluing of local heritage (in Vol 2 CFA reports and Vol 5 baseline reports and gazetteers of heritage assets), shows the Proposed Scheme's lack of recognition of the significance of non-designated heritage assets to the local community and the significant contribution such buildings and structures make to the environment as a whole.</p> <p>Camden Council disputes the route-wide statistics provided by HS2 Ltd since a grade II drinking fountain proposed for dismantling and relocation from St James's Gardens has been omitted from the ES (Vol 2, Para 6.4.2, 6.4.17, 6.4.23; Vol 3, Para 7.1.2) . The number of grade II listed buildings affected route-wide should read as 19 in total, with nine to be removed and relocated.</p> <p>Camden Council notes that 10 of the 18 (19) route-wide designated heritage assets which will be significantly affected through direct physical impact, fall in CFA 01 Euston Station and Approach, as follows:-</p>
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			<ul style="list-style-type: none"> <li>- Two grade II listed buildings will be demolished: 14 and 15 Melton Street.</li> <li>- Seven grade II listed structures will be removed and relocated: Statue of Robert Stephenson, Euston Station forecourt; Christie Monument, St James's Gardens; Southampton Monument, St James's Gardens; Drinking Fountain, St James's Gardens; LNWR War Memorial, Euston Square Gardens; Boundary railings, Euston Square Gardens; Mornington Street bridge piers.</li> <li>- One grade II listed structure will be altered: Parkway Tunnel.</li> </ul> <p>Camden Council is disappointed that no route-wide statistics are given for other types of designated and non-designated heritage assets, positive contributors in conservation areas and buildings on local lists. However, the following non-designated heritage assets in CFA 01 Euston Station and Approach will be significantly affected through direct physical impact as follows:-</p> <ul style="list-style-type: none"> <li>- 16 existing entries or candidates for the Camden draft Local List will be demolished: 1-3 Cobourg Street; three properties at 59, 61, 65 and 67 Cobourg Street; Bree Louise PH, 69 Cobourg Street; three properties at Cottage Hotel, 67-75 (odd) Euston Street; 77-79 (odd) Euston Street; Carriage Shed, Granby Terrace; two properties at National Temperance, Hampstead Road; Former Euston Underground Station entrance, Melton Street; Grant Thornton House, 20 Melton Street; One Euston Square, 44 Melton Street; Mornington Street Bridge.</li> <li>- Three entries on the Camden draft Local List will be altered: St James' Gardens, Hampstead Road; Retaining wall, Mornington Terrace; Retaining wall, Park Village East.</li> </ul> <p>Camden Council notes that within the Euston Station and Approach CFA 16 existing entries or candidates for the Camden draft Local List/positive contributors in conservation areas will be totally demolished, and three entries on the Camden draft Local List/positive contributors in conservation areas will be altered through partial demolition. An unacceptably high number of historic buildings, including groups of 19<sup>th</sup> century buildings of valuable townscape west of Euston Station will be lost forever. A former 18<sup>th</sup> century burial ground will be destroyed and a valuable public open space will be altered beyond recognition.</p> <p>One of the 18 (19) route-wide designated heritage assets which will be significantly affected through direct physical impact, fall in CFA</p> <p>Camden Council notes that one of the 18 (19) route-wide designated heritage assets which will be significantly affected through direct physical impact, fall in CFA 03 Primrose Hill to Kilburn, as</p>
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			<p>follows:-</p> <ul style="list-style-type: none"> <li>- One grade II* listed curtilage structure will be demolished: concrete ramp and planting bed in Langtry Walk.</li> </ul> <p>Camden Council is disappointed that no route-wide statistics are given for other types of designated and non-designated heritage assets, including positive contributors in conservation areas and buildings on local lists. However, the following non-designated heritage assets in CFA 02 Camden Town and HS1 Link will be significantly affected through direct physical impact as follows:-</p> <ul style="list-style-type: none"> <li>- One positive contributor in a conservation area will be demolished: 61-83 (odd) Loudoun Road and 1-8 (consec) Langtry Walk.</li> <li>- One candidate for the Camden draft Local List will be altered: boundary wall on the south side of Adelaide Road, west of 49 Adelaide Road.</li> <li>-</li> </ul> <p>Camden Council notes that within the Primrose Hill to Kilburn CFA one grade II* listed curtilage structure will be totally demolished and rebuilt in replica, one key positive contributor in the Alexandra Road Estate Conservation Area will be totally demolished, and one candidate for the Camden Local List will be altered due to substantial demolition. Fewer heritage assets will suffer direct physical impact than in CFA 01 and CFA 02 as the entire stretch of the Proposed Scheme will be tunnelled under CFA 03. The direct impacts will result from the construction of the two vent shafts and headhouses to serve the tunnels. The direct physical impact involving the loss of significant heritage assets in the Alexandra Road Estate Conservation Area, affecting the eastern entrance to the grade II* listed Alexandra Road Estate, will cause irreversible harm to an outstanding post-war housing estate.</p>
		7.1.4	<p>Camden Council emphasises that in principle the loss of the great majority of heritage assets is of an irreversible nature. In the majority of cases, where a built heritage asset is lost, it is impossible to authentically replicate it. Although mitigation measures may bring some benefits, it is usually impossible to compensate for the loss of the heritage asset. In Camden, the large-scale loss expressed in the Council's response to Para 7.1.2 of Vol 3 Route-wide effects, can never be overcome by mitigation.</p>
8			<p>Camden Council rejects that compensatory habitat creation will maintain and enhance ecological networks. Camden Council points out that compensatory habitat in Camden is to be created post-</p>

			<p>construction, meaning that habitats will be absent or establishing for more than a decade, which is likely to have a significant impact on the integrity of the urban ecological network; furthermore the reduction in size of Camden Sites of Importance to Nature Conservation (core ecological sites) – 36% reduction of North London Line, 37% loss of Chalk Farm and Adelaide, and 100% St James Gardens – is completely contradictory to Lawton principles for restoration of coherent ecological network.</p>
9			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
11	11.1	11.1.1	<p>Camden Council disputes the statement in paragraph 11.1.1 that significant localised effects on employment are reported in the CFA reports. Camden Council contends that the estimation of the localised effects is inaccurate in the Camden CFA reports. It is not clear why HS2 Ltd has failed to report temporary effects in terms of amenity or isolation effects from the construction only at the route-wide level. Camden Council has serious concerns that HS2 Ltd is failing to be transparent about the totality of the socio-economic effects of the Proposed Scheme at a CFA level.</p>
	11.2	11.2.1	<p>Camden Council is concerned that the overview of national policy and guidance in Volume 3 fails to include the government's Green Book or related research. The Green Book is the standard approach for undertaking economic impact analysis. The assessment of socio-economic effects in the ES has</p>

			not considered any costs of HS2 to local economies and communities.
	11.3	11.3.3	Camden Council notes that the route-wide assessment includes three types of impact on existing businesses and organisations. The three impacts, plus the uncertainty that HS2 creates for business, communities, livelihoods, investment and regeneration, are the blight of H2, that has not been adequately assessed. Camden Council is strongly of the view that the ES has failed to adequately assess the impacts on businesses, organisations and the local economy at a CFA level, meaning that the route-wide assessment under-reports the adverse employment effects of the Proposed Scheme and is inaccurate.
		11.3.5	Camden Council notes the explanation in paragraph 11.3.5 that socio-economic effects will be reported as either gross or net employment effects. Camden Council is unclear whether this is the case in Volume 3 as the figures are not reported as either gross or net. Secondly, Camden Council is unclear whether a similar approach has been taken to reporting socio-economic effects in the CFAs as again figures are not labelled as being gross or net. Camden Council has serious concerns that there is a lack of transparency in the ES on the calculation of socio-economic effects, with no details of the additionally factors used and the justification for their use.
	11.4	11.4.1	Camden Council notes the topics identified as potential wider socio-economic benefits of the Proposed Scheme. Camden Council is concerned that HS2 Ltd has failed to seize the potential regeneration and growth opportunity at Euston by proposing an inappropriate scheme for Euston station. This scheme fails to realise regeneration and growth potential in this local area and support community aspirations as outlined in the Euston Area Plan, whilst having a potentially devastating impact on Euston communities from the construction of HS2. Camden Council maintains a more comprehensive and better designed scheme at Euston could generate far more houses, jobs and community benefits than HS2 Ltd.'s current plans and is needed to mitigate many of the blight adverse effects of the Proposed Scheme. The current Proposed Scheme and proposals and initiatives set out in the ES do not ensure HS2 contributes to local economic growth in Camden or central London.
	11.5		Camden Council is concerned that section 11.5 of Volume 3 fails to provide an accurate and rounded socio-economic baseline at a route-wide level. The baseline is limited and fails to identify or explore the socio-economic challenges and deprivation of communities in Camden that will suffer some of the worst impacts of HS2. Camden Council is deeply concerned that HS2 Ltd and the ES has failed to identify that Camden contains some of the most deprived communities in the nation. Camden

			Council urges HS2 Ltd to limit and mitigate the impacts on these poorer communities and put in place assurances and commitments to ensure these local communities can benefit from the scheme.
		11.5.9	<p>Camden Council notes that the ES outlines the requirement for major construction projects to plan and put in place education and training programmes in advance to ensure sufficient provision of suitable skills in the workforce. Camden Council urges HS2 Ltd to commit to and fund an employment, education and training strategy in Camden, building on the Council's best practice at King's Cross Central.</p> <p>Camden Council is incredulous how HS2 Ltd has concluded that there will not be a shortage of construction labour for the Proposed Scheme when the ES includes no detailed analysis of HS2's skills and labour requirements and how this compares against the current or future supply of labour. Camden Council would urge that HS2 Ltd undertake skills forecasting and fund an employment, education and training strategy in Camden.</p>
	11.6	11.6.2/6	Camden Council notes that paragraph 11.6.2 states that 14,600 permanent full time construction jobs will be created by the Proposed Scheme and paragraph 11.6.6 states there will be 5,480 indirect jobs. Camden Council is concerned that there is no transparency of how these figure have been calculated. Camden Council is also concerned that the ES is misrepresenting the employment effects of construction as not all of the 14,600 construction jobs will be additional as some will displace or substitute construction jobs elsewhere. Camden Council requests that HS2 Ltd provide clarification on the calculation of <b>all</b> employment effects in the ES (route-wide and in the CFAs) and how the additionally of the effects of the Proposed Scheme have been considered.
		11.6.3	Camden Council notes that paragraph 11.6.3 states that construction jobs may be accessible to local residents. Camden Council urges HS2 Ltd to take a much more pro-active approach to enabling this in Camden through committing to put in place and fund an employment, education and training strategy. This should target in particular under-represented groups in the labour force and deprived communities that will experience some of the worst adverse effects of HS2 and build on Camden Council's best practice in this area.
		11.6.5	Camden Council welcomes the inclusion of apprenticeship placements as part of the HS2 construction workforce. However, Camden Council is concerned that there is no transparency at how the figure of 1,000 apprenticeships has been calculated and no details on how HS2 intends to maximise the creation of new apprenticeships. Camden Council urges HS2 to commit to delivering



			<p>local employment benefits through the HS2 Act and fund an employment, education and training strategy in Camden to include local apprenticeships targets. Camden Council has offered to help HS2 Ltd to develop its employment strategy, building on the Council's best practice in enabling apprenticeships in construction and other sectors and success in negotiating apprenticeships, procurement and other benefits through the planning process, yet this support has not been taken up to date.</p>
		11.6.7	<p>Camden Council strongly disagrees with the statement in paragraph 11.6.7 that by implication the majority of businesses in Camden displaced will be able to re-locate. Camden Council is deeply concerned that the ES is inaccurate because</p> <ul style="list-style-type: none"> <li>• there is no analysis of the circumstances or characteristics of the affected businesses in Camden, or of their employees or owners, but rather businesses are lumped them together as 'defined resources' without further explanation;</li> <li>• the CFAs have failed to accurately report all of the businesses or defined resources affected;</li> <li>• the CFAs acknowledge there is a limited supply of employment/ retail floorspace in Camden with low vacancy rates;</li> <li>• the current compensation strategy for businesses is inadequate, both for businesses in the safeguarding area and outside of this and</li> <li>• the ES draws on inappropriate research in reaching its conclusions on the proportion of businesses that will be lost.</li> </ul> <p>Camden Council is concerned that HS2 Ltd has failed to follow its own advice as the ES fails to effectively address any of the factors identified in footnote 135 of Volume 3 as being important to business relocation decisions; namely market conditions at the time of the move, business vulnerability, state of preparation and owner-specific drivers.</p>
		11.6.8	<p>Camden Council notes that paragraph 11.6.8 acknowledges that the construction of HS2 will mean some other proposed developments will not take place. Camden Council is deeply concerned that despite acknowledging this, there is no CFA/ local estimates of the employment and other economic benefits that will be lost or delayed as a consequence of HS2, further weakening the robustness and veracity of HS2 Ltd.'s socio-economic assessment. Camden Council is also perplexed by the conclusion in the ES that the majority of the impacted developments will come forward elsewhere in each region, without any explanation as to why this assumption is valid. Camden Council is concerned that HS2 constrains or derails proposed regeneration projects in Camden that would have otherwise provided significant commercial floorspace and local community benefits such as affordable housing and a school. Camden Council is concerned that the estimation of employment</p>

			effects and impacts on socio-economic resources lacks transparency, is potentially inaccurate and over-represents the benefits of HS2.
		11.6.9	Camden Council notes that HS2 will result in a number of schemes not being able to proceed, which were expected to provide a total of 12,700 jobs. Camden Council would have expected 132-140 Hampstead Road to have been identified in paragraph 11.6.9. Camden Council is concerned that the ES fails to list the projects.
		11.6.10	<p>Camden Council is very concerned that HS2 Ltd.'s estimates of the number of jobs at risk of being lost route-wide and in the CFAs areas (from displaced businesses failing to relocate, closing or contracting and employees being unable to find replacement jobs) is not based on any detailed or local analysis of the affected businesses but on experience from the 2012 Olympic Games compulsory purchase programme.</p> <p>Camden Council is deeply concerned that the Olympics experience is unpublished data from the London Development Agency (LDA) that has not been independently verified or updated since it was provided in 2008, four full years before the 2012 Games when it is likely that further displaced businesses will have closed or contracted as they failed to adjust to their new location or lost competitiveness.</p> <p>Furthermore, Camden Council is concerned that the ES includes no acknowledgement or adjustment to reflect the fact that the Olympics and HS2 are very different projects with different effects. The Olympics land acquisition was in a part of London with low employment density, high industrial and manufacturing employment and relatively low land values. The converse is the case for areas in Camden (and other parts of the HS2 route) affected by HS2 land acquisition, which has not been acknowledged. Camden Council is also concerned that the HS2 compensation strategy for businesses may be inferior to the compensation strategy offered to businesses compulsory purchased by the LDA as part of the Olympics, where an uplift on market values may have been given to facilitate the movement of businesses. Camden Council requests clarification from HS2 Ltd on these matters.</p>
		11.6.12	Camden Council does not have confidence in HS2 Ltd.'s estimate that 1,390 jobs may be lost permanently route-wide as a consequence of HS2. Camden Council fails to see how HS2 Ltd has provided an adequate assessment of this or other employment effects when there have been limited analysis of impacts by CFA, from which the route-wide estimate is generated.

		11.6.14	<p>Camden Council disputes that displaced businesses will be fully compensated given the inadequacies of HS2's current compensation provisions for business. Camden Council has made representations to HS2 Ltd of the need to improve the compensation strategy so that it better meets the needs of business, both for businesses inside the safeguarding area and those outside of the safeguarding area that will be adversely impacted by HS2. Camden Council has requested that HS2 review its compensation strategy and provide the necessary provisions to compensate businesses affected by the scheme.</p> <p>Camden Council welcomes the statement in paragraph 11.6.14 that HS2 Ltd will provide additional support over and above statutory requirements to assist displaced businesses to relocate. Camden Council welcomes that HS2 Ltd has listened to the representations made by Camden Council in this regard however urges HS2 Ltd to go further than this to commit to ensuring displaced businesses are provided with options to relocate close to their existing location and are guaranteed to remain locally if the business wishes to. Camden Council would welcome further clarification from HS2 Ltd on what additional property support will be provided to displaced businesses.</p>
		11.6.15	<p>Camden Council cannot comment on whether or not the estimate of a total of 8,430 jobs facing relocation from socio-economic resources affected by land required for construction is accurate as there is insufficient detail and break-down in the respective CFAs on the businesses affected and the jobs to be relocated.</p>
		11.6.16	<p>Camden Council strongly disputes the assertion in paragraph 11.6.16 that business amenity and isolation effects have been assessed and reported within the CFA reports. This is patently not the case, as Camden Council has commented in response to the CFAs. Furthermore, there are significant inconsistencies in what the ES says about the reporting of business amenity and isolation effects. For example, paragraph 10.4.14 of the Camden Town CFA says that resulting effects on employment from amenity and isolation effects are reported in aggregate at a route-wide level. However, there is no evidence of such an assessment in Volume 3, and in fact the route-wide assessment says it is dealt with in the CFAs. Camden Council is of the view that this is a significant omission, is inaccurate, and further strengthens the argument that these effects have been under-estimated.</p> <p>Camden Council also has reservations and concerns about the approach taken in the ES to estimate the permanent loss of jobs from businesses facing amenity and isolation effects. No justification or rationale is provided as to why it has been assumed that only a small proportion of amenity/ isolated</p>

			<p>affected jobs will be lost based on obscure assumptions about the, “likely proportion of employment which could be significantly affected by changes in amenity”. Camden Council is very concerned that there is a lack of transparency in the ES, no justification for the chosen approach and that the reporting of amenity and isolation effects may be a significant under-estimate and inaccurate.</p> <p>Please also refer to Camden Council’s response to 8.8.7 of volume 1 – The Introduction.</p>
	11.7	11.7.3	<p>Camden Council urges that any retail floorspace development as part of the HS2 Euston station should be in line with the policies and objectives of the Euston Area Plan, in particular that it complements and does not seek to replace retail provision in the local area, including the Drummond Street and Eversholt Street Neighbourhood Centres.</p> <p>Camden Council notes that paragraph 11.7.3 states that there is potential for over-site development at Euston. Camden Council urges HS2 Ltd to put forward a better, more comprehensive scheme design at Euston that minimises impacts but seeks to take better advantage of regeneration and growth opportunities.</p>
		11.7.4	<p>Camden Council seeks clarification from HS2 Ltd as to whether the reported 2,200 direct operational jobs are gross or net estimates. Camden Council urges that HS2 Ltd provide all employment and job estimates netted to take account of additionally and the fact that some of the jobs will have been created irrespective of HS2.</p>
		11.7.7	<p>Camden Council agrees that a new Euston HS2 station could generate additional demand for retail and office space, because of the increased footfall and connectivity, and could encourage further investment in the surrounding area. Camden Council has significant experience of managing growth from new infrastructure through its pivotal role in the regeneration of King’s Cross and St Pancras. This experience, and the weaknesses of the current HS2 Euston station design, is why Camden Council is urging HS2 Ltd to come up with a much better scheme at Euston that minimises the impacts on our communities and supports all of the objectives of the Euston Area Plan. Camden Council also urges HS2 Ltd to drop the HS1 Link as currently proposed because of the detrimental impacts it will have on retailing, the Camden Markets, office developments and visitor economy of Camden Town.</p>
13			See Camden Council comments contained in Vol 5: Part 2,3 and 4
14			Camden Council would like assurances that adequate mitigation is in place should a higher

			proportion of waste be unacceptable for reuse and recycling, therefore requiring off-site disposal to landfill, with the associated impacts on transport and other environmental factors. Consideration should also be given to the potential impact this would have on the capacity of regional waste disposal facilities.
	14.6	14.6.91	Camden Council understands that the extent of off-site disposal to landfill is not known at this stage and supports the proposal for a qualitative assessment. Camden Council acknowledges that this document takes into account the local and regional waste and planning guidance and all available baseline data on tonnages in the commercial and industrial waste sector.
	14.7	17.7.50	Camden Council understands that the extent of off-site disposal to landfill is not known at this stage and supports the proposal for a qualitative assessment. Camden Council acknowledges that this document takes into account the local and regional waste and planning guidance and all available baseline data on tonnages in the commercial and industrial waste sector.
15	15.4		Camden Council notes that all discussion of groundwater focuses on aquifers. However there is also a risk of tunnelling reducing the area available for 'perched' groundwater above the clay, particularly where the tunnelling will be relatively near to the surface. This could lead to other cellars and basements in the area becoming potentially flooded at times of heavy rainfall. While the exact movements of perched water are nearly impossible to predict, it is a further reason why Euston Station must look to introduce substantial SuDS (Sustainable Drainage Systems) to absorb surface water.
	15.6		Camden council stresses the importance of considering surface water runoff as well as flood zones when applying the sequential and exception tests to urban areas.

# **HS2 Phase One environmental statement volume 4: off-route effects**

#### Volume 4: off-route effects report (Ref: ES 3.4.1)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.3		Camden Council would like assurances that adequate mitigation is in place should a higher proportion of waste be unacceptable for reuse and recycling, therefore requiring off-site disposal to landfill, with the associated impacts on transport and other environmental factors. Consideration should also be given to the potential impact this would have on the capacity of regional waste disposal facilities.
6	6.7	6.7.91	Camden Council is concerned that the levels of traffic generated by operational activities has not been quantified, therefore it is not possible to validate the HS2 statement that “ <i>operational road traffic is unlikely to result in significant indirect noise effects along existing roads</i> ”.
		6.7.97	Camden Council is concerned that there has been insufficient assessment of the construction and operational traffic to validate the statements that the relocated and operation Hex depot will the will not be significant.
7	7.7	7.7.28	Camden Council is concerned that the levels of traffic generated by operational traffic has not been quantified, to validate the statement that the small increase in traffic flows are not considered significant.

#### Volume 4: off route effects map book (Ref: ES 3.4.2)

Map number	London Borough of Camden response
	Camden Council notes the content of the map book.



## **Volume 5: environmental topic reports and map books**

## CFA 01 air quality report: Euston Station and approach (Ref: AQ-001-001, ES 3.5.2.1.1)

Section number	Sub section	Paragraph	London Borough of Camden response
3	3.2		Camden Council considers more information is required on the exact addresses and impact that construction will have. The mapbooks do not contain a sufficient level of detail and no explanation for the inclusion of some properties and exclusion of others is provided.
4			<p>Camden Council maintains that the impact is highly significant (see Vol 2 CFA Euston 4.4) with the highest possible levels of risk of dust. Consequent additional mitigation is required.</p> <p>Camden Council questions whether combination and/or cumulative effects have been properly considered in terms of the significance of the overall impact on the area.</p> <p>Camden Council points to mitigations outlined in the CoCP, and requests the following additional mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase and to continue to fund monitors in Euston during the</li> </ul>

			<p>operational phase</p> <ul style="list-style-type: none"> <li>Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM10, PM2.5 and NO2. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
	4.1	4.1.1	<p><u>Dust Impact evaluation and risk rating:</u> Camden Council would expect the latest IAQM guidance to be used which is 2012. However 2011 is referred to instead. The competency of assessor is not outlined and detail should be provided about whether they are a member of the IAQM and their experience in this area.</p> <p>Camden Council believes that the assessment appears to be flawed and confusing due to lack of detailed justifications. For example it doesn't categorise magnitude of impact without COCP mitigation measures as per the guidance.</p> <p>Camden Council disagrees with the low sensitivity of the surrounding area of the Euston station tunnel portal when receptors are only 20-100m from the site. Track out and earthworks have also been disregarded without an explanation. The Principal justification information provided is too brief and Camden Council requests more information on this and the right to make further comments. Camden Council also notes that the Dust emission class and risk category judgements have been based on very brief information of the local area. Having gone through the guidance in the IAQM (2011) document Camden Council would expect the categorisation to be higher and expect more detailed justification for HS2's assessment.</p> <p><u>Euston station and approach:</u> Camden Council notes that although the highest categories of impact and sensitivity are included the magnitude after impact (which includes the COCP mitigation) is only classed as slightly adverse. As LEMPs have not yet been agreed or discussed with Las, it is impossible to make a valid and realistic assessment at this stage and not in line with the IAQM assessment methodology.</p> <p>Camden Council expects a thorough dust impact assessment including detailed justifications for any classification used and to follow the guidance in the latest IAQM document.</p>

			<p>Camden Council is particularly concerned about the impact in the Euston area from the construction site and increased number of lorry movements. Camden Council notes that the ES describes increases in concentrations of PM10 but has insufficient detail on the smaller PM2.5. There is evidence that PM2.5 enters deeper into the airway, and is thus a more important risk factor when looking at air pollution compared with PM10. A report commissioned by the Greater London Authority, based on best estimates from the Committee on the Medical Effects of Air Pollutants, estimated that each increase of 10µg of small particulate matter (PM2.5) increased mortality by 6%. Estimates suggest that 13 deaths are attributable to PM2.5 each year in Regents Park ward (to the west of the Euston site) and St Pancras and Somers Town (to the east of the Euston site) currently. Neither the ES nor the HIA have attempted to quantify the effect on Camden residents living near to Euston, where the impact is likely to be particularly large, nor on the major roads which are likely to see an increase in PM2.5 as a result of HS2.</p>
5	5.3		<p>Camden councils stresses that the magnitude of change in pollution levels are dramatic, and on a scale that dwarfs any other development in Camden. They are hugely significant in terms of human health and EU targets. Mitigation measures proposed are:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO2) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM10, PM2.5 and NO2. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling</li> </ul>

			<p>us to assess the proportion of concentrations attributable to the construction works (for reporting to Defra and the EU).</p> <ul style="list-style-type: none"> <li>An Ultra-Low Emission Zone around the station during the operational phase, to include restrictions that only allow zero and low emission vehicles to service the station, as detailed in the Euston Area Plan. Camden does not accept that this will happen naturally as a result in improvement in vehicle technology, as this has been promised in the past and has not materialised.</li> </ul>
	5.4		<p>Camden Council has concerns about:</p> <ul style="list-style-type: none"> <li>the background data used, as discussed previously (CFA Euston 4.1);</li> <li>the strong possibility that the traffic impacts may be underestimated and hence the air quality impacts;</li> <li>that no mitigations are proposed.</li> </ul> <p>Camden Council strongly recommends that the Ultra-Low Emission Zone is incorporated.</p>
6	6.1		<p>Camden Council requests new buildings to prioritise energy efficiency and renewables in line with the London Plan. Where a combustion plant is used it must be the lowest emission technology available at the time.</p>

### CFA 02 air quality report: Camden Town and HS1 link (Ref: AQ-001-002, ES 3.5.2.2.1)

Section	Sub section	Paragraph	London Borough of Camden response
3	3.2		<p>Camden Council is concerned there is insufficient information regarding the exact addresses and impact that construction will have. The mapbooks are not to a sufficient level of detail and no explanation for the inclusion of some properties and exclusion of others is provided.</p>
4			<p>Camden Council maintains that the impact is highly significant (see Vol2 CFA Euston 4.4) with the highest possible levels of risk of dust. Consequent additional mitigation is required. Camden Council also questions whether cumulative effects have been properly considered in terms of the significance of the overall impact on the area.</p>

			<p>Camden requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
5	5.1 – 5.3		<p>Camden Council believes the overall assessment of significance for this area seems low, given the scale of works proposed.</p> <p>Camden Council is concerned that traffic impacts and contraction dust impacts have been significantly underestimated, and cumulative impacts have not been considered.</p> <p>Camden Council is concerned that it is not clear that the works required for utilities have been scoped into the Environmental Statement; if these have not been scoped, there will be resultant increases in traffic disruption and pollution levels. Camden therefore requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> </ul>

			<ul style="list-style-type: none"> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
	5.4		Camden Council states that, as stated previously, the estimates for background levels in 2026 are likely to be underestimates. Although as operational impacts are lower, this is less of a significant issue than at Euston.

### CFA 03 air quality report: Primrose Hill to Kilburn (AQ-001-003, ES3.5.2.3.1)

Section	Sub section	Paragraph	London Borough of Camden response
3	3.2		Camden Council is concerned there is insufficient information regarding the exact addresses and impact that construction will have. The mapbooks are not to a sufficient level of detail and no explanation for the inclusion of some properties and exclusion of others is provided.
		3.2.3	Camden Council would like to stress that Adelaide Road Local Nature Reserve is a statutory site designated for its value in access to nature. Camden Council considers that Adelaide Road Local Nature Reserve might also be at risk of being affected by air quality issues due to the loss of the



			adjacent woodland and its air-filtering function.
4			<p>Camden Council maintains that the impact is highly significant (see Vol2 CFA Euston 4.4) with the highest possible levels of risk of dust. Consequently additional mitigation is required.</p> <p>Camden Council also questions whether cumulative effects have been properly considered in terms of the significance of the overall impact on the area.</p> <p>Camden Council requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO2) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM10, PM2.5 and NO2. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
5			<p>Camden Councils believes the overall assessment of significance for this area seems low given the scale of works proposed. There has not been time for Camden to engage a technical consultant to scrutinise the methodology in full, and this may be required.</p> <p>If the scrutiny of the transport assumptions reveals under estimates of traffic disruption then there will</p>

			<p>be knock-on effects for air quality.</p> <p>Camden Council is also concerned that it is not clear that the works required for utilities have been scoped into the ES. If utilities have not been scoped, there will be resultant increases in traffic disruption and pollution levels.</p> <p>Camden Council requests the following mitigations:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
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### Air quality map book (Ref: ES 3.5.1.2)

Map number	London Borough of Camden response
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Air Quality Receptor Sites for Construction Dust Assessment AQ-02-001-01	Camden Council is concerned that these maps do not make clear exactly what addresses have been identified as receptors or what level of risk they are exposed to. Moreover there is no explanation of why some properties have been included and others, just as close to construction and demolition have not been included.
Air Quality Receptor Sites for Construction Dust Assessment AQ-02-002-01	Camden Council is concerned that these maps do not make clear exactly what addresses have been identified as receptors nor what level of risk they are exposed to. Moreover there is no explanation of why some properties have been included and others, just as close to construction and demolition have not been included.
Air Quality Receptor Sites for Construction Dust Assessment AQ-02-002-02	Camden Council is concerned that these maps do not make clear exactly what addresses have been identified as receptors nor what level of risk they are exposed to. Moreover there is no explanation of why some properties have been included and others, just as close to construction and demolition have not been included.
Air Quality Receptor Sites for Construction Dust Assessment AQ-02-003-01	Camden Council is concerned that these maps do not make clear exactly what addresses have been identified as receptors nor what level of risk they are exposed to. Moreover there is no explanation of why some properties have been included and others, just as close to construction and demolition have not been included.

### Summary of carbon calculation outputs (Ref: CL-002-000, ES 3.5.0.3.2)

Section	Sub section	Sub	London Borough of Camden response
4			<p>Camden Council notes that the missing data for construction waste and station fit outs will impact negatively on local level carbon emissions and should be considered.</p> <p>Camden Council does not consider the assumption that 2,000,000 trees will be planted by 2017 as being realistic.</p>
5	5.1		Camden Council notes that there is a huge difference in construction emissions estimate from the AoS to the ES (an increase of 4.4MtCO <sub>2</sub> e from an estimated 1.2MtCO <sub>2</sub> e at AoS) and notes that HS2 argue that this discrepancy was caused by the AoS adopting a different emissions boundary to that considered under the EA. Camden therefore believes that the AoS as a consultation document was

			not fit for purpose regarding construction carbon emissions.
	5.2		Camden Council notes that the removal of modal shift for domestic flights has artificially reduced operational emissions; see notes on 5.5.26 in Volume 3 response.

### Resilience to impacts from climatic conditions (Ref: CL-003-000, ES 3.5.0.3.3)

Section	Sub section	Paragraph	London Borough of Camden response
1	1.2		Camden Council considers that local climate change adaptation documents such as the London Mayor's Climate Change Adaptation Strategy should be referenced when considering policy.
2	2.2		Camden Council strongly considers that the human factors considered should include not just the staff and passenger experience of the Proposed Scheme but also those living and working in the immediate vicinity of the station and other new infrastructure.
3	3.2		Camden Council believes the risk of increasing overheating to residents through reduction of green space should be considered in preliminary design.
3	3.3		Camden Council believes the effect of heat on nearby residents should also be considered.
	3.4		Camden Council believes the effect of heat on nearby residents should also be considered.
	3.5		Camden Council believes the risk of increasing overheating to residents through reduction of green space should be included in preliminary design.

### Preliminary consideration of potential climate change impacts (Ref: CT-009-000, ES 3.5.0.3.4)

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council believes that the effect of overheating on communities, in particular in areas where

			their access to green infrastructure has been reduced, can be robustly incorporated into the report and should be.
2	2.3		Camden Council believes that the climate change impacts of increased overheating should be considered in the Habitability Assessment. The effects of the urban heat island are already felt in central London and the reduction in the already limited amount of green infrastructure in the area will further exacerbate the problem. It will need to be considered in its cumulative impact with other environmental impacts such as noise and the reduction in open space.
	2.5		Camden Council notes that whilst it is difficult to incorporate future potential impacts of climate change into the assessment, there are recommended approaches to assessing and managing ecological resources in a future climate, including making space for nature through restoration of coherent ecological networks.

### Construction worker impact reports (Ref: CM-002-000, ES 3.5.0.4)

Section	Sub section	Paragraph	London Borough of Camden response
2			<p>Camden Council considers that there will be a significant amount of working outside of the core hours noted in the final bullet point of this paragraph within Camden and therefore consider this statement to be unsupported by the information provided elsewhere within the Environmental Statement.</p> <p>Camden Council that this information should be revised to reflect the working hours expected within Camden and the impacts re assessed if necessary. Camden Council considers that the percentages quoted require supporting evidence as it is not possible for Camden Council to know whether these figures are accurate and whether they account for any possible changes in labour and living patterns since the construction of HS1 (from where it appears the figures were derived).</p>
3			Camden Council urge HS2 to put in place proactive measures to encourage construction worker spend in Camden through the proposed business advice and support service and mechanisms for formally engaging with businesses and business groups.

## CFA 01 Community report: Euston Station and approach (Ref: CM-001-001, ES3.5.2.1.2)

Section	Sub section	Paragraph	London Borough of Camden response
1			<p>Camden Council is concerned that there are a number of other children's services within the community forum areas that we believe will be directly impacted by the proposed scheme but have not been mentioned within the data reports. These are Robson House PRU, Stanhope Street –</p> <p>Camden Council is concerned about the ability of the unit to continue operating during construction and the impact that this will have on vulnerable young people who use the service. There will be demolition in close vicinity and Stanhope Street will be one of the main construction traffic.</p> <p>Camden Council is concerned about the operation of Christ Church NW1 primary –school being impacted by utility diversion works on Albany street for almost 2 years, 2016 onwards. The Environmental Statement also states that construction traffic will create in-combination effects on Albany street and that residents along sections of the road will have a major adverse effect on their amenity but fails to relate this to the impacts on the school. Christ Church NW1 is not mentioned within the Environmental Statement, but looks set to be significantly disrupted; –</p> <p>Camden Council is concerned about the operation of the Richard Cobden primary school being impacted by increased construction traffic, particularly along Camden Street and Crowndale Road and how safe routes to schools will be maintained.</p> <p>Camden Council is extremely concerned about the impact of construction on Agar Children's Centre situated at Wrotham Road where the Environmental Statement considers there will be significant effect due to construction noise. The Children's Centre is situated near land-take area for the Wrotham Road equipment platform and the Camley Street main compound, as well as demolition of 75 dwellings in the locality (on Baynes Street, A5202 St Pancras Way and Wrotham Road) and the Council believes that there will be a significant impact on the children's centre whilst construction works are taking place around the site.</p> <p>Camden Council notes that the revised alignment of the Euston tunnel will require the installation of a replacement sewer along Princess Road to St Mark's Square. The Council is concerned about the disruption that this will cause to Primrose Hill Primary School which is accessed from Princess Road and how safe routes to the school will be maintained whilst construction works are taking place.</p>

			<p>Camden Council is concerned about the level of dust emissions from the Adelaide Place vent shaft. The construction site is adjacent to the former Jack Taylor school site which is due become an FE college for 16-25 year olds with severe complex needs and the health and safety of these particularly vulnerable young people. We disagree with the assumption within the ES that there will not be a significant effect as a result of these works as the impact on this future use of the site has not been taken into account within the ES; and Langtry Children's Centre which appears to be affected by utility works although the details of the extent of this work is not clear within the ES.</p> <p>Camden Council points out that a key cultural and community institution in Euston is missing from the study area. The Camden People's Theatre on Hampstead Road is an important asset within London and will be adversely effected by environmental impacts arising from HS2 could seriously compromise the ability of the theatre to run performances. Appropriate mitigation measures such as soundproofing should be installed prior to start of construction to allow the theatre to function during HS2 works.</p>
2	2.1		<p>Camden Council notes that there seems to be a mistake with the survey results, it should read 1308 users for Tuesday 21 May.</p> <p>Camden Council is concerned that some of the trees from Euston Garden will be lost, but there is no indication of how many. Without this information the impacts of this loss are difficult to assess, however mitigation will be sought for any trees removed.</p> <p>Camden Council is concerned that in this document there is no mitigation offered for the loss of green space in the area during the 11 years of construction, which will impact on the physical and mental health of nearby residents as outlined in the Health Impact Assessment. Consideration for the length of impact, in this case 11 years, should be taken into account when assessing impact, as temporary seems to be a broad term within the Environmental Statement and can be inaccurate.</p>
	2.2		<p>Camden Council notes that these premises are a "permanent loss", but while it is defined as a community facility it is used by people associated with UCL and not by the local community or general public.</p>
	2.3		<p>Camden Council would like to discuss the options for this estate further, as relocating the play space within to the proposed site would then take up valuable green space in the area. Camden Council is</p>



			<p>concerned about the security and health and safety of residents on Churchway Estate as a result of the construction compound on this site.</p> <p>Camden Council is concerned about the health and safety of residents on the Churchway Estate as a result of impacts by HS2.</p>
	2.4		<p>Camden Council considers the demolition of these properties significant and is alarmed by the inappropriate compensation proposed for those affected.</p>
	2.5		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures. Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined</p>

		<p>assessment nearer the time of construction.</p> <p>Camden Council advises that the noise insulation/temporary re-housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p> <p>.</p>
	2.6	<p>Camden Council is disappointed to note that the proposed development will cause these significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore consider that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>

		<p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council advises that the noise insulation/temporary re-housing appraisal process must begin at least two years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future</p>
	2.7	<p>Camden Council is disappointed to note that the proposed development will cause these significant effects.</p> <p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p>

		<ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council advises that the noise insulation/temporary re-housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
	2.9	<p>Camden Council notes that utility works in the grounds of Maria Fidelis are likely to take around 3 months. Camden Council does not agree that the nature of these works will not have a significant</p>

		<p>effect on the school. The school will lose a considerable amount of already limited play space during the time of these works and the Council is also concerned at the noise and disruption that will impact Maria Fidelis as a result of the works. The Council believes that these impacts, along with the wider impacts on the school of the construction works and road/path closures around Euston, will mean that the school will experience significant impacts from the proposed HS2 works including construction disturbance, noise, pollution and falling pupil roll numbers. The Council does not consider that Maria Fidelis can continue to operate at its North Gower Street site as a result.</p> <p>Although discussions have been taking place with HS2 regarding relocating the school, no agreements have yet been reached that would enable this to happen and we therefore require HS2 to secure agreement with the Metropolitan Police Service for the purchase of the garages at Drummond Crescent to enable the consolidation of the school in Somers Town to take place. Camden Council is disappointed to note that the proposed development will cause these significant effects to the school. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking related assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice.</p> <p>Camden Council considers that there could be additional mitigation measures which should be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	2.10	<p>Camden Council believes that the huge disruption around Euston station caused by the proposed scheme will have a significant impact on Netley Primary School in terms of construction noise and disruption, pollution, and safe routes to schools. Camden Council therefore considers the overall effects on the school to be significant. Camden Council is disappointed to note that the proposed development will cause these significant effects on local children’s services.</p>

		<p>Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement. Camden Council has made detailed comments on the Code of Construction Practice.</p> <p>Camden Council therefore considers that there could be additional mitigation measures which might be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	2.11	<p>Camden Council would like to stress that the re-provided space is not an equivalent in size to the loss of open space in the area.</p> <p>Camden Council is concerned that it is considered to be only a medium impact in St James Gardens, when it is a well-used space that will be lost for a long period (11 years) and then subsequently reduced in size. All of the features in the garden will be demolished and will become the entrance of the station, so likely to be paved and open rather than restored to its green state. The effects of the loss of this site on the ecology, community and young people (who use the play and games spaces) will be significant, and therefore it would be considered high.</p> <p>Camden Council would like more information about the new open space proposed north of Langdale, such as potential size and maintenance schedule for the site. Camden Council notes that it has concerns about the area to be re-provided as open space in the proposed scheme design. St James’ Gardens is an established and well used green space and historical burial ground and the Council does not feel the proposed space is its equivalent in safety, location or size. It also does not offer a solution to the spaces lost during the long period of construction and we will be seeking mitigation for this.</p> <p>Camden Council would like clarification with regards to the proposed improvements in Cumberland</p>

		<p>Market, Munster Square, Clarence Gardens, Hope Gardens and Tolmers Square. While improvements to these spaces are welcome, some of these spaces are very small and would not be able to re-provide play areas, and this also does not mitigate against the loss of public access land in the proposed scheme.</p> <p>Camden Council has concerns that Cumberland Market is not the best space to offer an 'eco-gym' and it already contains one multiuse games area where a site for a second would take up much needed green space. Access to the identified sites would need to be addressed, as some of these spaces are confined or hidden within estates.</p> <p>Camden Council disagrees that there are limited opportunities to create space as we have suggested parking areas and potential streets that could be utilised in this way.</p> <p>Camden Council would like clarification on what is proposed on the corner of Stanhope and Robert Street.</p> <p>Camden Council is concerned that the construction phase will leave the area with a significant lack of open space, in order to mitigate this we would like to see barriers (such as cultural or physical) that prevent people accessing Regent's Park to be addressed through activities as well as wayfinding.</p>
	2.13	<p>Camden Council is concerned of the cumulative effects on the Surma Centre from the proposed development plans for this area. This has not been identified or correctly assessed within the Environmental Statement.</p>
	2.15	<p>Camden Council believes that the huge disruption around Euston station caused by the proposed scheme will have a significant impact on local schools in the area, including St Aloysius Infants and Junior schools in terms of construction noise and disruption, pollution, and safe routes to schools. Camden Council is disappointed to note that the proposed development will cause these significant effects on local children's services.</p> <p>Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden</p>



			<p>Council therefore considers that there could be additional mitigation measures which should be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	2.17		<p>Camden Council notes that these premises are a "permanent loss", but while it is defined as a community facility it is used by people associated with UCL and not by the local community or general public.</p>
	2.18		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts</p>

		<p>such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction.</p> <p>Camden Council advises that the noise insulation/temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
	2.19	<p>Camden Council believes that the huge disruption around Euston station caused by the proposed scheme will have a significant impact on local schools in the area, including St Mary and St Pancras in terms of construction noise and disruption, pollution, and safe routes to schools. Camden Council is disappointed to note that the proposed development will cause these significant effects on local children's services. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>

	2.21	<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
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	2.22		<p>Camden Council notes a discrepancy in the Environmental Statement about this space. In this document it says ‘this is a moderately or semi-regularly used and valued resources’. However, it goes on to say that surveys indicate the site is ‘well used’.</p> <p>Camden Council would like more information about the new open space proposed north of Langdale, such as potential size, design and maintenance schedule for the site.</p> <p>Camden Council notes that it has concerns about the area to be reprovided as the proposed space is not the equivalent of what is being lost in safety, location or size. It also does not offer a solution to the spaces lost during the long period of construction and which requires mitigation.</p> <p>Camden Council would like clarification with regards to the proposed improvements in Cumberland Market, Munster Square, Clarence Gardens, Hope Gardens and Tolmers Square. While improvements to these spaces are welcome, some of these spaces are very small and would not be able to reprovide play areas, and this also does not mitigate against the loss of public access land in the proposed scheme.</p> <p>Camden Council has concerns that Cumberland Market is not the best space to offer an ‘eco-gym’ and it already contains one multiuse games area where a site for a second would take up much needed green space. Access to the identified sites would need to be addressed, as some of these spaces are confined or hidden within estates.</p> <p>Camden Council disagrees that there are limited opportunities to create space as we have suggested parking areas and potential streets that could be utilised in this way.</p> <p>Camden Council would like clarification on what is proposed on the corner of Stanhope and Robert Street.</p> <p>Camden Council notes that the construction phase will leave the area with a significant lack of open space, there are barriers (such as cultural or physical) that prevent people accessing Regent’s Park which will need to be addressed through activities as well as wayfinding for mitigation.</p>
	2.23		<p>Camden Council is concerned that there has been limited progress from HS2 on solutions for provision and very little detail in the environmental statement. Camden Council would like to stress that in order for there to be no loss of service provision to young people accessing the centre, that the</p>

			replacement building is relocated at a space in the surrounding area prior to demolition of the existing site, with a centre that is fit for purpose.
	2.24		<p>IMPACT 1: Camden Council notes that SoS and Camden Council have not entered a partnership agreement; however both parties are discussing options for replacement housing. Camden Council requires all tenants to move only once and meet the needs of residents as stated in the Housing Needs Survey.</p> <p>Camden Council is working with HS2 to explore options for replacement housing to match the need of the residents affected. All replacement housing will be complete in advance of demolition of that area. Any solutions for HS2 replacement housing will be no net loss to affordable housing supply for the borough as a whole. Those residents affected should be re-housed as close as possible to requested need and location, as identified in the Housing Needs Survey. All residents housed should be within scope for replacement housing with a mixed tenure approach similar to existing. Affordable buy options should be considered for leaseholders within the affected area.</p> <p>Camden Council is concerned that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally.</p> <p>Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehouse as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council is concerned that HS2 do not have an understanding of leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p> <p>IMPACT 2: Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of</p>

		<p>these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
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	2.25		<p>Camden Council would like more information about the new open space proposed north of Langdale, such as potential size, design and maintenance schedule for the site.</p> <p>Camden Council notes that it has concerns about the area to be reprovided as the Council does not consider the proposed space is the equivalent of what is being lost in safety, location or size. It also does not offer a solution to the spaces lost during the long period of construction and we will be seeking mitigation for this.</p> <p>Camden Council would like clarification with regards to the proposed improvements in Cumberland Market, Munster Square, Clarence Gardens, Hope Gardens and Tolmers Square. While improvements to these spaces are welcome, some of these spaces are very small and would not be able to reprovide play areas, and this also does not mitigate against the loss of public access land in the proposed scheme.</p> <p>Camden Council has concerns that Cumberland Market is not the best space to offer an 'eco-gym' and it already contains one multiuse games area where a site for a second would take up much needed green space. Access to the identified sites would need to be addressed, as some of these spaces are confined or hidden within estates.</p> <p>Camden Council disagrees that there are limited opportunities to create space as we have suggested parking areas and potential streets that could be utilised in this way.</p> <p>Camden Council would like clarification on what is proposed on the corner of Stanhope and Robert Street.</p> <p>Camden Council is concerned that the construction phase will leave the area with a significant lack of open space, there are barriers (such as cultural or physical) that prevent people accessing Regent's Park which will need to be addressed through activities as well as wayfinding for mitigation.</p>
	2.26		<p>Camden Council is concerned that parts of Amptill Open Space has been identified and confirmed by HS2 as being used for utility works, yet this is not in the impact assessment. The loss of the playground and multi-use games area, plus the destruction of the open space will have a significant adverse effect on Amptill residents. It is inaccurate that the temporary loss of this space is not in the Environmental Statement.</p>



			<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
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	2.27		Camden Council is disappointed that parts of Harrington Gardens has been identified and confirmed by HS2 as being used for utility works, yet this is not in the impact assessment. The destruction of the open space will have a significant adverse effect on residents in the area who use this space. It is inaccurate that the temporary loss of this green space is not in the Environmental Statement.
	2.28		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed</p>

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	2.29		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in</p>

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	2.30	<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all</p>

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	2.31		<p>Impact 2 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the</p>

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	2.32		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the</p>

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3	3.1		<p>Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>C Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
4	4.2		Camden Council considers these surveys are not reflective of this open space’s actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account peak periods. For example, one weekend survey was started prior to the allocated



			times (7.57 am), and they do not reflect peak hour periods, such as after 5pm on a weekday. In addition, there is a typo error for the last weekday survey time. Camden Council would like to know what the criteria are for assessing the value of open space.
	4.3		Camden Council considers these surveys are not reflective of this open space's actual visitor numbers, as the times the surveys were conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office hours.
	4.4		Camden Council points out that this site also has historical value, as an old burial ground. Camden Council is concerned that these surveys are not reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office or school hours. Also, for this particular site, it rained for the majority of the time surveyed which would have had an impact on the results.
	4.4		Camden Council points out that this site also has historical value, as an old burial ground. Camden Council is concerned that these surveys are not reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office or school hours. Also, for this particular site, it rained for the majority of the time surveyed which would have had an impact on the results.
	4.5		Camden Council considers these surveys are not reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office or school hours.
	4.6		Camden Council considers these surveys are not reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office or school hours.

## **CFA 02 Community report: Camden Town and HS1 link (Ref: CM-001-002, ES3.5.2.2.2)**

<b>Section</b>	<b>Sub section</b>	<b>Paragraph</b>	<b>London Borough of Camden response</b>
2	2.1		Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best

			<p>practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council advises that its comments are based on the data and information available at the time of submitting this consultation response, and therefore retain the right to amend our comments should further information become available in the future.</p>
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	2.2	<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
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	2.3		Camden Council considers that the demolition of this property is considered to be a significant impact which should be identified as such. Camden Council considers that the occupant must be provided with an appropriate level of compensation.
	2.4		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be</p>

			proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.
	2.5		<p>Camden Council notes that although it is positive that the gardens will remain open for the majority of the time, the construction will affect the amenity of the green space. Camden Council will also be seeking mitigation for this and the loss of 10% of green space post construction.</p> <p>Camden Council notes that it is unclear how many trees will be affected by these proposals, or how the construction works will interact with the gardens (for instance, how they expect such large works to not impede further into the gardens than 10%). Without these details it is difficult to assess the impacts on Camden Gardens.</p>
	2.6		<p>Impact 2 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced</p>

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	2.7		<p>Camden Council considers that the demolition of this property is considered to be a significant impact which should be identified as such. Camden Council considers that the occupant must be provided with an appropriate level of compensation.</p>
	2.8		<p>Impact 2 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>

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	2.9		<p>Camden Council remains extremely concerned over the impact of HS2 on Hawley primary school. Although discussions have taken place with HS2 Ltd regarding mitigating against the impact of the temporary and permanent loss of land from the new school site, no agreements have been reached. Camden Council disagrees with the assumptions made in the ES which states that the temporary land take from the school site and the construction works relating to the widening of the viaduct will not have a significant effect on the school. Any construction works on the viaduct being undertaken during school term time will have serious implications for the operation of the school due to the disturbance this will cause. Permanent and temporary landtake will have a serious impact on the outside learning and play provision at the school. The impact on the school cannot be addressed by simply re-organising the outside learning and play environment. Camden Council is concerned to note that there is a discrepancy between the data sheet which states that the majority of works to widen the NLL Viaduct will take place from outside the school boundary and the CFA- 2 report which states “The majority of the construction work to widen the viaduct will be undertaken from land</p>



			occupied by the school (i.e. land identified for a playground).”
	2.10		Camden Council takes the view that mitigation should potentially include loss of income through reduction in demand for venue hire for community centres.
	2.11		Camden Council is concerned that the Regent’s Canal will be affected by the in combination effects, which will negatively affect its ecology which is not identified as an impact in the assessment.
	2.12		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in</p>

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	2.14		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council’s response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close</p>

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	2.15		Camden Council considers that the demolition of this property is considered to be a significant impact which should be identified as such. Camden Council considers that the occupant must be provided with an appropriate level of compensation.
3	3.1	3.1.1	Camden Council considers that it is not accurate to state that there will be in no impacts in operation. The Railway viaduct will be closer to the planned residential properties at Hawley Wharf and also to the new school.
4			Camden Council considers these surveys not to be reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor do they take into account potential peak periods such as after office or school hours.
	4.1		Camden Council considers these surveys not to be reflective of this open space's actual visitor numbers, as the times the surveys conducted were not spread out enough throughout the day, nor take into account potential peak periods such as after office or school hours.
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### CFA 03 Community report: Primrose Hill to Kilburn (Camden) (Ref: CM-001-003, ES3.5.2.3.2)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p>

		<ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
	2.2	<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> </ul>

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	2.3	<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> </ul>

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	2.4	<p>Camden Council notes that there will be 'major adverse significant effect' on the school due to significant air quality, noise and construction traffic effects during the construction phase. The Council is extremely of the impact that this will have on the school and believes that this could ultimately result in a loss of pupil numbers for the school. Camden Council is disappointed to note that the proposed development will cause these significant effects on local children's services. Camden Council considers that it is not possible to verify whether all "best practicable means" have been accounted for when undertaking these assessments as the details of these best practicable means</p>

		<p>have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p>
	2.7	<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety and other secondary impacts such as ventilation and</p>



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	2.8		<p>Camden Council is very concerned about this assessment for a number of reasons. The amenity impact on the Adelaide Local Nature Reserve will be high, especially as the views of the vent shaft will be permanent (which is identified as a significant impact in Map Book LV08.004a), however this is not reflected in the assessment.</p> <p>Camden Council notes that the construction of the vent shaft will have an effect on the ecological value of the area, plus the in-combination effects will also be significant. Camden Council will be seeking commitment for mitigation on this.</p> <p>Camden Council notes that a construction period of five years is considered temporary in the Environmental Statement, however this is quite a significant length of time and this should be a consideration when assessing impact and mitigations.</p> <p>Camden Council is also concerned that the Local Nature Reserve is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required. Any digging or construction work within the Local Nature Reserve would be detrimental to its valuable ecology and also use as a community facility. Considering the area is already losing an established nature reserve because of the vent shaft, this would be a very significant loss.</p>
	2.9		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of</p>

		<p>these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
	2.11	<p>Camden Council considers that the demolition of these properties is considered to be a significant impact which should be identified as such.</p>

		<p>Camden Council considers that the occupant must be provided with an appropriate level of compensation.</p> <p>Camden Council would like to reiterate that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals, including at Langtry Walk. The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p> <p>Camden Council is concerned about the removal of facilities which the community relies on, especially the loss of a laundrette facility, at the location of the proposed Alexandra Place vent shaft and requests for this impact to be mitigated. The laundrette plays a significant service for local residents. This is due to the internal layouts of the grade II* listed interiors which do not accommodate washing machines. Many of the residents, especially tenants rely upon this facility to wash their laundry.</p> <p>Camden Council notes that the site of the Alexandra Place vent shaft is in council ownership and has been identified as a site with development potential. The Council considers that the use of this large site at this prominent location at the entrance to the grade 2* listed Alexandra and Ainsworth estate would have a permanent blighting effect that will prevent the regeneration of this local area and exacerbate existing issues of deprivation, social exclusion and community safety. Camden Council would require any impacts to be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	2.12	<p>Camden Council is disappointed to note that the loss of two residential dwellings is described as having a negligible impact. Camden Council contend that there is also a need to consider the community impact of the location of the vent shaft and needs to be designed carefully to allow for activity at the ground floor.</p> <p>Camden Council is concerned about the lack of reference to the location of the vent shaft at the entrance to the estate and the effect that this could have upon existing communities. Current proposals detract from what is already an unwelcoming entrance to the listed estate. Camden Council's own consultation has identified concerns with having a dead frontage in this location – this</p>

			<p>should be identified in the communities section as it could impact upon the way residents use their estate and surrounding local facilities. This effect is likely to be felt throughout construction and operation unless innovative design solutions are considered and implemented.</p> <p>Camden Council considers that the demolition of these properties is considered to be a significant impact which should be identified as such. Camden Council considers that the occupant must be provided with an appropriate level of compensation. Camden Council would like to reiterate that there are a number of regeneration proposals within the Borough which will be affected by the HS2 proposals, including at Langtry Walk. The Council's Community Investment programme is a 15 year plan which delivers much needed homes, education and community facilities as well as employment space. The Council would like to stress that the regenerative benefits of such developments are significant and any impacts should be mitigated or compensated for so that the Council and the local communities are in no worse position because of HS2.</p>
	2.13		<p>Impact 1 – Camden Council is disappointed to note that the proposed development will cause these significant effects. Camden Council considers that it is not possible to verify whether all “best practicable means” have been accounted for when undertaking these assessments as the details of these best practicable means have not been clearly noted within the Environmental Statement.</p> <p>Camden Council has made detailed comments on the Code of Construction Practice. Camden Council therefore considers that there could be additional mitigation measures which could be implemented, for example:-</p> <ul style="list-style-type: none"> <li>• noise insulation at non-residential premises,</li> <li>• real time noise and vibration monitoring; and</li> <li>• other recommendations as detailed in the Council's response on the Code of Construction Practice.</li> </ul> <p>The Council expects HS2 Ltd. to ensure that all best practicable means to mitigate against noise/dust and visual impacts are implemented in order to ensure that they are as low as is possible, having regard to the best technology available at the time. Camden Council considers that HS2 should be continually seeking the best technological advances to implement as mitigation measures.</p> <p>Camden Council considers that in-combination or cumulative effects should be considered for all impacts resulting from construction works. Camden Council expect HS2 to carry out a thorough habitability assessment of all potential impacts, and not only those required by minimum legislative requirements, e.g. safe access, fire safety, electromagnetic interference and other secondary impacts</p>

			<p>such as ventilation and summer cooling restrictions due to noise mitigation measures or reduced daylight due to hoardings. Camden Council understands there will be a further refined assessment nearer the time of construction. Camden Council advises that the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time. Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation. Camden Council advises that our comments are based on the data and information available, and therefore retain the right to amend our comments should further information become available.</p>
3	3.1	3.1.1	<p>With reference to the community services and residential properties assessed in sections 2.11 and 2.12 (tables 11 &amp; 12) Camden Council is concerned that unless innovative design solutions are considered and implemented for the vent shaft which address the lack of an active frontage that we understand is currently proposed at this important entrance to the estate this will effect communities during operation. Current proposals detract further from what is already an unwelcoming entrance to the listed estate. Camden Council's own consultation has identified concerns with having a dead frontage in this location – this should be identified in the communities section as it could impact upon the way residents use their estate and surrounding local facilities. This effect is likely to be felt throughout construction and operation unless innovative design solutions are considered and implemented.</p> <p>Camden Council's own consultation with the local community identifies the loss of the launderette as a significant concern for many residents. It is reported that many of the residential units on the estate do not have washing machines and so the laundrette provides an extremely valuable community resource – the loss of which needs to be mitigated through reprovision in the immediate vicinity.</p>
4	4.1	4.1.1	<p>Camden Council stresses that there will be significant in-combination effects on Adelaide Nature Reserve as a result of the construction and traffic for a long period of time (three years). The impact of this should have been identified through both user surveys and ecological surveys; neither of which have been completed. This assessment is therefore seriously flawed.</p>

## Community Map Book (Ref: ES3.5.1.3)

Map number	London Borough of Camden response
CM-01-001 – Significantly Affected Community Resources	Euston Gardens is currently marked as a temporary effect even though it will be unavailable for 11 years. This is a significant length of time, and this should be a consideration when assessing impact and mitigation.
CM-01-002 – Significantly Affected Community Resources	<p>Camden Council would like to stress concerns that part of Harrington Gardens has now been confirmed by HS2 as being required during construction, even though the Environmental Statement identifies this as only being a potential scenario. This is inaccurate and the impacts of this construction should have been assessed.</p> <p>Camden Council notes that the stated '50-60 residents on Regents Park Estate' who have construction impacts, should also be identified as having impact during operation (Legend should be brown).</p>
CM-01-003 – Significantly Affected Community Resources	<p>Camden Council would like to stress concerns that part of Harrington Gardens has now been confirmed by HS2 as being required during construction, even though the Environmental Statement identifies this as only being a potential scenario. This is inaccurate and the impacts of this construction should have been assessed.</p> <p>Camden Council would like commitment that this green space will not be used. Camden Council notes that the stated '50-60 residents on Regents Park Estate' who have construction impacts, should also be identified as having impact during operation (Legend should be brown). Camden Council would like clarification on the multiple effects expected to affect Camden Gardens.</p>
CM-01-006 – Significantly Affected Community Resources	<p>Camden Council notes that neither Camden Gardens nor Baynes Street Open Space has been identified on the map.</p> <p>Camden Council is concerned that there is green space/woodland north of Freight Lane that potentially will be required during construction.</p> <p>Camden Council also notes that any changes to the proposed development at Hawley Wharf that have a negative effect on open space or affordable housing would also have a significant effect and would require appropriate mitigation.</p>

<p>CM-01-007a – Significantly Affected Community Resources</p>	<p>Camden Council is also concerned that the Local Nature Reserve is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required.</p> <p>Camden Council notes that Adelaide Local Nature Reserve is not identified in the map as a green space.</p> <p>Camden Council would like to stress that Adelaide Local Nature Reserve should also be identified as significantly affected because of the in-combination effects of being next to a construction site, the reduction in access because of construction and the permanent amenity caused by the vent shaft.</p> <p>Camden Council would like to stress that reduced access to South Hampstead Train Station for the residents on Alexandra&amp; Ainsworth Estate would also cause significant impact on amenity.</p>
<p>CM-01-007b – Significantly Affected Community Resources</p>	<p>Camden Council is concerned that the Adelaide Local Nature Reserve is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required.</p> <p>Camden Council notes that Adelaide Local Nature Reserve is not identified in the map as a green space.</p> <p>Camden Council would like to stress that Adelaide Local Nature Reserve should also be identified as significantly affected because of the in-combination effects of being next to a construction site, the reduction in access because of construction and the permanent amenity caused by the vent shaft.</p> <p>Camden Council would like to stress that reduced access to South Hampstead Train Station for the residents on Alexandra&amp; Ainsworth Estate would also cause significant amenity impact.</p>
<p>CM-01-008 – Significantly Affected Community Resources</p>	<p>Camden Council is also concerned that the Adelaide Local Nature Reserve is now mapped as potential land take during construction and Camden Council would like commitment that this will not be required. Camden Council notes that Adelaide Local Nature Reserve is not identified in the map as a green space. Camden Council would like to stress that Adelaide Local Nature Reserve should also be identified as significantly affected because of the in-combination effects of being next to a construction site, the reduction in access because of construction and the permanent amenity caused by the vent shaft.</p>



CM-01-009a – Significantly Affected Community Resources	Camden Council is concerned that there are two areas within the open space in Alexandra and Ainsworth Estate that are part of the potential land required for construction. This open space has recently received heritage lottery funding for improvements. Camden Council would like commitment that this area will not be used.
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### Cultural heritage CFA 01 Baseline report: Euston Station and approach (Ref: CH-001-001,ES 3.5.2.1.3)

Section	Sub section	Paragraph	London Borough of Camden response
4	4.1	4.1.7	Camden Council is concerned that the number of listed buildings in the Regent's Park Conservation Areas under-represented. The paragraph records seven grade I and eight grade II* listed buildings located to the east of the Outer Circle. There are substantially more listed buildings, since the list entries cover large groups in long terraces of townhouses. For instance, Chester Terrace, entered as one grade I listed building, actually comprises 42 separate grade I listed houses.
		4.1.17	Camden Council would like to stress that 20 <sup>th</sup> century development on the north and west sides of Euston Square has changed rather than degraded the visual setting and appreciation of this London Square. Several of the buildings have architectural interest in their own right, and make a positive contribution to the area, demonstrating the evolving nature of the historic environment. The scale of Walkden House, 10 Melton Street, to be demolished, is in keeping with its grade II* neighbour at 1-9 Melton Street.
		4.1.23	Camden Council disputes the statement that modern institutional buildings have slightly degraded the 19 <sup>th</sup> century character of the Bloomsbury Conservation Area and have affected the overall setting. Camden Council wishes to emphasise that Bloomsbury has been enhanced by many outstanding modern buildings including the grade II* listed Senate House and grade II* listed Philips Building.
		4.1.24 Fitzroy Square	The Fitzroy Square Conservation Area (EUS020) dates to the late 18th to early 19th century and has a contemporary built character to that of the neighbouring (to the east) Bloomsbury Conservation Area. The visible focus of the area is the Fitzroy Garden Square, which is surrounded by grand 19th century terraces. A number of Grade II terraces and the Grade II* 18th century 58 Grafton Way are located within the study area in this conservation area, but are at least 1km away from the construction area of the Proposed Scheme.

			<p>It should be noted that the London Square which forms the central focus of the conservation area is named Fitzroy Square. The baseline underplays the outstanding quality of the architecture by failing to state that the south and east sides of this important public space are lined with terraces of grade I buildings, in addition to the grade II* buildings to found on the north and west sides.</p>
		4.1.26	<p>Camden Council is concerned that the number of listed buildings in the King's Cross Conservation Area is under-represented. The paragraph records 19 listed buildings in this section of the study area, but the number is much greater due to the groups of buildings represented as only one entry: for instance, Argyle Square and the surrounding streets are lined with long terraces of listed townhouses, with up to 19 separate listed houses in each terrace.</p> <p>Camden Council wishes to stress that the removal of a grade II listed building and a number of positive contributors from the King's Cross Central site had substantial and irreversible impacts on heritage on a scale to be avoided for future infrastructure projects.</p>
		4.1.27 Somers Town	<p>Camden Council notes that Somers Town (see Sections 3.6.6 and 3.7.1 (EUS019 CH-01-002)), which is partly within the land required for the Proposed Scheme, contains the Grade II listed Walker House, Chamberlain House and Levita House. These were built as council flats in the 1920s and early 1930s to designs by the London County Council Architects Department under G. Topham-Forrest. Further blocks of flats were added to the area following bomb damage clearance after World War II.</p> <p>Camden Council notes that Somers Town had been planned as an upmarket residential area during the early 19<sup>th</sup> century but late 19th century low quality (slum) residential development removed the planned coherent character of the area. The London County Council flats were built as an attempt to improve the area and have coherent style, but the World War II clearances and the contrasting utilitarian, modernist and Edwardian styles used during the later redevelopment of the area has reduced the character and visual setting of the listed buildings.</p>
		4.1.28	<p>Somers Town had been planned as an upmarket residential area during the early 19th century but late 19th century low quality (slum) residential development removed the planned coherent character of the area. The London County Council flats were built as an attempt to improve the area and have coherent style, but the World War II clearances and the contrasting utilitarian, modernist and Edwardian styles used during the later redevelopment of the</p>

			area has reduced the character and visual setting of the listed buildings.
		4.1.29	Camden Council wishes to highlight that the heritage value of Eversholt Street is not fully portrayed. No mention is made of the landmark Art Deco grade II listed Royal George PH at 8-14 Eversholt Street on the corner of Lancing Street. No reference has been made to the entries on the Camden draft Local List which include 34-70 (with exception of 64 which is grade II listed).
		4.1.38	Camden Council wishes to dispute that Euston Station has an inconsistent character derived from contrasting styles and massing. Although the train shed may be disjointed from the front areas of the station, the station concourse and the two towers at 22 and 40 Melton Street, all designed by the acclaimed architect Richard Seifert, have a strong shared architectural vocabulary adhering to the International style, which was popular in the 1960s and 1970s.
		4.1.40	Camden Council wishes to stress that the slightly concealed setting of the grade II listed Parkway Tunnels, which by their very nature are set in a railway cutting, does not detract from their special interest as designated railway heritage assets.
		4.1.41	Camden Council is concerned that the number of listed buildings in the Camden Town Conservation Area is under-represented. The paragraph records 34 listed buildings in this section of the study area, but the number is much greater due to the groups of buildings represented as only one entry: for instance Mornington Crescent contains 35 separately grade II listed townhouses, which are recorded as only 4 listed buildings due to nature of the group listings of the terraces.
		4.1.45	Camden Council wishes to clarify that the grade II listed drinking fountain in St James's Gardens has temporarily been put in safe storage following fire damage, with a view to reinstatement following conservation-led repairs. The base and setting of the fountain remain <i>in situ</i> . It is a major omission that this grade II structure has not been fully included in baseline documents, no assessments have been made of impacts and effects and no mitigation measures considered including reinstatement and relocation.
		4.1.47	Camden Council disputes the description of the National Temperance Hospital as being "derelict". Although the building is vacant and would benefit from sensitive restoration, its building envelope is intact and its historic features are retained. Due to its redundancy its condition would be better described as "poor", suggesting that it would be possible to restore this valuable non-designated heritage asset (on the Camden draft Local List) to its former glory.

		4.1.49	Camden Council stresses that 14-15 Melton Street comprises two grade II listed townhouses, not one as suggested. These buildings warrant grade II because of their own special historic and architectural interest. That they are a pair of surviving early 19 <sup>th</sup> century townhouses set within a varied streetscape reflects the development of the historic environment over two centuries in the Euston Square area. This varied and interesting urban environment does not detract from their high value as listed buildings.
		4.1.50	Camden Council stresses the significance of the former Euston Underground Station entrance on the corner of Melton Street and Drummond Street as an important non-designated heritage asset, which features on the Camden draft Local List. It is part of a series of Northern and Piccadilly Line stations designed by Leslie Green with characteristic ox-blood red faience tiles. It is a landmark building which can withstand changes to its setting and was never intended to be part of a uniform townscape. Camden Council wishes to emphasise that it has adapted well to other uses since becoming redundant as an underground entrance, and that it retains the majority of its original external features and would be enhanced by the removal of less sensitive modern additions.
		4.1.51	Camden Council wishes to state that the former stable building 1-3 Cobourg Street is a highly valued railway heritage asset, which has been imaginatively converted to office and residential use. It features on the Camden draft Local List, is a focal point in views looking north along Cobourg Street and helps to enclose St James's Gardens.
		4.1.53	<p>Camden Council is concerned that the number of listed buildings in the North Gower Street and Drummond Street area is under-represented. The paragraph records 10 listed buildings in this section of the study area, but the number is greater due to the groups of buildings represented as only one entry, particularly in North Gower Street. That some terraced houses have undergone partial or total rebuilding does not necessarily detract from the contribution they make to the historic environment; many scholarly reconstructions are of a high quality.</p> <p>Camden Council wishes to highlight that no mention has been made of a number of non-designated heritage assets in this area which are on the Camden draft Local List or are candidates for the Local List. These buildings of historic townscape value include 59-67(odd) Cobourg Street, the Bree Louise PH at 69 Cobourg Street and 67-79 (odd) Euston Street.</p>

6	6.1	6.1.6	Camden Council disputes the significance attributed to the Bloomsbury and Fitzroy Square Conservation Areas as being of 'moderate' value. Both conservation areas have very high quality townscapes of national if not international importance, with several London Squares and large numbers of listed buildings including a high proportion of grade I and grade II*. Both conservation areas should be given a 'high' value.
		6.1.7	Camden Council wishes to stress that large parts of King's Cross and St Pancras areas are of high townscape value, retaining an important historic environment linked to the 19 <sup>th</sup> century railway heritage.
		6.1.8	Camden Council wishes to dispute the 'moderate' value attributed to the Camden Town study area. Camden Town is made up a number of character sub areas, many of which have well preserved streets of uniform early 19 <sup>th</sup> century residential terraces of high townscape value.
		6.1.9	Camden Council wishes to stress that elements of Somers Town, particularly in the vicinity of the grade II listed 1920s residential blocks, have a high quality historic environment. Recent residential developments have enhanced the wider townscape of the area.
8	8.1		Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Euston CFA. GLAAS highlights St James's Gardens 18 <sup>th</sup> -19 <sup>th</sup> century chapel and burial ground, which may have received c 50,000 or more burials. GLAAS highlights canal and railway heritage above and below ground, including Euston Station, Mornington Street Bridge and Parkway Tunnel. The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES.

**Cultural heritage CFA 01 gazetteer of heritage assets: Euston Station and approach**  
**(Ref: CH-002-001, ES 3.5.2.1.4)**

Section	Sub section	Unique ID	London Borough of Camden response
3	Table 1	EUS002	Camden Council would like to state that a key view located within the bounds of the Proposed

			<p>Scheme into Regent's Park across Gloucester Gate Bridge would be along Gloucester Gate, not along Gloucester Avenue.</p> <p>Camden Council would like to highlight no mention is made that 1 Park Village East is a non-designated heritage asset which is a positive contributor in the Regent's Park Conservation Area.</p>
		EUS004	<p>Camden Council would like to state that the Wellcome Trust building in Euston Road is a non-designated heritage asset which is a positive contributor in the Bloomsbury Conservation Area.</p>
		EUS005	<p>Camden Council does not agree that the two Richard Seifert designed blocks mask the architectural quality of Euston Station. The statement, "These later blocks show fashion changes, Bauhaus/International style not in favour and a sort of lumpy not quite post-modernism in evidence," makes little sense and is disputed. The 1970's stowers display an International style in keeping with the style of the earlier 1960s concourse buildings. The Richard Seifert elements of Euston Station are of 'moderate' value rather than the 'low' value stated.</p> <p>Camden Council wishes to highlight that the former Euston Underground Station in Melton Street is a non-designated heritage asset which is on the Camden draft Local List and is designed in a tiled Baroque style rather than in an Arts and Crafts style. It is considered to be of 'moderate' rather than the 'low' value stated.</p>
		EUS013	<p>Camden Council would like to state that there a number of grade II listed buildings in Platt Street, within the King's Cross Conservation. (Pratt Street falls within the Camden Town Conservation Area.)Neither are the grade II listed buildings mentioned in Royal College Street in the King's Cross St Pancras Conservation Area.</p>
		EUS014	<p>Camden Council would like to highlight that St James's Gardens and the National Temperance Hospital are on the Camden draft Local List. The grade II listed drinking fountain in St James's Gardens is in safe Council storage following fire damage and will be reinstatement once it is repaired. Since the gardens are the site of a former 18<sup>th</sup> and 19<sup>th</sup> century burial ground and chapel of archaeological significance the 'moderate' level of significance is too low and should be raised to 'high'.</p>
		EUS017	<p>Camden Council would like to highlight that in addition to the two sets of bridge piers which are grade II listed, Mornington Street Bridge is a non-designated heritage asset which is on the Camden draft</p>

			Local List.
		EUS018	Camden Council would like to highlight that 34-70 (even) Eversholt Street (with the exception of 64 which is grade II listed) are non-designated heritage assets which are on the Camden draft Local List.
		EUS020	Camden Council wishes to emphasise the high heritage value of the Fitzroy Square Conservation Area. This paragraph does not mention the large numbers of grade I and II* situated at the heart of the conservation area and no mention is made that Fitzroy Square itself is a London Square. The value rating should be raised from 'moderate' to 'high'.
		EUS022	Camden Council wishes to emphasise the high heritage value of the Bloomsbury Conservation Area. The conservation area covers some of the country's most significant Georgian squares, a high number of grade I and grade II* listed buildings, and some fine examples of modern architecture. The value rating should be raised from 'moderate' to 'high'.
		EUS023	Camden Council wishes to draw attention to misconceptions of non-designated heritage assets in Cobourg Street and Euston Street, which are on the Camden draft Local List. The paragraph overstates the alterations to 67-79 Cobourg Street, which are minor, mainly comprising window replacements which are reversible allowing for original window designs to be reinstated. The description for 59-67 Cobourg Street reads "Looks as if it has been heavily refurbished"; this is not the case as the townhouses retain many original features. The Bree Louise PH is described as a "heavily altered 19 <sup>th</sup> century" public house; in fact it is a 1930s red brick public house which features on the Camden draft Local List for being a good example of an interwar PH.
		EUS038	The Granby Terrace Carriage Shed is good example of late 19 <sup>th</sup> /early 20 <sup>th</sup> century railway architecture, boasting high quality brick details. It is a non-designated heritage asset which features on the Camden draft Local List. It is an integral part of the Euston railway cutting and should be classed as of 'moderate' rather than 'low' value.
		EUS040	Camden Council notes that the former St James's Burial Ground and the National Temperance Hospital are both on the Camden draft Local List due to their historic and archaeological interest. The Greater London Archaeological Advisory Service (GLAAS) highlights St James's Gardens 18 <sup>th</sup> -19 <sup>th</sup> century chapel and burial ground, which may have received c 50,000 or more burials.



# **Culture Heritage CFA 01 impact assessment tables: Euston Station and approach** **(Ref: CH-003-001, ES 3.5.2.1.5)**

Section	Sub section	Unique ID	London Borough of Camden response
		EUS003	Camden Council wishes to stress that the construction impacts on the 17 grade II* listed houses in Park Village East and on the Regent's Park Conservation Area is likely to be severe. The residential properties and the street itself will suffer access issues for a period of seven years, which is likely to put these nationally significant Nash properties at risk and in danger of serious decay. The impacts from structural works to the railway cutting retaining wall and from potential settlement and vibration have not been assessed. The scale of impact of 'medium' underestimates the potential impacts, which should be 'high'. Camden Council supports the 'major adverse' effect rating.
		EUS004	Camden Council considers that the construction impacts have been underestimated for Euston Square Gardens, which have been given 'minimal' impact and 'minor adverse' effect ratings. Due to open-cut excavation works across the gardens for a new underground link, plus the creation of two construction compounds in the gardens, the impact is considered to be 'medium to high' and there is a 'moderate adverse' effect.
		EUS005	<p>Camden Council considers there will be major construction impacts at Euston Station due to the demolition of much of the Richard Seifert-designed sections of the station: a large part of the concourse and the complete demolition of the two towers at 22 and 40 Melton Street. Whilst Camden Council supports the category of high scale of impact, it considers that the 'moderate adverse' effect rating is insufficient and should be raised to a 'major adverse effect'.</p> <p>The Greater London Archaeological Advisory Service (GLAAS) states on Railway Heritage: More detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway heritage (both above and below ground). This applies to Euston Station. The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES.</p>
		EUS014	Camden Council considers that the total demolition of the National Temperance Hospital, and the

			dismantling and relocation of grade II listed monuments to unknown positions, all affecting the setting of the gardens, will cause irreversible harm. The 'medium' construction impact and 'moderate adverse effect' ratings are inadequate. Camden Council considers there will be a 'high' impact and a 'major adverse' effect resulting from total demolition and dismantling with unknown consequences of heritage assets.
		EUS016	<p>Camden Council considers the proposed railway infrastructure works in the Mornington Terrace and Mornington Crescent area will have a high impact on this section of the Camden Town Conservation Area, particularly arising from the substantial demolition of the historic Mornington Terrace retaining wall and the demolition and reconstruction of the Mornington Street Bridge. The demolition of the Granby Terrace Bridge and its replacement with a re-aligned truss bridge is likely to have major impacts on the setting of the grade II listed southern section of Mornington Crescent and a property in Hampstead Road. The 'minimal' construction impact and 'minor adverse' effect rating totally underplay the extensive harm which will be caused to this part of the conservation area.</p> <p>Camden Council notes that Construction Phase map CT-05-001 shows a row of 4 mid-19<sup>th</sup> century terraced properties at 9-12 Mornington Terrace (positive contributors) which are likely to be required during construction; however, no written information is provided in the Environmental Statement (including in this Vol 5 table or in Vol 2 CFA 01 Ch 6).</p> <p>Camden Council notes that no mention is made of the impacts on the grade II listed building at 58 Mornington Terrace and the adjacent Edinburgh Castle PH which are also shown to be within the area of potential land take during construction. The 'minimal' construction impact and 'minor adverse' effect ratings are considered to be major underestimates of the construction impacts, which will be 'high' impact with 'major adverse' effect</p>
		EUS017	<p>Camden Council considers the total demolition of the existing Mornington Street bridge, which is a non-designated heritage asset on the Camden draft Local List, together with the dismantling and reconstruction of the grade II piers in the setting of a unsympathetically design new bridge employing a different form of construction to constitute a 'high' impact and 'moderate adverse' effect, contrary to the much lower ratings of 'medium' impact and 'moderate adverse' effect. The Greater London Archaeological Advisory Service (GLAAS) states on Railway Heritage: More detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway heritage (both above and below ground). This applies to Mornington Street Bridge. The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is</p>

			simply not apparent in the ES.
		EUS022	Camden Council would like to draw attention to the underplaying of the construction impacts on the setting of the Bloomsbury Conservation Area. Not only will there be major impacts on the setting of Euston Square in the north of the conservation area, arising from major demolition works at Euston Station, the demolition of the towers at 22 and 40 Melton Street, the new underground entrance in the north west of the square, the demolition of 10 Melton Street to the west compromising the setting of the grade II* listed 1-9 Melton Street, but there will be construction major impacts in Gordon Street affecting the setting of the grade II listed Drayton House (aka Friends' House) arising from excavation works for a new underground entrance. The construction impacts in this part of the Bloomsbury Conservation Area will have a 'major' impact and 'major adverse' effect, contrary to the 'minimal' impact and 'minor adverse' affect ratings given.
		EUS027	Camden Council would like to stress the wholly unacceptable harm which will be caused by the total demolition of the two adjacent grade II listed early 19 <sup>th</sup> century townhouses and attached railings at 14-15 Melton Street. Their loss will be irreversible and extensive, removing the last remaining portion of small-scale 19 <sup>th</sup> century residential development situated in the immediate vicinity of the west side Euston Station. In the absence of mitigation measures at this stage, the construction impact will be 'high' with a 'major adverse' effect.
		EUS028	Camden Council considers the total and irreversible demolition of the non-designated heritage asset of the former Euston Underground Station entrance, which features on the Camden draft Local List, to have a 'high' impact with a 'major adverse' effect rather than an a 'moderate adverse' effect as stated.
		EUS029	Camden Council considers the total and irreversible demolition of the non-designated heritage asset of the former Euston stables at 1-3 Cobourg Street, which features on the Camden draft Local List, to have a 'high' impact with a 'major adverse' effect rather than an a 'moderate adverse' effect as stated.
		EUS036	Camden Council considers the impact of demolition of Walkden House at 10 Melton Street, in the absence of appropriate mitigation measures, will impact negatively on the setting of the grade II* listed 1-9 Melton Street. The closure of the northern stretch of Melton Street to create the southern approach to the new HS2 terminus will also negatively impact 1-9 Melton Street's relationship with the wider setting of Euston Square. Camden Council therefore considers that the construction impact

			will be 'high' and there will be a 'major adverse' effect.
		EUS037	Camden Council is of the view that the substantial demolition of the grade II listed Parkway Tunnel will cause irreversible damage to the 19 <sup>th</sup> century railway heritage of this stretch of the Euston Approach including the impact on the railway cutting western retaining wall. Camden Council supports the 'high' impact and 'major adverse' effect ratings. The Greater London Archaeological Advisory Service (GLAAS) states on Railway Heritage: More detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18 <sup>th</sup> -19 <sup>th</sup> century railway heritage (both above and below ground). This applies to Parkway Tunnel. The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES.
		EUS038	Camden Council wishes to stress that the total demolition of the Granby Terrace Carriage Shed will cause irreversible and extensive harm by the loss of a non-designated heritage asset on the Camden draft Local List, as well as being part of a number of cumulative impacts on the late 19 <sup>th</sup> century/early 20 <sup>th</sup> century railway cutting and the Euston Approach. The Council supports the 'high' construction impact rating, but is of the view the 'moderate adverse' effect should be substituted for 'major adverse' effect.
		EUS040	Camden Council considers that the removal of St James' Gardens and its setting, containing the archaeological site of the former 18 <sup>th</sup> and 19 <sup>th</sup> century burial ground and chapel plus a large number of grave markers and memorials is wholly unacceptable. The Greater London Advisory Service (GLAAS) states the main archaeological impact would be the loss of St. James Garden 18 <sup>th</sup> -19 <sup>th</sup> century chapel and burial ground. It is estimated that the burial ground may have received c 50,000 or more burials. This is correctly assessed as a major adverse impact with mitigation by a programme of archaeological works to investigate, analyse, report and archive these assets. Further consideration should also be given to suitable resting place and memorial for the dead in consultation with the Church of England and taking account of the long-term research potential of such an assemblage.

## Culture heritage CFA 02 baseline report: Camden Town and HS1 link (CH-001-002, ES 3.5.2.3.3)

Section	Sub section	Paragraph	London Borough of Camden response
3	3.5	3.5.14	Camden Council wishes to draw attention to the inaccurate listing grade attributed to the Horse Hospital in Stanley Sidings (Stables Market), which is listed at grade II*, not grade II as stated. The remaining stables buildings on this site are grade II listed, and together they represent an invaluable part of Camden Town's canal and railway history.
4	4.1	4.1.4	Camden Council wishes to clarify that the North London Line (NLL) railway carries passenger trains as well as freight trains on its viaducts to a point just west of Kentish Town Road where it branches onto the Kentish Town Viaduct towards Gospel Oak. The grade II listed Camden Road Station was constructed to serve passenger trains in the 1870s. The NLL is now part of the London Overground network.
		4.1.7	Camden Council wishes to disagree that the Regent's Canal is separated from the surrounding area. Although industrial uses the past tended to enclose the canal, many recent developments have positively embraced the setting and have improved links with the canal and towpath. At King's Cross, the new Granary Square steps down to the canal and the consented Hawley Wharf redevelopment improves the permeability of the tow path.
		4.1.9	Camden Council wishes to state that the residential areas of Camden Town and Chalk Farm close to the railway viaducts are densely developed areas of principally 19 <sup>th</sup> century terraced housing, which have an urban rather than a suburban character. The rich historic environment is derived from the canal and railway heritage.
		4.1.11	Camden Council wishes to correct an inaccuracy. The Camden Incline Winding Engine House is located to the east of Gloucester Avenue, not Gloucester Road.
		4.1.12	Camden Council considers the proposed railway infrastructure works in the Mornington Terrace and Mornington Crescent area will have a high impact on this section of the Camden Town Conservation Area, particularly arising from the substantial demolition of the historic Mornington Terrace retaining wall and the demolition and reconstruction of the Mornington Street Bridge. The demolition of the Granby Terrace Bridge and its replacement with a re-aligned truss bridge is likely to have major impacts on the setting of the grade II listed southern section of Mornington Crescent and a property in Hampstead Road. The 'minimal' construction impact and 'minor adverse' effect rating totally under-

			<p>play the extensive harm which will be caused to this part of the conservation area.</p> <p>Camden Council notes that Construction Phase map CT-05-001 shows a row of 4 mid-19<sup>th</sup> century terraced properties at 9-12 Mornington Terrace (positive contributors) which are likely to be required during construction; however, no written information is provided in the Environmental Statement (including in this Vol 5 table or in Vol 2 CFA 01 Ch 6).</p> <p>Camden Council notes that no mention is made of the impacts on the grade II listed building at 58 Mornington Terrace and the adjacent Edinburgh Castle PH which are also shown to be within the area of potential land take during construction. The 'minimal' construction impact and 'minor adverse' effect ratings are considered to be major underestimates of the construction impacts, which will be 'high' impact with 'major adverse' effect.</p>
		4.1.13	<p>Camden Council considers the proposed railway infrastructure works in the Mornington Terrace and Mornington Crescent area will have a high impact on this section of the Camden Town Conservation Area, particularly arising from the substantial demolition of the historic Mornington Terrace retaining wall and the demolition and reconstruction of the Mornington Street Bridge. The demolition of the Granby Terrace Bridge and its replacement with a re-aligned truss bridge is likely to have major impacts on the setting of the grade II listed southern section of Mornington Crescent and a property in Hampstead Road. The 'minimal' construction impact and 'minor adverse' effect rating totally underplay the extensive harm which will be caused to this part of the conservation area.</p> <p>Camden Council notes that Construction Phase map CT-05-001 shows a row of 4 mid-19<sup>th</sup> century terraced properties at 9-12 Mornington Terrace (positive contributors) which are likely to be required during construction; however, no written information is provided in the Environmental Statement (including in this Vol 5 table or in Vol 2 CFA 01 Ch 6).</p> <p>Camden Council notes that no mention is made of the impacts on the grade II listed building at 58 Mornington Terrace and the adjacent Edinburgh Castle PH which are also shown to be within the area of potential land take during construction. The 'minimal' construction impact and 'minor adverse' effect ratings are considered to be major underestimates of the construction impacts, which will be 'high' impact with 'major adverse' effect.</p>
		4.1.14	<p>Camden Council considers the proposed railway infrastructure works in the Mornington Terrace and Mornington Crescent area will have a high impact on this section of the Camden Town Conservation</p>

			<p>Area, particularly arising from the substantial demolition of the historic Mornington Terrace retaining wall and the demolition and reconstruction of the Mornington Street Bridge. The demolition of the Granby Terrace Bridge and its replacement with a re-aligned truss bridge is likely to have major impacts on the setting of the grade II listed southern section of Mornington Crescent and a property in Hampstead Road. The 'minimal' construction impact and 'minor adverse' effect rating totally underplay the extensive harm which will be caused to this part of the conservation area.</p> <p>Camden Council notes that Construction Phase map CT-05-001 shows a row of 4 mid-19<sup>th</sup> century terraced properties at 9-12 Mornington Terrace (positive contributors) which are likely to be required during construction; however, no written information is provided in the Environmental Statement (including in this Vol 5 table or in Vol 2 CFA 01 Ch 6).</p> <p>Camden Council notes that no mention is made of the impacts on the grade II listed building at 58 Mornington Terrace and the adjacent Edinburgh Castle PH which are also shown to be within the area of potential land take during construction. The 'minimal' construction impact and 'minor adverse' effect ratings are considered to be major underestimates of the construction impacts, which will be 'high' impact with 'major adverse' effect.</p>
		4.1.15	<p>Camden Council wishes to stress that no mention is made in the Modern section of the Maiden Lane Estate, although there is a section on the Caledonian Estate (which falls within LB Islington, some distance to the north of the Proposed Scheme). The Maiden Lane Estate was built in the 1970s period by LB Camden in conjunction with the architects Benson and Forsyth. It has a certain iconic architectural status, although it has suffered social problems in recent years. It is featured on the draft Camden Local List, and planning consents are in place for a conservation-led regeneration programme. It is important to mention this estate as it lies immediately to the north of the existing North London Line (NLL) railway, between York Way and the Midland Mainline railway cutting.</p>

**Cultural heritage CFA 02 gazetteer of heritage assets: Camden Town and HS1 Link**  
**(Ref: CH-002-002, ES 3.5.2.2.4)**

Section	Sub section	Paragraph	London Borough of Camden response
3	Table 1	CAM011	Camden Council wishes to stress that the setting of the Regent's Canal has a densely urban



			character with streets of 19 <sup>th</sup> century residential terraces; it is not a suburban setting as stated.
		CAM015	Camden Council wishes to stress the significance of Camden Road Station as one of only two stations on the NLL Railway which are grade II listed, both adhering to a high quality later 19 <sup>th</sup> century Italianate style. The station's wooden platform canopy is one of few surviving original structures. The station is therefore undervalued by its 'moderate' significance rating, which should be 'high'.
		CAM017	<p>Camden Council highlights the inconsistent ratings given to the NLL Viaduct in different sections of the Environmental Statement. In the Vol 2 CFA 02 report it is treated as having a lesser significance, with a view that it has been altered or its setting harmed, whereas Vol 5 rightly gives it more significance.</p> <p>Camden Council considers the NLL Viaduct to be an important non-designated heritage asset which contributes positively to the setting of a number of conservation areas and is a candidate for the Camden Local List. However, it is noted that no mention is made in this table of the Chalk Farm Road Viaduct which is a positive contributor in the Regent's Canal Conservation Area, or to a number of bridges along the NLL including St Pancras Way, Baynes Street, Randolph Street, Camden Road, Camden Street, Kentish Town Road and Chalk Farm Road, all of which are candidates for the Local List and the lattermost is a positive contributor in the Regent's Canal Conservation Area.</p>
		CAM018	Camden Council wishes to stress the importance of groups of non-designated heritage assets, such as the terrace at 110-116 and 118-126 Camden Road. These early 19 <sup>th</sup> century terraces, and others like them, help to define the character of the conservation area; hence their positive contributor status. The 'moderate' value of these terraces is considered to be a fair rating, but is contrary to the 'low' ratings given in Vol 2 CFA 02 report, which undervalue their significance.
		CAM023	Camden Council wishes to stress the importance of the railway infrastructure which is integral to the character and appearance of the Jeffreys Street Conservation Area. The presence of the railway and bridges (including part of the Camden Road bridge and all of Camden Road Station), makes this area of high historic townscape value.
		CAM036	Camden Council disputes the 'low' significance rating given to 51, 53 and 53a Kentish Town Road. This rating should be 'moderate', as these mid-19 <sup>th</sup> century semi-detached villas are well

			preserved examples of their type, have group value with their grade II listed neighbours at 55-63 (odd), and play an important role in the setting of Camden Gardens. The one-storey projection at 51 dates from the late 19 <sup>th</sup> /early 20 <sup>th</sup> century and has historic merit of its own. The properties are non-designated heritage assets which feature on the Camden draft Local List.
		CAM040	Camden Council wishes to support the inclusion of non-designated heritage assets at 4-8 Torbay Street in the gazetteer, but highlights their absence from assessments in the Vol 2 CFA 02 report, in terms of construction impacts including on their setting.
		CAM044	Camden Council wishes to state that the Kentish Town Centre, Kingsway College has recently been refurbished and is now the French Lycee.
		CAM045	Camden Council considers the 'moderate' significance rating attributed to Stanley Sidings (Stables Market) to be too low, failing to recognise the historic and industrial archaeological significance of this site and the former stables buildings. The significance rating should be 'high'. This is supported by the grade II* listing of the Horse Hospital, which has been incorrectly entered in the gazetteer as grade II.
		CAM048	Camden Council supports the 'moderate' significance value attributed to Primrose Hill Station. However, it should be noted elsewhere in the Environmental Statement (including Vol 2 CFA 02 report), that it has been assessed as having a lower heritage value, which is incorrect. This building and 200 Regent's Park Road are candidates for the Camden Local List.
		CAM053	Camden Council contests the 'low' significance value given to the NLL Railway. The railway, including its viaducts and bridges is of historic value, both in terms of railway heritage and the role it plays in its context. The railway passes through a number of conservation areas, to which it makes a positive contribution and the NLL Viaduct, Chalk Farm Viaduct, and the bridges they incorporate are candidates for the Camden Local List. Attention is drawn to the words, "The architecture has value beyond function by including decorative features"; this statement conflicts with the 'low' significance rating, which needs to be amended.
		CAM060	Camden Council contests the 'low' significance value given to the Up Empty Carriage Tunnel, which should be 'moderate'. The tunnel is an important piece of early 20 <sup>th</sup> century railway heritage forming an intrinsic part of the Euston Approach and is connected to the grade II* Camden Incline Winding Engine House. The tunnel is a non-designated heritage asset which is

			a candidate for the Camden Local List.
		CAM061 – CAM075	<p>Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Camden Town and HS1 Link CFA.</p> <p>GLAAS has made the following comments relating to the archaeological issues in CFA 02. Canal and Railway Heritage: As noted above, more detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway and canal heritage (both above and below ground). The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES and so the need for a specialist integrated industrial heritage assessment should be emphasised. The suggestion that the setting of the Camden Incline Winding Engine House is not significant simply because this is a below ground asset does not accord with published English Heritage guidance on the setting of heritage assets.</p>
		CAM076	Camden Council wishes to dispute the 'low' significance value attributed to this early 19 <sup>th</sup> century terraced property, which forms part of a group of positive contributors with 112-126 Camden Road. These buildings help to make up the character of the Camden Broadway Conservation Area. Where rebuilding has occurred, it has been undertaken in a scholarly architectural manner, consistent with the other properties in the terrace, thereby not detracting from the value of these non-designated heritage assets. The rating should be amended to 'moderate'.

**Cultural heritage CFA 02 impact assessment tables: Camden Town and HS1 Link**  
**(Ref: CH-003-002, ES 3.5.2.2.5)**

Section	Sub section	Paragraph	London Borough of Camden response
		CAM017	Camden Council wishes to dispute the construction impact ratings of 'medium adverse' impact and 'minor adverse' effect on the NLL Viaduct. These ratings should be 'high adverse' impact and 'high adverse' effect. The works to the viaduct are extensive along its route and involve

			substantial or total demolition of various sections, notably of all of the bridges along its route, but also the demolition and rebuilding of original brick abutments and piers attached to the viaduct, and the total demolition and rebuilding of viaduct parapets in conjunction with the provision of access walkways and viaduct widening. Camden Council notes that there is a major omission in this entry, as there is no mention of construction impacts and effects on the Chalk Farm Road Viaduct which is a positive contributor in the Regent's Canal Conservation Area, or to a number of bridges along the NLL including St Pancras Way, Baynes Street, Randolph Street, Camden Road, Camden Street, Kentish Town Road and Chalk Farm Road, all of which are candidates for the Local List and the lattermost is a positive contributor in the Regent's Canal Conservation Area.
		CAM018	Camden Council wishes to dispute the 'medium adverse' impact and 'minor adverse' effect ratings attributed to the works affecting Camden Broadway Conservation Area. The total demolition of the positive contributor at 110 Camden Road, harming the setting of 112-116 Camden Road, together with the demolition and rebuilding of all the railway bridges including St Pancras Way, Baynes Street, Randolph Street and Camden Road bridges, warrants a 'high adverse' impact and 'high adverse' effect.
		CAM023	Camden Council wishes to dispute the 'medium adverse' impact and 'minor adverse' effect ratings attributed to the works affecting Jeffreys Street Conservation Area. This entry fails to mention that part of the Camden Road Bridge and all of Camden Road Station is situated in the Jeffreys Street Conservation Area. The total demolition and rebuilding of the bridge, plus unquantified demolition works to platform 1 of the station will harm the conservation area, causing 'high adverse' impact and 'high adverse' effect to the conservation area.
		CAM036	Camden Council disputes the 'moderate adverse' effect rating given to the total demolition works at 51, 53 and 53a Kentish Town Road. This rating should be 'high', as the effects from the demolition works will involve the loss of two non-designated heritage assets which are candidates of the Local List, will affect the setting of the adjacent grade II listed buildings and Camden Gardens which is a protected London Square.
		CAM037	Camden Council disputes the 'low' impact ratings attributed to the demolition works at 51, 53 and 53a Kentish Town Road upon the grade II listed buildings at 55-63 (odd) Kentish Town Road. This impact should be 'moderate to high'.

		CAM040	Camden Council is concerned that a full and scholarly assessment has not been made of the impact and effect on the non-designated heritage assets at 4-8 Torbay Street, based on the lack of assessments completed in the Vol 2 CFA 02 report, owing to the committed development for the Hawley Wharf site (planning ref 2012/4628/P). It is the Council's view that construction will cause a 'low to moderate' impact and 'low to medium' adverse effect.
		CAM045	Camden Council disputes the 'low adverse' impact and 'negligible' effect on the listed buildings in Stanley Sidings (Stables Market). These ratings should read as 'medium adverse' impact and 'moderate adverse' and are based on the potential harm caused by the Proposed Scheme. In the absence of assessments of the potential impacts from the demolition and rebuilding of Chalk Farm Road bridge and alterations to the Chalk Farm Viaduct, there is concern that the grade II listed Long Stable, Tack Room and other buildings very close to the north side of the viaduct could be directly impacted by construction and have their settings compromised. The assessment of impacts should also take account of the grade II* listing of the Horse Hospital, which has been incorrectly entered in the gazetteer as grade II.
		CAM046	Camden Council wishes to state that no assessment has been made of the impact on the grade II* listed Roundhouse, when considering the construction a short distance to the west of the proposed HS1 Link Tunnel portal and headhouse, and the potential impacts on its setting. Once this assessment has been undertaken, it is likely that the 'low adverse' impact and 'negligible' effect may have to be increased to a 'medium adverse' impact and 'moderate adverse' effect.
		CAM047	Camden Council wishes to stress that the Camden Incline Winding House is situated a short distance above the route of the proposed Euston Tunnel, giving an increased risk of settlement. The potential impacts from settlement are likely to have a 'medium-high' adverse impact and 'medium to high adverse' effect.
		CAM048	Camden Council contests the 'moderate adverse' effect given to the total demolition of Primrose Hill Station and 200 Regent's Park Road, particularly in the absence of proposed mitigation measures to compensate for the loss of non-designated heritage assets which are candidates for the Camden draft Local List. This rating should be increased to 'major adverse' effect.
		CAM053	Camden Council disputes the 'no change' impact and 'negligible' effect ratings on the setting of the NLL Railway. The railway will suffer a wide range of direct physical impacts from the

			demolition of bridges, piers and abutments, parapets and walkways, which will also affect its setting. The railway's setting will also be harmed by proposed demolition works at Camden Road Station. The ratings should be changed to 'medium-high adverse' impact and 'medium to high adverse' effect.
		CAM060	Camden Council disputes the 'moderate adverse' effect rating attributed to the demolition of the Up Empty Carriage Tunnel. These works, together with the sealing of its extremities, will be of an irreversible nature and will disconnect the non-designated heritage asset from the railway infrastructure of the Euston Approach including the grade II* Camden Incline Winding Engine House. This rating should be increased to 'major adverse' effect.
		CAM061 – CAM075	<p>Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Camden Town and HS1 Link CFA. Please refer to the GLAAS formal response for comments on impacts and effects.</p> <p>GLAAS has made the following comments relating to the archaeological issues in CFA 02. Canal and Railway Heritage: As noted above, more detailed desk and site-based assessment would be needed to inform strategies to minimise or mitigate impact of the scheme on the 18<sup>th</sup> -19<sup>th</sup> century railway and canal heritage (both above and below ground). The significance of these structures as part of a complex, evolving and technologically innovative transport network serving what was at the time the world's largest city is simply not apparent in the ES and so the need for a specialist integrated industrial heritage assessment should be emphasised.</p>
		CAM076	Camden Council wishes to dispute the 'low' significance value attributed to this early 19 <sup>th</sup> century terraced property, which forms part of a group of positive contributors with 112-126 Camden Road. These buildings help to make up the character of the Camden Broadway Conservation Area. Where rebuilding has occurred, it has been undertaken in a scholarly architectural manner, consistent with the other properties in the terrace, thereby not detracting from the value of these non-designated heritage assets. The rating should be amended to 'moderate'.

**Cultural heritage CFA 03 baseline report: Primrose Hill to Kilburn (Camden)**  
**(Ref: CH-001-003, ES 3.5.2.3.3)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.2	Camden Council wishes to report that a response from local engagement in CFA 03 has suggested that there may be an underground stream running below the Alexandra Road Estate, between Loudoun Road and Abbey Road, which could impact on settlement.
3	3.7	3.7.5	Camden Council highlights an omission in the description of the development of the Alexandra Road Estate. Although there is mention of the mixed use block at 1-8 (consec) Langtry Walk/61-83 (odd) Loudoun Road, no specific mention is made of its sister block at 32-62 (even) Alexandra Place/49-59 (odd) Loudoun Road. Both buildings were built in the 1980s to the designs of Tom Kay and are important positive contributors in the Alexandra Road Conservation Area, having group value and sharing a common architectural vocabulary.
4	4.1	4.1.1	Camden Council considers that the description in this paragraph that the grade II listed Parkway Tunnel is “technically not a tunnel but more a covered cutting” is contrary to the list description, which describes it a, railway tunnel & cutting, c1836-7. The tunnel runs under the wide road junction where Parkway, Delancey Street, Oval Road and Gloucester Avenue meet. It is inaccurate to describe this listed structure as a covered cutting, since it has the characteristics of a tunnel.
		4.1.2	Camden Council wishes to dispute the statement that the setting of the East and West Primrose Tunnel Portals (grade II* and grade II listed respectively) contributes little to the significance of the asset. Both tunnels are listed because of their historic significance as railway heritage assets, in this case as tunnel portals in deep set railway cuttings. That the open landscape above the cuttings and tunnel has been developed over the last 150 years does not mean that the special interest of the portals has been affected; rather it reflects the historic development of the CFA.
		4.1.3	<p>Camden Council notes an inaccuracy in this paragraph of the ES: the Camden Incline Winding Engine House is located to the east of Gloucester Avenue, not Gloucester Road. The paragraph states of the Incline Winding Engine House, “Because of its subterranean context the setting of the structure is not of significance to its value.”</p> <p>The Greater London Archaeological Advisory Service (GLAAS) comment: - “The suggestion that the setting of the Camden Incline Winding Engine House is not significant simply because this is a below ground asset does not accord with published English Heritage guidance on the setting of heritage assets.”</p>



		4.2.3	Camden Council notes that although mention is made of the grade II listed The Engineer PH at 65 Gloucester Avenue; an adjacent landmark building is omitted. Primrose Hill Primary School in Princess Road is an imposing grade II listed London Board School overlooking the canal towpath to the west of the public house.
		4.3.1	Camden Council wishes to correct the architectural description given to the grade II listed Regency Lodge housing block. It does not adhere to a 'modern style', rather to a 'moderne style', the latter is a more accurate description of this streamlined, ocean-liner style block which has Art Deco features.
		4.3.5	<p>Camden Council wishes to stress the outstanding historic and architectural significance of the Alexandra Road Estate. The estate is a low-rise, high-density local authority housing estate, which was developed on a linear site on the south side of the WCML from 1968 to 1978 to the designs of Neave Brown and Camden Architects' Department, following 19<sup>th</sup> century housing clearance. It takes the form of a concrete mega structure, and contains 520 dwellings, several community uses and a linear park. The estate was grade II* listed in 1993 and falls within the Alexandra Road Estate Conservation Area.</p> <p>Camden Council would like to highlight that nowhere in the Environmental Statement, in written or map form, is the former Jack Taylor School acknowledged as being grade II listed in its own right (it was given its own grade II listing in 2013).</p>
8			Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Euston CFA. Notwithstanding this external advice, Camden Council wishes to state that in Appendix CH-001-003 no mention is made of Kilburn Priory Archaeological Priority Area.
9			Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Euston CFA. Notwithstanding, Camden Council wishes to state that in the Analysis and research section there is no focus on the Kilburn Priory Archaeological Priority Area.

## Cultural heritage CFA 03 gazetteer of heritage assets: Primrose Hill to Kilburn (Camden)

(Ref: CH-002-003, ES 3.5.2.3.4)

Section	Sub section	Unique ID	London Borough of Camden response
		PRM001	Camden Council wishes to highlight inaccuracies in this paragraph. The correct address of the Erno Goldfinger-designed residential block is 10 Regent's Park Road. Cecil Sharp house is not an office block, rather it is a headquarters for the English Folk Dance and Song Society which contains a dance hall, performance spaces and some offices.
		PRM003	Camden Council wishes to highlight that the grade II* listed Belsize Fire Station is of high significance.
		PRM006	Camden Council highlights an inaccuracy in this paragraph. The name is Harmood Street Conservation Area, not 'Harmond Street' Conservation Area as stated.
		PRM009	Camden Council wishes to highlight that the grade I listed Isokon Flats, Lawn Road, within the Parkhill and Upper Park Conservation Area is of high significance. It should also be noted that the grade II listed St Dominic's Priory, and the grade II* listed Roman Catholic Church of St Dominic in Southampton Road fall outside of the conservation area boundary.
		PRM010	Camden Council wishes to highlight that the grade II* listed Church of All Hallows in the Mansfield Conservation Area is of high significance.
		PRM012	Camden Council wishes to highlight that the grade II* listed 1 and 3 (and attached boundary wall) Lyndhurst Terrace in the Fitzjohn's Netherhall Conservation Area is of high significance.
		PRM013	Camden Council wishes to highlight that the following buildings in the Hampstead Conservation Area are of high significance: grade I listed Church of St John, Church Row; grade I listed St Stephen's Church, Rosslyn Hill; grade II* listed Number 66 Frognal; grade II* listed Cloth Hill, 5 The Mount; grade II* listed The Old Mansion, 94 Frognal. It should be noted that a number of grade II* listed buildings of high significance have been omitted from the gazetteer, including residential properties in Church Row.
		PRM016	Camden Council wishes to draw attention to an omission: no mention is made of the Kilburn Priory

			Archaeological Priority Area, part of which falls within the boundary of the Priory Road Conservation Area.
		PRM017	Camden Council wishes to highlight that the grade II* listed Hampstead Synagogue is of high significance.
		PRM018	Camden Council wishes to highlight that the grade II* listed Number 2 and 4 Redington Road are of high significance.
		PRM021	Camden Council wishes to highlight that no mention is made of the grade II listed former Jack Taylor School, Ainsworth Way, an important element of the Alexandra Road Estate which was listed in 2013. The school was designed by Neave Brown and is contemporaneous with the housing blocks, employing similar concrete details.
		PRM040	Camden Council wishes to highlight that no mention is made of St John's Court, an important interwar residential block within the Swiss Cottage triangle. This building is a non-designated heritage asset which is a candidate for the Camden Local List. The Swiss Cottage Odeon and Swiss Cottage PH are also candidates for the Camden Local List.
		PRM042	<p>Camden Council wishes to highlight that no specific mention is made of the following positive contributor in the Alexandra Road Estate Conservation Area which is one of a pair at the eastern entrance of the estate designed by Tom Kay: 32-62 Alexandra Place and 49-59 Loudoun Road.</p> <p>Camden Council disputes that the 1980s Tom Kay-designed buildings at the eastern end of the estate are 'of poorer quality' than the 1960s and 1970s Neave Brown designs; both blocks are positive contributors, which whilst respecting the estate in terms of their height, bulk, scale and form, are constructed from a dark brick in contrast to the predominant use of concrete, and are interesting examples of mixed-use development from the 1980s.</p>
		PRM045	Camden Council wishes to raise concerns that no mention is made of the Kilburn Priory Archaeological Priority Area in the section on Kilburn High Road. Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Primrose Hill to Kilburn CFA. Please refer to the GLAAS formal response for comments on impacts and effects.

		PRM049	Camden Council wishes to emphasise the value of the NLL Railway as 'moderate to high'. The railway, including its viaducts and bridges is of historic value, both in terms of railway heritage and the role it plays in its context. The railway passes through a number of conservation areas, to which it makes a positive contribution and the NLL Viaduct, Chalk Farm Viaduct, and the bridges they incorporate are candidates for the Camden Local List. Attention is drawn to the words, "The architecture has value beyond function by including decorative features"; this statement conflicts with the 'low' significance rating, which needs to be amended.
		PRM064	Camden Council supports the 'moderate' value of significance attributed to the Kilburn Priory Archaeological Priority Area, but raises concerns that no full assessment has been made of the construction impacts either in the Vol 5 CFA 03 impact assessment tables or in the Vol 2 CFA 03 report. Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Primrose Hill to Kilburn CFA. Please refer to the GLAAS formal response for comments on impacts and effects.

**Cultural heritage CFA 03 impact assessment tables: Primrose Hill to Kilburn (Camden)**  
**(Ref: CH-003-003, ES 3.5.2.3.5)**

Section	Sub section	Unique ID	London Borough of Camden response
		PRM004	Camden Council disputes there will be a 'medium' impact and a 'moderate adverse' effect on the grade II* listed Alexandra Road Estate, the grade II listed former Jack Taylor School and associated curtilage structures. The impacts from the total demolition of a positive contributor in the Alexandra Road Estate Conservation Area, affecting the setting of the South Hampstead and St John's Wood (Westminster) Conservation Areas, as well as harming the setting of the grade II* listed estate, will have a 'high' impact and a 'major adverse' effect. This assessment is supported by the potential harm caused by tunnelling and piling.
		PRM005	Camden Council highlights a discrepancy: this paragraph states that the design of the vent shaft has been reduced to two storeys, but the Vol 2 CFA 03 report states the vent shaft house has been reduced to one storey. Whilst the height of the headhouse may not have a noticeable impact on the setting of the Primrose Hill Conservation Area, it will have a more immediate impact on the setting of

			the Eton Conservation Area, which is located to the north of the site. During community engagement, local concerns have been raised regarding the impact of the headhouse on the setting of the grade II* listed Primrose Hill Tunnel East Portals.
		PRM024	Camden Council disputes there will be no construction impacts and a 'neutral' effect on the grade II* listed Camden Incline Winding Engine, which is likely to suffer a 'medium' impact and 'moderate adverse' effect during construction and as a result of potential settlement resulting from being in very close proximity to the Proposed Scheme.
		PRM029	Camden Council disputes there will be no construction impacts and a 'neutral' effect on the grade II listed Swiss Cottage Library, which is likely to suffer a 'medium' impact and 'moderate adverse' effect during construction and as a result of potential settlement. It should be noted that the southern end of the building, which is situated close to the existing Primrose Hill tunnels, suffered from settlement prior to the building's restoration in 2004, which included structural remedial works. Camden Council requests that there be a programme of structural monitoring, taking this history into account.
		PRM030	Camden Council disputes there will be no construction impacts and a 'neutral' effect on the grade II listed Hampstead Figure Sculpture, which is likely to suffer a 'medium' impact and 'moderate adverse' effect during construction and as a result of potential settlement.
		PRM031	Camden Council disputes there will be a 'low' impact and a 'minor adverse' effect on the grade II listed Church of All Souls, which is likely to suffer a 'medium' impact and 'moderate adverse' effect during construction and as a result of potential settlement and piling work from the construction of the Alexandra Place vent shaft.
		PRM037	Camden Council wishes to correct an inaccuracy: the estate in question is named the Ferdinand Street Estate.
		PRM041	Camden Council wishes to correct an inaccuracy: South Hampstead Station serves the London Overground, not the London Underground.
		PRM042	Camden Council disputes the 'moderate adverse' effect attributed to the total demolition of this significant positive contributor which forms a pair with its neighbour at 32-62 Alexandra Place/49-61 Loudoun Road, especially in the absence of a replacement building and mitigation measures including landscaping which preserve and enhance the character and appearance of the Alexandra

			Road Estate Conservation Area, the setting of the South Hampstead and St John's Wood (Westminster) Conservation Areas, and respect the setting of the surrounding grade II and grade II* listed buildings.
		PRM056	Camden Council disputes the 'moderate adverse' effect attributed to the demolition of the Up Empty Carriage Tunnel and the sealing of the tunnel's extremities. There will be a 'major adverse' effect resulting from the loss of this non-designated heritage asset, which is a candidate for the Camden Local List, and for the disconnection of the asset from the Euston Approach railway infrastructure including the grade II* Camden Incline Winding House.
		PRM064	Camden Council disputes the 'low' impact and 'minor adverse' effect ratings relating to impacts on archaeology in the Kilburn area. The ratings should be 'moderate' impact and 'moderate adverse' effect based on the statement in this paragraph, "The construction of the Proposed Scheme will involve service modifications that have the potential to remove archaeological remains." Camden Council is being advised by the Greater London Archaeological Advisory Service (GLAAS) on archaeological matters for the Primrose Hill to Kilburn CFA. Please refer to the GLAAS formal response for comments on impacts and effects.
		PRM069	Camden Council disputes the 'low' impact and 'minor adverse' effect ratings attributed to the impacts on the grade II listed Regency Lodge housing block in the Swiss Cottage triangle, which is likely to suffer a 'medium' impact and 'moderate adverse' effect during construction and as a result of potential settlement.

### Cultural heritage map book for Euston and London Metropolitan (3.5.1.4.1)

Map name / number	London Borough of Camden response
CH-01-001 CH-01-002 CH-01-003 CH-01-004a	Camden Council wishes to express the view that the Cultural heritage baseline maps fail to quantify heritage assets in the CFAs. Although the maps fully represent all types of designated heritage assets including all grades of listed buildings, registered parks and gardens and conservation area designations, they do not show non-designated heritage assets, including entries on local lists, positive contributors in conservation areas and archaeologically sensitive sites. Camden Council therefore considers that the maps give a fair impression of designated heritage assets, but totally omit non-designated heritage assets of local value. The Greater London Archaeological Service

(GLAAS) states the absence of copies of historic maps and other details usually expected in archaeological and heritage statements is a shortcoming which makes understanding and critiquing the assessments more difficult.

**CFAs 1 to 6 designated sites, habitat surveys and flora ecological baseline data: Euston to Ickenham  
(Ref: EC-001-001, ES 3.5.2.1-6.1)**

Section	Sub section	Paragraph	London Borough of Camden response
1	1.1	1.1.1	Camden Council is concerned that the full range of habitats affected by the proposed scheme is not included in the baseline assessment, notably grassland and woodland habitats.
2	2.2		Camden Council is concerned that the methodology does not include any assessment of the value of sites in terms of access to nature for local people.
	2.3		Camden Council would like to stress that Adelaide Local Nature Reserve comprises a wider range of habitats, including flower-rich meadow, ponds and hedgerow. Camden Council is also concerned that the descriptions do not give a complete picture of the value of the sites in terms of access to nature for urban communities.
	2.4		Camden Council is concerned that the descriptions of St James' Gardens, Regents Park and Regents Canal do not give a complete picture of the value of the sites in terms of access to nature for urban communities.
3	3.4	3.4.3	Camden Council rejects that the presence of 'declining arable weeds' within the vicinity of Euston Gardens should be disregarded because they are believed to be from a planted source. Camden Council would like to stress that the presence of these species is relevant to the assessment as they demonstrate the active engagement of the Council and local communities to improve the ecological value of these sites.
		3.4.4	Camden Council would like to emphasise that protected/notable species surveys were not carried out at Adelaide Local Nature Reserve and adjacent private nature reserve and so the table presented may not fully reflect the species resource along the route.
	3.5	3.5.2	Camden Council rejects that the presence of 'declining arable weeds' within the vicinity of Euston



			Gardens and Adelaide Local Nature Reserve should be disregarded because they are believed to be from a planted source. Camden Council would like to stress that the presence of these species is relevant to the assessment as they demonstrate the active engagement of the Council and local communities to improve the ecological value of these sites.
4	4.3	4.3.3	Camden Council is concerned that Camley Street Natural Park is omitted from the list of surveyed sites, despite being a statutory designated site within 500m of the proposed scheme, as outlined in the methodology 2.2.
		4.3.4	<p>Camden Council considers the ES to be defective in that Phase 1 scoping was done in November which is outside the optimal time (April to September), meaning that some habitats are likely to have been missed.</p> <p>The Council also refutes the comment that surveys were “not permitted” on the Council owned assets listed within this paragraph. The Council absolutely refutes any contention that access was not permitted onto its land for habitat nor any other type of survey required to be undertaken to fully understand the impacts of HS2. In fact, the Council gave permission for access some time ago, subject to the usual Access Licenses being entered into by the promoter of the Bill. To date HS2 Ltd. has not entered into these documents. Any fault due to lack of access can squarely be attributed to HS2 Ltd.’s own actions, not the Council’s.</p>
		4.3.8	Camden Council is concerned that Phase 1 habitat surveys at sites in Camden were done in November which is outside the optimal time (April to September), meaning that some habitats (especially areas of grassland in parks such as St James’ Gardens managed by Camden on a reduced mowing regime to increase species-richness) are likely to have been missed.
	4.4	4.4.6	Camden Council would like to point out that amenity grassland left to grow tall for most of the year through successive years, has been shown to increase in species-richness, as is the intention of Camden Council in its management of the grassland in St James’ Gardens. Camden Council would also like to stress that even the slightest increase in species richness of amenity grassland is a positive step in re-connecting urban communities with nature, and why parks gardens and open spaces are a priority Biodiversity Action Plan habitat for Camden. Camden Council also points out that Parks, urban greenspaces and gardens are also regional priority habitats in the London Biodiversity Action Plan and the Mayors’ Biodiversity Strategy (London Plan Policy 7.19).

		4.4.11	Camden Council points out that built structures are also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.14	Camden Council points out that woodland is also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19) and UK Priority Habitat (Biodiversity 2020).
		4.4.21	Camden Council points out that Parks, urban greenspaces and gardens are also regional priority habitats in the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.23	Camden Council points out that standing waters are also a regional priority habitat in the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.30	Camden Council points out that built structures are also a regional priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.31	Camden Council points out that Parks, urban greenspaces and gardens are also regional priority habitats in the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.33	Camden Council points out that woodland is also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.36	Camden Council points out that woodland are also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19) and UK Priority Habitats (Biodiversity 2020).
		4.4.43	Camden Council points out that meadows and heathland are also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19) and are also UK Priority Habitats (Biodiversity 2020).
		4.4.46	Camden Council points out that standing water is also a priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19) and ponds are a UK Priority Habitat (Biodiversity 2020).

		4.4.49	Camden Council points out that built structures are also a regional priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
		4.4.50	Camden Council is concerned that the assessment of Primrose Hill as mostly amenity-turf does not take into account current conservation work by Camden Council and The Royal Parks to restore 1.635ha (8% of the London regional target) of acid grassland at Primrose Hill, as part of a 3-year project (2012-15). Camden Council points out that acid grassland restoration at Primrose Hill is being delivered as part of the Camden Biodiversity Action Plan and that acid grassland is a London regional priority habitat within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19) and a UK Priority Habitat (Biodiversity 2020). Camden Council would also like to point out that parks and gardens are priority habitats within the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy (London Plan Policy 7.19).
5	5.2	5.2.4	Camden Council is concerned that the species-rich grassland at Adelaide Local Nature Reserve has been omitted from the National Vegetation Classification (NVC) assessment, as well as habitats at Camley Street Natural Park. Camden Council is also concerned that other Camden grassland sites that warrant NVC assessment may have been omitted from the study since the Phase 1 survey was flawed due to being carried out in November – this resulted in grassland areas such as those in St James Gardens, which Camden manages on a reduced mowing regime to increase species richness, being classified as amenity grassland and therefore being omitted from the NVC assessment.
	5.3	5.3.3	Camden Council would like to point out that an access license was issued to HS2 Ltd, but it was not signed and returned.
	5.4	5.4.1	Camden Council is concerned that the grassland areas at St James Gardens may have been omitted from the study due to the Phase 1 survey being flawed as it was carried out in November – this resulted in grassland areas which Camden manages on a reduced mowing regime to increase species richness, being missed and classified as amenity grassland instead of semi-improved neutral grassland which may have warranted NVC assessment. Camden Council is also concerned that habitats at Camley Street Natural Park have also been omitted from the assessment.
		5.4.4	Camden Council is concerned that the species-rich grassland at Adelaide Local Nature Reserve has been omitted from the NVC assessment, as well as habitats at Camley Street Natural Park.

		5.4.7	Camden Council is concerned that species-rich habitats at Adelaide Local Nature Reserve have been omitted from the NVC assessment.
6	6.2	6.2.4	Camden Council is concerned that the assessment does not include the Regents Canal through Camden (CFA1 and CFA2).
7	7.2	7.2.2	Camden Council is concerned that the assessment does not include the Regents Canal through Camden (CFA1 and CFA2).
10	10.3	10.3.2	Camden Council is concerned that the assessment excludes ponds at Adelaide Local Nature Reserve (CFA 3), Camley Street Natural Park (CFA1 and 2) and Regents Park (CFA 1).
11	11.1	11.1.1	Camden Council is concerned that the lakes in Regents Park (CFA1) were not identified for survey.

**CFAs 1 to 6 amphibians, reptiles and birds ecological baseline data: Euston to Ickenham  
(Ref: EC-002-001, ES 3.5.2.1-6.2)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.3	2.3.3	Camden Council is concerned that the assessment excludes ponds at Camley Street Natural Park (CFA1 and 2) and Regents Park (CFA 1).
	2.4	2.4.7	Camden Council re-iterates the need for actual ecological assessment to confirm the absence of Greater Crested Newts and other protected species.
4	4.3	4.3.1	Camden Council is concerned that the assessment does not include Camley Street Natural Park (CFA1 and 2), Adelaide Local Nature Reserve and adjoining private nature reserve (CFA3) and the Northern Line at Kings Cross Site of Importance to Nature Conservation (SINC) (CFA2).
	4.4	4.4.3 – 4.4.4	Camden Council stresses that the breeding birds recorded at St James Gardens are all species of conservation concern (three are in moderate decline and are on the Birds of Conservation Concern amber list, two species are on the red list signifying that they are globally threatened and in severe decline). Camden Council stresses that the House Sparrow is of particular conservation significance

			for London (a London Biodiversity Action Plan priority species) having seen an almost 70% decline since 1994, and in fact grassland management at St James Park has been specifically adopted to increase invertebrates to support house sparrow populations, as part of the RSPB London House Sparrow Project.
		4.4.8	Camden Council stresses that Regents Park is of Metropolitan (regional) importance for breeding birds, not just borough importance.
		4.4.10	Camden Council would like to point out that the House Sparrow, recorded at Grand Union (Regents) Canal is actually of particular conservation significance for London (a London Biodiversity Action Plan priority species) having seen an almost 70% decline since 1994.
		4.4.14	Camden Council would like to stress that the breeding birds recorded on the canal are all of conservation concern with 10 species on the amber list and 8 species on the red list indication species under global threat and in severe decline.
		4.4.16	Camden Council would like to point out that the House Sparrow, recorded at Grand Union (Regents) Canal is actually of particular conservation significance for London (a London Biodiversity Action Plan priority species) having seen an almost 70% decline since 1994.
		4.4.24	Camden Council suggests that since the North London Line Site of Importance to Nature Conservation (SINC) is inaccessible and undisturbed, its open mosaic habitats are likely to provide secure breeding and feeding sites for birds.
		4.4.28	Camden Council would like to point out that no professional bird surveys were conducted at Adelaide Road and the data reported from the management plan is from amateur surveys meaning that easily identified common species are more likely to have been recorded than less common species. Camden Council would also like to point out that additional bird surveys are reported in the Adelaide Local Nature Reserve management plan yielding a total of 37 bird species including 4 red list species and 10 amber list species; this includes the House Sparrow which is a species of concern for London and is a priority species in the London Biodiversity Action Plan and the Mayor's Biodiversity Strategy.
5	5.2		Camden Council is concerned that Camley Street Natural Park was not included in the survey.

### CFAs 1 to 6 mammals ecological baseline data: Euston to Ickenham (Ref: EC-003-001, ES 3.5.2.1-6.3)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.2		Camden Council is concerned that surveys were not completed at Regents Park, Camley Street Natural Park, Adelaide Local Nature Reserve and adjacent trees, woodland and railside habitats, and therefore does not accurately reflect bat presence and activity at sites affected by the proposed scheme.
	2.4		Camden Council is concerned that surveys were not completed at Regents Park, Camley Street Natural Park, Adelaide Local Nature Reserve and adjacent trees, woodland and railside habitats, and therefore the results do not accurately reflect bat presence and activity at sites affected by the proposed scheme.

### CFAs 1 to 6 invertebrates and fish ecological baseline data: Euston to Ickenham (Ref: EC-004-001, ES 3.5.2.1-6.4)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.3	2.3.5	Camden Council is concerned that the survey did not include Adelaide Local Nature Reserve, Camley Street Natural Park, Regents Park, North London Line Site of Importance to Nature Conservation and other railside habitats.
	2.4	2.4.1	Camden Council is concerned that St James Gardens was scoped out of the survey since it was surveyed at a time when the grass was mown; St James Gardens is in fact managed to increase invertebrates to support house sparrows. Camden Council is concerned that projects and aims such as this have not been taken into account as part of the assessment.
		2.4.4	Camden Council is concerned that common invertebrate species assemblages found in green spaces and natural habitats within CFA1 are dismissed when in fact they are an important resource for birds and bats in this built up area and that birds and bats are likely to be further constrained should these sources of food disappear.
		2.4.6	Camden Council would like to point out that the types of habitat that exists at the North London Line Site of Importance to Nature Conservation may support a rich diversity of invertebrate including uncommon species, as is typical of open mosaic habitats on previously developed land. Camden

			Council is concerned that the limited ProW survey does not sufficiently survey this site.
		2.4.9	Camden Council stresses that the existing survey data for Adelaide Local Nature Reserve shows a rich invertebrate assemblage of protected and notable species.
3	3.2		Camden Council rejects that there will be no impact on ponds and hence aquatic invertebrate in ponds and other standing waters in CFA1-3. Camden Council is concerned that Adelaide Local Nature Reserve has been marked as 'land required during construction' as well as being adjacent to the vent shaft site and as such Camden Council considers that an assessment on the impact of aquatic invertebrates in the ponds at Adelaide Local Nature Reserve is necessary.

**CFAs 1 to 6 register of local level effects: Euston to Ickenham [Ecology]**  
**(Ref: EC-005-001, ES 3.5.2.1-6.5)**

Section	Sub section	Paragraph	London Borough of Camden response

**CFA 01 ecology map book: Euston Station and approach (Ref: ES 3.5.1.5.1)**

Map Number	London Borough of Camden response
EC-01 – Designated Sites EC-01-001	Camden Council point out that Camley Street Natural Park is designated a Site of Metropolitan Importance for Nature Conservation (SMI) as well as a Local Nature Reserve; this is not reflected on the map.
EC-02-001	Camden Council is concerned to note that there is no baseline data for street trees, for example the mature trees on Cardington and Eversholt Streets, which will all be removed according to the proposed design.
EC-08 – Breeding Birds – Protected and Notable Species EC-08-INDEX-CFA1	Camden Council points out that the maps do not reflect species of regional and local importance - these are particularly important since they have resonance with urban communities and are locally threatened, connect people with nature e.g. house sparrow.

**CFA 02 ecology map book: Camden Town and HS1 link (Ref: ES 3.5.1.5.2)**

Map	London Borough of Camden response
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Number	
EC-01 – Designated Sites EC-01-002	Camden Council point out that Camley Street Natural Park is designated a Site of Metropolitan Importance for Nature Conservation (SMI) as well as a Local Nature Reserve, this is not reflected on the map.

### CFA 03 ecology map book: Primrose Hill to Kilburn (Camden) (Ref: ES 3.5.1.5.3)

Section	Sub section	Paragraph	London Borough of Camden response

### Electromagnetic interference: Affected receptors within 50m of railway and associated risks and mitigation (Ref: EM-001-000)

Section	Sub section	Paragraph	London Borough of Camden response
			<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'. The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned. Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retain the right to provide further comments on electromagnetic interference at a</p>

			later date
2	2.1		Camden Council is concerned about the risk to residents in Cartmel. Include as part of comprehensive assessment of cumulative impacts.
	2.2		Camden Council is concerned about the 'unlikely' risk on residents. Include as part of comprehensive assessment of cumulative impacts.

### Electromagnetic Interference supporting information (Ref: EM-002-000)

Section	Sub section	Paragraph	London Borough of Camden response
			<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'. The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned. Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retain the right to provide further comments on electromagnetic interference at a later date</p>

### Electromagnetic interference: Network Rail company standard NR/L2/RSE/30041 (EM-003-000)

Section	Sub	Paragraph	London Borough of Camden response
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	section		
			<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'. The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned. Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retain the right to provide further comments on electromagnetic interference at a later date</p>

### **CFA 01 land quality report: Euston Station and approach (Ref: LQ-001-001, ES 3.5.2.1.7)**

Section	Sub section	Paragraph	London Borough of Camden response
			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p>

			<p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
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### **CFA 02 land quality report: Camden Town and HS1 link (Ref: LQ-001-002, ES 3.5.2.2.7)**

<b>Section</b>	<b>Sub section</b>	<b>Paragraph</b>	<b>London Borough of Camden response</b>
			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>

### **CFA 03 land quality report: Primrose Hill to Kilburn (Camden) (Ref: LQ-001-003, ES 3.5.2.3.7)**

Section	Sub section	Paragraph	London Borough of Camden response
			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>

### Land quality map book (Ref: ES 3.5.1.6)

Map number	London Borough of Camden response
	<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p>

	<p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
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### **CFA 01 landscape and visual assessment: Euston Station and approach (Ref: LV-001-001, ES 3.5.2.1.8)**

Section	Sub section	Paragraph	London Borough of Camden response
<b>Part 2 Environmental baseline report</b>			
1			Camden Council considers that the written assessments of LCAs and views, placing them in an assessment matrix which states the adversity of change over time as a result of the proposal, is a broad brush approach to the proposals and needs more detail.

### **CFA 02 landscape and visual assessment: Camden Town and HS1 link (Ref: LV-001-002, ES 3.5.2.2.8)**

Section	Sub section	Paragraph	London Borough of Camden response
<b>Part 2 Environmental baseline report</b>			
1			Camden Council considers that the written assessments of LCAs and views, placing them in an assessment matrix which states the adversity of change over time as a result of the proposal, is a broad brush approach to the proposals and needs more detail.

**CFA 03 landscape and visual assessment: Primrose Hill to Kilburn (Camden)**  
**(Ref: LV-001-003, ES 3.5.2.3.8)**

Section	Sub section	Paragraph	London Borough of Camden response
<b>Part 2 Environmental baseline report</b>			
1			Camden Council considers that the written assessments of LCAs and views, placing them in an assessment matrix which states the adversity of change over time as a result of the proposal, is a broad brush approach to the proposals and needs more detail.

**Landscape and visual map book for Euston and London Metropolitan (Ref: ES 3.5.1.7.1)**

Map Number	London Borough of Camden response
CFA1   Euston - Station and Approach	
LV-01-001	Camden Council considers that the views in this mapbook are repeats of those commented on in sections 1-4. The maps showing viewpoints are similar to though commented on in 1-4, but also have a layer showing the Zone of Theoretical Visibility (ZTV). This demonstrates that the proposal will have a far more significant visual presence than the limited published view cover. This is further evidence that more verified views from a broader range of locations are required.
LV-01-002	
LV-01-003	
LV-01-004	
LV-01-267	
LV-01-005	
LV-01-269	
CFA2   Camden Town and HS1 Link	
LV-01-006	Camden Council considers that the views in this mapbook are repeats of those commented on in sections 1-4. The maps showing viewpoints are similar to though commented on in 1-4, but also have a layer showing the Zone of Theoretical Visibility (ZTV). This demonstrates that the proposal will have a far more significant visual presence than the limited published view cover. This is further evidence that more verified views from a broader range of locations are required.
LV-01-007	
LV-01-009	
LV-01-010	
LV-01-013	
LV-01-014	
LV-01-015	
LV-01-016	
CFA3   Primrose Hill to Camden (Kilburn)	



LV-01-011	Camden Council considers that the views in this mapbook are repeats of those commented on in sections 1-4. The maps showing viewpoints are similar to though commented on in 1-4, but also have a layer showing the Zone of Theoretical Visibility (ZTV). This demonstrates that the proposal will have a far more significant visual presence than the limited published view cover. This is further evidence that more verified views from a broader range of locations are required.
LV-01-012	
LV-01-017	
LV-01-018	
LV-01-221	
LV-02-004b	Camden Council believes that Viewpoint 005.2.008 will be a significantly affected viewpoint, because the current view is greenery and will be replaced by immature trees and the vent shaft. Camden Council would like to see the vent shaft being designed to be in keeping with the landscape and therefore have green walls and roofs. Camden Council would like to see semi-mature or mature trees planted as a visual screen to the impact of removing the woodland.

### Socio-economics: Business and labour market data (Ref: SE-001-000)

Section	Sub-section	Paragraph	London Borough of Camden response
			Please also see comments provided for related appendices.

### Socio-economics mapbook (Ref: ES 3.5.1.8)

Map number	London Borough of Camden response
CFA 01 Euston Station and approach SE-01 - Socio-Economic Significantly Affected Resources, SE-02 -	Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.

<p>Demographic Character Areas</p>	<p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p> <p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed that this has not been reflected in the socio-economic assessment or associated map books.</p> <p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>
<p>CFA 02 Camden Town and HS1 Link SE-01 - Socio-Economic Significantly Affected Resources, SE-02 - Demographic Character Areas</p>	<p>Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.</p> <p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working</p>

	<p>Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p> <p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed that this has not been reflected in the socio-economic assessment or associated map books.</p> <p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>
<p>CFA 03 Primrose Hill to Camden SE-01 - Socio-Economic Significantly Affected Resources, SE-02 - Demographic Character Areas</p>	<p>Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.</p> <p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p> <p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed</p>

	<p>that this has not been reflected in the socio-economic assessment or associated map books.</p> <p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>

**Sound, noise and vibration: methodology, assumptions and assessment (route-wide)**  
**(Ref: SV-001-000, ES 3.5.0.10)**

Section	Sub-section	Paragraph	London Borough of Camden response
1.1			Camden Council notes that reference has been made to the draft national planning practice guidance, presenting an interpretation of its requirements, and consider that as this guidance is not an approved document that HS2 should review any assessments made in relation to this guidance at such time that the guidance is formally adopted or otherwise. Camden Council considers that a failure to review and amend the relevant outcomes following the formal publication of this guidance would render the ES deficient.
		1.5.44	Camden Council is considering its position on the need for a LOAEL for sleep disturbance from LpAFmax, subject to further research. Camden Council therefore reserves the right to confirm its position on this matter at a later date.

## Sound, noise and vibration: Appendix SV-001-000 - Annex A - Assessment of impacts, effects and significance

Section	Sub-section	Paragraph	London Borough of Camden response
1.	1.2		Camden Council is concerned that the methodology adopted for the identification of significant construction airborne noise impacts can require relatively high changes in noise level before a significant impact is identified for certain baseline conditions. Camden has concerns that a groundborne noise level of 45 dB LpASmax has been identified as the SOAEL, and that the LOAEL may also be set too high.
1	1.3		Camden Council is concerned that the scope of activities considered as potentially giving rise to significant construction groundborne noise and vibration effects does not cover for all activities that could give rise to significant construction groundborne noise and vibration effects. Camden Council is concerned that no technical assessment of potential significant effects associated with stationary installations is reported in the ES. The Council is concerned that the assessment of significant groundborne sound and vibration effects has not applied the SOAEL and LOAEL appropriately.
1	1.4		Camden Council is concerned that the assessment of significant groundborne sound and vibration effects has not applied the SOAEL and LOAEL appropriately. Camden has concerns that a groundborne noise level of 45 dB LpASmax has been identified as the SOAEL, and that the LOAEL may also be set too high.
1	1.5		Camden Council is concerned that the methodology adopted for the identification of significant construction airborne noise impacts can require relatively high changes in noise level before a significant impact is identified for certain baseline conditions.
1	1.6		Camden Council considers that the definition of "Quiet Areas" used by HS2 is restrictive and does not place sufficient value on the importance of relative quiet and tranquillity in parks and open spaces in a densely populated urban area such as Camden. Camden Council would like to see more emphasis placed on the value of relative quiet and tranquillity within parks and open spaces within Camden

## Sound, noise and vibration: Appendix SV-001-000 - Annex B - Baseline

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to

			be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
1	1.1		Camden Council considers that the maps are of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures.

### **Sound, noise and vibration: Appendix SV-001-000 - Annex C - Construction Assessment Methodology**

Section	Sub section	Paragraph	London Borough of Camden response
1	1.3		Camden Council is concerned that an external free-field to internal groundborne vibration transfer function has been applied to all high rise buildings above first floor based upon surveys undertaken on residential brick terrace buildings.
2	2.1		Camden Council is concerned that the methodology adopted for the identification of significant construction airborne noise impacts can require relatively high changes in noise level before a significant impact is identified for certain baseline conditions. Camden Council is concerned that the scope of activities considered as potentially giving rise to significant construction groundborne noise and vibration effects does not cover for all activities that could give rise to significant construction groundborne noise and vibration effects.
2	2.2		Camden Council considers that the assessment of off-site construction traffic at a mid-point during the construction programme may not provide a worse case assessment.

### **Sound, noise and vibration: Appendix SV-001-000 - Annex D1 - Operational assessment - ground-borne sound and vibration**

Section number	Sub section	Paragraph	London Borough of Camden response
1	1.1		Camden Council is concerned that the assessment of significant groundborne sound and vibration effects has not applied the SOAEL and LOAEL appropriately. Camden Council would like

			confirmation that the consideration of a foreseeable circumstance includes the consideration of cumulative groundborne noise levels arising at a receptor from multiple coincident train passbys.
1	1.2		Camden Council considers that the ES is deficient as it lacks information on the modifications to the HS1 groundborne sound and vibration model that have been applied to develop the HS2 model. Camden Council is concerned that the effects of rail roughness combined with change in speed of trains travelling in tunnels through LB Camden have not been adequately accounted for in the groundborne noise and vibration predictions. Camden Council notes that the groundborne noise and vibration prediction model does not take into account uncertainty tolerances in the predicted values. Camden Council is concerned that an external free-field to internal groundborne vibration transfer function has been applied to all high rise buildings above first floor based upon surveys undertaken on residential brick terrace buildings.

### Sound, noise and vibration: Appendix SV-001-000 - Annex D2 - Operational assessment - airborne sound

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council notes that the only sources of operation noise that are of importance in Camden are rolling sound and starting sound. Camden Council is concerned that the airborne noise prediction methodology applied to the assessment of effects, reported in CFAs 1, 2 and 3, does not include any provision for the noise model uncertainty. Camden Council would like confirmation that the consideration of a foreseeable circumstance includes the consideration of cumulative groundborne noise levels arising at a receptor from multiple coincident train passbys.
1	1.1		Camden Council is concerned that the airborne noise prediction methodology applied to the assessment of effects, reported in CFAs 1, 2 and 3, does not include any provision for the noise model uncertainty.
1	1.2		Camden Council notes that the only sources of operation noise that are of importance in Camden are rolling sound and starting sound. Camden Council notes that there is little information on the source-term derivation of trains travelling at speeds that are of importance in the LB Camden. Camden Council is concerned about the achievability of the assumed airborne noise specifications for HS2 trains travelling below 100 kph.
1	1.3		Camden Council notes that the only sources of operation noise that are of importance in Camden are rolling sound and starting sound. Camden Council notes that there is little information on the source-term derivation of trains travelling at speeds that are of importance in the LB Camden. Camden Council is concerned about the achievability of the assumed airborne noise specifications for HS2



			trains travelling below 100 kph.
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### Sound, noise and vibration: Appendix SV-001-000 - Annex E - Operation of stationary systems

Section number	Sub section	Paragraph	London Borough of Camden response
1	1.3		Camden Council is concerned that the Promoter has not attempted to predict any adverse effects arising from stationary systems and is instead relying upon the achievement of a specification. The current proposals are considered to provide inadequate information of potential significant effects arising from groups of dwellings or shared communities predicted to experience adverse effects between the LOAEL and SOAEL. Camden Council considers that the approach is not consistent with other noise and vibration topic approaches in the ES.

### Sound, noise and vibration: Appendix SV-001-000 - Annex F - Effects of noise on animals

Section	Sub section	Paragraph	London Borough of Camden response

### Sound, noise and vibration: Appendix SV-001-000 - Annex G - Assessment of effects (route-wide)

Section	Sub section	Paragraph	London Borough of Camden response

### Sound, noise and vibration: CFA 01 baseline report – Euston Station and approach (Ref: SV-002-001, ES 3.5.2.1.9)

Section	Sub	Paragraph	London Borough of Camden response
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	section		
1	1.2		Camden Council notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon.
2	2.2	2.2.2	Camden Council understands that officers were invited on one occasion but as too little notice was provided by the consultants engaged by HS2, it was not possible for officers to attend on that occasion. Camden Council considers that the wording of this paragraph suggests than more than one invitation was extended but do not have any records of any further invitations and would be grateful to clarify this matter.
3	3.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels in the ES, which may be high risk assumptions to rely upon.

### Sound, noise and vibration: CFA 01 construction assessment report – Euston Station and approach (Ref: SV-003-001, ES 3.5.2.1.10)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.3		Camden Council notes that construction traffic associated with the scheme and using the highway gives rise to 'indirect' effects. The Council questions whether are they are actually 'direct' effects.
2	2.4		Camden Council considers that the assessment of off-site construction traffic at a mid-point during the construction programme may not provide a worst case assessment.
3	3.1		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
4	4.3		Camden Council notes that the predicted construction noise levels in the ES are described as monthly averages. The predicted noise levels may therefore be an underestimation of the actual construction noise impacts (both absolute and temporal) that arise during works onsite. Camden Council is concerned that the methodology adopted by the Promoter for the identification of

			significant construction airborne noise impacts may require relatively high changes in noise level before a significant impact is identified at certain baseline ambient values that are of importance to Camden. Camden Council is concerned that the scope of activities considered as potentially giving rise to significant construction groundborne noise and vibration effects does not cover for all foreseeable eventualities. Camden Council considers that the additional notes provided with the tabulated construction noise and vibration assessment results are confusing and counter intuitive and need clarification.
4	4.4		Camden Council is concerned at the extent and severity of the reported significant adverse construction noise and vibration effects in CFAs 1, 2 and 3. Camden Council requests further explanation and justification into the significant airborne construction noise effects at receptors that have been professionally judged not to be representative at non-residential premises.

**Sound, noise and vibration: CFA 01 operational assessment report – Euston Station and approach  
(Ref: SV-004-001, ES 3.5.2.1.11)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.1	Camden Council would be pleased to clarify that Council officers provided HS2 with a photocopy of the relevant planning policy at the planning forum acoustic sub group meeting.
2	2.3	2.3.1	Camden Council is concerned that the airborne noise prediction methodology applied to the assessment of effects, reported in CFAs 1, 2 and 3, does not include any provision for the noise model uncertainty.
2	2.4	2.4.1	Camden Council considers the ES deficient as it lacks information on the modifications to the HS1 groundborne sound and vibration model that have been applied to develop the HS2 model. Camden Council is concerned that the effects of rail roughness combined with change in speed of trains travelling in tunnels through LB Camden have not been adequately accounted for in the groundborne noise and vibration predictions. Camden Council notes that the groundborne noise and vibration prediction model does not take into account uncertainty tolerances in the predicted values. Camden Council is concerned that an external free-field to internal groundborne vibration transfer function has been applied to all high rise buildings above first floor based upon surveys undertaken on residential brick terrace buildings.
2	2.5	2.5.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are

			declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden.
3	3.1		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
3	3.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
4	4.2		Camden Council considers the ES defective as it lacks sufficient information on the mitigation currently proposed and the justification for the promoter not identifying further mitigation options to reduce or avoid the reported significant effects. As a result of the decision by HS2 to commit to rolling stock specifications which are lower than those prescribed in the TSI Camden Council requires additional guarantees.
4	4.3		Camden Council considers that the additional notes provided with the tabulated construction noise and vibration assessment results are confusing and counter intuitive and need clarification.
4	4.4		Camden Council is concerned at the extent and severity of the reported significant adverse operational airborne noise effects in CFAs 1, 2 and 3. The Council requires further evidence from HS2 on its judgement to not define significant adverse airborne noise effects at non-residential premises alongside HS2 despite observed adverse impacts being predicted.

**Sound, noise and vibration: CFA 02 baseline report – Camden Town and HS1 link**  
**(Ref: SV-002-002, ES 3.5.2.2.9)**

Section	Sub	Paragraph	London Borough of Camden response
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	section		
1	1.2		Camden Council notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon.
2	2.2	2.2.3	Camden Council understands that officers were invited on one occasion but as too little notice was provided by the consultants engaged by HS2, it was not possible for officers to attend on that occasion. Camden Council considers that the wording of this paragraph suggests than more than one invitation was extended but do not have any records of any further invitations and would be grateful to clarify this matter.
3	3.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.

### Sound, noise and vibration: CFA 02 construction assessment report: Camden Town and HS1 link (SV-003-002, ES 3.5.2.2.10)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.3	2.3.1	Camden Council notes that construction traffic associated with the scheme and using the highway gives rise to 'indirect' effects. The Council questions whether they are actually 'direct' effects.
2	2.4	2.4.1	Camden Council considers that the assessment of off-site construction traffic at a mid-point during the construction programme may not provide a worst case assessment.
3	3.1	3.1.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
4	4.2	4.2.1	Camden Council notes that the residents of LB Camden are expected to be significantly affected by

			<p>construction noise and vibration. Camden Council therefore requires that the noise and vibration mitigation policy provides unequivocal direction on the roles and responsibilities of the project manager and contractors in the process of administrating and implementing the required off-site mitigation measures (i.e. (NI/TRH)) prior to the noisy works taking place on worksites. Camden Council will require complete agreement on the provisions to be included in the Promoter's emerging NI/TRH Policy. Camden Council notes that the ES assumes incorporated mitigation which is regarded by the Promoter to constitute Best Practicable Means, however, the Council believes that the Promoter's justification for not including other available site specific mitigation options needs to be included in the ES and / or LEMP. Camden would like to stress that the Project Manager should delineate contract packages responsibly to avoid multiple contractors affecting the noise and vibration at receptors at the same time. Camden Council requests assurances regarding the groundborne noise and vibration effects likely during the operation of temporary construction railway and the TBM during tunnel construction, as well as other sub-surface activities known to cause unacceptable magnitudes of prolonged groundborne noise and vibration.</p>
4	4.3		<p>Camden Council notes that the predicted construction noise levels in the ES are described as monthly averages. The predicted noise levels may therefore be an underestimation of the actual construction noise impacts (both absolute and temporal) that arise during works onsite. Camden Council is concerned that the methodology adopted by the Promoter for the identification of significant construction airborne noise impacts can require relatively high changes in noise level before a significant impact is identified at certain baseline ambient values that are of importance to Camden. Camden Council is concerned that the scope of activities considered as potentially giving rise to significant construction groundborne noise and vibration effects does not cover for all foreseeable eventualities. Camden Council considers that the additional notes provided with the tabulated construction noise and vibration assessment results are confusing and counter intuitive and need clarification.</p>
4	4.4		<p>Camden Council is concerned at the extent and severity of the reported significant adverse construction noise and vibration effects in CFAs 1, 2 and 3. Camden Council requests further explanation and justification into the significant airborne construction noise effects at receptors that have been professionally judged not to be representative at non-residential premises.</p>

**Sound, noise and vibration: CFA 02 operational assessment report: Camden Town and HS1 link (SV-004-002, ES 3.5.2.2.11)**

Section	Sub section	Paragraph	London Borough of Camden response
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2	2.1		Camden Council would be pleased to clarify that Council officers provided HS2 with a photocopy of the relevant planning policy at the planning forum acoustic sub group meeting.
2	2.3	2.3.1	Camden Council is concerned that the airborne noise prediction methodology applied to the assessment of effects, reported in CFAs 1, 2 and 3, does not include any provision for the noise model uncertainty.
2	2.4	2.4.1	Camden Council considers the ES defective as it lacks sufficient information on the modifications to the HS1 groundborne sound and vibration model that have been applied to develop the HS2 model. Camden Council is concerned that the effects of rail roughness combined with change in speed of trains travelling in tunnels through LB Camden have not been adequately accounted for in the groundborne noise and vibration predictions. Camden Council notes that the groundborne noise and vibration prediction model does not take into account uncertainty tolerances in the predicted values. Camden Council is concerned that an external free-field to internal groundborne vibration transfer function has been applied to all high rise buildings above first floor based upon surveys undertaken on residential brick terrace buildings.
2	2.5	2.5.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden.
3	3.1	3.1.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been available for any detailed review at this time, but further targeted studies may be required to support proposed petitioning at site specific areas of concern.
		3.1.2	
3	3.2	3.2.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
4	4.2	4.2.1	Camden Council considers the ES defective as it lacks sufficient information on the mitigation currently proposed and the justification for the promoter not identifying further mitigation options to reduce or avoid the reported significant effects. As a result of the decision by HS2 to commit to rolling stock specifications which are lower than those prescribed in the TSI Camden Council requests additional guarantees.



4	4.3		Camden Council considers that the additional notes provided with the tabulated construction noise and vibration assessment results are confusing and counter intuitive and need clarification.
4	4.4		Camden Council is concerned at the extent and severity of the reported significant adverse operational airborne noise effects in CFAs 1, 2 and 3. The Council requires further evidence from HS2 on its judgement to not define significant adverse airborne noise effects at non-residential premises alongside HS2 despite observed adverse impacts being predicted.

**Sound, noise and vibration: CFA 03 baseline report – Primrose Hill to Kilburn (Camden)**  
**(Ref: SV-002-003, ES 3.5.2.3.9)**

Section	Sub section	Paragraph	London Borough of Camden response
1	1.2		Camden Council notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon.
2	2.2	2.2.3	Camden Council do not have any records of officers being invited to attend baseline sound measurements within this community forum area and would be grateful to clarify this matter.
3	3.2		Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.

**Sound, noise and vibration: CFA 03 construction assessment report – Primrose Hill to Kilburn (Camden)**  
**(Ref: SV-003-003, ES 3.5.2.3.10)**

Section	Sub	Paragraph	London Borough of Camden response
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	section		
2	2.3	2.3.1	Camden Council notes that construction traffic associated with the scheme and using the highway gives rise to 'indirect' effects. The Council questions whether they are actually 'direct' effects.
2	2.4	2.4.1	Camden Council considers that the assessment of off-site construction traffic at a mid-point during the construction programme may not provide a worst case assessment.
3	3.1	3.1.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
4	4.2	4.2.1	Camden Council notes that the residents of LB Camden are expected to be significantly affected by construction noise and vibration. Camden Council therefore requests that the noise and vibration mitigation policy provides unequivocal direction on the roles and responsibilities of the project manager and contractors in the process of administering and implementing the required off-site mitigation measures (i.e. (NI/TRH)) prior to the noisy works taking place on worksites. Camden Council will require complete agreement on the provisions to be included in the Promoter's emerging NI/TRH Policy. Camden Council notes that the ES assumes incorporated mitigation which is regarded by the Promoter to constitute Best Practicable Means, however, the Council believes that the Promoter's justification for not including other available site specific mitigation options needs to be included in the ES and / or LEMP. Camden would like to stress that the Project Manager should delineate contract packages responsibly to avoid multiple contractors affecting the noise and vibration at receptors at the same time. Camden Council requests assurances regarding the groundborne noise and vibration effects likely during the operation of temporary construction railway and the TBM during tunnel construction, as well as other sub-surface activities known to cause unacceptable magnitudes of prolonged groundborne noise and vibration.
4	4.3		Camden Council notes that the predicted construction noise levels in the ES are described as monthly averages. The predicted noise levels may therefore be an underestimation of the actual construction noise impacts (both absolute and temporal) that arise during works onsite. Camden Council is concerned that the methodology adopted by the Promoter for the identification of significant construction airborne noise impacts can require relatively high changes in noise level before a significant impact is identified at certain baseline ambient values that are of importance to Camden. Camden Council is concerned that the scope of activities considered as potentially giving rise to significant construction groundborne noise and vibration effects does not cover for all

			foreseeable eventualities. Camden Council considers that the additional notes provided with the tabulated construction noise and vibration assessment results are confusing and counter intuitive and need clarification.
4	4.4		Camden Council is concerned at the extent and severity of the reported significant adverse construction noise and vibration effects in CFAs 1, 2 and 3. Camden Council requests further explanation and justification into the significant airborne construction noise effects at receptors that have been professionally judged not to be representative at non-residential premises.

**Sound, noise and vibration: CFA 03 operational assessment report – Primrose Hill to Kilburn (Camden)**  
**(Ref: SV-004-003, ES 3.5.2.3.11)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.1	Camden Council would be pleased to clarify that Council officers provided HS2 with a photocopy of the relevant planning policy at the planning forum acoustic sub group meeting.
2	2.4	2.4.1	Camden Council considers the ES defective as it lacks sufficient information on the modifications to the HS1 groundborne sound and vibration model that have been applied to develop the HS2 model. Camden Council is concerned that the effects of rail roughness combined with change in speed of trains travelling in tunnels through LB Camden have not been adequately accounted for in the groundborne noise and vibration predictions. Camden Council notes that the groundborne noise and vibration prediction model does not take into account uncertainty tolerances in the predicted values. Camden Council is concerned that an external free-field to internal groundborne vibration transfer function has been applied to all high rise buildings above first floor based upon surveys undertaken on residential brick terrace buildings.
2	2.5	2.5.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden.
3	3.1	3.1.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
3	3.2	3.2.1	Camden Council notes that the derivation of baseline noise levels at receptors within Camden are

			declared to be robust, despite the access restrictions to certain monitoring locations in LB Camden. Camden Council also notes the use of 'generic' noise levels (i.e. those based upon a broad categorised estimate of London - Urban, and London – Residential baseline noise levels) in the ES, which may be high risk assumptions to rely upon. Raw data has not been made available for any detailed review at this time, and Camden Council reserves its rights to comment once the required data has been received and studies are completed at site specific areas of concern.
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### **Sound, noise and vibration: Euston and London Metropolitan map book (Ref: ES 3.5.1.9.1)**

<b>Map number</b>	<b>London Borough of Camden response</b>
SV-01-INDEX-CFA1	Camden Council considers the maps to be of limited use at the current scale, and do not readily allow detailed consideration of: baseline monitoring locations; assessment locations; location and extent of significant adverse effects; and avoidance and mitigation measures.

### **Transport Assessment (TR-001-000) Traffic and Transport Part 1: Introduction**

<b>Section</b>	<b>Sub section</b>	<b>Paragraph</b>	<b>London Borough of Camden response</b>
1	1.1		<p>Camden Council is concerned that the reporting used in this section and generally throughout the transport related volumes of the Environmental Statement is predominantly descriptive and insufficiently punctuated with quantifiable evidence or indeed graphical diagrams that otherwise would have really assisted in reviewing the document. Many key areas are too ambiguous and lack depth of evidence when needed. Inconclusive phrasing such as 'there will inevitably be', 'potential', 'may also be', 'likely' and 'where appropriate' are used frequently and are not definitive and concise enough for the technical nature of the assessment that the ES should represent. This could suggest a lack of detail and thoroughness about the work that has been done in the time that has been available for such a major scheme and more importantly does go on to mean that the prevailing construction and operational impacts that HS2 is reported to generate are not fully or accurately estimated, as far as the London Borough of Camden is concerned.</p> <p>Camden Council considers the impacts to be potentially far worse than reported by HS2 in many key</p>

			parts of the TA and ES and as a result should certainly cover a wider area. References within the main sections of the ES, when they are occasionally provided, do not on the whole provide the sufficient raw data and core material that is needed to understand the derivation of key elements of the assessment, like for instance Construction Trip Generation. These omissions mean that much of the assessment and associated outcomes is fundamentally undermined and non-conclusive for Camden Council to be able to review and accept the document. Camden Council has provided detailed comments within this proforma in response to the ES and many of these do relate to fundamental flaws in the ES approach and associated assessment, which result in Camden Council rejecting many of the reported impacts and mitigation that are generally considered to be insufficient.
		1.2.1	Camden Council recognise the importance of considering the component parts of the HS2 scheme, however it is felt that splitting CFA1 from CFA2 and 3, does make the cumulative and joined up effects of the construction process less obvious to identify and in many cases, as reported elsewhere in this response, has meant that cumulative impacts and those in series from one CFA to the next have not been presented in full. For example, conflicts between utilities disruptions, various construction activities, and highway closures/lorry routing operations are not easily identifiable and therefore Camden Council remain unconvinced that the true accumulated impacts have been taken in to account. In essence, HS2 have, by breaking down the sum of the parts, made the cumulative and serial effects diminish and seem less onerous than they could be in reality. The occasional cross referencing between volumes and annexes does not always lead to the required information expected and prevents momentum building and clarity for reviewing the ES. As a consequence Camden Council are not convinced that the worst case cumulative impacts have been assessed, such as for example disruption from Euston Road's reduction to 4 lanes (to build Euston square link), Hampstead Road bridge works, HS1 viaduct works and the Adelaide Road closure.
		2.2.3	Camden Council consider that the main objectives of 'High Speed Europe' briefly referred to in this section may be compromised by the 'HS1 Link', that in its current form, fails to provide a compelling future proofed 'operational' solution. The current link has: 1) no business case, 2) limited demand, 3) huge negative impacts, 4) if built needs to be future proof. A direct non-stop services from Birmingham to Paris and Brussels could be expected to attract no more than 1050-2200 passengers per day in each direction in 2033 – i.e. sufficient to fill no more than 2-3 trains per day.
		2.3.14	Camden Council is concerned through the comments provided in this response that the DfT Guidance on Transport Assessment has not been fully adhered to.
		2.3.24	Camden Council is concerned that the Proposed Scheme does not provide sufficient connectivity with existing cycle and pedestrian networks (or capacity to meet potential demand) and therefore falls short of meeting this policy.
		2.3.27	Camden Council are concerned that the approach to Construction works does not go far enough in

			<p>considering materials by rail (or potentially waterways) to relieve the impacts on the lorry routes that have been identified. The assumption that all construction materials will be transported by road in the assessment is a fundamental concern and lacks evidence in justifying why more sustainable alternatives have not been optioned. Camden Council would have expected that rail opportunities would have been at the forefront of any construction transport strategy. The movement of all construction materials (not just excavated materials) should follow the project hierarchy applied for other major projects such as Crossrail, Thames Tideway Tunnels and Northern Line Extension. This should mean design dictates the re-use of materials, and every opportunity is explored to move materials by rail and river. This should be achieved by setting sustainability objectives looking to source materials from the most accessible locations for rail and river access for at least part of the journey. Where opportunities to move materials by means other than road are possible, these should be a commitment of the project, not a possible 'nice to have'. Unfortunately this appears to be an afterthought and Camden Council is not convinced that anything significant will emerge, if it is not featured already.</p>
		2.4.16	<p>Camden Council is concerned that the framework travel plan contained within Volume 5 Part 11 is insufficiently comprehensive and fails to meet many of these policy objectives. Camden Council requests these objectives to be addressed.</p> <p>The objectives of the Camden Local Development Framework reflect a key objective of the community strategy in ensuring sustainable communities, to make Camden an attractive, sustainable and successful place that balances the needs of residents, businesses and future generations. Policy CS2 promotes development at Euston that meets the Council's aspirations to (amongst other factors) secure a mixed use development that meets community needs, substantially improves walking links and connections through the area, improves the safety and attractiveness of public spaces and improves community safety and that change brings about benefits to local communities. Policy CS9 reaffirms that development at Euston needs to meet the needs of local residents and respecting their quality of life. It should be noted that Policy CS11 promotes the delivery of sustainable transport choices to support Camden's growth. It states that the Council will protect transport infrastructure including walking and cycling routes and public transport against severance, improve public spaces and pedestrian links. It also refers to reduce movement of freight by road and encouraging the movement of freight by rail. In this respect, it is particularly unacceptable that the Environmental Statement assumes that construction material will be transported by road and Camden Council is also concerned regarding the impact on freight services on the HS1-HS2 link.</p> <p>Camden Council notes that with regard to its Development Policies, Policy DP16, routes for construction and traffic diversions include roads off of the TLRN and SRN, which are not considered</p>

			<p>to be appropriate connections to highways in accordance with Camden's road hierarchy. It should be noted that Construction Management Plans are a normal requirement of significant development proposals. Policy DP20 seeks to minimise the impact of the movement of goods by road by being located close to the TLRN network or other Major Roads and avoiding the need for any additional movement of vehicles over 7.5 tonnes in residential areas. This is clearly not complied with during the proposed construction process and is unacceptable. Policy DP21 is not adequately referred to. It states (amongst other factors) that the Council will expect developments connecting with the highway network to ensure the use of the most appropriate roads by each form of transport and purpose of journey, in accordance with Camden's road hierarchy; it will expect works affecting highways to avoid disruption to the highway network and its function; avoid causing harm to highway safety or hinder pedestrian movement; and avoid causing harm to highway safety or hinder pedestrian movement. Camden's Transport Strategy reflects the aforementioned plans; however, however with regard to objective 1, it should be noted that the Council has introduced a borough-wide 20mph zone. Comments are made on the emerging Euston Area Plan with regard to specific points elsewhere in this response to the Environmental Statement.</p>
		3.1.4	<p>Camden Council has concerns about a lack of detail about the service operation feasibility for HS2 in phase 1 (14 trains per hour), phase 2 (18 trains per hour – NOT 22 tph as stated in this section as that higher figure only relates to the delta junction south of Leeds) and the HS1 link (3 trains per hour). In particular there are no details about the number of trains that would serve or terminate at Old Oak Common and the impact for Euston Station or the service pattern for the HS1 link. Camden Council has set out significant concerns about the HS1 link including its lack of business case, severe construction impacts and the significant impacts on the North London Line (6.2.23). Camden Council requests that alternative better routes for connecting with HS1, that are less constrained and can meet growth, be considered and taken forward. The current link has: 1) no business case, 2) limited demand, 3) huge negative impacts, 4) and if built needs to be future proofed. A direct non-stop service from Birmingham to Paris and Brussels could be expected to attract no more than 1050-2200 passengers per day in each direction in 2033, i.e. sufficient to fill no more than 2-3 trains per day.</p>
		3.1.5	<p>Camden Council notes that HS2 do not provide the speed of route for the HS1 Link here but it is understood to be 50km/hr maximum and much slower than other sections, again pointing towards other options that would be better for achieving an appropriate HS1 Link.</p>
		3.2.2	<p>Camden Council notes that in the first bullet point, 5 platforms are lost from the existing supply in the proposals for Euston Station, so the lengthy periods of disruption result in a net increase of 6 platforms rather than the 13 which is headlined. It is also not stated how the lost platforms relate to losses of existing rail services and the compromise to passengers, that currently use these services. The same bullet refers to improved connections with rail, LU and bus services, however the extent of</p>



			these improvements to meet demand for access to HS2 and onward travel from HS2 is not considered to be sufficiently far reaching. Camden Council is very concerned with the disruption to classic services and the impact this will carry and request that this is properly assessed.
		3.3.1	Camden Council are concerned that 'The Route' description in this section does not sufficiently explain how the HS1 Link will work and where interchange for passengers will take place for various journeys of relevance. This also ties in with earlier comments about the appropriateness of the proposed HS1 Link. Camden Council considers this absence of information renders the ES detrimental
		4.1.1	See earlier comment 1.2.1 regarding report structure.
		4.1.2	Camden Council are concerned that while the TA claims to cover all transport modes, it fundamentally does not extend far enough across the transport networks, or in sufficient depth for many of these, including LUL, NLL, bus, cycle and road network to capture the true impacts and provide sufficient mitigation. It fails to address many of the issues provided elsewhere in this response, under the relevant sections, to the HS2 Environmental Statement transport related documents. These include undermining issues such as baseline surveys and material discrepancies between HS2 and the London Borough of Camden data, whereby HS2 have severely under estimated baseline demand flows and as a result, HS2 modelling assessment and results have proven to overestimate the operational performance of key junctions across Camden. This may extend to other Boroughs and regions if found to be common throughout the ES. This is a fundamental point, as it clearly undermines HS2's assessment of impacts on traffic congestion, traffic displacement, air quality and impacts on buses.
		4.1.3	
		4.1.4	
		4.1.5	Camden Council is concerned that many of the objectives bulleted in these sections are not realised due to the comments provided at 4.1.2 to 4.1.4 above. This is especially a concern with regard to shortfalls in congestion, delays and identifying sufficient mitigation measures.
		4.1.6	
		4.3.2	Camden Council is concerned that many of the objectives bulleted in this section have not been sufficiently adhered to. Baseline conditions have not been accurately modelled (see later comments on Volume 5 Part 3). Reducing the need to travel especially by car has been covered in a light touch FTP and in many cases, such as in transporting construction materials, there is very little reporting on attempts made and options to engineer more sustainable alternatives, such as by rail or river. Residual trips and mitigation falls short for the reasons provided at 4.1.2 to 4.1.4 above which is also detailed more specifically in later sections of this response.
		4.4.1	Camden Council is concerned that the rail planning elements are not mentioned here, such as 'dummy timetabling' and platform allocation modelling to demonstrate that the HS2 services can successfully operate alongside 'retained' classic services and associated permanent way both within and on the approaches to Euston Station. The subjects listed here is comprehensive on the face of it,

			but again Camden Council draws HS2 to comments at 4.1.2.
		4.4.2	Camden Council is concerned that the rail planning elements are not mentioned here, such as 'dummy timetabling' and platform allocation modelling to demonstrate that the HS2 services can successfully operate alongside 'retained' classic services and associated permanent way both within and on the approaches to Euston Station. The subjects listed here is comprehensive on the face of it, but again Camden Council draws HS2 to comments at 4.1.2.
	4.5		Camden Council refutes that it has been significantly engaged with regard to the development of methodology for the TA. The Council also requested information with regard to surveys that HS2 Ltd wished to carry out in the borough which were not forthcoming, despite reminders from the Council. The Council expressed concerns with regard to the extent of impacts during discussions and requested further discussion with regard to strategic diversions, for example, which have not been agreed to date.
		4.6.2	Camden Council notes that the sensitivity tests are not described here, although are referred to as limited in number.
		4.6.6	Camden Council stresses that where HS2 suggests that construction overlaps have been considered, that this may not be the case, such as where utilities disruption has not been accumulated with other construction practices. This was a key 'Lessons learnt' issue from the CRL project and it should be assessed fully in the ES and not later on in the process when the scheme may not be possible to be materially changed.
		4.6.7	Camden Council is concerned that London and indeed Camden's peak periods extend beyond the time of those selected in the TA and further justification and sensitivity testing using more robust modelling should be undertaken to consider the impact more meaningfully, both at the times selected by HS2 and at other busy times.
		4.6.11	Camden Council considers that this is phrased too generically and fails to specify sufficient details or further references.
		4.7.1	Camden Council requested information with regard to surveys that HS2 Ltd wished to carry out in the borough which were not forthcoming, despite reminders from the Council. It also offered local transport data held by the Council. Concerns with regard to the inadequacy of data used in the Environmental Statement are highlighted as issues arise across this statement.
		4.8.1	Camden Council considers that a selection of listed developments would be helpful to consider this more thoroughly at this point in the report. Applying these developments within the baseline flows at certain locations on the network (together with extensive future growth assumptions) obviously increases the baseline flow to a degree that can diminish the percentage impact of the proposed scheme and construction effects. This in turn could result in the link or node falling below the threshold HS2 have selected for further testing and mitigation.

		4.9.2	Camden Council is concerned that there is limited focus on the transportation of excavated materials, although this is not properly derived back to lorry payloads and volumes of material. Traffic involved in the delivery of all other construction materials is not evident within the overall construction traffic generation forecasts. There does not appear to be reference to the other types of materials that will be delivered and scale of what this might be. Camden Council request more information on this omission so that a more meaningful review can be undertaken.
		4.9.3	
		4.9.4	
		4.9.5	Camden Council are concerned that despite this list of parameters, Volume 5 and related annexes do not assess impacts that are extended far enough across the local transport network, including those related to LUL, Rail, Bus and cycle. This is potentially due to issues Camden Council describe later in this response with regard to trip generation.
		4.9.6	
		4.10.3	Camden Council has two concerns with the statements presented in 4.10.3. First, it would be useful if information regarding the payloads of the different vehicle types used for the movement of materials could be provided as part of the overall assumptions for the project. Furthermore to provide the best possible opportunity to consider these fully, it would be helpful if they were cross-referenced with the key materials types to be moved. This approach has been adopted by one other major infrastructure project which is currently underway. Second, it appears to Camden Council that there is an inconsistency in the assumptions regarding the proportion of LGV traffic to HGVs in 4.10.3 compared with that presented in 6.4.22 Volume 5 Appendix – Transport Assessment- TR-001-000   London assessment (CFA1). It is not clear to Camden Council why a lower number of LGV vehicles are associated with 'ancillary materials' compared with other types of materials and therefore would like clarification on this point.
		4.10.4	Camden Council questions whether 20% of excavation materials would be removed from site in the last hour of the working day and based on this approach, presumably it is assumed by HS2 that the remainder of materials would be transported over the day between 0900 and 1700 at an average rate of 9%. Therefore, the Council feels it would be helpful if this point could be clarified and that evidence is presented showing how this assumption has been derived.
		4.10.5	Camden Council feels it would be helpful if the assumptions regarding the origins of the materials were provided. Furthermore, Camden Council is unclear what assumptions are included in 'professional judgement' and feels it would be helpful if these could be explained.
		4.10.7	This paragraph provides information regarding the possibility of workers living on-site. Camden Council would like clarification if this applies to the compounds in CFA1-3 and if so do the travelling assumptions for arriving and departing apply.
		4.10.14	Although modest consideration has been given to the use of rail, as an alternative transport mode to road, for moving excavated materials and demolition waste, Camden Council is concerned that there is no mention of assessing the use of water transport, given the proximity of Regent's Canal to the

			CFA2 works area. Therefore, could HS2 please confirm whether it will be carry out assessment of this mode in the context of CFAs 1 to 3 as this would be expected to be at the forefront of any Construction Transport Strategy.
		4.10.15	The paragraph states that "The quantity of material to be moved has been converted to vehicle loads using typical vehicle payloads", however, Camden Council is concerned that the payloads used to calculate lorry numbers for the assessments are not provided in the ES which undermines being able to accurately review the assessment. We note that different lorry types are able to carry different quantities of materials/spoil and this has a direct effect on the lorry number estimates.
		4.10.14	Camden Council notes that no similar statements on forecasting the number of trips associated with other construction materials, that are not classified as excavation or demolition waste, have been made. It is the Council's view that movements of other materials are equally as important and excavated materials since vehicles performing this transport could be of a different type to the typical waste tipper lorry. Therefore it is requested that more information regarding the transport of other materials to site could be provided to be able to consider Construction Traffic generation more meaningfully.
		4.10.15	
		4.10.16	
		4.10.17	
		4.10.18	
		4.11.1	Camden Council are concerned with phrasing such as 'where appropriate' and 'so far as reasonably practicable' especially in relation to the provision of mitigation measures. This is somewhat ambiguous and does not convince Camden Council that enough has been done to design out impacts inherently within the core design of the scheme.
		4.11.2	Camden Council considers that this reference is ambiguous.
		4.11.3	Camden Council are concerned that if firm mitigation is not proposed at this stage of the EIA process, then it will be not practical to adapt such measures at a later date when other complementary elements of the scheme have been fixed and budgeted.
		4.12.1	Camden Council would like to stress that the FTP is very lightweight for the scale of the project and the onus that is put on it by HS2 as a cornerstone of minimising traffic generation.
		4.12.3	
		4.13.3	Camden Council have significant concerns that the Modelling data presented in the TA (within the ES) is not reliable. More detail is provided in specific responses to Volume 5 parts 2 and 3, but as typical examples: surveys were undertaken during none typical summer months that normally experience lower transport demand; August was during the 2012 Games and school holidays and so not typical at all; similarly the surveys for Camden High Street were undertaken during the AM peak period, however the actual peak is during market operation times and is many times higher than reported in the ES i.e. Camden Council have surveys that show 6,000 pedestrians an hour and HS2 report 300 per hour. The ES uses CLoHAM to assess the baseline traffic conditions and the level of saturation, congestion and queues at key junctions within Euston, Camden Town and elsewhere. Key junctions are reportedly operating well below capacity i.e. <40% degree of saturation in the HS2 ES.
		4.13.4	
		4.13.5	
		4.13.6	

			However, Camden Council have undertaken their own detailed traffic modelling using VISSIM and or TRANSYT over recent years and this shows that for baseline conditions, the junctions are operating close to, or over capacity. There are considered to be many junctions where CLoHAM is under stating the traffic impacts and this results in under estimating mitigation measures. In terms of LU congestion, HS2 do not highlight or deal with many sections of critical crowding on the Northern, Circle and H&C lines.
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## Transport Assessment (TR-001-000) Traffic and Transport Part 2: Baseline conditions

Section number	Paragraph	Sub-Paragraph	London Borough of Camden response
		5.1.1	Camden Council draws attention to the above comments concerning data reliability (4.3.13) and also the more specific comments provided below in Part 3 and 4 regarding the London Assessment.
		5.1.2	
		5.1.3	
		5.1.4	
		5.2.2	Camden Council rejects that primary data collection of the type listed in this section should be undertaken in summer months when demands are lower. This is of greater concern during the build-up and occurrence of major global events such as the 2012 Olympics and subsequent Paralympics when conditions will be as far from the typical peaks as possible. Camden Council have first-hand knowledge of the impacts of the 2012 Olympics and Paralympics both during the games and on the run up especially with regard to helping TfL prepare the ORN. The effects of using the unreliable data are borne out by the optimistic results of operational performance in the baseline modelling results, as detailed under the relevant sections in Part 3.
		5.3.3	The extent of the study area was not agreed with Camden Council, nor was the scope of work for the Euston area agreed with Camden.
		5.3.4	The routes listed here are those that are immediately affected, however there will be many more within and beyond the Borough of Camden that will be impacted by the reassignment of traffic caused by the long periods of construction disruption.
		5.3.6	This section highlights when traffic and other surveys were undertaken. These were undertaken

		5.3.7	either in June, August or September of 2012. In June 2012 significant works to implement the Olympic Route Network (ORN) began and these were in place in July 2012. June and July are not typical months for traffic levels in any respect and normally generate lower traffic flows due to summer behaviour patterns. August 2012 was during the Olympic Games and school holidays and so is not typical at all.
		5.3.8	Camden Council consider that the selected duration of 1 hour for the peak periods is narrow for central London and may have been done to minimise assessment. On reflection of the data reliability issues, the peak periods may not be as selected (8-9am) and (5-6pm) and therefore should be validated with more reliable data.
		5.3.9	Camden Council fully rejects the dates of undertaking non-motorised surveys in August and September 2012 during the Olympics and Paralympics. Travel patterns were entirely different during this period and it is the summer holidays when many people do not work and therefore travel in or out, or within London. Similarly the surveys for Camden High Street were undertaken during the AM peak period, however the actual peak is during market operation times and is many magnitudes higher than reported in the ES i.e. we have surveys that show 6,000 pedestrians an hour and HS2 report 300 per hour. This of course leads to a significant concern that travel demands have been substantially under estimated.
		5.3.10	
		5.3.11	
		5.3.12	
		5.3.17	Camden Council requests evidence to support the statement in the ES that the demand flows to Birmingham, Manchester, Liverpool and Glasgow are the highest flows for long distance travellers.
		Table 5.1 (after 5.3.19)	Camden Council notes that the ES has overstated the London Midland train departures. Table 5.1 implies there are 12tph when in reality there are 7tph. This leads to a concern over data reliability in the baseline report.
		5.3.25	Camden Council notes that there is no analysis of the baseline situation with regards to LU services and frequencies at Euston Square station, despite this being a key interchange point between Euston main line terminus and LU services to the West End.
		Table 5.2 (after 5.3.25)	Camden Council considers that the number of Victoria Line trains in the AM peak period and AM peak hour have been underestimated. It is considered that for Southbound trains, the correct figures are 91 for the peak period and 32 for the peak hour, and for Northbound, 89 for the peak period and 33 for the peak hour.

		5.3.27	Camden Council notes that the joint Railplan work undertaken for the TfL, the London Borough of Camden and HS2 Euston Area Action Plan clearly indicates that the principal desire line for passengers arriving at Euston is to the City and West End (i.e. Northern Line Bank branch, Victoria Line and Circle and H&C). Also this work confirms that the Charing Cross branch of the Northern Line is approaching the level when it is not tolerable i.e. 3-4 people standing / m2. Camden Council considers that HS2 do not fully embrace this in their assessment or mitigation. Similarly, the H&C and Circle lines show that between Kings Cross and City the level of standing is currently 2-3 people / m2. With the increase in passengers from HS2 this will more than likely increase significantly, and beyond the 4 people / m2 limit. Camden Council request that this is properly assessed and mitigated, primarily as major concerns have been raised by Camden Council with the RailPlan model forecasting approach and outcomes, reported in the London Assessment (Part 4).
		5.3.32	Camden Council notes that the peak hour frequencies of bus routes 59 and 91 quoted in the ES are incorrect. The actual frequency of service 59 is 10bph towards Streatham Hill and 12bph towards Kings Cross, and the frequency of service 91 is 11bph towards Trafalgar Square and 8bph towards Crouch End. Camden Council is concerned that this raises doubts on data accuracy within the assessment.
		5.3.33	Camden Council notes that the peak hour frequencies of bus routes 18 and 476 quoted in the ES are incorrect. The actual frequency of service 18 is 18bph terminating at Euston and 19bph towards Sudbury, and the frequency of service 476 is 11bph terminating at Euston and 8bph towards Northumberland Park. Camden Council is concerned that this raises doubts on data accuracy within the assessment.
		5.3.34	Camden Council notes that the frequency of buses on A400 Hampstead Road in the Environmental Statement is incorrect. The actual frequency of bus services in the peak period is 53bph. Camden Council is concerned that this raises doubts on data accuracy within the assessment.
		Table 5.6 (after 5.3.34)	Camden Council notes that the peak hour frequency of bus route 29 quoted in the ES is incorrect. The actual frequency of service 29 is 15bph in both directions towards Wood Green and Trafalgar Square. Camden Council is concerned that this raises doubts on data accuracy within the assessment.
		5.3.35	Camden Council consider that quoting bus demand data from surveys undertaken in June 2012 will



			reflect lower patronage levels than normal, and therefore spare capacity on local bus services may be identified when it in fact does not exist for the majority of the year.
		5.3.38	Camden Council consider that the use of simple boarding and alighting data does not bear any resemblance to whether there is spare capacity available on any of the buses, as it takes no account of passengers travelling through the Euston area en route to other destinations. Therefore this data cannot be used to make generalised statements about available bus capacity. In addition, there is no estimate of available capacity on the bus routes in the area (number of bus departures multiplied by bus capacity), so the data is meaningless in this context.
		5.3.41	Camden Council is aware that bus replacement services also wait on Cardington Street and on occasion Eversholt Street where there is insufficient capacity in Euston Station.
		5.3.42	Camden Council considers the Environmental Statement to be unclear as to whether or not baseline pedestrian demand assessment has been undertaken for enclosed routes including passageways, stairways, ticket halls, platforms and escalators within LU. These should have been carried out in order to then consider the additional demand from HS2 and mitigation, especially for links that will need to accommodate additional demands of 'access to' and 'onward travel from' Euston Station as a result of HS2.
		5.3.57	<p>Camden Council note that the ES does not show the data behind the potential mitigation measures highlighted here by HS2, but Camden Council are aware that this is included within the joint Euston Area Plan which also highlights PCL levels F on:</p> <ul style="list-style-type: none"> <li>• Gordon Street</li> <li>• Endsleigh Gardens</li> <li>• Eversholt Street (eastside)</li> <li>• Grafton Place</li> </ul> <p>However, these are not listed in the ES and Camden Council would require them to be included as well as several others.</p>
		5.3.60	<p>Camden Council notes that the ES highlights quite minimal issues relating to the PERS audit, however the Euston Area Plan PERS assessment highlights broader recommendations:</p> <p>"A PERS street audit was undertaken in 2012 to assess the pedestrian environment surrounding Euston Station. Key issues highlighted within this Euston Station PERS audit include:</p> <ul style="list-style-type: none"> <li>• Euston Road was identified to have a poor quality of environment, mainly due to high traffic</li> </ul>

			<p>flows which negatively impact air quality, and noise levels</p> <ul style="list-style-type: none"> <li>• Euston Road was identified to have a poor permeability due to traffic dominance which forms a barrier to crossing movements</li> <li>• crossing provision and performance vary throughout the study area. The lack of pedestrian green man phases and staggered arrangements at the crossings along Euston Road with Euston Square results in a lack of crossing points and long pedestrian wait times. In addition, the Eversholt Street crossing with Grafton Place eastern and the western arm of the Euston Road crossing with Gordon Street, do not include pedestrian crossing phases.”</li> </ul> <p>Again, Camden Council consider that these should have been included.</p>
		5.3.63	Camden Council is concerned that the pedestrian flows shown in Table 5-8 are significantly underestimated due to the survey dates highlighted earlier.
		5.3.64	<p>Camden Council are very concerned that HS2 Construction Lorries are to be assigned to many of the main cycle routes in the Borough based on information provided in the ES. Large HGV vehicles pose one of the biggest road safety threats to cyclists as borne out in recent cycle fatality statistics. The Borough are proud of the very high modal share they have helped to achieve for cycle use both within and across their Borough boundaries and this is evident from screen line monitoring results which currently indicate 15% of all vehicles are cycles (this is based on 6 hour counts (8am-10am, Noon-2pm &amp; 4pm-6pm) proportion of cycle users. Camden Council are justifiably concerned that this sustainable proportion could fall during the construction period and be replaced by more motorised congestion if proper mitigation is not provided, or worse there will be an increase in serious and fatal accidents. Camden Council is also concerned that the references listed do not include the GLA / TfL proposals for a Central London Cycle Grid.</p>
		5.3.65	
		5.3.66	
		5.3.67	
		5.3.68	
		5.3.71	Camden is concerned that no data is provided on cycle parking occupancy.
		Figure 5-6	<p>Camden is concerned that the local cycle network map is incomplete. In particular there is a significant omission of routes in the Kings Cross area. Furthermore the London Cycle Guide information is out of date - in Figure 5.6 the date is 2008 (or 2003) whereas TfL's 2012/2013 Local Cycling Guide 14 is dated April 2012. There are also missing links close to Euston Station. For example The Camden Cycling Campaign Open Street map (<a href="http://www.openstreetmap.org/#map=17/51.53152/-0.13415&amp;layers=C">http://www.openstreetmap.org/#map=17/51.53152/-0.13415&amp;layers=C</a>) identifies roads such as Polygon Road on cycle route 16, a very important north-south link. There could be a conflict between</p>

			the existing use of this cycle route and the proposed use of Polygon Road for HS2 utilities supply. Camden is concerned that there is no commentary on the possible need for an alternative cycle route while works are undertaken in Polygon Road and other disrupted routes.
		5.3.72	Camden notes that the text refers to nine docking stations but only eight are listed in the table 5-9 (Eversholt Street is omitted). The numbers of spaces at Gower Place, Doric Way and Taverton Street are different to those indicated by TfL's website. Furthermore the official number of spaces on Gower Place is 15 not 49. No information is provided on the availability of hire cycles - as shown on TfL's website.
		5.3.74	Camden is concerned that a survey of parking accumulation on 26 June 2012 recording a low parking utilisation may not represent a typical level of occupancy due to the pre-Olympics Travel Demand Management campaign that discouraged private car trips into areas close to the Olympic Route Network. Camden Council notes that the car park is not operated by the council where any short term parking would displace to short term on street parking in pay & display / cashless parking bays.
		5.3.83	Camden Council is concerned that Table 5-12 is limited and does not incorporate a number of streets which may service the station, business, residents or visitors with the local area. These streets are incorporated in the construction and operational assessments and should be incorporated in the baseline conditions for this section. In addition consideration of single or yellow lines has not been undertaken. Loading and unloading, picking up and dropping off are exempt in these areas, all of which serve the station, surrounding businesses, schools, etc.
		5.3.84	Camden Council is concerned that the TA only concentrates on the Hackney Licenced Taxi drop off area. It does not consider Private Hire Licenced vehicles that also have a need to drop off and pick-up in the surrounding area and should form part of the baseline data.
		5.3.86	Camden Council notes that there are a significant number of taxi's already generated in the baseline conditions and subject to the dubious survey dates could even be an under estimate. The introduction of HS2 will dramatically increase the number of taxis at Euston, as has been the case with the recent expansions at Kings Cross/St Pancras (including HS1) and the Heathrow Express at Paddington.
		5.3.91	Camden Council is concerned that there are an insufficient number of key junctions reported here.

			Other junctions on the A400 with Mornington St, Granby Terrace, Robert St and Varndell St; and junctions on the A4200 with Oakley Sq. Further analysis based on accurate information would be required to give a comprehensive list of junctions impacted.
		5.3.95	Camden Council is concerned that the baseline description of how Euston Road operates, under states the congestion that the Euston Road experiences as a major east west corridor in to London from the M40 and as a distributor of traffic to various north and south routes accessed from it, and that falls outside the Congestion Charging Zone. Camden Council is especially concerned that the link will be reduced from 6 lanes to 4 lanes to construct the new access link to Euston Square. Such a measure could potentially cause a more severe bottleneck on this strategic route on the TLRN and cause traffic to spill on to less suitable routes across the Borough to seek alternative access unless appropriate mitigations are identified and implemented to prevent this occurring, which is not clearly indicated in the ES.
		5.3.101	Camden Council is concerned that the baseline description of how Hampstead Road operates, under states the flow conditions and congestion that the link experiences as a key north-south transport corridor from Camden High street and beyond. This is especially a concern given that the link will be reduced from 6 lanes to 2 lanes for many years during construction of the new replacement bridge.
		5.3.107	Camden Council is concerned that the baseline description of how A4200 Eversholt Road operates, under states the flow conditions and congestion that the link experiences as a key north-south transport corridor to/from A400 Camden High street/Camden Street via Oakley Sq.
		5.3.111	Camden Council is concerned that the baseline description of how Upper Woburn Place operates, under states the flow conditions and long queues and congestion throughout much of the day that the link experiences as a key north-south transport corridor linking Eversholt Street / A400 Camden High street.
		5.3.115	Camden Council is concerned that the baseline description of how Tottenham Court Road operates, under states the busy flow conditions and peak time congestion that the link experiences as a key northbound transport corridor to Hampstead Road / A400 Camden High street and beyond. 5.3.116-119 Camden Council are concerned that the baseline description of how Gower St operates, under states the flow conditions and long queues and congestion throughout much of the day that the link experiences as a key north-south transport corridor.

		5.3.123 to 5.3.138	Camden Council is concerned that the baseline description of how Gordon Street operates in this section of the Environmental Statement, is as free flow. This understates the flow conditions and congestion that the link experiences with actual peak hour queues over 100m. There is no justification referenced and Camden Council considers this to be simply not true.
		5.3.129	Camden Council are concerned that the baseline description of how Melton St and Cardington operate, understates the flow conditions and long queues and congestion these streets experience during the day.
		5.3.132	Camden Council is concerned that the important local shopping and evening/weekend entertainment function of this street and its restaurants is not mentioned. There are important servicing and access functions that need to be maintained as part of the essential function of this street.
		5.3.134	Camden Council has introduced a 20mph speed limit throughout the borough.
		5.3.139	Camden Council is concerned that the vast majority of roads north of Euston Road are lower than the observed June / July 2012 surveys. For example the two-way flow on the A400 Hampstead Road is approximately 40% less in the AM and PM. Camden Council notes that Table 5-15 shows link flows but no comment on these or relationship to link capacities, so meaningless for the reviewer. Camden Council would like to stress the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-16 and Table 6-34 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road / Melton Street/Gordon Street peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ.
		5.3.140	Camden Council is concerned that only 6 junctions are identified as 'key' and assessed in CFA1.
		5.3.141 to 5.5.153	Camden Council is concerned that important nodes are missing from the reporting, such as others connecting with A400 Hampstead Road and A4200 Eversholt St. As a general observation, the degree of saturation and queuing appear to be under-estimated on most if not all of the 6 junctions reported. This is likely due to the survey issues raised elsewhere in this response and their validation effects on the CLoHAM and TRANSYT application models.  Camden Council considers that those that are considered to be significantly under-estimated in terms

			of operational capacity and queuing include the 6 listed in 5.3.141 to 5.3.153. HS2's concluding comments under each section claiming 'queue lengths can be accommodated on Eversholt Street without affecting upstream junctions' are inaccurate and optimistic. The junctions do not even operate at the levels claimed, during inter-peaks and this has been straightforwardly proven by Camden Council on-site observations during the consultation period. Camden Council consider this to be a fundamental problem that has far reaching negative implications on the soundness of the TA and ES assessments and ultimately many of HS2's important conclusions such as appropriate routes for construction, mitigation and estimated HS2 delivery timeframes.
		5.3.142	Camden Council stresses the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-16 and Table 6-34 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road / Melton Street/Gordon Street peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ in each. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.144	Camden Council stresses the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-17 and Table 6-35 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road /A4200 Upper Woburn Place/Euston Square peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.146	Camden Council stresses the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-18 and Table 6-36 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road /Churchway/Dukes Road peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.148	Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A4200 Eversholt Street/Grafton Place/Euston Bus Station peak hour flows, DOS and queue

			lengths (PCU), however the DoS and MMQ results differ. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.154	Camden Council is concerned that the accident and safety review of 750 accidents lacks analysis and falls short of best practice and guidelines contained within RoSPA.
		5.3.150 to 5.3.164	Camden Council is very concerned that no connection is made in commentary between existing cycle routes and HS2 construction vehicle routes or worksites. HGVs are disproportionately responsible for serious cycle casualties and construction routes that duplicate as cycle routes are a serious concern
		5.3.155	This accident record and clusters shown on Figure 5-7 is an obvious concern to Camden Council based on the potential further impact of bringing HS2 construction traffic and disruption in to the area.
		5.3.156	Camden is concerned that the commentary does not refer to specific cycle routes. For example the open street map ( <a href="http://www.openstreetmap.org/#map=18/51.54193/-0.14150&amp;layers=C">http://www.openstreetmap.org/#map=18/51.54193/-0.14150&amp;layers=C</a> ) of cycle routes in Camden identifies a part of Kentish Town Road as located on cycle route 6a.
		5.3.158	Camden Council is concerned that no comments are provided in relation to the accident data. The assessment approach is also inconsistent with other CFA sections whereby 'the mean PIA' average was provided as a comparison (see Table 5.42).
		5.3.142	Camden Council stresses the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-16 and Table 6-34 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road / Melton Street/Gordon Street peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ in each. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
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			inferred modelling outcomes are not accurate.
		5.3.146	Camden Council stresses the discrepancies between the two sets of 2012 baseline junction assessment results presented in Table 5-18 and Table 6-36 (Volume 5 Appendix - Transport Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A501 Euston Road /Churchway/Dukes Road peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.148	Assessment - TR-001-000   London Assessment). Both tables summarises the 2012 baseline results for the A4200 Eversholt Street/Grafton Place/Euston Bus Station peak hour flows, DOS and queue lengths (PCU), however the DoS and MMQ results differ. Camden Council's earlier described concerns regarding the survey reliability and the inaccuracies outlined here strongly suggest that the inferred modelling outcomes are not accurate.
		5.3.154	Camden Council is concerned that the accident and safety review of 750 accidents lacks analysis and falls short of best practice and guidelines contained within RoSPA.
		5.3.150 to 5.3.164	Camden Council is very concerned that no connection is made in commentary between existing cycle routes and HS2 construction vehicle routes or worksites. HGVs are disproportionately responsible for serious cycle casualties and construction routes that duplicate as cycle routes are a serious concern.
		5.3.155	This accident record and clusters shown on Figure 5-7 is an obvious concern to Camden Council based on the potential further impact of bringing HS2 construction traffic and disruption in to the area.
		5.3.156	Camden is concerned that the commentary does not refer to specific cycle routes. For example the open street map ( <a href="http://www.openstreetmap.org/#map=18/51.54193/-0.14150&amp;layers=C">http://www.openstreetmap.org/#map=18/51.54193/-0.14150&amp;layers=C</a> ) of cycle routes in Camden identifies a part of Kentish Town Road as located on cycle route 6a.
		5.3.158	Camden Council is concerned that no comments are provided in relation to the accident data. The assessment approach is also inconsistent with other CFA sections whereby 'the mean PIA' average was provided as a comparison (see Table 5.42).
		5.4	Camden Council notes that this chapter is ordered differently from the previous CFA1 in terms of

			<p>content which does not assist the ease of reviewing the document. For areas such as baseline pedestrian demand, it follows a different approach than for CFA1 by omitting any PERS or PCL analysis, even though Camden Town facilitates very high numbers of pedestrian flows along the routes that HS2 will be disrupting for many years.</p> <p>Camden Council emphasises that CFA2 contains critical routes within the Borough including Camden Road, Kentish Town Road, Camden St and Camden High St. They combine to form the local access network and circulatory system within the heart of Camden Town and some also serve links to the wider strategic corridors on the TLRN to the north including the A1 and the A41 and to the south towards Central London via the A400 and A4200. They each contain very congested junctions and not just in the peak hours, that have not been adequately assessed in the ES. They also accommodate several bus routes and large housing, tourist and local business populations served directly off them and also frequent minor access roads, such as Mornington Crescent, Parkway, Delancey Street, Jamestown Road, Crowndale Road, Hawley Road, Prince of Wales Road, etc. The route has narrow sections of streets created along it, whereby over the years Camden Council have prioritised pedestrian movement over through traffic to reflect the value of the surrounding visitor attractions such as Camden Market and the local residential community.</p> <p>Camden Council is therefore concerned that these routes are both earmarked for significant periods of closure, due to the proposed HS1 Link works which will have major impacts on access for residents, trade, schools, tourism etc.; and that they are identified as construction routes for inappropriate HGV traffic with no other strategic routes identified on the TLRN or, where this is not possible, on the SRN, or where even this is not possible, other suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report. The traffic reassignment impact and direct threat to road safety from using Camden Road, Kentish Town Road, Camden St and most sensitively, Camden High St (with its immense pedestrian activity and mitigating measures that have been introduced by Camden Council over recent times for good reason) as construction routes is a major issue for Camden Council and it seeks alternative more acceptable solutions together with adequate mitigations.</p>
		5.4.10	<p>As referred to earlier, Camden Council is concerned that the 3 week period (18th June to 6 July) that the surveys were undertaken do not typically reflect peak network conditions due to several factors including them being in lower demand summer months and effected by route preparations on the run up to the 2012 Games. Camden Council question whether there could have been some validation of baseline transport surveys by utilising similar data that would be available from existing</p>

			sources such as London Borough's. This could be taken from other more reliable periods rather than depending on new data in a very narrow window in the summer.
		5.4.11	Camden Council also considers the description of the surveys at this reference ambiguous. It would be helpful to punctuate much of the wordy description with more graphics to assist understanding or at least cross-reference to specific figures. For example, a map of the survey sites and study area described here would be far more valuable than generic description alone.
		5.4.14 to 5.4.15	This reference confirms again that key baseline travel surveys were undertaken during August and September, which are summer holidays and during the 2012 Games. Camden Council fundamentally rejects August and September as appropriate months to base the travel surveys on, due to the lower demand levels and non-typical travel patterns that would be reflected in the data. This in turn undermines the related assessments that are based on this incorrect baseline, which renders them are therefore not valid. It is very surprising that this departure from routine TA best practice would even be attempted for a scheme of HS2's size and importance. Camden Council questions whether there were any logical reasons for surveying at the times that were adopted.
		5.4.16	Camden Council is unclear when the exact dates the pedestrian surveys were undertaken from this reference.
		5.4.17	Camden Council agrees that the routes named here are congested, but would also extend these conditions to other times beyond the relatively narrow peak periods that have been surveyed. Due to this recognition of congestion on these routes by HS2 consultants, although possibly not to the extent that Camden Council are aware of through their long established local expertise, it seems entirely illogical that the routes named here, plus many more upstream, downstream and in parallel, are intended as HGV construction routes. This is compounded by the fact that this will be the case for many years, indeed a time period that is so extensive it is more accurately considered to be permanent than temporary for the many that will be effected living, working and visiting Camden. The height restrictions of the bridges are also not considered to be conducive to construction vehicle loads.
		5.4.20	Camden Council notes there is mention here and in other locations of roads being 20mph, it does not take into account that all Camden roads are now under this prohibition.
		5.4.21	Camden Council notes it is incorrect to state that vehicles of certain weight are prohibited from certain

			street/s. It is in fact referring to an overnight waiting ban and not a prohibition on vehicle movements.
		5.4.22	Camden Council notes this is partially incorrect as the road layout for Royal college Street is now completely redesigned and is now a single lane of traffic driving in a northerly direction with a segregated cycle on either side of the carriageway.
		5.4.24	Camden Council rejects the description and states this is only a three lane road for a very short length from the junction Kentish Town Road to Camden Road. From the Junction with Camden Road to Crowndale Road this is a two lane road.
		5.4.20 to 5.4.29	Camden Council notes that these sections on highway routes is purely descriptive on the physical layout of the routes selected which seem to be reported at random rather than systematically from a defined study area. Reference to a study area plan would have been more informative and helpful.
		5.4.30	Camden Council notes that the table 5-24 provides link flows but no comment is provided.
		5.4.39	Camden Council rejects this description and states this is a three way junction of Camden High Street, Chalk Farm Road and Castlehaven Road however Camden High Street does not extend this far.
		5.4.40	Camden Council rejects this description as route 168 bus also follows the same route as the other buses at this junction.
		5.4.45	Camden Council rejects this description as there is car parking on both sides of the road and not one as stated.
		5.4.65	Camden Council states this is not a complete list of bus routes as route 31 bus also routes through here.
		5.4.69	Camden Council states this is not a complete list of bus routes as route 31 bus also routes through here.
		5.4.76	Camden Council states this is not a complete list of bus routes as the following buses are also routed through this junction: 253, 29, 214,134,C2.

		5.4.31 to 5.4.95	<p>Camden Council are concerned that junctions appear to have been selected at random and certainly not reported from east to west to ease reference (as claimed at 5.4.5). There are also odd discrepancies such as Haverstock Hill / England's Lane being reported within CFA2 and yet Haverstock Hill/Chalk Farm Road being further east being omitted and reported in CFA3, which undermines the reporting and ease of review. Camden Council has plotted the selected junctions on a map and note a few important nodes missing from the reporting, as was the case in CFA1. As a general observation, the degree of saturation and queuing appear to be under-estimated on most if not all of the junctions. This is likely due to the survey issues raised elsewhere in this response and their validation effects on the CLoHAM model. Without going through each junction reported, individually, Camden Council can provide examples of those that are considered to be significantly under-estimated in terms of operational capacity and queuing. These include Chalk Farm Road/Camden High Street; Parkway /Arlington Road; Haverstock Hill / England's Lane; Royal College Street / Camden Road; Kentish Town Road/ Camden Street; Camden High St /Jamestown Road; Camden High St /Parkway; Camden Road/Camden St etc. Conclusive comments such as in 5.4.78 'this junction performs well within its capacity in AM and PM peaks' are repeated throughout and are simply not true and entirely inaccurate. Key junctions e.g. Camden High Street / Parkway, Camden Road / Royal College Street, Avenue Road / Adelaide Road are reported by HS2 to be operating well below capacity i.e. &lt;40% degree of saturation. At all 3 of these junctions Camden Council have undertaken their own detailed traffic modelling using VISSIM and /or TRANSYT and this shows that the baseline conditions for all 3 junctions are operating close to capacity or over capacity. There are likely to be many more junctions where CLoHAM is under reporting the traffic impacts and this will clearly feed into the impacts of HS2. The junctions do not even operate at the levels claimed, during inter-peaks and this has been proven by Camden Council with straightforward on-site observations during the consultation period. Camden Council consider this to be a fundamental problem that has far reaching adverse implications on the soundness of the transport and ES assessments and the conclusions to impacts, mitigation, and estimated HS2 delivery timeframes. Camden Council considers that there is a very strong case for the modelling to be corrected and re-done to take account of issues raised in this response.</p>
		5.4.96	<p>Camden Council is concerned that the accident and safety review of 529 accidents lacks analysis and falls short of best practice and guidelines contained within RoSPA.</p>
		5.4.96 to 5.4.98	<p>Figure 5-9 is one of the few graphics contained in the Baseline report for CFA2 and it is welcomed. Camden Council notes that the majority of accidents focus on the sensitivity of the area around Camden Town where there are an incredibly high number of vulnerable road users filling the streets</p>

			and crossing the highway at most times due to the numerous small businesses, visitor attractions, bars, cafes, shops and markets and dense public transport services. Table 5-42 establishes this further with confirmation that Camden Town and HS1 Link study area has a higher level of fatal and serious accidents than elsewhere in Camden and Greater London. Camden Council therefore reject that this area is safe for construction vehicle routing of the nature proposed, especially for the many years that they will operate.
		5.4.100	Camden Council rejects the description as there is resident permit parking for 10 vehicles not 12 as stated.
		5.4.102	Camden Council would like to stress that this parking supports this largely residential road and the shops in the adjacent road.
		5.4.105	Camden Council rejects the description that the pay and display parking bay is recorded as holding 6 cars as it actually holds 8.
		5.4.108	Camden Council rejects the description Harmood Road as it is Harmood Street.
		5.4.113	Camden Council rejects the parking occupancy survey. It notes that a resident parking permit can be used within the entire CA-F. The permit to parking space ratio is recorded in 2011-2012 as 1 parking space to 1.04 permit issued. Essentially, the zone is oversubscribed where motorists will move around the zone for a parking space. This can be impacted by parking suspensions or road closures making availability more problematic.
		5.4.118	Camden Council believes that the words "Camden Town London Overground station" should refer to "Camden Road London Overground station". There is no mention of Kentish Town West station in this section, despite it being referenced in Table 5.43.
		Table 5.45 (after 5.4.127)	Camden Council notes that the frequency of bus route 29 quoted in the ES is incorrect. The correct frequency of service 29 throughout the day is 15bph.
		5.4.128	Camden Council believe that this paragraph has double counted bus route 31/N31 serving Camden Street by stating that "all are 24 hour services except 46 and 168", but then stating "in addition night service... ...N31 operate on Camden Road (sic)".

		5.4.129	Camden Council believes that this paragraph significantly over-estimates the bus frequency at Stop D in Camden Street. The correct frequency of buses at this point is 71bph.
		5.4.130	Camden Council considers that as bus service 46 does not pass under the Kentish Town Road bridge, it is therefore not relevant to this analysis.
		Table 5.46 (after 5.4.130)	Camden Council considers that several of the bus frequencies indicated in this table are incorrect. The correct frequency of service 24 is 10bph, service 27 is 8bph, service 31 is 10bph, service 134 is 12bph, service 168 is 9bph and service 214 is 8bph. This means that the overall frequency of buses is considerably lower than stated - 71bph.
		Table 5.47 (after 5.4.130)	Camden Council considers that some of the bus frequencies indicated in this table are incorrect. The correct frequency of service 134 is 12bph and service 214 is 8bph.
		5.4.131	Camden Council believe this paragraph is inaccurate as it implies all of bus stops CQ, CE, CB and CF are served by all buses 24, 27, 31, 168 and 393, when this is not the case. There is no mention of bus stand CH which is adjacent to the Morrisons petrol station and immediately adjacent to the existing railway.
		5.4.133	Camden Council considers that this sentence should note that the Morrisons supermarket stop is also served by route 393.
		Table 5.48 (after 5.4.134)	Camden Council notes that, as per Table 5.46, there are errors in the frequency assessment for routes 24, 27, 31 and 168.
		Table 5.49 (after 5.4.134)	Camden Council notes that, as per Tables 5.46 and 5.48, there is an error in the frequency assessment for route 27.
		5.4.136	Camden Council is concerned that the TS is only considering the impact of Hackney Licenced vehicles and not Private Hire Vehicles who regularly drop off and pick up in this area. There are Taxi ranks at the Britannia Road junction and the Hawley Road junction which are not highlighted here.
		5.4.139	Camden Council note the confusion between Camden Town London Underground station and Camden Road London Overground station in this paragraph. The text refers to "Camden Town London Overground" station yet the bus stops it describes are close to Camden Road London



			Overground station.
		5.4.142 to 5.4.148	Camden Council notes that the baseline pedestrian analysis approach is inconsistent between CFA2 and that provided for CFA1. It is purely descriptive and very light touch for CFA2 without any of the PERS or PCL studies that were at least undertaken for CFA1, albeit with questionable data. There are no comments on the levels and capacity of pedestrian activity or indeed the under-stated ped flows that are shown in Figures 5-13 and 5-14 for the AM peak. This inconsistency is a weakness and disproportionate to the importance of the volumes of pedestrians that exist in CFA2 especially around Camden Town and, that in the HS2 proposals, will be merging with HS2's intended construction routes that drive right through the heart of the main pedestrian thoroughfares.
		5.4.149	The ped surveys for Camden High Street were undertaken during the AM peak period. However the actual peak is during market operation times and is many magnitudes higher than reported on Figures 5-13 and 5-14, i.e. Camden Council has surveys that show 6,000 pedestrians per hour and HS2 report 300 per hour, a factor of 20 difference. HS2 provide no commentary on the Figures in any event.
		5.4.150 to 5.4.163	Camden Council are very concerned that HS2 Construction Lorries are to be assigned to many of the main cycle routes in the Borough based on information provided in the ES. Large HGV vehicles pose one of the biggest road safety threats to cyclists as borne out in recent cycle fatality statistics. The Borough are proud of the very high modal share they have helped to achieve for cycle use both within and across their Borough boundaries and this is evident from screen line monitoring results which indicate a significant and growing proportion of cycle users. Camden Council are justifiably concerned that this sustainable proportion could reverse during the lengthy construction period and be replaced by more motorised congestion if proper mitigation is not provided, or worse still, there may be an increase in serious and fatal accidents.
		5.4.165	Camden Council notes that HS2 observes the Regents Canal passes close to the Proposed Scheme, however no further comment or intention to embrace this as a potential transport link is described here in any form whatsoever.
	5.5		Camden Council notes that this chapter follows a different structure to CFA1 although the same structure as for CFA2 in terms of order of content, albeit covering an even narrower study area. Consequently, many of the fundamental issues raised by Camden Council in the previous response (chapter 5.4) apply to this chapter for the Primrose Hill to Kilburn (CFA3) section. These include:

			baseline survey reliability, over optimistic baseline junction performance forecasts including low queuing and low degrees of saturation and insufficient study area and junctions to be assessed, that should be reported because of the issues described in 5.5.19 and 5.5.20 below.
		5.5.19	<p>Camden Council considers Adelaide Road to be an important east-west transport route within the Borough. It is identified as a Borough Distributor Road in the Council's Network Duty Management Plan. It connects to a major gyratory at Swiss Cottage (to the west) which serves the A41, a strategic north-south route on the TLRN between Central London and the M25. To the east it connects with Chalk Farm Road and beyond towards Camden Town where the route moves in to very congested junctions and not just in the peak hours that have been assessed. Adelaide road also accommodates several bus routes and large housing populations served directly off Adelaide Road and also frequent side arms such as Eton Road, Primrose Hill Road, Elsworthy Rise, Lower Merton Rise and Winchester Road/Harley Rd. The route has 20 mph zones along it, including along Adelaide Road itself, to reflect the surrounding residential areas it serves.</p> <p>Camden Council is therefore very concerned that it is both earmarked for a significant period of closure, due to the proposed scheme works which will have major impacts on access for residents, businesses, schools etc.; and that it is identified as one of the primary construction routes for HGV traffic with no other east-west strategic routes identified on the TLRN or, where this is not possible, on the SRN, or where even this is not possible, other suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report as alternatives (when cross referring to the CFA3 map book). The traffic reassignment impact and direct threat to road safety of using Adelaide Road (with its 20 mph zones that have been introduced by Camden ) as a principal construction route is a major issue for Camden Council and it seeks alternative more acceptable solutions and mitigations.</p>
		5.5.20	Camden Council is concerned that Loudoun Road /Alexandra Place are currently inappropriate routes for accessing works relating to the Alexandra Place vent shaft. The geometry, development and cycle traffic it currently serves emphasise this view.
		5.5.21 to 5.5.33	Selecting merely 3 junctions to cover the CFA3 construction impacts in the baseline review is insufficient and demonstrates a shortfall in HS2's appreciation of the potential impacts of the works in this area. Closure to Adelaide Road will have a major reassignment issue on other parts of the network and yet no other junctions off the Adelaide Road route have been reported. In addition, Camden Council considers there to be junctions missing from the baseline reporting on the route

			itself such as Eton Road, Winchester Road/Harley Rd, Fairfax Rd/Belsize Rd, Finchley Road/Boundary Rd and the A41 Finchley gyratory to then understand where the reassigned traffic will have an impact. In common with the previous CFA1 and 2, conclusions regarding the operational performance of the three junctions reported are overly optimistic with queuing and DoS results having lower values than the London Borough of Camden's own records indicate.
		5.5.34 to 5.5.39	Camden Council is concerned that the accidents show clusters on routes proposed for construction traffic. The nearby school shown in Figure 5-18 is in close proximity to the Adelaide Road, Chalk Farm Road and Prince of Wales Road construction routes. The Alexandra Place works also have a plethora of accidents in proximity. Camden Council notes that the accidents recorded around Adelaide Road and Alexandra Place including the A41 gyratory, are 3 times higher than the average, although no comment is provided on this by HS2, just the raw data.
		5.5.47	Camden Council is concerned that the removal of the pay & display bays on the southern part of Adelaide Road close to its junction with Primrose Hill Road would impact on visitors to the Adelaide Medical Centre.
		5.5.49	Camden Council rejects the parking occupancy survey. It notes that a resident parking permit can be used within the entire CA-B. The permit to parking space ratio is recorded in 2011-2012 as 1 parking space to 1.10 permit issued. Essentially, the zone is oversubscribed where motorists will move around the zone for a parking space. This can be impacted by parking suspensions or road closures making availability more problematic. The TA does indicate the streets where suspensions and diversions will take place during construction but these are not incorporated into this assessment. For example, England's Lane will be used as diversion route where it is indicated that 42 resident permit parking bays and 27 pay & display bays will be suspended (refer to Vol 5 6.5.66).
		Table 5.56 (after 5.5.68)	Camden Council understands that 2011/12 data on entries and exits at National Rail and London Underground stations is now available. This shows a considerable increase in entries and exits at Kilburn High Road (from 1,273,808 to 1,657,800) and at South Hampstead (from 495,560 to 582,326). This is a 30% increase at Kilburn High Road and 17.5% at South Hampstead. On London Underground, entries and exits at Chalk Farm have risen from 4,937,923 to 5,340,369 and at Swiss Cottage from 6,906,412 to 7,526,301, rises of 8% and 9% respectively. Camden Council would like assessment and mitigation as necessary to safeguard against this increase in patronage not affecting the ability of these stations to cope with greater passenger numbers which will arise during the construction and/or operation of HS2.

		5.5.72	Camden Council notes that the first sentence of this paragraph does not make sense.
		Table 5.57 (after 5.5.72)	Camden Council notes that the frequency of bus service 31 is quoted in this table as 10bph (which is correct), as opposed to the 15bph that has been quoted in every other table containing service 31. In addition, the frequency of service C11 is shown incorrectly as the frequency of this service is 8bph.
		5.5.78 to 5.5.93	Camden Council notes that the baseline pedestrian analysis approach is inconsistent between CFA3 and that provided for CFA1. It is purely descriptive and very light touch for CFA3 in common with CFA2, without the PERS or PCL studies that were undertaken for CFA1, albeit with questionable data. There are no comments on the levels and capacity of pedestrian activity or indeed the under-stated ped flows that are shown in Figures 5-24 and 5-25 for the AM peak. This level of baseline review is disproportionate to the importance of the volumes of pedestrians that are being proposed to be merging with HS2's intended construction route along Adelaide Road within 20 mph zones, at ped crossing points and bus interchanges.
		5.5.95	Camden Council is concerned that closure of Adelaide road will increase traffic on the alternative 'quieter' routes that HS2 recommend in this section for cycling. Indeed, 'Primrose Hill Road' is proposed as a construction route by HS2 and yet it is also recommended by HS2 as a 'quieter route' for cyclists. Camden Council are generally very concerned that this disconnected thinking and complete absence of a formal 'Transport Strategy' is a major shortfall in the ES.
		5.5.97	Camden Council considers the Environmental Statement lacks sufficient information to show whether the TfL cycle route over Loudoun Road bridge will remain as a result of the Alexandra Place vent shaft works.

### Transport Assessment (TR-001-000) Traffic and Transport Part 3: London assessment

Section	Sub section	Paragraph	London Borough of Camden response
		6.1.4	Camden Council considers that this comment rather under-states the operational impacts that will be experienced in future years on the wider transport systems, especially those that will be required to provide access to, or onward travel from, the Euston HS2 Terminus. The assessment covered in

			this chapter does provide sufficient information to understand these extended impacts.
		6.1.5	Camden Council considers that construction impacts are also down played here. The fact that construction access routes are mentioned mean that the impacts are not going to be 'concentrated', indeed they will be far reaching along these corridors especially where reassignments and delays resulting from construction disruption take place.
		6.1.11	Camden Council would like to draw particular attention to the validation of the CLoHAM model and its subsequent reliability in assessing the Borough's network. Comments raising issues were provided under the Baseline section of this response.
		6.2	Camden Council notes that there is no description within this methodology section for the fundamental subject regarding the derivation of HS2 Construction traffic. This would be expected to enable Camden Council to review how construction traffic has been derived and not just relating to volumes of earthworks and construction personnel but other construction related activities and materials. There are 'typical vehicle trip generation for construction compounds' reported in the CFA's within Vol 2, for example at 12.4.9 of CFA2; and also the relative impacts in Tables 6-60 to 6-76 of this Vol 5 Part 3 document, but there seems to be no explanation on how these have been derived. Camden Council considers the ES defective as it lacks sufficient information on this important area
		6.2.4	Camden Council refers to earlier comment at 6.1.4
		6.2.5 and 6.2.6	Camden Council refutes that it has been significantly engaged with regard to the development of methodology for the TA. The Council also requested information with regard to surveys that HS2 Ltd wished to carry out in the borough which were not forthcoming, despite reminders from the Council. The Council expressed concerns with regard to the extent of impacts during discussions and requested further discussion with regard to strategic diversions, for example, which have not been agreed to date.
		6.2.8	Camden Council does not believe that the traffic modelling is robust. The data is not reliable (it was collected during the run up to the 2012 Olympics and the summer holidays). The traffic modelling outputs have been compared with more detailed traffic models that have been validated by TfL which show that a number of key junctions within Camden Town and Euston are over capacity and cannot accommodate extra vehicles because of construction or traffic diversions. HS2 need to

			update their traffic models using reliable traffic data and to more accurately validate the base and proposed models.
		6.2.9	Camden Council are concerned that the reasons for robustness summarised in 6.2.9 seem rather ambiguous and provide no specific detail around the reasons provided. Description such as: 'undertaken respecting applicable guidance', 'was subject to appropriate quality assurance', 'used appropriate and suitably robust tools', 'objective methodology to reach conclusions' all seem vague and generic. Camden Council note that data they hold for the Borough has not been used to validate the models HS2 utilised as commented on earlier as part of Camden Council's baseline response.
		6.2.10	Camden Council considers that HS2 consultants could have drawn on their experience from other case studies for feeding in to the modelling framework. The assessment previously undertaken for major projects of this kind, such as Thames Tunnel and CRL is well known to the HS2 consultants. This would be valuable in terms of informing construction generations and typical cumulative impacts such as from utility diversions as part of lessons learnt from these projects.
		6.2.23	Camden Council notes that the rail models do not make any allowances for international trips. Camden Council are therefore keen to understand the allowances and forecasts that have been modelled for HS1 to appreciate the suitability and capacity of the proposed HS1 Link that is to be squeezed in adjacent to the NLL and which in turn will restrict future expansion of this sustainable orbital route across north London. In terms of HS1, the narrow link may in time become a bottleneck on the route between Europe and the North of England as demand increases.
		6.2.25 to 2.6.36	Camden Council considers the Environmental Statement is not clear about the precise location and date of each traffic survey. This clarification is essential and should have been included.
		6.2.25	As commented earlier, Camden Council are concerned with the regional highway modelling and especially that the new surveys, critical in calibrating the CLoHAM model, were undertaken during the summer months and in the year of the 2012 Games. Camden Council has referred to this in specific areas under their Baseline responses. Camden Council consider this could have contributed to the free flow conditions that HS2 have reported for many of the junctions assessed in CFA1, 2 and 3, which Camden Council know are more congested than modelled in the Environmental Statement.

		6.2.26	Camden Council are concerned that the peak hours are somewhat narrow and that the 7-8am, 9-10am and 4-5pm, 6-7pm are also very congested periods on the network. No justification is provided for selecting just the 8-9am and 5-6pm periods.
		6.2.34 to 6.2.35	Camden Council notes that the growth rate of 2% in 9 years based on the 'validated 2012 flows' is an under-stated, modest rate of growth.
		6.2.38	In the first bullet point, Camden Council are concerned that the full effects of the reassignment caused by construction and utilities disruption, road closures etc. have not been fully considered in the modelling approach. In the second bullet point, Camden Council would like further rationale for HS2 selecting 2% as being the threshold for identifying junction arms that are affected by the Proposed Scheme.
		6.2.40	Camden Council are concerned that by modelling the impact of the three construction activity scenarios of 2017, 2019 and 2021, all in proportion to the higher 2021 background demands, then the relative impact from the Construction activity will be a lower percentage of the baseline, and therefore may fall below 2% when otherwise it would be at or above that level, meaning that it will not be identified as experiencing a material change/impact. This will especially be the case for the heavy demolition and excavation phases which occur in the earlier 2017 and 2019 scenarios, as illustrated on Figures 6-24 to 6-27.
		6.2.43	Camden Council are not clear on where a comprehensible and quantifiable breakdown of the information referred to in this paragraph is located in the ES so that it can be reviewed in terms of its robustness.
		6.2.44	Camden Council are very concerned with the methodology adopted for rail demand forecasting surrounding the RailPlan model, because of the operational demand outcomes that have been forecast in Vol 5 Part 4, which divert trips away from crowded lines in the LU network, such as the Northern and Victoria Lines, in favour of lines where spare capacity is less critical, such as the sub-surface Metropolitan, Circle, H&C lines served by Euston Square, Farringdon and Liverpool St. Unfortunately this will not happen in reality as journey origins and destinations do not conveniently transfer from one line to another as the Model predicts, just because of congestion. This leads to unrealistic LU trip assignments and mis-directs and under-estimates where mitigation will be most needed to support HS2, i.e. for access to and onward travel from Euston Station on the Northern and Victoria Lines. It also factually distorts where new bus routes and services will need to be



			introduced to help meet access to and onward travel demands arising from HS2.
		6.2.46	Camden Council notes that the second, third and fourth bullet points suggests that activity at stations and crowding impacts on a network wide basis for NR and LUL services is provided. However, is this merely limited to carriage capacities and stating what the demand will be, or does this more meaningfully compare future demands to baseline crowding capacities at LUL station platforms, ticket/barrier areas and passageways and then identify mitigation for improving the capacity to meet demand? This is especially critical for those Stations on the Northern and Victoria Lines that are coded red or black in terms of crowding for the baseline scenarios and which are being asked to support large increases in passenger loadings to cope with access to and onward travel from HS2 services?
		6.2.47	It is not clear how the differences between observed and modelled Railplan translates into future year assessments. Given that there are differences of up to 23%, further validation and refinement seems justified and Camden Council has concerns about how accurate the current assessments are.
		6.2.51	Camden Council are very concerned that the theory of peak spreading is stated as a method to mitigate against very high crowding levels being realised on the network. This is overly optimistic and an inappropriate approach to deal with the very real issues of overcrowding from a major scheme such as HS2. An alternative mitigation approach is required, because peak spreading is not going to be readily achievable or in any way practical for a massive scheme such as HS2. If a HS2 service is required to be accessed in the peak period in order to make a journey from a high density fixed origin to a high density fixed destination, or to make an onward journey, or other instances where there is little tolerance for flexibility, then peak spreading is not the best practice solution. Camden Council require HS2 to accurately predict and fix the HS2 demands on the network and then mitigate them accordingly; and not merely reassign the true catchment areas of demand to illogical alternative routes/services where capacity happens to be available, no matter how unlikely in reality that journey behaviours will adjust in such a way and by so many. This issue is directly related to HS2 operational impacts on the LU and Bus network, as picked up by Camden Council in later responses to this issue.
		6.2.53	Camden Council is concerned to learn that HS2 will require a succession of closures of the Victoria and Northern Line platforms over a disruption period spanning around 18 months. The impacts of this and reassignment of trips to alternative routes will carry a significant impact. Have these been

			fully assessed, taken in to account and mitigated?
		6.2.58	"Camden Council is concerned that the highway modelling and junction assessment issues, referred to in the baseline response that effectively suggest free flow conditions and a generally optimistic view of local network operations is likely to be as a result of the adopted methodology and therefore require this to be re-visited with more accurate data to more truly reflect baseline conditions. Unless this is addressed then subsequent future year development related assessment and impacts are meaningless and will not attract the appropriate mitigation especially as the majority appear to be under-estimated. The ES uses CLoHAM to assess the baseline traffic conditions and the level of saturation, congestion and queues at key junctions within Euston, Camden Town and elsewhere. Camden Council has significant concerns that in many cases the traffic modelling data presented is not reliable. Key junctions e.g. Camden High Street / Parkway, Camden Road / Royal College Street, Avenue Road / Adelaide Road are reportedly operating well below capacity i.e. <40% degree of saturation. At all three of these junctions Camden Council has undertaken detailed traffic modelling using Vissim and or Transyt. This shows that the baseline conditions for these three junctions are operating either very close to capacity or over capacity. There are likely to be many more junctions where CLoHAM is under reporting the traffic impacts and this will clearly distort the impacts and mitigation of HS2."
		6.2.59	Camden Council are keen to understand the stage that HS2 (and TfL) consider that it is necessary and appropriate to undertake more detailed local modelling if not at the ES preparation stage?
		6.2.59 to 6.2.60	Camden Council would suggest that more detailed traffic modelling is required at Euston and Camden Town covering the impacts that include HS1 link and the Adelaide Road vent shaft.
		6.2.62	Camden Council has fundamental concerns on the 2012 validation surveys undertaken in the summer months and close to the 2012 Games.
		6.3.5	Camden Council are concerned that the cumulative effects of the full (2) and partial (1) closures of the 3 bridges listed, that all overlap in phasing, are all located in close proximity to each other and provide important east-west crossing of the railway for densely populated residential development to the west of Euston (Granby Terrace in particular). The 7+ years that the closures will span will generate severe disruption to the local network and place more pressure on parallel routes such as Parkway which are already heavily congested for lengthy times throughout the day. When combined with other HS2 Utility diversions and Construction activities the impacts will be compounded further.

			Camden Council request advice on how these closures will be mitigated over the lengthy period that they are out of action?
		6.3.6	Camden Council considers the Environmental Statement is lacking advice on which services will be affected by the removal of the approach lines referred to here and how this will be mitigated. This information should have been provided to properly understand the impacts of the HS2 scheme.
		6.3.7	Camden Council notes that the Proposed Scheme for CFA1 relates to elements primarily within and close to Euston Station. However this seems to be where the capacity mitigation measures cease and do not extend far enough to accommodate, for example, the increased demand for access to and onward travel from Euston Station as a result of HS2. This is specifically aimed at LUL and Bus services and cycle routes.
		6.3.9	Camden Council considers that there is no baseline data for the volume of private cars or Private Hire Licenced vehicles to determine if there is sufficient space on Eversholt Street as a drop off area. We note there are trees along Eversholt Street which are being removed during construction and replaced prior to operation. The council would like further data on how HS2 have understood the capacity requirements for such a facility. It also specifies that disabled parking bays will be provided. We are aware of disabled parking bays in the car park but it is unclear if the disabled parking outside of the station has been considered or the possibility that Blue Badge holders can park on yellow lines. This data has not been captured in any baseline data.
		Table 6-15	Camden Council considers that the pedestrian comfort levels summarised in Table 6-15 contains errors. Crossings improve in future year baseline for example crossing No. 8 in the AM peak has a PCL of B in the 2012 baseline, E in the 2026 baseline, and back to B again in the 2041 baseline.
		6.3.17	Camden Council is not able to draw much insight from the highway layout (Map CT-06-01) referenced here as it does not show sufficient detail.
		6.3.18	Camden Council notes that the ahead movements on Euston Road in the vicinity of the Station will be reduced from 3 lanes to 2 in conjunction with a loss in 'green time' that will be required to be re-allocated to the new right turn lane for buses from the east. The impacts of this on traffic flow and congestion need to be understood by Camden Council so further detail should have been included in the Environmental Statement.

		6.3.20	Camden Council considers the Environmental Statement should clarify when the bus standing and servicing area referred to here, will become operational as it is not shown on the main phasing diagrams other than in the demolition key. In addition, the operation of the access serving the standing area on Eversholt St appears to be based on priority and give-way operation with right turn entry and egress reliant on gaps in the traffic along the Eversholt St. The turning facility within the bus standing area looks very tight with a 60 degree sharp bend outlined on Map CT-06-01.
		6.3.21 to 6.3.22	Camden Council considers the Environmental Statement should clarify alternative routes for Robert Street residents and businesses to turn right and south towards the Euston Road and any restrictions at Varndell St. Also taking in to account the closure of Granby Terrace, Camden Council are concerned that the residential area to the west of Hampstead Road is becoming sterilized by the removal of permeable routes in and out of this zone.
		6.3.23	Camden Council notes that the Hampstead Road is re-provided with 5 lanes rather than the existing 6 lanes ink 2 bus lanes. HS2 removes the southbound bus lane and Camden Council would like explanation on why this is not re-provided bearing in mind the bridge is being entirely reconstructed in this location?
		6.3.27 to 6.3.36	With regard to CFA2 and CFA3, Camden Council notes the description and are primarily concerned from a transport perspective about the Construction activity and access impacts that will arise from the proposed works, over a long period of time and in some very busy areas of the Borough that are heavily used by more vulnerable road users such as peds and cyclists and public transport users.
		6.3.37	<p>"In response to the third bullet point, Camden Council notes that the EAP highlights that the baseline has crowding on both branches of the northern line and that the H&amp;C and Circle between Kings Cross and City the level of standing is currently 2-3 people / m2. With the increase in passengers from HS2 46% increase in the AM peak highlighted in section 6.3.58) these will more than likely increase significantly despite what HS2 have shown later in their demand impacts. Figure 6-11 does show significant overcrowding on the Northern Line Bank branch with 5 people / m2 between Camden Town and Euston, however it does not say how this will impact the operation of Camden Town station which is already currently very busy. Between Kings Cross and Old Street there would be 5.5 people / m2 which is also a serious concern.</p> <p>The transport issues that HS2 list here are relevant but not considered by Camden Council to be exhaustive when taking on board additional concerns raised in this consultation response. Many of</p>

			which, such as the optimistic operational performance of junctions, construction trip generation, lorry routing and narrow scope of study for transport impacts on local services and infrastructure affected by future levels of demand from HS2, magnify an increase the number of issues listed here."
		6.3.38	The Grand Union Canal runs more or less parallel and to the south of the HS1 Link and across the Euston tunnel. Camden Council notes that this is not assessed as a potential construction route and seeks further justification for its exclusion.
		6.3.43	Camden Council considers clarification and a quantifiable comparison on the number of conventional rail services at Euston Station in future years should have been provided for the baseline. The figures presented in Tables 6-8 and 6-9 do not seem to provide the two sets of figures for 2026 and 2041 that are stated in the Table headings.
		6.3.46	Camden Council consider that it is an extreme oversight to assume that there will be no cycling improvements between now and 2020, especially when progress for this mode over recent times across London is taken in to account.
		6.3.48	Camden Council is aware that taxis will need to access Euston Road via Hampstead Road. The Euston Circus enhancements ban the left turn from Hampstead Road to Euston Road (section 6.3.51) to provide a single stage direct pedestrian crossing. It is not clear how HS2 have assumed taxis will re-join the TLRN network to travel east?
		6.3.50	Euston Circus, the design that is due to be completed in January 2013, bans the left turn from Hampstead Road to Euston Road for all vehicles to facilitate a pedestrian crossing across Euston Road. It is not clear how HS2 will impact on this junction during construction and in the final scheme and Camden has concerns that access from Euston Station to Euston Road for taxis and construction vehicles has not been fully addressed.
		6.3.61 to 6.3.64	Camden Council recognises the crowding information reported here and are concerned at the levels, particularly on the southbound Northern and Victoria Lines and the westbound Piccadilly in the AM peak. The closures to the platforms reported in 6.2.53 will clearly result in a severe impact.
		6.3.68	Table 6-13 shows that the vast majority of buses will be slower and although in many cases the delay is less than 2 minutes this will equate to a large number of overall passenger delays when the numbers of people using buses is accounted for. However, there are numerous examples of very

			significant delays. Route 10 would be delayed by 20 minutes or by 17.5% and Route 73 (one of London's busiest routes) delayed by 21.1 minutes or 42%. Route 390 by 24.1 minutes (25%) Route 24 by 23 minutes (50%) Route 29 by 26 minutes (32%) Route 134 by 23 minutes (63%), These significant delays are a serious concern to CC.
		6.3.75 and 6.3.80	<p>With regard to the PCL analysis that is presented in Table 6-15, Camden Council disagree with many of the results and point out their own baseline results are less optimistic than HS2 have reported here. Camden Council are aware that the joint Euston Area Plan also highlights PCL levels on:</p> <ul style="list-style-type: none"> <li>• Gordon Street</li> <li>• Endsleigh Gardens</li> <li>• Eversholt Street (eastside)</li> <li>• Grafton Place</li> </ul> <p>However, these are not listed in the ES and Camden Council's position would be to require them to be included as requiring mitigation measures. Camden Council notes that PCL analysis was undertaken for open pedestrian crossing areas outside Euston Station, but are also concerned and perhaps more so, with a need for station capacity assessment for enclosed infrastructure such as stairways, escalators, passageways, ticket halls, barrier areas etc. These will feature on upstream and downstream transport links to deal with access to and onward travel from the HS2 services at Euston Station. Key links include the Northern and Victoria Lines due to their current levels of crowding and the compounded impacts of HS2.</p>
		6.3.85 to 6.3.88	The popularity of cycling in this area should be noted. Camden Council's screenline data shows cycling now accounts for over 32% of all peak traffic in the borough south of Euston Rd.
		6.3.89 to 6.3.90	Camden Council's previous concerns regarding the new surveys undertaken for 'calibrating' the 2012 model should be noted here. Additionally and in turn, if the calibrated CLoHAM model has then contributed to determining growth factors then this is also a concern in terms of overall reliability and accurate impact prediction in the TA and ES.
		6.3.91 to 6.9.95	Camden Council are concerned that Tables 6-20 and 6-21 do not include all the appropriate highway links to inform the Council of the baseline flows so that Camden Council can adequately cross refer with their own data records. Adelaide Road itself, Camden High Street, Parkway are primary examples. Additionally, Camden Council request that all routes identified as construction routes and routes parallel to construction and utility works routes, that are likely to experience reassigned traffic due to disruption caused by construction activities and utility diversions, are also

			included in the tables. These should be included after adjustments are made to the model to overcome any 2012 calibration issues, raised earlier in this response.
		6.3.100	Camden Council own traffic modelling for 2013 shows very different saturation levels and significantly higher results than the 2012 base presented by HS2. Camden Council would therefore expect the 2021 to be higher with an extra 80 vehicles queuing and at certain time periods over capacity.
		6.3.99 to 6.3.109	Camden Council refers here to earlier comments in Vol 5 Part 2 Section 5 regarding concerns with the baseline position assessed for CFA2 and 3 and subsequent implications. This trend of concern deepens in this section of the ES in that the growthed 2012 Baseline flows to 2021, which have been tested by HS2, show very little difference to the 2012 performance results and therefore carry an even greater degree of optimism regarding their operational performance than the already optimistic 2012 position. Camden Council have their own records of how these junctions operate, including direct observations, and most do so with far more onerous queues and congestion than the results report here. There are also concerns regarding a full representation of all key junctions.
		6.3.110 to 6.3.138	Camden Council refers here to earlier comments in Vol 5 Part 2 Section 5 regarding concerns with the baseline position assessed for CFA1 and subsequent implications. This trend of concern deepens in this section of the ES in that the growthed 2012 Baseline flows to 2026 and then 2041 which have been tested by HS2 here, show very little difference to the 2012 performance results and therefore carry an even greater degree of optimism regarding their operational performance than the already optimistic 2012 position. Camden Council have their own records of how these junctions operate, including direct observations, and most do so with far more onerous queues and congestion than the results report here. Camden Council is surprised and do not accept that the majority of the junctions tested in 2041 are still operating within capacity and with very little change from 2012 performance levels. This simply cannot be true and indicates problems with the assessment that has been undertaken. There are also concerns regarding a full representation of all key junctions.
		6.3.139	Camden Council is concerned with this statement. Camden Council considers that accident prevention should begin as early as possible and in this respect should be inherent within the scheme proposals in a pre-emptive approach, rather than reactive. The conclusion that the level of risk identified for the 2012 baseline are still relevant is inaccurate based on the comments above and earlier in Section 5. No assessment is presented on impact of road traffic accidents during construction with the major increase in HGVs.



		6.4.5	There appears to be a contradiction in description of the Proposed Scheme in relation to the new A400 overbridge. Camden Council considers clarification should have been included in the Environmental Statement on how the creation of headroom will be achieved in design terms. This reference explains that the proposed HS2 tracks will be constructed beneath the level of existing tracks and achieved through excavating down to achieve the vertical distance and meet the level of the A400 overbridge. However, earlier in 4.3.16, the first bullet describes the new A400 overbridge will be constructed at a level 3.9m higher than current carriageway level to achieve clearance. The latter would be a considerable height to make up in terms of highway design?
		6.4.7	Camden Council notes that the LU concourse will be extended at Euston Station to cater for additional passenger demand. However Camden Council are concerned that this capacity building does not extend much further than Euston Station to meet additional loadings for access to and onward travel from HS2 services as outlined earlier in this response.
		6.4.10	Camden Council notes that the construction period is forecast to extend for at least 11 years from 2015.
		6.4.11	Camden Council considers construction routes should also be added on to Figures 6-23 to 6-34 to demonstrate the cumulative effects of these routes with the extent of works shown. When the two sets of information are overlaid, as Camden Council have now done, the additional extent of potential disruption is far greater due to overlaps and a wider extended area which takes over much of the Borough's network and associated development.
		6.4.13	Camden Council are concerned that the closures and disturbance to routes outlined here, will combine to create a greater degree of disruption than perhaps HS2 envisages, especially for the dense housing and development to the west of Hampstead Road which becomes far more isolated. The east-west bridge closures and north-south reductions in road widths and further closures/restrictions for utility works are considered to reduce access dramatically and Camden Council consider that this has not been properly assessed or mitigated for the lengthy construction phases involved.
		6.4.15	Camden Council notes that the further road closure to Varndell Street, outlined here will compound those impacts that are ongoing (described in 6.4.13 above) to an even greater degree.
		6.4.13 to	Camden Council considers that the descriptions in these sections are very brief and high level

		6.4.17	without sufficient detail
		6.4.18	Table 6.41 provides no explanation as to what constitutes a “busy” construction time i.e. what level of activity this represents and level of activity and no. of HGVs outside this period. Camden Council notes that there is no derivation provided for the forecasts contained in Table 6-41. Camden Council therefore request a reference in the ES where a derivation of Construction traffic generation is fully explained and set out so that Construction impacts can be properly checked for accuracy, obviously because of their key importance to safety, delays and sensible mitigation.
		6.4.18	Camden Council notes that the key components of construction trips, such as numbers of construction workers at the various compounds and their related traffic generation are either contained in entirely different parts of the ES volumes, making them difficult to review, or missing from the ES altogether. Camden Council considers they should logically be contained in the same area of the report and broken down in to each trip type for all the main construction elements. This makes this key area of the assessment inconclusive as the elements need to be inspected individually as well as combined to check that the assessment is thorough and true impacts are forecast. Not having staff trips derived in the core Transport assessment part of the ES, i.e. Vol 5 parts 3 and 4 is a significant oversight and Camden Council request that this information be brought together more transparently so that Camden Council can review more meaningfully.
		6.4.19	Having searched the general reference (Vol 2 report 1), because no precise reference was provided, there is no derivation of staff numbers and their associated vehicle trips provided, other than the broad estimate of personnel numbers expected for each compound within the lengthy description of each compound at section 2.4 of Vol 2 report 1. Camden Council has also commented (under Vol 2) in response to the extent of the data that is provided there. As an example of the importance of understanding the derivation of Construction traffic, the National Temperance Hospital compound is quoted to accommodate around 1800 construction workers and because it is the main compound adjacent to the Station it will also undoubtedly generate a considerable number of Construction vehicles due to the heavy works involved at this key construction location. However according to Table 4-41, a mere 650 two-way vehicle trips at its peak are forecast to be generated, over a whole day. Camden Council are therefore very keen to consider the derivation of this construction traffic forecast, plus others in Table 4-61, as this cannot be found in the ES. Camden Council request this to be provided or referenced if contained somewhere in the documents. In addition, if these compound flows are an accurate estimation, then clearly considerable reliance has been put on the Travel Plan within Annex A to offset the number of non-vehicle trips especially relating to the 1800

			workers. The FTP is not considered to be substantive in its current form in being able to do this, as explained in other parts of this response.
		Table 6.41	Camden Council is concerned that the impact of road closures and bus lane suspensions on cyclists has not been properly considered. In particular modelling is required to understand the risks of congestion and road safety on cyclists during the construction phases. Camden Council is also concerned that the planning of cyclist diversion routes has not been properly cross referenced to the expected HGV construction routes and road closures.
		6.4.19	Camden Council are concerned that the reduction in lanes from 6 to 2 along A400 Hampstead Road over many years coincides with the operation of the main National Temperance Hospital compound and which will take its access directly from this reduced capacity 'A' road.
		6.4.20	Camden Council notes that the durations in Table 4-61 are only based on periods when peak flows are above 50% of the peak flow and therefore will be actually be much longer than reported when taking in to account periods when flows are below 50%.
		6.4.20	This reference states that the assessment scenario assumes the peak month for the combination of activities. Camden Council considers the derivation and workings behind this statement should have been provided within the Environmental Statement.
		6.4.20	Camden Council notes there is no breakdown of the LGV and HGV projections presented in the Table, so it is inconclusive as to whether the projections are sufficient or indeed have covered the key transport related activities of the Construction process.
		6.4.21	Camden Council notes that there is a concentration of accesses to compounds on the same roads. Eversholt St has 4 accesses and Hampstead Road has 5 direct accesses plus 2 served via this route all in close proximity. To compound impacts further, both are subject to major utility diversions and as described above, Hampstead road will be experiencing major road works for the new overbridge, whereby 6 lanes are reduced to 2.
		6.4.22	Camden Council considers the derivation of the construction traffic relating to the component materials referred to in the first part of 6.4.22 should have been provided within the Environmental Statement

		6.4.22	Camden Council considers there is an inconsistency in the assumptions regarding the proportion of LGV traffic to HGVs (see Volume 5 Appendix – Transport Assessment – TR-001-000   Route-wide methodology - 4.10.3). Therefore, with regard to this issue, Camden Council considers the information from HS2 Ltd. on how this split has been derived and what evidence it has used to support its assumption should have been provided within the Environmental Statement. A time period for the 370 vehicles is not specified, so Camden Council is unable to determine whether this is daily or in a peak hour. Therefore the extent of the impact of the HS2 scheme cannot be determined by the Environmental Statement.
		6.4.25	This statement needs to be stronger, i.e. all site deliveries will be limited to normal working hours except in exceptional circumstances.
		6.4.27	Camden Council notes in 6.4.157 that Robert St is also selected as a diversionary route for cyclists when the Granby Terrace route is closed and is therefore concerned that its function as a primary construction route to the GT compound is a major safety issue. Camden Council has major concerns regarding the use of sensitive access routes in close proximity to residential properties in this area which would cause major adverse impacts and greater demonstration needs to be shown as to how the use of these routes by construction traffic would be minimised.
		6.4.28	Camden Council cannot draw any precise study from this statement. Camden Council considers the description to be ambiguous without sufficient detail or precise information.
		6.4.29	Camden Council considers that some of the potential construction access roads are much less appropriate for carrying construction traffic due to the cumulative impacts they will experience from utility diversions, long period closures, temporary works and the impacts from other CFA's including 2 and 3. The latter have been split out in the assessment and not presented in combination in the same chapter which makes cumulative impacts more difficult to review. Camden High St and the heavily restricted A400 Hampstead road (with its 60% capacity reduction due to the extensive overbridge works) are typical examples of less appropriate routes. In particular, Camden Council are concerned with the suitability of the highway characteristics and function of Camden High St in accommodating large volumes of vulnerable pedestrians and cyclists in conjunction with carrying relatively large volumes and sizes of construction traffic over many years. The impact of these routes will be severe and will affect Camden's residents, businesses and visitors over a long period of time with potentially very damaging consequences.

		6.4.30	There are no details about the timescales or duration of utility works or their impacts on transport networks, residents or businesses. Camden Council is aware from its experience on CRL that utility works can have significant impacts and these need to be properly assessed and mitigated in the ES.
		6.4.37	Camden Council notes several conflicts between constructions routes at peak construction phases and proposed diversionary routes, routes that already suffer severe congestion and the highway interventions from utility diversions etc. as listed in Table 6-47. Parkway and Eversholt St are clear examples.
		6.4.38	Camden Council has commented on the ZSL Holding Area in other parts of this response; however they also request whether any alternatives for Lorry Holding Areas are under consideration and how will the impacts of these be assessed as they do not appear in the ES.
		Table 6-43	Camden Council considers that not all of the main Construction materials are outlined in the routing Table, such as structural steel etc. which will arrive on large lorries.
		6.4.41 and Tables 6-44 to 6-47.	Camden Council notes the extensive permanent and long period road closures and highway interventions. Camden Council requests details of the stated interaction of CFA1 with CFA2 and CFA3 for lorry routing and road closure impacts? HS2 reference the reader to relevant CFA reports where impacts for each area will be contained. However, having cross-referenced this, they are not adequately covered and quantified in any detail whatsoever. No modelling of the impact of the road closures is provided, which is not acceptable. It is not clear who would implement permanent road closures and who would issue the stop up notices. Table 6-45 is confusing in that it refers to 'permanent' closures and then refers to time periods that are not permanent. This section of the ES is defective and cannot be relied upon to show the impacts of the scheme.
		6.4.42	Camden Council notes the substantial loss in road width shown for the busy A400 Hampstead Road. They highlight major reductions in highway capacity to Hampstead Road Gate junction for bridge works. This road carries large volumes of traffic and the proposals are likely to lead to significant queues and delays to all users. The assessment does not show this. There is no explanation as to why cyclists cannot be accommodated during the works to Hampstead Road Bridge for the full extent of the works, or any assessment of the relevant impacts.
		6.4.44	Figure 6-36 onwards. This section highlights major reductions in highway capacity at Euston Road to facilitate a new LUL station entrance on Gordon Street. Euston Road carries very large volumes of

			traffic and the proposals are likely to lead to very significant queues and long delays to all users. The assessment does not show this.
		6.4.45	This section highlights major reductions in highway capacity at the Parkway / Gloucester Gate junction in Camden Town to facilitate utility works. This junction is very busy and congested and recent improvement works highlighted that this junction was operating close to capacity. The proposals are likely to lead to significant queues and delays to all users and the assessment does not show this.
		6.4.46	Camden Council notes the substantial loss in road width shown for the already severely congested A4201 Parkway and is concerned with major inaccuracies in the highway modelling assessment results, as reported earlier under baseline conditions.
		Table 6-48	Camden Council is concerned that several of the diversionary routes already suffer severe congestion for extensive periods throughout the day, such as A4021 Parkway. The baseline operational performance of Parkway is not accurately assessed in the ES and is optimistic; therefore this may not be recognised by HS2 as a congested route. However, a site visit would confirm this. Parkway's capacity is compromised further as commented on 6.4.46.
		6.4.48	<p>Camden Council's experience from Crossrail is that the extent of utility works was vastly underestimated both in duration and impacts. There is very little evidence in the ES for the statements that set out potential durations. The details of utility works are extremely vague with reference of "possible sewer replacement" "possible closures on the following roads" "these works will be limited to period of approximately less than 4 weeks." More details of these works and their impacts are required. There are no details about the location of the proposed sub-stations or the full extent of the works. The statement "<i>the works will be undertaken in short sections along the proposed routes with each section taking less than four weeks</i>" does not provide sufficient detail on the works duration or their impacts. These should fundamentally be covered in the ES. Camden Council notes that Delancey St is subject to utility works, but is itself proposed as a diversionary route in Table 6-48 and within an area that HS2 are already proposing closures to alternative parallel routes.</p> <p>Camden Council seeks clarification on periods for the phasing of these events. Same comments apply to Eversholt Street which is subject to major utility works as well as being identified as a construction route and a key transport route serving the Borough. Camden Council is concerned that</p>

			<p>there are many vague uncertain statements and no assessment of the impacts of the major utilities works, such as to replace the gas mains in Eversholt Street. There is also the possible diversion of a Thames Water sewer and a statement that merely suggests that works are not expected to coincide. There are similar statements about possible replacements of other utilities with no assessments of impacts on the highway network or pedestrians, cyclists, buses or residents. Including: “possible sewer replacement and lining works along Augustus Street”; “possible utility works required on Endsleigh Gardens”; “possible utility works required on Mornington Terrace, which, would require sections of Mornington Terrace to be closed”; “further utility works with possible closures may be required on the following roads: Aldenham Street; Polygon Road; Lancing Street; Drummond Crescent; and Doric Way”; and “any partial or full road closures, as a result of these works, will be limited to a period of less than approximately four weeks.” Camden Council does not consider such vague and confusing statements to be acceptable.</p> <p>Drummond Crescent is required for access by the Police for its nearby compound and any closure of this street may cause security issues.</p>
		6.4.49	<p>As described in Table 6-47, the utility works will include the replacement of gas mains on A4200 Eversholt Street. It is also possible that a Thames Water sewer, also on A4200 Eversholt Street, may be diverted along Phoenix Road and Chalton Street. However, should this sewer diversion be required, the works on Phoenix Road and Chalton Street are not expected to coincide with the works on A4200 Eversholt Street; however, no risk assessment is referred to or demonstrated. It is not clear whether this would involve any road closures and the resulting diversions nor assessment of their impacts, however nearby minor undesignated roads such as Chalton St (which is closed due to a street market 3 days per week) and Pheonix Rd (which is a residential street and includes a school) would be inappropriate. There are similar vague statements about possible replacements of other utilities with no assessments of impacts on the highway network or pedestrians, cyclists, buses or residents. This is not sufficient by any means, there should be much greater clarity about utility works and a full assessment of likely durations and impacts and resulting mitigations. These should be covered in the Environmental Statement. There are similar statements about possible replacements of other utilities with no assessments of impacts on the highway network or pedestrians, cyclists, buses or residents. This is not sufficient by any means; there should be much greater clarity about utility works and a full assessment of likely durations and impacts. These should be covered in the Environmental Statement.</p>
		6.4.50	<p><i>“Construction will impact the way pedestrians enter and exit Euston station and therefore, during the</i></p>



			<i>different stages of the construction programme routes for pedestrians will be managed to maintain adequate routes". Camden Council rejects this and does not consider 'adequate' to be good enough. High quality, safe and legible pedestrian and cycle routes must be maintained during all periods of construction.</i>
		6.4.51	<i>"Traffic management measures will be introduced to reduce the impact on pedestrians in the immediate area of the construction works. Given the large pedestrian demand in the area, adequate measures need to be considered in the next stages of design to ensure walkability and pedestrian safety in the area is not compromised."</i> Camden Council expects that the traffic management measures should be detailed and assessed in the ES. However, no such analysis is provided, which is unacceptable.
		6.4.67	<i>"From quarter one of 2020 to quarter four of 2021, the construction works on the northern side of the bridge will limit the number of lanes on A400 Hampstead Road to three, one southbound lane and two northbound lanes. One of the northbound lanes will be a bus lane. Again, the temporary layout allows for pedestrian footways on both sides of the road."</i> There are no details of how cyclists will safely use this road. All designs must provide the safest cycle access possible.
		6.4.51 to 6.4.73	The pedestrian access phasing changes relating to Euston Station over the long 12 year timeline are noted. Camden Council is concerned with the length of this period and the safety of vulnerable users around the station. Camden Council also questions the relocated positions of the Barclay cycle hire pods and whether they should be relocated elsewhere away from the west side of the Station where construction vehicles will be most concentrated.
		6.4.74	<i>"The proposed sub-surface pedestrian route under Euston Square Gardens and across A501 Euston Road, and the connections to the Euston Square underground station platforms, will be constructed using open cut excavation techniques and will include diversion of various utilities that will require the temporary closure of the eastbound and westbound bus lanes on A501 Euston Road. Construction will be phased across the road, in order to maintain two lanes in each direction, compared to the existing three lanes in each direction;"</i> There are no details as to how cyclists will safely use this road. All designs must provide the safest cycle access possible.
		6.4.76	Camden Council notes this objective, but are not convinced with the substance of the FTP to bring about delivery, for example there are no details about the number of workforce or how their travel will impact on public transport.

		6.4.82	Camden Council requests a reference to where details of the Construction activity elements of the traffic and transport impacts have been derived in the ES. Searches of the Annexes within the ES and Transport Assessments do not seem to arrive at this data?
		6.4.83	Camden Council notes that the 'temporary' impacts will cover long periods of many years and seek derivation of the various traffic demands outlined here.
		6.4.84	<i>“Construction of the Proposed Scheme at Euston will also have an impact on public transport, due to a reduction in the available NR services and the potential requirement for temporary closure of some LU platforms at Euston station. Interchange performance at Euston station will, however, be maintained throughout construction”.</i> LUL have indicated to the London Borough of Camden that alternative construction methodologies are available i.e. construct additional escalators, connections and other infrastructure at the start of the programme. This would remove the requirement to temporarily close LU platforms at Euston Station whilst existing escalators and infrastructure are adapted. The London Borough of Camden urges HS2 to consider all options to minimise the impacts on the dispersal of passengers at Euston Station.
		6.4.87	Camden Council are concerned that the visitor tourist economy, including many young people that access Euston from longer distances to visit Camden's unique cultural attractions such as the Market, cafes and bars at weekends will be significantly compromised by the rail closures at weekends and bank holidays.
		6.4.88	Camden Council do not concur with HS2's view on Rail works disruption, that 'the great majority of possessions will have a very limited impact on the operation of Euston and its rail services as they are relatively minor localised works'. The removal of 5 existing platforms and extension of 2 others, alone, are none considered minor and localised.
		6.4.89	<i>“Overall it is expected that there will be approximately 20 disruptive possessions which include weekend closures.”</i> It is not clear whether this indicates that there will be possessions that would not take place at weekends. Further details about these possessions and the impacts on rail passengers are required.
		6.4.96 to 6.4.99	Camden Council are very concerned with both the level of disruption and the lengthy period that the LU platform closures will take hold, along these very busy commuting routes. Closures appear to

			come one after the other, from late 2021 to early 2023, so combined, longer than the reported elemental closures of 3 and 5 month periods.
		6.4.100 to 6.4.104	Camden Council seek clarification on which stations will be affected as this will provide more insight in to the wider extent of impacts rather than just the 'key changes' as summarised here. Camden Council also seek clarification on whether the impacts of the LU closures are going to be mitigated through additional substitute bus services, because many of the alternative LU routes described here are already experiencing severe crowding and should not solely be relied upon to absorb diversionary demand? Bus services will be the next alternative for many affected by these closures, however there does not appear to be any reference to which bus services these may be or capacity analysis of the relevant buses.
		6.4.105	Camden Council seek clarification on how the modest proportionate increases in journey times have been derived as no background working or reference to this is explained or provided.
		6.4.106	<p>Camden Council is very concerned that there are no details to understand how Kings Cross, Camden Town, Warren Street and TCR would cope with additional passengers during the closures of Euston Underground. It is very likely that there will be significant impacts at Camden Town that would result in station closures and other disruption. Both Camden Town and Kings Cross would have a large increase. Table 6.51 shows the majority of bus routes will see delays of several minutes. Given that Camden Council know that the traffic data is under estimated these delays are also a major underestimate.</p> <p>Camden Council considers that the reporting of stations or indeed any transport links (as in the case of highways in later sections), that will be closed or will have capacity taken away during construction, as then experiencing reduced 'activity' and a form of beneficial impact is inaccurate. This can only be the case if demand reduces relative to capacity remaining the same. If capacity is taken away then this should arguably be a negative impact, but certainly not a beneficial one, because the demand needs to be diverted elsewhere, or more likely the trips will still be made where capacity is reduced meaning a worse impact locally due to peak spreading, i.e. increasing exposure time. Loss of capacity in transport infrastructure cannot be beneficial unless it has been shown to be under-utilised, which in Central London, is very unlikely.</p>
		6.4.142	Camden Council notes that the construction impact section of the ES relating to public transport, does not provide any prediction or analysis of the travel impacts of the c.2000 construction workers

			relating to the various compounds around Euston Station, as reported in Vol 2 (section 2.4). The TA claims that these will not be permitted to travel by car and that the FTP will help control travel behaviours, however the impacts on other modes are not reported in any form.
		6.4.156	Camden Council is very concerned with the safety implications associated with the proposed temporary bus lane closures. Cyclists are being required to fall in with general traffic lanes on heavily trafficked and narrowed routes, such as Euston Road, Eversholt St and Hampstead Road. Safety in relation to this has not been properly assessed. Where cycle routes are broken alternative convenient and direct diversions must be provided.
		6.4.157	Camden Council is very concerned from a safety perspective about the suitability of Robert Street as a diversionary route for cyclists during the lengthy closure of Granby Terrace, since Robert Street is also identified as a planned route for construction traffic in the heart of the construction activity around National Temperance Hospital and the Granby Terrace compounds.
		6.4.162	Camden Council considers that the cycle docking station should be relocated away from construction activity rather than at some of the locations described here. It would be unsafe to draw cyclists in to such an area when safer locations could easily be identified.
		6.4.165	Camden Council is concerned that there is no assessment on the impact of accidents involving cyclists from the impact of removing routes and diversions onto main roads.
		6.4.165 to 6.4.166	Camden Council rejects the statement <i>"The disruption to cycle routes, as a result of road closures will not have a substantial impact on journey times and affect a low number of cyclists."</i> The closure of roads such as Cardington Street will directly affect designated cycle routes and the alternatives proposed routes will be busier routes, identified for construction. Hampstead road will also be subject to a reduction in lanes from 6 to 2 for 10 years.
		6.4.169	Camden Council is concerned that there is insufficient information in the Code of Construction Practice to show how the risk of HGV/cyclist collisions will be mitigated. Camden Council seek clarification on whether the risk of HGV/cycle accidents has been quantified and which detailed locations present the greatest safety risks, for example conflicts between left turning construction vehicles and cyclists at compound access points etc.
		6.4.169	Camden Council is generally very concerned with the potential safety risks for cyclists during the

			long construction period spanning many years and they consider that insufficient planning and assessment has been undertaken so far to safeguard this most vulnerable and high profile road user.
		6.4.170	Camden Council notes that the 123 on-street parking spaces will be temporarily lost. This is not the case as some streets will be permanently lost. Also it does not include streets that are being used during the construction process such as Drummond Crescent and Doric Way, Banrby Street. Accordingly, the Council would like to see revised figures that accommodate all the areas that may be temporarily taken out of action. The Council also advises that the CA-G has a permit to parking space ratio of 1.04. Accordingly spaces are in high demand and any loss will impact on parking provision for residents.
		6.4.171	Camden Council is concerned that suspensions with a 4 week or more duration are indicated. Any number of suspensions has an impact on the parking availability and need to be indicated so that Camden Council can mitigate.
		6.4.174	Camden Council notes that the TS refers to a loss of 29 parking bays on the southbound lane of Eversholt Street. There are two loading bays on this stretch. Accordingly, Camden Council needs clarification if the street name is correct.
		6.4.176	Camden Council requests clarification if further suspensions are required on Euston Street and Drummond Street to allow delivery and refuse collection services to turn. This is only specified for Starcross Street and Stephenson Way.
		6.4.178	Camden Council requests clarification on how parking bays will be relocated and whether these costs will be met in making amendments to Traffic Management Orders to affect such a change.
		6.4.179	Camden Council requests clarification on how parking bays will be relocated and whether these costs will be met in making amendments to Traffic Management Orders to affect such a change.
		6.4.180	Camden Council requests clarification on where the vehicles that utilize public or private off street parking spaces is los will be relocated to.
		6.4.183	Camden Council is concerned that the impact of moving the taxi facility to Eversholt Street has not been considered fully. Eversholt Street is being used as the main route for Coach parking, disabled

			parking, passenger drop-off and pick-up and a taxi rank. Eversholt Street already serves a number of bus routes and is main route into Camden Town (going north) and the West End (going south). There are potential major utility works planned such as a sewer and gas mains diversions discussed elsewhere in the ES. The plan is also to use Drummond Crescent as an over flow for the taxi rank. The Met Police's Rapid Response Unit is located on Drummond Crescent where any traffic flow issues or obstructions would impact on the police's ability to respond to an emergency.
		6.4.184	Camden Council requests clarification on a secondary 'feeder' rank on Doric Way. In Figure 6-68 and 6-69 a 'provisional rank is shown in Drummond Crescent. There is no indication of a feeder rank on Doric Way and needs to understand if parking spaces will in fact be utilised on Doric Way.
		6.4.185	Camden Council has various concerns on the temporary taxi provision: Figure 6-68 shows that all trees will be removed without seemingly considering alternatives. It proposes standing taxis for 23 vehicles on Drummond Crescent which is inappropriate as well as using Doric Way for access. HS2 states that parking will need to be suspended not reprovided or relocated. The pedestrian crossing is moved well away from desire line on Phoenix Road which is the important pedestrian link to St Pancras. Taxis could be shifted north. Camden Council questions how will businesses on the east side of Eversholt Street, service their premises as no details provided, other than loading removed.
		6.4.186	Camden Council is concerned that the taxi facilities on Eversholt Street are half the capacity of the current taxi rank. The council understands that Drummond Crescent may be used but this will only accommodate the remainder. It does not accommodate the fact that the existing facility is insufficient as vehicles can rank onto Melton Street. Camden Council needs to understand how this will be controlled as Drummond Crescent is a residential street and houses the Met Police Rapid Response Unit.
		6.4.189	Camden Council notes that the 'taxi concept' is yet to be developed in detail and are therefore concerned with the potential impacts that taxis, if not adequately provided for, can generate. Avoiding congestion, delays and safety issues to other more vulnerable road users should be the main objectives and Camden Council awaits further design and assessment on this. There is no mention of liaising with the London Borough of Camden to discuss the taxi proposals, which is unacceptable.
		6.4.196	Camden Council notes the increase in taxis on routes that will be reduced in capacity during construction for several years. As a result of moving the taxi facility to A4200 Eversholt Street, HS2

			propose that the flow of taxis will increase on Polygon Road and Chalton Street. This is not appropriate with the nature of these streets. Chalton Street for example, contains a market on a Friday, but this is currently under consultation and maybe extended to 4 days a week. Although the market will operate outside peak hours, set-up and take down of the market will impact on traffic flow. Accordingly, Camden Council will need to see revised data to incorporate this change. and is closed to traffic on Wednesdays, Thursdays and Fridays. This should not be a taxi route during or after construction. There are also inconsistencies in this section as it states there will be an increase in taxis on Gordon Street and yet section 6.4.198 says there will be a decrease.
		6.4.199	With regards to the overall approach that HS2 have taken to assessing the construction highway impacts, Camden Council reiterates their earlier concerns that there is seemingly no evidence provided within the ES of how the construction traffic loadings have been derived and to what specific activities they relate. In view of this and the apparent low levels of forecast construction traffic, Camden Council can only reject the current highway impact assessment for the construction process on the basis that the results are considered to be inconclusive and based on insufficient detail. In conjunction with Camden Council's local expertise of the highway network relative to the information that HS2 have presented, then the results are considered to reflect an under-estimation of impacts and a vastly optimistic level of operational performance, compounding Camden Council's earlier concerns regarding reliability and under estimations of the baseline assessment.
		6.4.202	The tables (6-59 to 6-77) in this section of highway impacts scenarios show substantial increases in traffic, notwithstanding the Council's concerns regarding baseline data and methodology. These include a number of substantial traffic increases on minor roads, which is unacceptable and not mitigated in a satisfactory manner. HS2 state '70% of the maximum construction traffic'. Camden Council request to details of this and a breakdown of what activities it relates to.
		6.4.203	Camden Council notes that Figures 6-76 and 6-77 in the absence of any other visual presentation are entirely imprecise and meaningless. The description refers to 'reductions' in flows where capacity is partially or entirely removed. Camden Council considers this to be inaccurate and an incorrect approach for the justification Camden Council provided in their full response to this issue at 6.4.106.
		6.4.203	The data assumes that all roads are acceptable for increases in traffic and HGV movements and this is not the case. HGV movements must be assigned on TLRN and SRN. Borough roads should only be used where there are absolutely no alternatives and this is clearly not the case.



			There are large and unacceptable increases on the following roads which are wholly inappropriate for diversion routes and HGVs: Albany Street, Churchway (384%) Drummond Street 9+400%) Outer Circle, Chalton Street (267%) and Judd Street. Greenland Road (112%), North Gower Street (350%) Polygon Road (425%) Stanhope Street, Torrington Place, Tavistock Place, Arlington Road, Castle Road and Oval Road (south of Jamestown Road) (556300%).
		6.4.205 to 6.4.226	Camden Council reject the flows in Tables 6-59 to 6-70 and associated commentary based on a lack of supporting evaluation and the justification Camden Council provided at 6.4.199.
		6.4.227 to 6.228	Camden Council do not accept the assessment described here as it is based on flawed survey data and traffic modelling data that does not ally with Camden Council own detailed traffic models. Camden Council rejects that the construction impact of a major scheme such as HS2 will only result in three junctions experiencing change in flows of 2% or more. This simply will not be the case and reinforces Camden Council position that the highway impact assessment is insufficiently robust and not at all representative of baseline and future construction stage scenarios.
		Table 6-77	The junctions shown in the Table have modest ratios of forecast flow to capacity, below 100%, even with future year growth scenarios and construction traffic added. Camden Council is aware from local knowledge that the capacity performance results are overly optimistic and not an accurate reflection of observed conditions, let alone the growth baseline or combined with the three construction scenarios. Camden Council therefore rejects, as a substantial under estimation, the traffic impacts and junction modelling that is presented here and threaded through the ES. This obviously has fundamental implications with regards to the reported outcomes of the ES. In summary, Camden Council considers that there is a significant requirement to re-work the baseline forecasting with reliable calibration data, provide a transparent derivation of construction traffic and then re-model the network more accurately so that impacts and future year highway operations are understood more clearly with the possibility of more robust mitigation identified.
		6.4.239	Camden Council considers that the number of links identified would be much greater if the highway assessment had been undertaken more accurately in line with earlier comments. The links and junctions identified where there could be an increase in accidents is not in accordance with Camden Council own assessments. There needs to be clear mitigation to reduce the risk of accidents not a general acceptance that accidents will happen. There is no acceptance that an increase in HGVs of any % will lead to an increase in accidents particularly for pedestrians and cyclists.

		6.4.240	Camden Council is concerned that the accident section of the TA for construction impacts does not go very far with very limited prevention proposals. Many of the issues provided in this response will lead to a greater risk of accidents occurring than has been assessed and reported in the ES. Increased construction traffic alongside increased pedestrian & cycle flows will lead to increased accident risk. Appropriate measures, such as temporary pedestrian / cycle facilities, driver inductions / training, vehicle upgrades to include extra mirrors / warning noises etc. need to be considered and proposed.
		6.4.243	<p>Camden Council considers that the claims of the first sentence under mitigation measures is contradicted by the statement in 6.4.248. Camden Council also reject the proposal that it is appropriate for the travel plans to be identified as the primary mitigation solution, alongside the CoCP, to deal with the transport related construction impacts for such a major scheme. The assessment of impacts has already allowed for optimistic workforce mode share. It is unlikely that any further mode shift would be achieved through travel planning, which should form part of the baseline in any event as this is normal best practice for any development. The CoCP is also the normal procedure for such a development, so nothing out of the ordinary is proposed here by HS2, in terms of other mitigation measures.</p> <p>More importantly, there is no evidence that a thorough approach to considering sustainable options for construction materials movement has been undertaken, and there are no commitments to any such sustainable movement in the proposals. Notwithstanding the above, the FTP that is appended to the ES does not commit to any tangible measures and the draft CoCP is short on detail (see Camden Council further comments in relevant section of this response).</p>
		6.4.244	Camden Council questions how this will go beyond what they have already assumed in the construction trip forecast and will it be a requirement of the contractor to guarantee to monitor movement and meet certain targets? Camden Council also request details of travel plan deliverables, tolerances and targets that HS2 will be prescribing to their contractors and how these will be enforced.
		6.4.245	Camden Council recognises that the provision of rail bus replacement services is a basic requirement of the Regulator and not mitigation.
		6.4.246	Camden Council does not consider SCOOT should be indicated within the mitigation measures section as it already exists in the baseline. Camden Council also recognises that where junctions are predicted to be at, or close to capacity, there is no scope to mitigate impact through adaptive

			control. This will only be effective where there is some reserve capacity on one or other arm, and scope to provide more green time to the arm where traffic is added. So in summary, SCOOT can only go so far in making traffic run more efficiently. It is less effective where congestion is already occurring as is the case (although not accurately reported in the ES) on much of Camden's road network in proximity of the HS2 works.
		6.4.247	Camden Council recognises this should actually be undertaken and fully tested within this TA and ES and not at a later date.
		6.4.248	Camden Council would have expected that rail opportunities would have been at the forefront of any construction transport strategy. The movement of all construction materials (not just excavated materials) should follow the project hierarchy applied for other major projects such as Crossrail, Thames Tideway Tunnels and Northern Line Extension. This should mean design dictates the re-use of materials, and every opportunity is explored to move materials by rail and river. This should be achieved by setting sustainability objectives looking to source materials from the most accessible locations for rail and river access for at least part of the journey. Where opportunities to move materials by means other than road are possible, these should be a commitment of the project, not a possible 'nice to have'. Unfortunately this appears to be an afterthought and Camden Council is not convinced that anything significant will emerge, if it is not featured already. The use of rail for construction should be a core part of the project and therefore this is a huge oversight.
			Camden Council recognises that the construction works are not as concentrated as within CFA1, however for CFA2 and 3, construction impacts will relate to more distributed and sensitive parts of the transport network which have weaker less appropriate routes construction access opportunities that are heavily populated with vulnerable road users, and subject to severe congestion for long periods during weekdays and weekends.
		6.5.7	Camden Council is very concerned with Construction Scenario 2 and the proposed closures to B509 Adelaide road and Chalk Farm Road both individually and when taken in combination. These will also be overlapped with the major restrictions further south in the Borough on Hampstead Road due to overbridge works and utility diversions. In series, this will make access along one of the main spines in Camden (spanning to/from the A41 and the A501 Euston Road) impossible without major delays and increased risks to road safety. There is also the issue of the impact of this on the alternative routes that will need to be adopted which are far less suitable to the volume and nature of traffic that will need to be diverted.

		6.5.8	Camden Council questions whether the reassignment due to Scenario 2 has been properly assessed, not just quantifiably but also in terms of whether the reassigned routes are appropriate in road safety terms to take on these significant diversions.
		6.5.10	Camden Council rejects the unsubstantiated statement that utilities works will not result in any substantial traffic and transport impacts. This does not accord with Camden Council's experience of disruption caused by utilities works disruptions.
		6.5.11 to 6.5.12	As previously raised in this response, Camden Council have fundamental issues with the construction forecasts for CFA2 and 3 as for CFA1, due to a lack of derivation contained within the ES. Consequently, Camden Council do not consider that the daily forecasts provided in Table 6-78 can be considered to be accurate and sufficiently robust until they have seen further substantiation, such as a detailed breakdown of the derivation relating to each of the key elements of the construction process.
		6.5.13 to 6.5.58	<p>Camden Council are very concerned with the individual and cumulative impacts that will arise from road closures and the construction routes associated with access to/from the compound and satellite sites for CFA2 and 3.</p> <p>The construction sites and access routes to them are situated within residential and amenity areas in the heart of Camden. Local businesses will also be severely compromised. To a greater degree than in CFA1 and the Euston Station works, some of the sites are less well connected with the strategic road network (TLRN and SRN).</p> <p>Construction routes identified are convoluted, requiring day to day negotiation of constrained inappropriate roads such as 'local residential' streets and other such roads that are not at appropriate levels in the Council's road hierarchy set out in its Network Management Duty Report and junctions, that are entirely inappropriate for accommodating regular HGV traffic, without causing a significant increase in the risk of accidents (to pedestrians and cyclists), adverse impacts on residents and businesses, congestion and delays.</p> <p>Diverted traffic should be limited to suitable roads on the TLRN or, where this is not possible, on the SRN having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report and considered in the context of strategic diversions. Some diversions may not be</p>

			<p>feasible, such as the bus turn from Hawley Rd onto Kentish Town Rd due to inadequate available space. It would be generally appropriate to divert buses on the same routes as general traffic, unless there are specific justified circumstances.</p> <p>Local access would need to be accommodated, for example to town centre shops such as Sainsbury's Supermarket, with related mitigation measures provided by HS2 to prevent inappropriate traffic using minor roads.</p> <p>Some road closures and works sites such as at Kentish Town Rd, the nearby Camden High St/Chalk Farm Rd bridge sites and Chalk Farm Viaduct spans would be close to the Hawley Wharf development site, which is critical to the future of Camden Town Centre and it is important that these or any works at any other sites do not inhibit development of this vital site.</p>
		6.5.14	<p>Camden Council does not consider that HS2 have adopted left in left out circulation for construction traffic in the subsequent descriptions of HGV routing. There are many references for required right turn manoeuvres at junctions that will obviously carry the issues of conflict with other streams of traffic.</p>
		6.5.15 to 6.5.52	<p>There is a general shortfall of detail regarding how the worksites will have traffic management, for example whether the roads are wide enough to facilitate HGVs and consideration for the impacts on pedestrians, cyclists and parking. No details about how vehicles will turn. How traffic will be managed is dealt with by vague statements about turning off traffic signals to permit 2-way traffic, but no details as to how this will be managed safely. This requires more detail and careful planning with the London Borough of Camden Statements like "<i>roads generally kept open</i>" (figure 6.95) regarding Kentish Town Road is too vague.</p> <p>Proposed pedestrian and cycle routes are shown which are unclear, such as at Camley St work site, where it is unclear whether existing routes would be maintained and, if not, the new proposed routes would not provide access for pedestrians and cyclists to areas where important access routes are currently provided, such as to the entire north-south route between Agar Grove and Camley St and to the east to adjacent residential areas. Camden Council has concerns that Camley St is narrow in this area and sufficient space needs to be provided on both side of the street for pedestrians and cyclists to pass and not conflict with construction traffic. Figure 6-87 suggests an area beneath the Camley St bridge with shared pedestrian and cycling routes, separated from vehicular traffic, however it is unlikely to be wide enough for shared use. Also it is not clear how southbound cyclists</p>

			<p>would re-join the road south of the bridge. HGV's have created hazardous conditions for cyclists using established routes in this area, including an accident causing a fatality to a cyclist in 2006 at Camley St/Goods Way junction. This issue is a matter of concern. Further comments are made with regard to Camley St at paragraph 5.3.11 in Volume 2, CFA2.</p> <p>With regard to the Camden Rd/ Royal College St site, a strategic two-way cycle route with lightly segregated cycle tracks runs on Royal College Street south of Baynes Street and will soon be extended north across Camden Rd. Alternative routes should be of equal quality with segregated tracks in both directions, plus careful consideration will need to be given to alternative cycle routes to ensure that cyclists are safe and do not have to make long diversions</p> <p>It is unclear how some roads will be used, for example plan CT-05-143 in the Mapbook for CFA2 in Volume 2 (Doc Ref ES3.2.2.2) indicates the minor residential road of Rousden St would be used as a construction traffic road which is off of both the TLRN and SRN, which would be a matter of concern and inappropriate. It should be noted that the Council has a regeneration programme for the Agar Grove area and would be concerned regarding any proposals that undermine these initiatives. It is unclear how cycle routes would be diverted.</p>
		6.5.17	Camden Council notes that description in 6.5.17 excludes an alternative route description for when Adelaide Road is closed.
		6.5.36	“Short term temporary road closures of Camden Street will be required to facilitate works on the bridge. At these times the one-way working in Camden Street between Kentish Town Road and Camden Gardens will be suspended to allow two-way working. The traffic signals at the junction of Kentish Town Road / Camden Street may also need to be temporarily switched off to allow traffic to emerge from Camden Street.” Camden Council considers much more detail should be provided to show how HS2 Ltd. expects this to work.
		6.5.43 – 6.5.48	“It will be necessary to temporarily close the roads for short periods to facilitate the bridge works. During these periods it will be necessary to suspend the one-way working in Castlehaven Road, between Chalk Farm Road and Castlehaven Road, and in Chalk Farm Road between Castlehaven Road and Jamestown Road, in order to introduce two-way working.” Camden Council has been told previously by HS2 that Camden High Street will be closed for all access including pedestrian access but this has not been assessed. This is a major concern for the London Borough of Camden. Pedestrian volumes are very high at this location (6,000 per hour) and this is the heart of Camden

			<p>Town and the markets and for cyclists. The proposal cuts the town centre in two. The impact of this closure for pedestrians and on the economy has not been assessed. This will make it very difficult to attract people to the area. It is vital that direct access for pedestrians and cyclists is provided along Chalk Farm Road throughout the construction period.</p> <p>Construction routes proposed are not practical, such as two-way working on Camden High St which would be unsafe. There would also be a seriously adverse impact on businesses and their servicing arrangements, in addition to the need for access for the large number of pedestrians and cyclists that use the area. Major mitigations would be needed, although some of the proposed arrangements appear fundamentally flawed.</p> <p>The proposed bus diversion route is using Harmood Street which is a narrow residential road and not appropriate for large volumes of buses. The standard London Buses bus diversion route is via Prince of Wales Road and HS2 have been clearly advised of this (this is the proposed traffic diversion). This "Camden / London Buses" diversion should be properly assessed in the ES. Camden Council considers much more detail on how HS2 Ltd expects all these elements to work should have been included in the ES.</p> <p>The diversions proposed for cyclists are too great. Indeed access should be provided for cyclists and pedestrians through the construction site and bridge for as long as possible rather than creating diversions.</p> <p>Camden Council is concerned as to the impact of significant volumes of construction traffic accessing and egressing the HS1-HS2 Link Portal site upon nearby residential premises, particularly in Juniper Crescent and Regent's Park Road/Bridge Approach. The proposed construction route would also conflict with cycle and pedestrian routes on Regent's Park Rd/Bridge Approach, which has a sharp bend and is also on a significant slope, posing potentially hazardous conditions to vulnerable road users, which need to be mitigated.</p>
		6.5.49- 6.5.51	<p>There are no details for the Adelaide Road vent shaft about where alternative pedestrian crossings will be provided only that one will be removed. Camden Council Engineers believe that alternative construction methods would potentially allow this street to remain open and for the works to be completed within the highway in a significantly shorter time period. It should be justified further why it is not possible to at least maintain single lane flow, plus provision for cyclists and pedestrians. Figure 6.101 only shows pedestrian crossings to be removed and does not reprovided facilities. The</p>



			<p>consequences of this road closure would involve unacceptable use of roads off of the TLRN or SRN for diverted traffic, such as England's Lane. The construction routes indicated for HGV's from the west along Adelaide Road would arrive at the western end of the site, which would contradict the direction of construction vehicle flow on the two site layout diagrams (fig 6-100 &amp; 101) which suggest this the west end of the site to be for egress only. The eastern route is not viable. Camden Rd and Chalk Farm Rd will have road closures during parts of the HS2 construction period. Eversholt Street (not Road) is proposed elsewhere in the ES to be used for utility works and potential closures, diversions, taxis and buses, plus the suggested route includes some prohibited turns which are not assessed which is not acceptable. It is also unclear why cycle access cannot be maintained together with the pedestrian access proposed.</p>
		<p>6.5.59 to 6.5.62 (and accompanying tables 6-79, 6-80 and figs 6-103, 6-104, 6-105)</p>	<p>Camden Council expect as a matter of principle, that diversions should only take place onto roads on the TLRN or, where this is not possible, on the SRN, or where even this is not possible, other suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report, and that 24 hour access beneath bridges concerns would be maintained for pedestrians and cyclists on all sites. If this is not possible in any cases, pedestrian <i>and</i> cycle diversion routes should be specified (it is not appropriate to assume that general vehicular diversion routes would be used). The Camden Town area is heavily used by cyclists. Camden does not consider that any delay to existing cycle routes is acceptable and opposes any working assumption that a delay (for example of up to 2 minutes and 30 seconds) to cycle routes could be regarded as an insignificant impact.</p> <p>Camden has a general preference that where buses are diverted for extended periods due to various adjacent worksites that a common route is provided where possible and appropriate. In many cases, it would be appropriate to divert buses on the same routes as general traffic, unless there are specific justified circumstances.</p> <p>Further detailed discussion is required with Camden Council regarding the proposed work sites and diversions, as numerous detailed issues arise.</p> <p>Further discussion is required regarding any bus diversions, traffic management and construction access to the site at St Pancras Way and Randolph St, for example (figs 6-103 &amp; 104). The opportunity should be used to implement engineering changes to Randolph St in respect of vehicle flow and public realm which are being planned by Camden Council. Bus and cycle measures are also being implemented by the Council in the area over the next year. It should be noted that</p>

			<p>Camden Council has plans to close Farrier St to vehicular traffic in the future.</p> <p>Again, diversions for cyclists are not clear, but it would be inappropriate and potentially dangerous for cyclists to use the proposed general traffic diversion shown.</p> <p>Camden Council has serious concerns about the proposals to undertake works at the busy Camden Rd/ Royal College St junction which would have serious impacts on the TLRN and on Camden's highway network impacting on buses, general traffic, pedestrians and cyclists which have not been adequately identified and addressed and mitigated. Strategic diversions (having regard to the Council's Network Management Duty Report and using the aforementioned rationale with regard to the road hierarchy), are likely to be necessary to move traffic onto more strategic routes, such as Kentish Town Road and York Way and Camden Council would be concerned regarding any use of more minor roads other than for access for local traffic into and out of the area only. However, HS2 will need to implement mitigation measures that will need to be agreed with Camden to prevent abuse of such a facility, for example by through traffic (e.g. preventing access on to some roads, where necessary). The impacts of these works on Camden's entire highway network needs detailed traffic modelling to better understand how this crucial junction with very high traffic flows can be managed and mitigated. The phasing and duration of works at junctions such as this and whether they coincide with other works taking place in the area will have a critical influence on the impact of the works. Further discussion between relevant highway authorities and other key stakeholders such as the emergency services is essential. Bus diversions require further discussion. There are significant cycle routes in the area of Camden Rd, Royal College St and Kentish Town Rd that are well used and it is not clear how these routes will be impacted and whether satisfactory arrangements for cyclists are proposed.</p> <p>Camden Council is very concerned that the cumulative disruption, not just within CFA2 and 3, but also relating to wider adjacent areas such as CFA1, have not been fully reported in the ES. This is captured by the optimistic predictions described in this section and Tables 6-79 to 6-84. The ES repeatedly describes single closures in isolation (e.g.in 6.5.66), but this is inaccurate because when they are added with all the others during the same extensive period, then the disruption across the local congested network will be very severe and damaging. Camden Council requests combined phasing details of the CFA2/3 and 1, so that all works and disruptions and impacts, occurring simultaneously, can be reviewed more transparently. It needs to be clear how activity and traffic associated with other significant development projects that may be taking place in the area at the same time (e.g. redevelopment of Hawley Wharf regeneration site and Camden Town Underground</p>
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			<p>Station) would be accommodated alongside the HS2 proposals. It needs to be demonstrated that utilities works have fully been taken into account as the comments made are vague and unacceptable and could have a significant impact on the duration and impact of works. HS2 will be expected to pay for all consequences of the proposed diversions, such as highway works and compensation for loss of parking / relocation of loading and parking etc. Mitigation measures will generally be required to prevent through traffic that may attempt to 'rat-run' adjacent/nearby residential and other roads off the TLRN as a result of diversions.</p>
		Table 6.81 (after 6.5.63)	<p>Camden Council is concerned that adding 1km to the route of northbound buses serving Royal College Street during the Camden Road bridge closure will have a significant impact on the ability of the route to operate reliably and without recourse to additional vehicles. The diversion route, whilst currently used by buses, is tortuous and will add significant amounts of journey time well in excess of what statements in the ES would indicate. A full analysis of the journey time penalty and impact on the bus routes serving this area should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality.</p>
		Table 6.82 (after 6.5.63)	<p>Camden Council considers that whilst alterations to Georgiana Street and Lyme Street can be made to accommodate buses, there will be a considerable loss of parking in Lyme Street if two-way working is to be established in this street (northbound for buses, southbound for other vehicles). This will have a significant impact on local residents. Again the diversion route is 1km and is a slow and tortuous route, which will take much longer than envisaged in the ES. A full analysis of the journey time penalty and impact on the bus routes serving this area should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality.</p>
		6.5.83, Table 6.83 (after 6.5.63) and fig 6-106	<p>Camden Council considers the ES deficient in that the impact of the proposed Chalk Farm Rd site and has not been properly assessed. Another deficiency identified within the ES relates to the Chalk Farm Rd bridge site is that it is likely to overlap with works at Adelaide Rd and potentially for a significant period of time, which Camden Council considers to be totally unacceptable. This closure highlights concerns about through traffic and wider strategic diversions and their impacts. Diversions and routes for construction traffic should be directed to roads on the TLRN or, where this is not possible, on the SRN, or where even this is not possible, other suitable roads having adequate reasoned and demonstrable regard to the Council's Network Management Duty Report Mitigation measures will be required to reduce potential of through traffic on inappropriate roads.</p> <p>A diversion route via Prince of Wales Road (the normal diversion agreed with London Buses route</p>

			<p>when this junction has been impacted by road works) is appropriate, however, concern regarding the use of Harmood St for any significant number of bus diversions.</p> <p>Camden Council note the diversion route of 1.1km to avoid bridge works at Chalk Farm Road. Whilst all the routes to be used are suitable for double decker buses, the journey time penalty is considered to be in excess of what is envisaged in the ES. A full analysis of the journey time penalty and impact on the bus routes to operate this diversion should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality. The need for pedestrian and bicycle access is particularly important in this busy area of Camden Town Centre and its important link for cyclist. The proposed pedestrian and unclear cycle diversions are unacceptable to Camden Council. Formal and informal pedestrian routes need to be identified and matters such as adequate lighting and community safety issues addressed. A covered walk/cycleway for use by pedestrians and cyclists beneath the bridge will be needed, (even a temporary bridge over the railway viaduct may be necessary when such access is not possible), as pedestrian volumes are very high and important to the functioning of the town centre, which is also of national importance to the tourist economy. This closure would be harmful to the operation of the town centre and it should be demonstrated that these are limited to the absolute minimum.</p>
		Table 6.84 (after 6.5.66)	<p>The ES does not make sufficiently clear why the closure of Adelaide Rd is necessary, particularly for the lengthy period of 4 months plus any extended period needed to accommodate utilities works. The identification of suitable east-west routes for diversions for this site is remains problematical and requires further consideration Mitigation measures would be required to prevent inappropriate roads such as Steele's Road and Eton Road being used use by through traffic.</p> <p>Camden Council considers that the diversion of nearly 0.5km for bus services on Adelaide Road will have an impact on the ability of the route to remain punctual; however it is still believed that the excess journey time will be greater than that envisaged in the ES. The route via England's Lane is also envisaged to be used by a significant number of buses, diverted traffic and construction traffic which would be inappropriate, likely to result in significant congestion on this stretch of road and the suspension of a significant number of parking bays and nuisance to residents on a road off of the Strategic Road Network (TLRN and SRN). Further information is needed on how conflict between public transport and construction traffic can be avoided and traffic modelling to assess the traffic impact on roads such as England's Lane,, plus a full analysis of the journey time penalty and impact on the bus routes to operate this diversion should be undertaken to show the effects in more detail, including the potential need for additional PVR to maintain punctuality.</p>

		6.5.67, 6.5.70-74	<p>Bus and traffic diversions should be limited to the Strategic Road Network or TLRN. England's Lane is not an appropriate road to divert such a large number of buses and all traffic, in addition to construction traffic. This is a residential road serving a large number of residents. The road is also of unsuitable size to accommodate larger vehicles, particularly to the volumes likely to be generated by such diversions, causing congestion and hazardous conditions, especially for vulnerable users of the public highway, such as pedestrians and cyclists. It could also impede the movement of emergency vehicles (the Royal Free Hospital is close to this area, for example). Similarly, the proposed bus diversions including Lyme Street and Ferrier Road are on narrow residential roads that are not appropriate for bus use. Buses should be diverted via Crowndale Road, which is more suitable for buses.</p> <p>Direct access needs to be maintained for pedestrians across Alexandra Place between adjacent residential areas such as the Alexandra and Ainsworth Estates and Loudon Road and South Hampstead Station.</p>
		6.5.79	Camden Council notes that the period for construction impacts in CFA2 and 3 is 2017 to 2026, the same as for CFA1 and refers HS2 to their concerns on cumulative effects, provided throughout their ES response.
		6.5.81	Camden Council has not seen the derivations for traffic generation of the construction activities and considers the claims within this reference to be largely unsubstantiated.
		6.5.82	Camden Council considers the ES is defective as it does not provide clarification on what will be the 'primary HGV' construction route when Adelaide Road and Chalk Farm Road are closed for long periods.
		6.5.83	Camden Council considers derivation information on the cumulative impact trip generation for planned developments, that is referenced, should have been provided within the Environmental Statement.
		6.5.84	Camden Council considers derivation information on the trip generation results that are referenced should have been provided within the Environmental Statement.
		6.5.90	Camden Council refers to earlier responses regarding the reliability of baseline calibration surveys

			and baseline operational performance results that were considered to be very optimistic and inaccurate.
		6.5.92	Camden Council seeks clarification on which simultaneous component impacts have been included in the cumulative assignments and whether these also include adjacent areas such as CFA1 and 4.
		6.5.93 to 6.5.104, Tables 6-85 – 6-93	Camden Council generally considers the changes in traffic flows as a result of HS2 construction activities that are presented here to be modest and without trip generation supporting derivations are not able to conclude otherwise. Camden Council also considers changes in traffic flows as a result of HS2 construction activities for Adelaide Road for the scenarios when it is open as should be included within the Tables presented to show the full impacts of the HS2 scheme, nor the impact set out upon nearby roads such as England's Lane which is currently proposed to accommodate construction traffic and diverted traffic
		6.5.105 to 6.5.124	Camden Council do not accept the operational capacity and queuing performance results presented here for reasons explained in earlier sections of this response. The junctions in summary are predicted to operate with exaggerated levels of spare capacity and low queuing, for example at 6.5.109.
		6.5.108	Royal College Street forms part of the main north / south cycle route in Camden linking the West End and Kentish Town. The route is due to be upgraded in 2014 to facilitate wide high quality cycle tracks. HS2 have been advised of this but no attempt to take account of cyclists has been made including alternatives or high quality diversions.
		6.5.109	"Table 6-100 below shows the performance of the junction under three construction scenarios alongside the 2021 Baseline. This junction is currently operating close to capacity. The diversion of traffic within Scenario 1 causes the degree of saturation on the Chalk Farm Road southbound arm to increase in both peak periods to 90%. This is not considered a substantial impact." Camden Council cannot understand, from the information provided in the Environmental Statement, why this impact is not considered to be substantial.
		6.5.110 to 6.5.115	Camden Council own modelling data shows that Kentish Town Rd/ Hawley Crescent junction is operating close to capacity and not at 43% or 62% capacity. Camden Council own modelling data shows that Parkway / Arlington Road junction is operating close to capacity and not at 28% or 1% capacity. Haverstock Hill / England's Lane, Adelaide Road / Primrose Hill Road and Adelaide Road /

			Haverstock Hill are also vastly underestimating traffic and its impacts, compared to Camden Council own data and this may mean the actual impacts and mitigation is significantly under-estimated.
		6.5.116	“Table 6-107 below shows the performance of the junction under three construction scenarios alongside the 2021 Baseline. It can be seen that the impacts on this junction are relatively small in tests 1 and 3, but in Scenario 2 the degree of saturation on the England's Lane approach exceed 100%. Mitigation in the form of advanced warning signs and signal optimisation are considered appropriate.” Camden Council question the modelling data, given their own data shows that HS2's data is vastly underestimating traffic demand and its impacts. These mitigation measures are therefore not considered appropriate for Haverstock Hill /England's Lane.
		6.5.117 to 6.5.118	Adelaide Road / Avenue Road and Finchley Road / Avenue Road are under-estimated. Camden Council own data shows that these junctions are operating close to capacity and not at such a low DoS. The impacts are therefore likely to be much more significant.
		6.5.119 to 6.5.120	Boundary Road / Finchley Road and Boundary Road / Loudoun Road are vastly underestimating traffic and its impacts, compared to Camden Council own data and this may mean the actual impacts and mitigation is significantly under-estimated.
		6.5.125	Camden Council notes that the modest number of routes considered by HS2 to carry an increased risk of accidents is just two. This seems to be as a direct outcome of the approach and assessment to transport, adopted by HS2 within Vol 5 of the ES. Consequently, this strongly signifies to CC, that HS2 have got their assessment substantially wrong in many areas leading to a significant under-estimation of impacts, based on the many reasons summarised by Camden Council in this response to the ES.
		6.5.125	Camden are concerned that in Scenario 2 there is an increased risk of accidents on Royal College Street (part of cycle route 6) and Chalk Farm Road (overlap with cycle route 6a). What are the proposed mitigation measures for cyclists on these links?
		6.5.127 to 6.5.128	Camden Council seeks confirmation of disruption to Freight services and their secondary impacts on other freight and passenger services, plus the resulting impacts on communities and any consequent need to transfer to less sustainable freight provision using the road network.
		6.5.128	"The diversion of the NLL tracks from the south side to the north side of the affected bridges and



			viaducts in this area will require rail possessions. Up to 163 possessions will be required, which will mainly be mid-week night-time possessions but may require one 7-day blockade at Chalk Farm Road and seven 54-hour possessions. Since these will generally be overnight and weekend closures, the impacts on public transport delay is considered to be not substantial." Camden Council rejects this statement and considers these impacts to be highly significant.
		6.5.129 to 6.5.132	Camden Council is concerned that impacts on Bus services and associated diversions have not been properly assessed in sufficient detail and are insufficiently covered in a very short section here, despite the many routes that are subject to closure or disturbance.
		6.5.134	Camden Council is not convinced that further public transport interchanges will not be adversely affected by the disruptions in CFA2 and 3, as claimed here, such as Camden Town.
		6.5.135	Camden Council is concerned that sufficient cycle diversionary routes are not identified to the extent required to fully meet the construction impacts.
		6.5.136	"The longest pedestrian diversion required will be associated with the Chalk Farm Road closure at around 530m or nearly eight minutes' walk time affecting over 1000 pedestrians per day." Camden Council data shows that at peak times there are 6000 pedestrians an hour. The HS2 figure of 1000 per day is so far out, that in common with other major data issues highlighted in this response, Camden Council is very concerned that these fundamental inaccuracies completely undermine the assessment that has been done both within the ES and as part of broader economic cases. Such a diversion of major volumes of pedestrians is completely unacceptable and would have major adverse impacts on the functioning and success of Camden Town Centre, its markets and tourists.
		6.5.140	Camden Council notes the statement: "Cyclist diversions will be the same as for general traffic although cyclists also have the option of dismounting and following the pedestrian diversion. At Adelaide Road up to 33 cyclists per hour will be impacted and up to 100 cyclists per hour at Alexandra Place." Camden Council considers confirmation of when these surveys were undertaken should have been included within the Environmental Statement to determine if they were in a typical/neutral survey month. Adequate provision should be made to maintain adequate access for pedestrians and cyclists throughout the construction period at all construction process, unless there are strong demonstrable reasons illustrating specifically why this is not possible, in which case impacts should be minimised as far as possible. Requiring cyclists to dismount does not constitute satisfactory provision for cyclists

		6.5.147 to 6.5.148	Camden Council considers that the wording in these closing paragraphs is far too vague and not sufficiently convincing. Phrases such as 'seeks to minimise adverse impacts' and 'where reasonably practical the number of private car trips to and from the site.....will be reduced by encouraging alternative modes of transport or vehicle sharing' are not measurable or definitive and will ultimately allow HS2 the freedom to impact the network as they see fit and to the detriment of other users both within, visiting and passing through the Borough.
		6.5.150	"No further traffic and transport mitigation measures during construction of the Proposed Scheme are considered necessary, based on the outcomes of this assessment." Camden Council considers that if based on the assessment presented in the ES then this statement may have some truth. However, the assessment is fundamentally flawed in many areas that have been summarised in this response and therefore the content fails to accurately model baseline, HS2 construction related activity and subsequent impacts across the transport network, resulting in a complete lack of sufficient mitigation. Camden Council wholly refutes this statement.

## Transport Assessment (TR-001-000) Traffic and Transport Part 4: London assessment

Section	Sub section	Paragraph	London Borough of Camden response
6			Many descriptive elements of Part 4 are duplicated for ease of reference from other volumes, so comments provided here by Camden Council are related to other issues not previously covered. Camden Council recognise that the operational impacts of HS2 focus more on the surrounding sustainable modes including existing rail, LU, bus, cycle and pedestrian provision.
		6.6.53 to 6.6.67	Camden Council seek clarification on a potentially major issue that emerges from the Railplan modelling approach and subsequent outcomes reported in the ES regarding its prediction of HS2 demands and impacts on the LU network (CFA1 to 3). This was not immediately noticeable, because HS2 curiously elected to combine the demand trips for Euston Station with Euston Square when presenting the respective impacts of each station in Tables 6-118 and 6-119. All other stations were shown separately. Camden Council detected that Railplan has loaded the majority of the additional HS2 operational demand on the LU lines served by Euston Square, such as the

			<p>Metropolitan Line rather than those at Euston Station (Northern and Victoria Lines), because it is understood that Railplan places demand where there is less crowding, due to weighting factors) even if those lines are serving lesser demand catchments than the high demand lines where trips will gravitate to and from. Conversely, Railplan has evidently and inaccurately not placed any additional demand from HS2 on the critical Northern and Victoria lines served by Euston Station (in fact a reduction is shown in 6-116 and 6-117 for the AM and PM peak periods in 2026 respectively) probably for no other reason that they are already severely crowded. This explains why the impacts in Part 4 on the LU network are entirely distorted away from the crowded Northern and Victoria LU lines and towards lines with relatively more capacity. While this methodology is convenient for absorbing the demand of HS2 for onward travel, unfortunately however it is an unrealistic in reality and therefore incorrect for determining environmental impacts, because users can not just switch their journey purpose and origin/destination route of travel from densely populated catchment areas in and around London, or mainline interchanges such as Victoria, Waterloo or Kings Cross (as relate directly to the Northern and Victoria Lines) to a less crowded route, for instance the sub-surface lines and CRL.</p> <p>Camden Council suspects that HS2 have also realised this, because HS2 main capacity building mitigation measures for LU to accommodate the main increase in passengers correspond to Euston Station (ticket hall expansion etc.) and not Euston Square other than the too narrow underpass link, even though the model states otherwise and that Euston Square will increase by c.9000 passengers in the 2026 peaks and Euston Station will strangely reduce by c.400 as a direct result of HS2 demand. This mitigation at Euston Station is only realistically provided up to a point, because the modelled results (Tables 6-118 and 6-119) then wrongly show that there is little to no passenger demand impact on many of the Northern and Victoria Line LU stations, where of course additional access to and onward travel from Euston Station because of HS2 services, will be felt profoundly. Through this approach, HS2 have avoided the need to mitigate critical pinch points on the NL and VL which will mean that passengers will undoubtedly suffer even worse crowding discomfort than currently and in future year baselines, primarily because the model has wrongly reassigned demand via Euston Square services in an east-west orientation, rather north-south via Euston Station LU services. This may explain why there are noticeable discrepancies/omissions in Table 6-118 for the AM peak relating to LU stations on the VL and NL, such as: Euston Stun showing a reduction in demand of 459 trips rather than any increase, Goodge St showing a reduction in demand of 260 trips rather than any increase, Bank showing a reduction in demand of 570 trips rather than any increase, Warren St showing only a modest increase of 140 trips, Mornington Crescent showing only 30 additional trips, Charing Cross, Kentish Town, Oxford Circus, Chalk Farm and Highbury &amp;</p>
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			Islington amongst many others are all omitted because they are alleged to not generate more or less than 100 trips. By contrast, Liverpool St which is linked by the Metropolitan, Circle and H&C lines, shows 1,330 additional trips, as does Farringdon showing 1190 extra trips and Euston Square (Table 6-116) taking all the immediate LU demand at Euston with an increase of 8790 trips. CRL linkage is also a factor in increased capacity. Tables 6-119 and 6-117 for the PM peak follow similar trends, most noticeably with Euston Square shouldering virtually all the increase in HS2 trips of 9610 and Euston Station this time showing a decrease of 370 trips.
		6.6.20	Camden Council request clarification on whether additional mileage generated from buses travelling to and from the new bus standing and servicing area has been considered in the assessment process. It is not entirely clear in the ES what services are intended to use this area.
		6.6.21-6.6.24	Camden Council request information on whether the effect on bus journey times of provision of additional signalised junctions on A400 Hampstead Road has been assessed, and what mitigation measures have been put in place to ensure that buses have ease of access through these junctions so as not to experience additional delay.
		6.6.27	Camden Council note that this paragraph makes reference to the new bus stand north-east of the station, off Eversholt Street. As per paragraph 6.6.20, and given that the new Euston bus station area is expected (by HS2) to provide additional capacity, what do HS2 envisage this area being used for, and how will conflicts between private cars and buses in the northern entrance area be managed?
		6.6.32	Camden Council notes that HS2 consider "reductions in passenger volumes on Underground lines from King's Cross St Pancras" as a benefit of Phase 2 of the scheme. Of course, all Underground lines serving King's Cross St Pancras bar the Piccadilly Line also serve Euston (or Euston Square), so this beneficial effect overall will be much less strong than this paragraph would make out, as any reductions in patronage from Kings Cross St Pancras will be masked by increases from Euston or Euston Square.
		6.6.36	Camden Council note the statement that the improved bus facilities at Euston station will maintain and increase capacity for through and terminating bus routes in order to meet additional demand generated by HS2. Provision of additional bus services is a significant cost burden which it is presumed HS2 believe will be met by TfL, and cannot be guaranteed will take place.
		6.6.56	Section 6.6.56 provides a hint at why the results are biased away from LU's high demand Lines when HS2 refers to 'as a result of pre-existing crowding levels' but Camden Council rejects this as

			the correct approach. Camden Council considers that an alternative run of the model with Euston Station (and not Euston Square) taking the bulk of the demand, as is very likely to be the genuine case. Camden Council considers that the impractical notion that passengers will interchange at Euston Square and then Moorgate to access the Bank branch of the Northern Line in 6.6.56 (and in reverse to arrive at HS2), when a direct interchange to the NL is available directly at Euston Station is especially improbable, except for a modest proportion of trips and nowhere near the extent predicted in 6.6.56. Camden Council's fundamental concern with this distortion is that it means HS2 have not properly mitigated the impacts of onward travel from, and access to, HS2 services at Euston Station on the Northern and Victoria Lines. This will have a knock-on adverse impact for all passengers using these incredibly popular LU routes on a daily basis and also mis-directs where mitigation is really needed, not just on LU, but also for additional bus services etc.
		6.6.59	Camden Council notes that HS2 refers to 'Euston Station (including Euston Square).....' when referring to demand increases at Euston. This merging of the two LU stations conveniently disguises the obvious discrepancy of the reduced demand from HS2 that is forecasted at Euston LU Station. Camden Council does not accept this outcome and have highlighted this in their fuller response at 6.6.53 to 6.6.67.
		6.6.60	Camden Council entirely rejects the contention that impacts at Zone 1 stations are relatively small and refers HS2 to its full response at 6.6.53 to 6.6.67.
		6.6.61	Camden Council notes that HS2 fails to mention the unrealistic 'positive' LU impacts forecasted by the modelling at Euston Station, not surprisingly.
		6.6.64 6.6.155	Camden Council recognise that the model distortion they have endeavoured to explain in outline above, unfortunately makes the remaining sections of the Rail operational impact assessment largely meaningless and therefore sections dealing with impacts on passenger flows, crowding levels and proposed mitigation cannot be accepted without HS2 re-working the forecasts to address Camden Council's comments at 6.6.53 to 6.6.67. This includes the information presented in Figures 6.122 onwards.
		6.6.68	Camden Council notes the reliance in the ES on passengers interchanging onto Crossrail services at Old Oak Common, which in turn would reduce the requirement for mitigation at Euston. Camden Council would like greater detail of the evidence that these passengers can be accommodated on Crossrail and GWML classic services, as if the result of transfer onto Crossrail is simply greater

			crowding on this route, then it will become a less attractive option and therefore the impacts on Euston will be significantly greater. There appears to be no analysis of Crossrail capacity as part of the ES.
		6.6.71-6.6.72 (plus Figures 6.124/5/8/9)	Camden Council considers it is unclear how a reduction in crowding on the GWML will be achieved purely as a result of HS2. It is difficult to see why there will be a reduction in crowding between Slough and OOC in the morning peak period when HS2 will have little or no impact on the journey patterns of the majority of people using this route. It is therefore difficult to see how this can be a positive impact of the Proposed Scheme due to the level of interchange with HS2 services available at OOC. Simply providing a station for interchange at OOC between Crossrail and the GWML would have much the same effect, without the need for HS2.
		6.6.77/6.6.79	Camden Council argues that it is too simplistic to assume that passengers will not attempt to travel on a route simply because it has high levels of crowding. Even if passengers are not immediately able to access trains, it is considered likely that there will be significantly increased crowding as passengers attempt to travel - a significant proportion of HS2 passengers will not be regular users and will be guided by available public transport information rather than by a detailed knowledge of crowding on the London transport network.
		6.6.81	Camden Council refers to our response to paragraph 6.6.53 onwards in relation to the analysis of Railplan data and the shifting of passengers onto routes from Euston Square to mask the potential for additional crowding on the critical Northern and Victoria Lines into Central London.
		6.6.82	Camden Council believe that the Piccadilly Line would offer a relatively attractive route to Central London as a result of excessive crowding on the Northern and Victoria Lines; certainly more attractive than travelling via Euston Square and Baker Street. It is therefore considered that the data provided does not show the full potential for additional crowding on this route as other, "preferential" routes for increased patronage have been selected.
		6.6.84	Camden Council note there is no mention of additional Crossrail trains between Paddington and OOC in the PM peak which would alleviate the additional crowding on this route. This paragraph states that "the pattern is very similar to the AM peak period", but without the additional trains, crowding would reach unacceptable levels on the line between Paddington and OOC. There appears to be no mitigation proposed for PM peak crowding on Crossrail, which in turn would lead to greater passenger volumes on other routes to HS2.

		6.6.86	Camden Council considers that passengers will still attempt to utilise the Northern and Victoria Lines for their journeys, particularly those who are not familiar with the system, and therefore the amount of additional crowding on these lines has been underestimated. As previously stated, it is convenient for HS2 to route trips via alternative, less direct routes to Central London as these have lower levels of crowding and therefore less expensive mitigation is required for the London Underground.
		6.6.95/6.6.96	Camden Council reiterate the issues surrounding the agglomeration of additional trips at Euston and Euston Square stations (as per our comments on paragraphs 6.6.53 to 6.6.67), and the indication that the majority of trips will use the east-west services from Euston Square rather than the direct north-south links to Central London provided by the Northern and Victoria Lines. These impacts will be even more acutely felt in 2041 as passenger volumes continue to increase on LU, National Rail and HS2 Phase Two services, with no mitigation measures proposed for the critical Northern and Victoria Lines.
		Table 6.126 (after 6.6.95)	Camden Council considers that full data for the access, egress and interchange utilisation of Zone 1 stations should be provided by HS2, and not just those that have an impact of >100 passengers in the AM peak period. We also disagree with the agglomeration of impact at Euston and Euston Square stations as discussed above and in our comments on paragraphs 6.6.53 to 6.6.67.
		6.6.97	Camden Council contends that the "positive impact" of reductions in demand to/from Paddington are not a result of HS2. They are the result of a new station at Old Oak Common. This station could be provided without the rest of HS2, and therefore there is no positive benefit to the scheme over and above the delivery of the interchange.
		6.6.105	Camden Council maintains its position that allocation of significant flows to the west-east routes from Euston Square will not reflect the reality of passengers wishing to access Central London and continuing to attempt to use the Northern and Victoria Lines, both of which have unacceptable levels of crowding in this scenario. It is simply not realistic for HS2 to state that passengers will travel in different directions to their intended destination as a result of crowding on the network.
		6.6.107	Camden Council note that the analysis indicates that HS2 will create an unacceptable crowding impact on the northbound Northern Line (Charing Cross branch) between Warren Street and Euston, and yet there are no proposals to mitigate this impact on the Northern Line, leading to greater



			passenger discomfort compared to the 2014 baseline scenario.
		Figure 6.145 (after 6.6.110)	Camden Council notes that, as per paragraph 6.6.107, crowding levels greater than four passengers/m <sup>2</sup> are created in the PM peak on the Northern Line (Charing Cross branch). In paragraph 6.6.110 this is dismissed as a "limited" impact, when clearly it will have real and undesirable effects on the travel conditions of passengers on this route in the PM peak.
		6.6.113	Camden Council reiterate previous comments that the impact of HS2 on Victoria Line crowding has been understated as a result of the bias in the model towards routes which have lower levels of crowding, regardless of destination.
		6.6.114-6.6.115	Camden Council reiterate previous comments that the impact of HS2 on Northern Line crowding has been understated as a result of the bias in the model towards routes which have lower levels of crowding, regardless of destination.
		6.6.116	Camden Council note that Figure 6.151 shows that AM peak Northern Line crowding in the 2041 baseline is slightly below four passengers/m <sup>2</sup> between Euston and Warren Street, but the impact of HS2 pushes this over four passengers/m <sup>2</sup> . This clearly demonstrates that HS2 has a detrimental impact on Northern Line passenger flows in the AM peak period, increasing passenger discomfort.
		6.6.122	Camden Council believe that HS2 adds most crowding on the east-west sub-surface lines because it is convenient to do so, not because this represents the actual journeys to be made by passengers arriving at Euston, many of whom will be intending to travel on the Northern or Victoria Lines towards Central London.
		6.6.131 and 6.6.139	Camden Council is concerned that there is not sufficient depth or coverage of mitigation across all modes to embrace the future demands that are expected from HS2, especially for bus, LU and cycle. The issue highlighted in 12.5.4 below is a major cause for concern in HS2 not directing mitigation at the critical areas or with sufficient penetration. Additional bus services to take demand, LU capacity improvements for onward travel and a comprehensive cycle route network that is not just a poor replacement, but allows for future growth trends of cycling as a result of HS2 are expected minimums, but do not feature anywhere near far enough in the transport assessment and subsequent ES. Camden Council considers this to be a considerable oversight and makes the ES inaccurate and ineffective in many areas for Central London, not just the London Borough of Camden. Camden Council questions the 'mitigation' works described for Euston LU Station if HS2

			<p>support the Railplan modelling results. Why provide mitigation at Euston Station as they have proposed, if HS2 is alleged not to have a direct impact at Euston LU Station, as claimed at 6.6.53.</p> <p>By contrast, Camden Council questions why HS2 are not mitigating the considerable demand increases that the model forecasts for Euston Square if indeed HS2 genuinely agree with the model outcomes. On a wider economic basis, Camden Council question whether the economic disbenefits of passengers walking 300m to access HS2 via Euston Square has been included in the economic benefits analysis.</p>
			<p>The new pedestrian subway under the A501 Euston Road has not been designed to sufficient capacity and comfort levels for a new piece of infrastructure, especially if HS2 'Railplan' demand through Euston Square is to be mitigated within baseline conditions.</p>
		6.6.147	<p>Camden Council is very concerned that HS2 have not detected that obvious demand increases, arising from HS2, will have an impact on the LU lines that directly run through and serve Euston Station /HS2. This major oversight to a very obvious outcome is considered to reflect a major flaw in the transport assessment that informs the ES of impacts and areas in need of mitigation.</p>
		6.6.157	<p>Camden Council would like to see occupancy analysis of the new bus station and northern bus standing area to indicate that there is sufficient capacity to accommodate the new and altered bus services.</p>
		6.6.160	<p>Camden Council notes the proposals to relocate bus stops around Euston station. Relocation of bus stops can make access more difficult for those with mobility difficulties or with heavy luggage, and it is therefore important that the disruption caused by bus stop relocation is kept to a minimum in terms of distance to the relocated stop.</p>
		6.6.161	<p>Camden Council request clarification on whether the journey time analysis for service 91 includes the additional running and dwell times that will be incurred in operating through the new Euston bus station, as this will be a substantial diversion (the bus currently turns left from Euston Road to Upper Woburn Place), and if not, whether this would have a material impact on the ability of the service to operate reliability and/or within its current PVR.</p>
		6.6.163	<p>Given the lack of mitigation measures proposed on the LU Northern and Victoria Lines, Camden Council would have appreciated greater information on the proposed new bus routes than that</p>

			provided in the ES. Whilst TfL may have requested these routes, it is not clear who is going to pay for them - Camden Council is of the opinion that HS2 should meet at least the initial cost of these services as they will be necessary to mitigate crowding on the LU network caused as a direct result of HS2. Information on the routes to be taken by these new services, and the terminating points of each, would have been useful in assessing whether or not these routes would be useful in mitigating the Proposed Scheme, as would information on the likely PVR of the service and the cost of provision. In any case, Camden Council considers that provision of a bus service is not likely to provide significant mitigation for the LU network as it is not known what proportion of passengers arriving at Euston consider the bus to be a viable option in reaching their onward destinations quickly.
		Table 6.133 (after 6.6.164)	Camden Council direct HS2 to our comments concerning Tables 6.13 and 6.14 in which we state that the baseline bus journey times are incorrect, and therefore the forecast baseline for 2026 is also incorrect. Therefore the data in this table is meaningless. Even if the data was correct, there are large journey time increases indicated for routes 18, 59 and 91; how will these be mitigated and if they cannot be mitigated will HS2 be funding the additional PVR necessary to maintain the existing frequencies?
		6.6.165	Camden Council notes that this paragraph is incorrect. Four bus routes have journey time increases of plus 5% - 18, 59, 91 and 253. Again, there is no mention of potential mitigation measures that may be required to maintain the existing frequency or increase PVR on the route as a result of this increased journey time.
		Table 6.134 (after 6.6.170)	Camden Council considers that the information presented in this table is simplistic and does not recognise the relative demand of each bus route. Simply taking a total number of additional bus passengers and dividing them by 87 to get a number of buses takes no account of the fact that some bus routes are more popular than others, and consequently there may be spare capacity on some routes and less on others. The impact on certain bus routes could be greater and require a higher number of buses on that particular route, whereas on other routes the additional demand may not be sufficient to fill up buses with spare capacity. Referring to -2.8 buses per hour is meaningless because a fall in traffic as a result of HS2 is unlikely to correlate directly to a reduction in frequency; however, it is likely that additional costs will be incurred on the busiest routes. There is also no information presented on the existing usage of the bus services, rendering the boarding and alighting data meaningless as it does not give any indication of whether the bus routes are full or empty at this point.

		6.6.171-6.6.172	As stated above, Camden Council considers the analysis resulting in a changed buses per hour figure to be simplistic as it ignores variations between high demand routes (where the need for additional buses may be greater) and lower demand routes (where the number of buses would stay the same, and not decrease). It is clear that a fall in passenger numbers arising from HS2 will not lead to a reduction in frequency and so referring to a negative figure in terms of buses per hour does not represent a saving.
		6.6.176 and Table 6.135	Camden Council reiterates that identifying a negative figure in terms of buses per hour will not result in a reduction in frequency on the routes concerned. The table and accompanying text implies that a saving could be made by reducing the bus frequency, but that is highly unlikely to happen. However, it may be that on the busiest routes additional capacity will be required which will come at significant cost, none of which will be outweighed by any meaningless "savings".
		6.6.177	Camden Council note that the frequencies of bus services in the bulleted section of this paragraph are incorrect, as per the baseline situation audit outlined in our previous comments.
		Table 6.136 (after 6.6.180)	Camden Council direct HS2 to our comments concerning Tables 6.13 and 6.14 in which we state that the baseline bus journey times are incorrect, and therefore the forecast baselines for 2026 and 2041 are also incorrect. Therefore the data in this table is meaningless. Even if the data was correct, there are large journey time increases indicated for routes 18, 59 and 91; how will these be mitigated and if they cannot be mitigated will HS2 be funding the additional PVR necessary to maintain the existing frequencies?
		Table 6.133 (after 6.6.164)	Camden Council direct HS2 to our comments concerning Tables 6.13 and 6.14 in which we state that the baseline bus journey times are incorrect, and therefore the forecast baseline for 2041 is also incorrect. Therefore the data in this table is meaningless. Even if the data was correct, there are large journey time increases indicated for routes 18, 24, 27, 29, 59, 73, 88, 91, 134, 168, 253 and 476; how will these be mitigated and if they cannot be mitigated will HS2 be funding the additional PVR necessary to maintain the existing frequencies? In addition, clearly there is an error in the forecasting for service 68 as it is impossible that a journey time saving of 50% can be made on this route as a result of HS2!!
		6.6.181	Camden Council note that the data shown in Table 6.133 relating to service 68 is clearly incorrect as this paragraph references this service as being one where journey times have increased, not

			decreased. If this is the case, then in total 13 bus routes have increases over 5%, not 12 - the bulleted points have omitted service 27 which has an 8% increase in journey time in the AM peak period. Again, no mitigation is proposed for the potential cost of additional PVR or the major adverse impact a reduction in frequency would have on passenger numbers and perception of the bus.
		Table 6.137 (after 6.6.186)	Camden Council considers that the information presented in this table is simplistic and does not recognise the relative demand of each bus route. Simply taking a total number of additional bus passengers and dividing them by 87 to get a number of buses takes no account of the fact that some bus routes are more popular than others, and consequently there may be spare capacity on some routes and less on others. The impact on certain bus routes could be greater and require a higher number of buses on that particular route, whereas on other routes the additional demand may not be sufficient to fill up buses with spare capacity. There is also no information presented on the existing usage of the bus services, rendering the boarding and alighting data meaningless as it does not give any indication of whether the bus routes are full or empty at this point. However, the analysis does indicate a significant number of additional buses would be required in order to mitigate the impact of the increased passenger movements.
		6.6.188-6.6.189	As stated above, Camden Council considers the analysis resulting in a changed buses per hour figure to be simplistic as it ignores variations between high demand routes (where the need for additional buses may be greater) and lower demand routes (where the number of buses would stay the same, and not decrease).
		6.6.194 and Table 6.138	Camden Council note there is no analysis of existing occupancy of bus services in the Euston area, which would allow a more realistic view on the number of additional buses required, as not all buses already on the road will be full. Camden Council also reiterates that identifying a negative figure in terms of buses per hour on Marylebone Road will not result in a reduction in frequency on the routes concerned. The table and accompanying text implies that a saving could be made by reducing the bus frequency, but that is highly unlikely to happen. However, it will be that on the busiest routes additional capacity will be required which will come at significant cost, none of which will be outweighed by any meaningless "savings".
		6.6.196	Camden Council reiterates the need for passenger assistance at the coach set down facilities to be highly accessible and highly visible to prevent drivers being required to leave passengers at the stop in order to access help from Network Rail staff. If staff cannot be constantly present, then some

			form of call system must be implemented to allow drivers to remain with their vehicles and passengers whilst assistance arrives.
		6.6.200 to 6.6.243	Camden Council are concerned that Railplan's distorted passenger modelling predictions described earlier do not accurately target where pedestrian demand impacts will be greatest and therefore will not result in appropriate mitigation. This is primarily a concern for LU stations on the Northern and Victoria Lines.
		6.6.244	Camden Council considers that the general provision of proposed cycle routes is very modest for a scheme with the demand increases that HS2 will command. Replacing LCN Route 6a with a 'quiet way' route is a poor exchange and downgrade to a lesser version, so is really not considered to be representative of 'new' mitigation of future HS2 demand. Camden Council considers that HS2 have really missed the opportunity to knit cycle route improvements in to the heart of the revised highway network especially around Euston Station and strongly recommend that HS2 also re-visit this area of the Proposed Scheme design.
		6.6.248	Camden Council is concerned that the scale factor applied by Railplan may not be reliable due to other issues Camden Council raised earlier with regard to the accuracy of forecasts from Railplan.
		6.6.273	Camden Council seeks clarification if taxi is in reference to Hackney Licenced Vehicles (taxis). The Council needs to understand if Private Hire Vehicles (PHV) have been accommodated within their evaluation. PHV do not have the same rights as taxis and therefore must be considered as part of the private vehicle drop off. Camden Council cannot find any baseline data for private vehicles whether PHV or not for pick-up or drop-off.
		6.6.282	Camden Council is aware that taxis will need to access Euston Road via A400 Hampstead Road. The Euston Circus enhancements ban the left turn from Hampstead Road to Euston Road (section 6.3.51) to provide a single stage direct pedestrian crossing. Camden Council request clarification on how HS2 have assumed taxis will re-join the TLRN network to travel east, which will of course be a popular direction for taxi's to assign?
		6.6.283	Camden Council seeks clarification if private car also refers to Private Hire Vehicles and what analysis has been undertaken on increased PHV use.
		6.6.285	Camden Council is concerned that no disabled parking set-down or drop-off is allocated on

			Eversholt Street.
		6.6.286	<p>While not fully opposed, Camden Council considers the Environmental Statement should have provided further rationale and justification for removing all the parking from Euston Station. The Council is not fully convinced that this may not result in the less preferable outcome of additional overspill and strain on nearby streets. For example, where drivers choose to park up and wait for a short period to pick up passengers as they arrive in to Euston Station from HS2 and classic services. It is noted that a drop-off facility is provided for departing passengers but Camden Council cannot understand the capacity of this facility and how this meets predicted demand without the relevant evidence, which was not provided in the Environmental Statement.</p> <p>The loss of 107 on-street spaces is also considered to contribute to this potential problem.</p>
		6.6.289	<p>Camden Council recognise that the two large hotels that are to be demolished, and not seemingly re-provided, do currently provide a useful service in easing peak period demand on passenger transport access modes to/from Euston Station for peak-time rail services. Camden Council seeks clarification on how these trips have been re-introduced to the transport network in the peaks. Camden Council would also like clarification on whether the disbenefit from the loss of parking revenue from the removed short and long stay parking and the demolished hotels has been taken in to account in the economics business case for HS2.</p>
		6.6.294	<p>In common with other trip generation forecasts in the ES, HS2 have not provided any supporting evidence, data or reference to how the serving vehicle generation forecast has been derived, including what operations it is based upon. This again means that Camden Council cannot form a clear view on whether the figures are accurate or under-estimated and this is not acceptable due to the potential impacts on other users of Eversholt Street. The Station servicing section is generally considered to be too brief and compelling for a major scheme such as HS2.</p>
		6.6.306	<p>Camden Council considers the Environmental Statement lacks sufficient clarification on how the parking reductions have been reflected in the highway network assessment. Camden Council does not consider that these trips will just disappear from the network for reasons explained in 6.6.286.</p>
		6.6.307	<p>Camden Council refer to comments made in the Baseline section (Part 2) regarding fundamental issues with the 2026 and 2041 baseline highway models and especially the under-estimation of traffic impact that they predicted for the Construction related highway impacts.</p>



		6.6.313	Camden Council re-iterates that SCOOT systems are not HS2's mitigation. It is firmly embedded in the baseline conditions and therefore not the right of HS2 to adopt for their own mitigation. In any event and as described earlier, it is only effective if spare capacity is available on other arms, which is often not the case in most peak period scenarios in this part of central London.
		6.6.315 to 6.6.428	Camden Council firmly reject the highway impact assessment presented in these sections as an under-estimation of traffic impacts and potentially mitigation for the same fundamental reasons Camden Council provided in Part 2 of Vol 5. These in part related to unreliable survey data undertaken at inappropriate periods in 2012 and optimistic baseline operational performance testing of junctions on the highway network and without coding information to review whether the capacity assessment had been done sufficiently accurately and robustly. This view is reinforced by the fact that the baseline assessment does not correlate with Camden Council's own more established and reliable corresponding information known to them as the local highway authority, with HS2's versions reflecting an under-estimation of traffic impact and related performance. In common with the highway impact assessment for the Construction impacts, these major issues undermine the highway assessment and predictions reported in this TA and more critically for HS2, the Environmental Statement.
		6.6.429 to 6.6.431	Camden Council notes that accidents and safety records are presented in this short section. HS2 even state that the risk of accidents occurring will increase with the Proposed Scheme based on 30% increase in traffic flows. This affects nine junctions. Camden Council is very concerned that no further comment or attempted mitigation is then provided by HS2.
		6.6.434	Camden Council considers the heading 'Other mitigation measures' to be somewhat inaccurate as there appears to be no mitigation measures elsewhere in this section. Camden Council disagrees that the Proposed Scheme has been designed to mitigate the impacts of the demand from HS2 because of issues such as mis-representing the true impacts of HS2 on access to and onward travel from Euston Station on, for example, the LU network (NL and VL) and the bus system; and the unreliability of the highway impact assessments.
		6.6.436	Camden Council considers this statement to be inaccurate and misplaced for reasons described at 6.6.313
		6.6.437	Camden Council considers further clarification should be provided from HS2 on the implied comment in this paragraph. It appears to be suggested that Camden Council and TfL will be responsible for

			the HS2 operational impact in relation to junctions that are over capacity in the future, which is unacceptable. Such impacts must be adequately mitigated to acceptable levels and these measures must be financed fully by HS2 Ltd.
		6.6.438	Camden Council strongly considers that this should have been derived and fully assessed within the TA and ES.
		6.6.439	The credits from the travel plan objectives listed here have already been absorbed by HS2 within the scheme proposals and associated low forecasts of operational traffic generation from measures such as zero parking provision. Consequently, these measures cannot be exploited again or double counted as mitigation measures as the benefits have already been accounted for in the minimised car trip forecasts.
		6.6.440 to 6.6.442	Camden Council considers that with the exception of the modest re-provision of the occasional pedestrian and cycle link, albeit not to the same grade as some of those that have been lost, the package of mitigation for HS2 delivers very little for the Borough and wider local area, especially in view of the considerable disruption to the local area and adverse impacts on the local transport system that HS2 will bring in return for many years to come. Camden Council strongly urges HS2 to re-work the proposals to address this major issue for the good of those living in, working in, travelling through and visiting the Borough and this part of London.
		6.6.443 to 6.6.517	Camden Council fundamentally disagrees with the accuracy of the assessment and outcomes under the heading: 'Junction performance at other junctions' in Part 4, Vol 5 of the ES: London Assessment. This is for the reasons provided earlier at 6.6.315 to 6.6.428.

## Transport Assessment (TR-001-000) Traffic and Transport Part 5: London assessment

Section	Sub section	Paragraph	London Borough of Camden response

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## Transport Assessment (TR-001-000) Traffic and Transport Part 10: Route-wide and off-route assessment

Section	Sub section	Paragraph	London Borough of Camden response

## Transport Assessment (TR-001-000) Traffic and Transport Annex A: Framework travel plan

Section	Sub section	Paragraph	London Borough of Camden response
3	3.1	3.1.1 to 3.1.3	Local Environmental Management Plans (LEMP) and Traffic Management Plans (TMPs) are referenced as a source of guidance for Construction Worker Travel Plans (CWTPs); however, neither of these has been prepared at this time. Camden Council cannot be satisfied that these documents will meet the aims and objectives of the CWTPs and request further information on LEMP and TMPs.
		3.4.2	Camden Council notes that the information with Volume 5 on existing rail, underground, and bus timetables and frequencies is inaccurate to the extent that this does not provide an accurate reflection of any public transport. Camden Council is therefore concerned that if there is a lack of attention to detail within the ES on public transport information, this could also set an unacceptable precedent for future CWTPs.
		3.6.2	Camden Council notes that baseline public transport information contained within Volume 5 is consistently inaccurate and is concerned that without accurate public transport information in future CWTPs, the public transport 'workforce travel mitigation measures' aimed at workers travelling directly to construction sites will not be effective.
		3.7.1	No initial multimodal travel targets have been provided within the Framework Travel Plan. Objectives and targets set out within any form of travel plan should be based upon trip rates and modal split and clearly detailed within the travel planning document. Camden Council therefore consider that the

			Framework Travel Plan does not comply with best practice including TfL's 2008 Guidance on Workplace Travel Planning and consequently fails the TfL ATTrBuTE criteria for travel planning.
		4.4.1	Camden Council notes that the information with Volume 5 on existing rail, underground, and bus timetables and frequencies is inaccurate to the extent that this does not provide an accurate reflection of any public transport. Camden Council is therefore concerned that if there is a lack of attention to detail within the ES on public transport information, this could also set an unacceptable precedent for future CWTPs.
		4.5.2	Camden Council notes that the information with Volume 5 on existing rail, underground, and bus timetables and frequencies is inaccurate to the extent that this does not provide an accurate reflection of any public transport. Camden Council is therefore concerned that if there is a lack of attention to detail within the ES on public transport information, this could also set an unacceptable precedent for future CWTPs.
	4.11		"Camden Council is concerned with the statement "It can be notoriously difficult to set mode share targets and predict how staff and passengers will react to different interventions. For example, restrictions on car parking may not reduce car travel, due to more 'kiss and ride' drop-off activity, which may have a negative impact on traffic and the environment." Camden Council expects monitoring against Mode share targets to be set for HS2 travel plans, and evidence of these targets required.
		5.1.1 to 5.1.2	Camden Council is concerned that there is no mention of future travel surveys, either during construction or following completion of works. Consequently, there is no reference to future travel surveys being iTRACE or TRAVL compliant, which is a TfL requirement as set out within the TfL (2008) Guidance on Workplace Travel Planning for Development, which is referenced in the Framework Travel Plan itself. The Framework Travel Plan is therefore considered to fail the TfL ATTrBuTE criteria for travel planning as set out within the aforementioned 2008 TfL guidance.

## Transport Assessment (TR-001-000) Traffic and Transport Annex B(i): Baseline survey report

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.1	Camden Council are concerned that the summer period that the surveys were undertaken do not typically reflect peak network conditions due to several factors including them being in lower demand summer months and effected by route preparations on the run up to the 2012 Games. Camden Council questions whether there could have been some validation of baseline transport surveys by utilising similar data that would be available from existing sources such as London Borough's. This could be taken from other more reliable periods rather than depending on new data in a very narrow window in the summer.
	3.1	App A	Camden Council is concerned that the dates for each specified survey location are not provided. Survey dates for each location cited in appendix A are required to clarify the locations where surveys were carried out in 2012, and the precise dates for each survey.
		App B	Camden Council notes that the raw survey data has not been included and only AM and PM peak hour flows have been analysed.
		App C	Camden Council is concerned that the survey period (0700-1000 and 1600-1900) does not capture full parking demand. Camden Council also notes the results have been summarised in to zones (East, North and West) with no supporting information to establish how the zones were defined and if all the roads within the zones has been undertaken on the same day. Raw survey data has also not been supplied.
		App E	Camden Council notes that no dates for the surveys have been provided in the table.
		App F	Camden Council notes that the O&D survey results have only been presented for the entire survey period (0700-1000 and 1600-1900). It is also noted that the date of the survey has been excluded. There is no reference to the inclusion of the raw survey data therefore Camden Council cannot confirm that these surveys are reflective of typical traffic conditions. Camden Council requests the supply of full raw and analysed traffic survey data.
		App G	Camden Council would like to stress that the queue length surveys may not have been surveyed in accordance with Traffic Modelling Guidelines published by TfL. Camden Council notes that the dates

			of the queue surveys have been removed from the raw survey results. Camden requests the supply of full raw and analysed traffic survey data.
		App H	Camden Council notes that no dates for each bus journey have been provided. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App I	Camden Council notes that dates have not been supplied for each ATC. In addition, the raw data has not been supplied so the tabulated results cannot be verified.
		App J	Camden Council stresses that the number of journeys on each route during each time period has not been provided. It is also worth noting the dates of the journeys are not provided. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App K	Camden Council notes that the date and time period of the survey has not been supplied. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App L	Camden Council notes that the date of the survey has not been supplied. In addition, no information regarding the results of the face-to-face questionnaire survey has been provided. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.

### Transport Assessment (TR-001-000) Traffic and Transport Annex B(ii): Baseline survey report

Section	Sub section	Paragraph	London Borough of Camden response
1	1.1		Camden Council is concerned that the vast amount of initial surveys carried out in June and July 2012 surveys could have been affected by the 2012 Olympic games
4		App A	Camden Council welcomes the fact the actual survey dates have been provided. However there are concerns that the vast amount of initial surveys carried out in June and July 2012 surveys could have

			been affected by the 2012 Olympic games
		App D	Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data to verify summary sheets.
		App E	Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data to verify summary sheets.
		App F	Camden Council notes that the date and time period of the survey has not been supplied. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App G	Camden Council notes that the date and time period of the survey has not been supplied. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App H	Camden Council notes that the date and time period of the survey has not been supplied. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App K	Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App L	Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App N	Camden Council notes that the date and time period of the survey has not been supplied. Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.
		App O	Camden Council considers the Environmental Statement should have contained the supply of full raw and analysed traffic survey data.



## Transport Assessment (TR-001-000) Traffic and Transport Annex C: Model performance reports

Section	Sub section	Paragraph	London Borough of Camden response
			<b>Annex C(i) - Railplan Model Performance Report</b>
2			Camden Council questions what "localised adjustments or get the most out of it at localised level" as set out within the TfL Technical Note
3	3.2		Camden Council would like to stress that only presenting the NR passenger flow validation in the heading Headline Validation Statistics miss-leads the reader.
4	4.2		<p>Camden Council would like to stress that 38% (3 out of 8) modes set out in Table 2 have percentages differences higher than the guidance of 15%.</p> <p>Camden Council is concerned that "Railplan bus usage within the Euston cordon is 47% lower than observed" which falls very short of the DfT validation guidance.</p>
	4.3		Camden Council is very considered that the AM peak model is only "a reasonable basis for the HS2 TA.
5	5.2		<p>Camden Council considers that the PM interchange validation is not acceptable. 63% (5 out of the 8) modes set out in Table 5 have percentage differences higher than the guidance.</p> <p>Camden Council would also to stress the total link validation percentage difference is 14.3% this is very close to the DfT guidance of 15%.</p> <p>Camden Council is concerned that "Railplan bus usage within the Euston cordon is 61% lower than observed" which falls very short of the DfT validation guidance.</p> <p>Camden Council considers for the reasons set out above the PM peak model is not fit for purpose.</p>
	5.3		Camden Council would like to stress that they do not consider the PM peak model fit for testing future

			year scenarios. It should also be noted that Camden Council cannot find any evidence that due to "the poorer validation in the PM peak period model should therefore be recognised when interpreting results for the TA".
6	6.11		Camden Council notes the models "require an element of professional judgement" due to noted particular issues.
			<b>Annex C(ii) - CoLHAM Performance Report - Annex C (ii)</b>
3	3.1	3.1.1	Camden Council stresses the data collection in the Euston Station area in June and July 2012 could have been effected by the 2012 Olympics.
	3.3	3.3.1	Camden Council stresses the data collection in the Euston Station area in June and July 2012 could have been effected by the 2012 Olympics.
	3.4	3.4.1	Camden Council notes that TfL recommended the use of the November 2011 TrafficMaster dataset rather than 2012, which could have been affected by the closure of the Hammersmith Flyover. It is noted that this is the only recommended period in the report that is not based upon the use of 2012 data.
	4.2	4.2.1	Camden Council notes that there are discrepancies between Figure 6: EAP Zonal Disaggregation and paragraph 4.2.1 regarding the number of additional modelling zones introduced.
6	6.1	6.1.1	Camden Council is concerned that there is no supporting information / guidance justifying why the GEH validation has been relaxed to 7.5.
7	7.1	7.1.7	Camden Council rejects that screenlines percentages tabulated in Table 9, Table 10 and Table 11, which are "generally just above 5%". The majority of the screenlines have a percentage difference of nearly double (9%).
	7.2	7.2.3 – 7.2.4	Camden Council rejects that the overall journey time validation is better in all three time periods, especially in the PM time period, compared to the full area model. Camden Council stresses that timing points along the routes have not been investigated in order to undertake local link calibration. Camden Council also notes an error in the tables regarding the journey time criteria column.

			Camden Council is concerned that the model performance is only reasonable in the AM and IP periods (with 80% and 90% of modelled screenlines flows being within 5%). Camden Council stresses that this falls to 60% in the PM peak, which suggests the PM peak is not reasonable.
10	10.1	10.1.5	Camden Council notes that there is a discrepancy error regarding the PM peak screenline performance percentages.
			<b>Annex (9iv) - Euston Road (Region *) TRANSYT Model Performance Working Paper</b>
			Camden Council is concerned that the applicant has not followed the TfL Model Auditing Process (MAP) standards set out in Traffic Modelling Guidelines
2	2.2		Camden Council is concerned that the surveys collected in June 2012 underestimated the normal traffic patterns due to the 2012 Olympic games. Camden Council are concerned that the 3 week period (18th June to 6 July) that the surveys were undertaken do not typically reflect peak network conditions due to several factors including them being in lower demand summer months and effected by route preparations on the run up to the 2012 Games. Camden Council questions whether there could have been some validation of baseline transport surveys by utilising similar data that would be available from existing sources such as London Borough's. This could be taken from other more reliable periods rather than depending on new data in a very narrow window in the summer.
	2.3		Camden Council notes that links 1844, 1845 and 1846 within the Region 8 model were changed from a signal controlled link to a bottleneck, however, no supporting information (i.e. stop and delay weightings) have been provided.
	2.4		Camden Council welcomes that the calibrate 2012 baseline models files were provided to support the report, however no Model output runs or models are attached to the report.
	2.5	2.5.2	Camden Council welcomes the UTC information supplied by TfL was used to update the Region 8 model. The report states this information has been supplied but it's not enclosed within the document?
		2.5.3	Camden Council considers the reduction in green time on the demand dependent nodes to correlate with data obtained from TfL for the day of the surveys under estimates normal typical demand. Camden Council is concerned that the dates of the surveys are compromised by the London 2012 Olympic games.

		2.5.5	<p>Camden Council notes that a 30 second phase delay has been applied to links 1420 and 1421 to replicate the observed blocking back at that junction. The report goes on to state: "Although blocking back has been observed on occasion at other locations, video observations have shown that the recorded queues can generally be accommodated within the available carriageway space".</p> <p>No supporting information has been supplied to justify this assertion.</p>
	2.6		Camden Council stresses the data collection in the Euston Station area in June and July 2012 could have been affected by the 2012 Olympics.
	2.7		Camden Council is concerned that the applicant has not followed the TfL Model Auditing Process (MAP) standards set out in Traffic Modelling Guidelines and a more detailed validation exercise will only be undertaken when the scheme progresses to detailed design stage.
3			Camden Council would like to stress there is no evidence the model was validated using TfL's MAP process
	3.3		Camden Council is concerned that HS2 has deemed it appropriate to model the impact of the proposed scheme on both Euston Circus and the Euston Road corridor by combining the Region 8 and 9 TRANSYT model. Camden Council considers that the appropriate approach should be to develop a micro-simulation model.

## Transport Assessment (TR-001-000) Traffic and Transport Annex D: Traffic data used for Air Quality

Section	London Borough of Camden response
CFA01 - Baseline Traffic Data	Camden Council considers the 24 hour baseline speeds to be incorrect. A vast number of links have speed of less than 10 kph (6mph). In addition no supporting information has been provided as to how the daily AADT and HGV's flows have calculated.

	Camden Council would also like to stress that OS coordinators have only been provided to identify links, slowing the auditing process.
CFA01 - Construction Traffic Data	Camden Council considers the ES defective in that it provides no supporting information evidencing how the construction traffic was assessed. Without this data no auditing process / validation can be made. In addition the reduction / increase on speed also can't be audited.
CFA02 - Baseline Traffic Data	<p>Camden Council considers the 24 hour baseline speeds to be incorrect. A vast number of links have speed of less than 10 kph (6mph). In addition no supporting information has been provided as to how the daily AADT and HGV's flows have calculated.</p> <p>Camden Council would also like to stress that OS coordinators have only been provided to identify links, slowing the auditing process.</p>
CFA02 - Construction Traffic Data	Camden Council considers the ES defective in that it provides no supporting information evidencing how the construction traffic was assessed. Without this data no auditing process / validation can be made. In addition the reduction / increase on speed also can't be audited.
CFA03 - Baseline Traffic Data	<p>Camden Council considers the 24 hour baseline speeds to be incorrect. A vast number of links have speed of less than 10 kph (6mph). In addition no supporting information has been provided as to how the daily AADT and HGV's flows have calculated.</p> <p>Camden Council would also like to stress that OS coordinators have only been provided to identify links, slowing the auditing process.</p>
CFA03 - Construction Traffic Data	Camden Council considers the ES defective in that it provides no supporting information evidencing how the construction traffic was assessed. Without this data no auditing process / validation can be made. In addition the reduction / increase on speed also can't be audited.

## Transport Assessment Traffic and Transport Mapbook

Map number	London Borough of Camden response

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## Waste and material resources assessment (Ref: WM-001-000, ES 3.5.0.13.1)

Section	Sub section	Paragraph	London Borough of Camden response
1	1.1	1.1.1	Camden Council understands the rationale for structuring the report so that each section is related to a community area forum. However, it does not present a borough wide perspective on how waste will be moved in, out and around the borough and the impact that will have on local conditions.
		1.1.2	
1	1.2	1.2.4	Camden Council believes that Volume 3 - route wide effects, section 14 has limited information on the likely significant environmental effects associated with the off-site disposal to landfill of solid waste generated during construction and operation of the Proposed Scheme. It refers to impacts on tonnage projections and waste disposal facility capacity but no other environmental factors.
2	2.1	2.1.1	Camden Council considers that the way that the waste tonnage information is presented in this document and Volume 3 section 14 Route Wide Effects makes it impossible to assess the assumptions and limitations. However, the road transport network in and around Euston is restrictive so any removal of excavation, demolition and construction waste from site will have major impact.
		2.1.2	
2	2.2	2.2.1	Camden Council considers that the way that the waste tonnage information is presented in this document and Volume 3 section 14 Route Wide Effects makes it impossible to assess the assumptions and limitations. However, the road transport network in and around Euston is restrictive so any removal of excavation, demolition and construction waste from site will have major impact.
2	2.3		Camden Council would like to see landfill diversion rates of 70% in place of 61% as quoted in 2.3.8 and based on the operational diversion rates cited in 2.3.3.
3	3.1	3.1.1	Camden Council considers that the way that the waste tonnage information is presented in this document and Volume 3 section 14 Route Wide Effects makes it impossible to assess the assumptions and limitations. However, the road transport network in and around Camden is restrictive so any removal of excavation, demolition and construction waste from site will have major impact.
3	3.1	3.1.2	

3	3.2	3.2.1	Camden Council cannot find section 4.5 in volume 1. The use of different waste categories in Volume 3 section 14 and this document make it difficult to compare the unacceptable waste types. At least 30% of this type of waste may go to landfill and Camden Council would like to see other options considered before landfill is used.
3	3.2	3.2.3	Camden Council is not clear whether the possible treatment of the unacceptable material would take place in Camden or off site. Camden Council is concerned about how and where this will happen, how much of this waste would be treated at any one time and what the wider effects of the bi products of cleaning contaminated waste and their impact on local environmental conditions.
3	3.2	3.2.10	Camden Council would like to see the industry benchmark data (26.4 tonnes per £100,000) cross referenced with other industry standards or evidence such as the Olympics, Thames Gateway and Cross Rail. Camden Council believes that table 5 would benefit from additional columns which outline on site reuse, off site reuse and disposal of all excavated wastes from the Camden Town area. Camden Council requests further clarification on the waste types, quantities and disposal/reuse routes in order to understand the full impact of excavated material disposal/reuse from the Camden area.
3	3.3		Camden Council supports the proposal to have landfill diversion rates of 81%.
4	4.1	4.1.1	Camden Council considers that the way that the waste tonnage information is presented in this document and Volume 3 section 14 Route Wide Effects makes it impossible to assess the assumptions and limitations. However, the road transport network in and around Primrose Hill / Kilburn is restrictive so any removal of excavation, demolition and construction waste from site will have major impact.
		4.1.2	
4	4.2	4.2.1	Camden Council cannot find section 4.5 in volume 1. The use of different waste categories in Volume 3 section 14 and this document make it difficult to compare the unacceptable waste types.
4	4.2	4.2.3	Camden Council finds it unclear whether the possible treatment of the unacceptable material would take place in Primrose Hill/Kilburn or off site. Camden Council is concerned about how and where this will happen, how much of this waste would be treated at any one time and what the wider effects of the by-products of cleaning contaminated waste and their impact on local environmental conditions.



4	4.2	4.2.10	Camden Council would like to see the industry benchmark data (26.4 tonnes per £100,000) cross referenced with other industry standards or evidence such as the Olympics, Thames Gateway and Cross Rail. Camden Council believes that table 9 would benefit from additional columns which outline on site reuse, off site reuse and disposal of all excavated wastes from the Primrose Hill / Kilburn area. Council requests further clarification on the waste types, quantities and disposal/reuse routes in order to understand the full impact of excavated material disposal/reuse from the Primrose Hill / Kilburn area.
4	4.3		Camden Council supports the proposal to have landfill diversion rates of 83%.

### Route-wide waste and material resources supporting information (Ref: WM-002-000, ES 3.5.0.13.2)

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council believes the location of existing waste disposal facilities should be included in 1.1.3 and section 3 to better understand the starting position of the project with regards to potential impacts on waste capacity on a regional level.
3	3.1		Camden Council is concerned by the baseline data given for the period 2017 to 2025 in table 2. It is not clear what the source of the baseline data is to verify if it gives a true reflection of waste generated in Camden. The figures do not match what is in the reference document in 3.1.6: Future Waste Arisings 2010 -2031 A summary note.
3	3.2	3.2.1	Camden Council agrees with the baseline data information provided in table 6.
3	3.3		Camden Council notes the information provided and that landfill capacity in the affected regions is projected to decrease during the lifetime of the project.
4	4.1		Camden notes the information on the cumulative assessment of developments along the route of the proposed scheme. However, due to its qualitative nature it is very difficult to draw any specific

			conclusions, suffice it say there will be further pressure on local and regional landfill capacity. Therefore it is integral there should be weighting towards re-use, reduce and recycle so as better manage waste and reduce waste to landfill.
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### Water resources: Routewide appendix (Ref: WR-001-000, ES 3.5.0.14)

Section	Sub section	Paragraph	London Borough of Camden response
1	1.3	1.3.1	Camden Council notes that HS2 considers the Environment Agency to be the only stakeholder necessary to consult with for route-wide issues despite the fact that water companies are responsible for sewer flooding and Lead Local Flood Authorities for surface water flooding.  Camden Council is concerned that by not consulting these risk management authorities, as identified by the Flood and Water Management Act, important flooding issues have not been appropriately discussed.
1	1.4	1.4.1	Camden Council refers to comments submitted on Volume 5 Appendix CR-001-000/1 relevant to this point.
		1.4.2	
1	1.8		Camden Council refers to comments submitted on Volume 5 Appendix CT-009-000 relevant to this point.
3	3.2	3.2.1	Camden council questions whether reducing the extent of direct impact on surface water flooding to 500m in urban areas is appropriate.
		3.2.2	
3	3.3		Camden council questions whether a 49mm rise in a 1% annual probability event should be considered only slight adverse.
3	3.4		Camden Council strongly disputes the claim that "it is considered that the Proposed Scheme will provide wider sustainability benefits to the community, as demonstrated in Volume 2 and Volume 3" as stated in 3.4.12 as a generic comment. In particular Camden Council disputes whether areas identified as being of high flood risk will not be increased during the construction phase with the reduction of St James' Gardens and the proposed compound on the area of highest risk.

4	4.3	4.3.7	Camden Council considers that where 4.3.7 states that 'a drainage management plan could be compiled for each railway drainage system', that such a plan be a requirement for Euston Station and its environs.
4	4.4		Camden Council is supportive of a person being appointed to coordinate all flood related activities around Euston Station. Camden Council would like to clarify that re 4.4.5, all discharges to surface or groundwater will require approval by the council in its role as a SuDS (Sustainable Drainage Systems) Approval Body.

**CFA 01 water resources assessment report: Euston Station and approach  
(Ref: WR-002-001, ES 3.5.2.1.12)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.1	Camden Council notes that HS2 considers the Environment Agency to be the only stakeholder necessary to consult with for route-wide issues despite the fact that water companies are responsible for sewer flooding and Lead Local Flood Authorities for surface water flooding. Camden council is concerned that by not consulting these risk management authorities, as identified by the Flood and Water Management Act, important flooding issues have not been appropriately discussed at the same time as water quality issues.
3	3.2		Camden Council welcomes the acceptance of the risk of superficial deposits on Lynch Hill Gravel and interprets this as an acceptance of the risk of 'perching'. This emphasises the need for high quality SuDS (Sustainable Drainage Systems) to reduce flood risk and pressure on the urban drainage system.
3	3.3	3.3.1	Camden Council considers that the interaction between surface water and perched water, especially likely with increased tunnelling, should be taken account of.

**CFA 01 flood risk assessment report: Euston Station and approach (Ref: WR-003-001, ES 3.5.2.1.13)**

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1		Camden Council notes that where tunnelling and the introduction of basements occur there is a risk of 'perching' in the surface of the ground which does not fit the source pathway receptor model. While it is not possible to model the exact impact of the flooding, compensatory SuDS (Sustainable Drainage Systems) should be introduced to compensate for lost ground to tunnelling or lost open green space.
2	2.2	2.2.1	Camden Council notes that 'perching' is sometimes considered part of groundwater but may be better considered as a separate risk.
		3.1.1	Camden Council highlights that Camden Planning Guidance 3 states that developments must achieve a greenfield surface water run-off rate once SuDS (Sustainable Drainage Systems) have been installed. As a minimum, surface water run-off rates should be reduced by 50% across the development. This should be added to the design criteria.
		3.1.2	
6	6.3		Camden Council notes that as well as areas of high risk within the CFA there are areas just outside the CFA on Hampstead Road with a high risk of flooding and consideration must be made to how the changes to the site have affected flood risk elsewhere.
6	6.4	6.4.1	Camden Council requires all basements of a certain size to complete a Basement Impact Assessment to assess the impact of both aquifer groundwater and perching. The cumulative impact must be considered in this assessment rather than simply the basement on its own. There is no indication that existing nearby basements have been considered.
		6.4.2	
6	6.7		Camden Council notes that this summary of baseline flood risk considers only HS2 infrastructure and not the area around it which it is affecting.
7	7.2	7.2.1	Camden Council rejects the idea that no further specific mitigation is required. The London Plan requires new developments to seek to return to greenfield runoff rates and while Camden accepts that will not be possible in this case, clear efforts must be made to create more SuDS (Sustainable Drainage Systems) and other attenuation features to improve the drainage in the area and ensure the development does not increase the risk elsewhere.

7	7.3	7.3.1	Camden Council considers that SuDS (Sustainable Drainage Systems) features should be installed to mitigate against the risk of perching from the new basements and tunnelling.
8	8.3		Camden Council notes that some of the deepest areas of predicted surface water flooding will be within the boundary of the station extension and will be collected within the station drainage system. This further emphasises the need for sustainable drainage to be part of the station drainage system to future proof against increasing pressure to the Thames Water system.
8	8.7		Camden Council notes that in order for no adverse effects to be expected from the development, sustainable drainage must be installed to compensate for the loss of permeable surface at St James's Gardens and the inclusion within the site of areas where the water collects within the system. Camden Council strongly believes that green roofs and other natural systems should be introduced to help manage drainage.
9		9.1.1	Camden Council rejects the suggestion that there will be no additional burden on the existing drainage infrastructure and also stresses that even if this were the case the station has an obligation to improve the drainage in the area and reduce pressure on a highly stressed sewer system.
		9.1.2	
		9.1.3	
		9.3.1	Camden Council believes there has not been sufficient analysis of the flood risk created by the Proposed Scheme and that SuDS (Sustainable Drainage Systems) schemes need to be introduced to ensure there are no residual risks in the areas.
		9.4.1	Camden Council notes that to be in compliance with the recommendations of Camden planning guidance CPG3 Sustainability, developments must achieve a greenfield surface water run-off rate once SuDS (Sustainable Drainage Systems) have been installed. As a minimum, surface water run-off rates should be reduced by 50% across the development. Currently plans for the station do not meet these requirements.

## CFA 02 water resources assessment report: Camden Town and HS1 link (Ref: WR-002-002, ES 3.5.2.2.12)

Section	Sub section	Paragraph	London Borough of Camden response
2	2.1	2.1.1	Camden Council notes that HS2 considers the Environment Agency to the only stakeholder

			necessary to consult with for route-wide issues despite the fact that water companies are responsible for sewer flooding and Lead Local Flood Authorities for surface water flooding. Camden council is concerned that by not consulting these risk management authorities, as identified by the Flood and Water Management Act, important flooding issues have not been appropriately discussed at the same time as water quality issues.
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### **CFA 02 flood risk assessment report: Camden Town and HS1 link (Ref: WR-003-002, ES 3.5.2.2.13)**

Section	Sub section	Paragraph	London Borough of Camden response
3	3.1	3.1.1	Camden Council notes that according to Camden Planning Guidance 3 on Sustainability, developments must achieve a greenfield surface water run-off rate once SuDS (Sustainable Drainage Systems) have been installed. As a minimum, surface water run-off rates should be reduced by 50% across the development. This should be added to the design criteria.
		3.1.2	

### **CFA 03 water resources assessment report: Primrose Hill to Kilburn (Camden) (Ref: WR-002-003, ES 3.5.2.3.12)**

Section	Sub section	Paragraph	London Borough of Camden response
5	5.1	5.1.1	Camden Council notes that a borehole currently used to provide a water listed fountain in a public park, as well as the water supply for park maintenance is likely to be destroyed. The solution must ensure an equally sustainable source for the fountain is found. The replacement should be a new borehole rather than a mains water supply as that would have ongoing costs for metered water. HS2 should pay for an investigation into a new borehole location at Swiss Cottage Open Space.

### **CFA 03 flood risk assessment report: Primrose Hill to Kilburn (Camden) (Ref: WR-003-003, ES 3.5.2.3.13)**

Section	Sub section	Paragraph	London Borough of Camden response
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2	2.2	2.2.1	Camden Council notes that there have been regular reports of cellars flooding in recent years suggesting that there may be underground springs or that tributaries of the river Westbourne may still be active. In determining the flood risk for the area, this should be taken into consideration. It highlights the importance of considering the impact of the tunnelling on flood risk in the area through 'perching' i.e. water trapped in the upper surface of the ground unable to soak through the clay and the need for SuDS (Sustainable Drainage Systems) to be investigated to absorb and collect more of the rainwater than is done currently.
3	3.1	3.1.1	Camden Council notes that according to Camden Planning Guidance 3 on Sustainability, developments must achieve a greenfield surface water run-off rate once SuDS (Sustainable Drainage Systems) have been installed. As a minimum, surface water run-off rates should be reduced by 50% across the development. This should be added to the design criteria.
		3.1.2	
6	6.4		Camden Council notes that there have been regular reports of cellars flooding in recent years suggesting that there may be underground springs or tributaries of the river Westbourne may still be active. In determining the flood risk for the area, this should be taken into consideration. It highlights the importance of considering the impact of the tunnelling on flood risk in the area through 'perching' i.e. water trapped in the upper surface of the ground unable to soak through the clay and the need for SuDS (Sustainable Drainage Systems) to be investigated to absorb and collect more of the rainwater than is done currently.
6	6.7		Camden council believes that the risk of 'perching' to properties in the surrounding area to the tunnels needs to be considered.
7	7.2	7.2.1	Camden Council notes that the Proposed Scheme will not significantly affect the risk of surface water flooding at or in the vicinity of the Adelaide Road vent shaft. In order to meet Camden Planning Guidance 3 Sustainability, the development must maintain it at its current greenfield rate. Similarly efforts should be made at Alexandra Place vent shaft to reduce the runoff from its current situation rather than not significantly affect it.
		7.2.2	
7	7.3	7.3.1	Camden council believes that to compensate for the risk of 'perching' to properties in the surrounding area, opportunities for public realm SuDS (Sustainable Drainage Systems) in the direct vicinity of the tunnel to help compensate for lost ground for water to absorb in should be investigated.
8	8.3		Camden Council notes that the Proposed Scheme will not significantly affect the risk of surface water



			flooding at or in the vicinity of the Adelaide Road vent shaft. In order to meet Camden Planning Guidance 3 Sustainability, the development must maintain it at its current greenfield rate which will require SuDS (Sustainable Drainage Systems). Similarly efforts should be made at Alexandra Place vent shaft to reduce the runoff from its current situation rather than not significantly affect it.
8	8.4	8.4.1	Camden council believes that to compensate for the risk of 'perching' to properties in the surrounding area, opportunities for public realm SuDS (Sustainable Drainage Systems) in the direct vicinity of the tunnel to help compensate for lost ground for water to absorb in should be investigated.
9	9.1		Camden Council notes that an assessment of the risk must consider the impact of tunnelling on the opportunities for perched water in the area which is a very regular phenomenon.
9	9.3	9.3.1	Camden Council notes that SuDS (Sustainable Drainage Systems) schemes must be introduced to ensure that the residual risk of flooding to third parties has been reduced.
9	9.4	9.4.1	Camden Council notes that to be in compliance with the recommendations of Camden planning guidance CPG3 Sustainability developments must achieve a greenfield surface water run-off rate once SuDS (Sustainable Drainage Systems) have been installed. As a minimum, surface water run-off rates should be reduced by 50% across the development. Currently plans for the station do not meet these requirements.

### Water resources map book: Euston and London Metropolitan (Ref: 3.5.1.11.1)

Map number	London Borough of Camden response
CFA 01 Euston Station and approach SE-01 - Socio-Economic Significantly Affected Resources, SE-02 - Demographic Character Areas	<p>Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.</p> <p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental</p>

	<p>Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p> <p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed that this has not been reflected in the socio-economic assessment or associated map books.</p> <p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>
<p>CFA 02 Camden Town and HS1 Link SE-01 - Socio-Economic Significantly Affected Resources, SE-02 - Demographic Character Areas</p>	<p>Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.</p> <p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p>

	<p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed that this has not been reflected in the socio-economic assessment or associated map books.</p> <p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>
<p>CFA 03 Primrose Hill to Camden SE-01 - Socio-Economic Significantly Affected Resources, SE-02 - Demographic Character Areas</p>	<p>Camden Council is highly concerned with the content of the socio –economic map books for Euston, Camden Town and HS1 Link and Primrose Hill/Kilburn CFA's. The socio-economic maps fail to identify the significant socio-economic effects and do not provide an accurate representation of land required, isolation, amenity and multiple effects.</p> <p>Camden Council considers that the socio-economic maps are significantly inaccurate, with only selected information being displayed and substantial omissions. Camden Council considers that the maps do not reflect the true magnitude of socio-economic impacts that will be hugely greater than those stated in the Environmental Statement.</p> <p>Camden Council is highly concerned that the information in the socio-economic map books is contrary to information provided to HS2 Ltd by Camden Council through the Business and Employment Mitigation Working Group and by the local community including the Drummond Street Traders Association and the Euston Community Forum.</p> <p>Camden Council identified a series of economic character areas that are likely to face the most severe impacts of HS2, including Euston Station, Station Forecourt, West Euston, East Euston, Camden Town and HS1 Link, Langtry Walk Vent Shaft and the Tunnelled Areas. Notes and map based analysis of these character areas have been shared with HS2 via the Business and Employment Mitigation Working Group. Camden Council is disappointed that this has not been reflected in the socio-economic assessment or associated map books.</p>

	<p>Camden Council considers that the socio-economic assessment and associated map books represent a severe under-estimation of the significant impacts of HS2 in Camden, provides inaccurate information and fails to provide a commitment to mitigation.</p> <p>Camden Council insists that HS2 Ltd. work with the Council and the community to rectify the failures in the assessment and to develop a comprehensive compensation and mitigation strategy to rectify the significant harm to businesses, employment and communities that will otherwise occur.</p>
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## **HS2 Phase One environmental statement volume 5: supporting information and planning**



**Draft environmental statement consultation summary report**  
**(Ref: RD 8.1, volume 5 appendix CT-008-000)**

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council notes the explanation given in the Introduction.
2			Camden Council notes the report structure.
3			Camden Council notes that it provided detailed written comments on, and requested changes to, the Draft ES. The Council's comments on the current suite of ES documents (25 Nov 2013) will determine whether it considered HS2 Ltd.'s responses to those comments as being appropriate or not.
5	5.1	5.1.1	Camden Council notes the approach outlined.
	5.2		Camden Council notes and concurs in principle with 5.2. The Council's comments on the current suite of ES documents (25 Nov 2013) will determine whether it considers HS2 Ltd.'s responses to those comments as being appropriate in level of detail, or not.
	5.3		Camden Council notes and concurs in principle with 5.2. The Council's comments on the current suite of ES documents (25 Nov 2013) will determine whether it considers HS2 Ltd.'s responses to those comments as being appropriate in level of detail, or not.
	5.5		Camden Council notes that this document states that monitoring equipment is needed for certain locations and will be specified in the local environmental management plans. Monitoring will be crucially important and must be delivered to the appropriate level.
	5.6		Camden Council notes that the removal of modal shift for domestic flights at Heathrow appears arbitrary, given the high level assumptions made for other emissions throughout this footprinting exercise. Camden believes that this should still be included in the operational footprint for the scheme. As it stands the removal of this domestic flight modal shift has artificially reduces operational emissions.

			Camden Council notes that the huge difference in the construction emissions estimate from the AoS to the ES further indicates the inadequacy of the AoS methodology. The AoS as a consultation document was therefore not fit for purpose regarding construction carbon emissions.
	5.7		<p>Camden Council disagrees that HS2 have sought to minimise impacts on open and green space during construction, as there has been no mitigation or alternatives provided for the significant loss of open space during construction in the Euston area.</p> <p>Camden Council disagrees that there has been protection of designated green spaces as there is no proposed mitigation for removing the woodland (such as green living hoardings) for the Adelaide vent shaft.</p> <p>Camden Council still has concerns about the proposed traffic routes and diversions in the Environmental Statement.</p> <p>Camden Council notes that not all cumulative effects have been captured by HS2 Ltd in the Environmental Statement, such as planned developments, loss of multiple green space.</p>
	5.8	5.8.2- 5.8.3	<p>Camden Council asserts that a high level of information should be incorporated into the principal documents forming the ES for purposes of clarity and in order to present elements of the Proposed Scheme in an analytical fashion, backed by assessments fully informed by data from the Cultural heritage baseline. Issues such as setting, loss of historic fabric, impact on grade II listed buildings, conservation areas and non-designated heritage assets are not properly addressed. This should be backed by comprehensive lists in the principal documents of all designated heritage assets likely to be affected, which are of national interest, including conservation areas and grade I, II and II* buildings, but also full details of non-designated heritage assets, including positive contributors in conservation areas and locally listed buildings, which tend to be of local rather than national interest. Baselines in the ES continue to be oversimplified and descriptive, whilst supported by little or no detailed analysis of the context of the Proposed Scheme.</p> <p>There are still a number of inaccuracies and discrepancies, particularly in the CFA Cultural Heritage baseline sections. Concerns are raised regarding how listed buildings are represented on the Environmental Baseline maps in the CFA Map Books: where there are group listings, each individual building should be marked separately. Since there are many group listings in Camden, ranging from numerous terraces of townhouses to groups of railway heritage buildings, the maps are inaccurate</p>



			since they under-represent the number of listed buildings in each CFA. There are also some inaccuracies regarding grade of listed buildings, with a number of grade II* listed buildings recorded as grade II listed.
		5.8.4 – 5.8.5	The route of the Proposed Scheme through the three CFAs in LB Camden completely disregards the sensitivity of its historic urban environment. This means that a high proportion of designated and non-designated heritage assets suffer direct physical impacts, in many cases resulting in the complete and irreversible loss of important elements of the historic environment. Issues of settlement arising from tunnelling and vibration from construction works remain unresolved, especially at Park Village East and the Alexandra Road Estate. In such cases, mitigation is a secondary measure which may never compensate for the loss to heritage. It will be too late to address fundamental mitigation issues in the provisions of the Heritage Memorandum. Where mitigation measures are proposed, a low level of information is provided, invariably requiring further consideration at a later stage. No mention is made of HS2 working closely with local authority historic building officers to identify mitigation measures for the built heritage; instead the focus is on archaeological mitigation.
		5.8.6 – 5.8.7	<p>Camden Council notes that notwithstanding the statement that further cultural heritage research has been undertaken since the draft ES, the assessments in the ES on the potential impacts on heritage assets of all types contain a low level of detail, which in many cases make it impossible to comment on the appropriateness of the Proposed Scheme.</p> <p>Camden Council notes that insufficient information is provided in the principal documents on the impacts on individual heritage assets in their wider context, such as in conservation areas or where the impacts effect the setting of significant heritage assets in important views, for example the Roundhouse or Primrose Hill Tunnel East Portals.</p> <p>Camden Council notes that the ES fails to recognise the characteristics of each Community Forum Area in Camden, not only the distinct and varied character of the numerous conservation areas affected, but also the other urban areas affected which are likely to be home to locally listed buildings including significant railway heritage structures, all essential components of the historic environment.</p>
		5.8.8 – 5.8.9	There is a tendency for the ES to undervalue the significance of heritage assets, ranging from grade II listed buildings (designated heritage assets) to locally listed buildings and positive contributors in conservation areas (non-designated heritage assets). There are few examples of assessments of impacts on grade II listed buildings, with the onus being put on grade I and grade II* buildings where

			<p>they exist. No detailed assessments are made in the ES on the impacts and adverse effects on positive contributors in conservation areas or buildings or structures on Local Lists. There are detailed heritage audits in many of the LB Camden conservation area appraisals, which are not referred to in the CFA documents. No references are made to the LB Camden draft Local List, which at-time-of-writing is at the consultation stage, and is open to nominations. The focus on designated, rather than non-designated, heritage assets is limiting; non-designated heritage assets of all types should be included in more detail, recognising the contribution the latter make to local distinctiveness, which is essential to the richness and variety of historic urban environments, and which should not be underestimated for the contribution it makes to national and international heritage.</p>
		5.8.10 – 5.8.11	<p>Insufficient information and detailed analysis has been provided in terms of the assessments of impact on the setting of heritage assets. This ranges from designated heritage assets of high value, such as the grade II* listed 1 Melton Street, Alexandra Road Estate, the Roundhouse and the Primrose Hill Tunnel East Portals. Other examples are the grade II listed buildings in Stables Market, Drayton House in Euston Road and the settings of a number of memorials in St James's Gardens and Euston Square. Only a limited number of visual images have been provided of the Proposed Scheme; many important views have been omitted, such as views showing the altered setting of 1-9 Melton Street from the north, or the altered setting of the Alexandra Road Estate from the east. The content and detailing in visual images tend to be inaccurate in their portrayal of visual impacts. For example, it is considered that the images portraying new bridge works in Camden Town show no sympathy with or understanding of the existing streetscape. The existing bridges are integral to Camden Town's historic townscape, but their replacements are illustrated as bland concrete and steel structures. There are numerous cases in the CFAs where the setting of non-designated heritage assets has not been properly considered. Many situations arise in Camden Town where the widening of the viaducts or rebuilding of bridges affect the setting conservation areas, positive contributors in conservation areas and locally listed buildings. Notable examples are the demolition of 110 Camden Road, one of a terrace of positive contributors, and 51, 53 and 53a Kentish Town Road, locally listed buildings, which are supported by minimal research in the main documents.</p>
		5.8.12 – 5.8.13	<p>The significance of heritage assets (designated and non-designated) has generally been down-valued in the ES, as a national top-down approach has been taken paying no attention to the significance of buildings and structures of local value, many of which are non-designated heritage assets including positive contributors in conservation areas and locally listed buildings. Little attention has been made to conservation areas, and impacts on their setting. The significance of grade II buildings, all of which are of national importance, has also been belittled. It should be noted</p>

			that the relevant methodologies were not developed in consultation with local authorities or local community groups and individuals who may have better understanding of the significance of the heritage assets affected and of the wider local historic environment. Concerns are raised regarding non-listed heritage assets, including the former burial ground of St James's Gardens, which is not statutorily listed, but is considered to be of national historic significance. Invariably the assessment of potential impacts and adverse effects on the Proposed Scheme is derived from the level of significance given to a heritage asset, so it is essential that the significance of heritage assets is not undervalued.
		5.8.14 – 5.8.15	LB Camden does not have the in-house archaeological expertise to formally comment on this issue. However, it is apparent that insufficient archaeological field evaluation information is documented, considering the potential impacts and adverse effects on archaeology, most notably at St James's Gardens site of a former 18 <sup>th</sup> and 19 <sup>th</sup> century burial ground and former chapel, which may contain over 50,000 burials. There is a low level of information provided regarding the Kilburn Archaeological Priority Area, with no assessment of impacts and adverse effects. Where necessary HS2 Ltd should provide sufficient resources for preliminary archaeological investigation, monitoring and recording. Please refer to the formal response from English Heritage's Greater London Archaeological Advisory Service (GLAAS).
		5.8.16 – 5.8.17	LB Camden does not have the in-house archaeological expertise to formally comment on this issue. However, it would be preferable if the main documents of the ES had provided a higher level of information on the elements of design and construction that have a direct impact on heritage assets including archaeology, rather than covering this subject in the Heritage Memorandum. Please refer to the response from English Heritage's Greater London Archaeological Advisory Service (GLAAS).
		5.8.18 – 5.8.19	Interdisciplinary working practices are supported to ensure heritage assets are not harmed by mitigation measures addressing other environmental topics. It is essential that high quality architecture and landscape solutions are sought which minimise the harm to the historic environment. Where physical measures are necessary, for example to mitigate against environmental health or sustainability issues, close working between specialists is essential.
	5.9		Camden Council would like to point out that a core element of the Council's response to the draft ES was a request to include an assessment of the impact on access to nature especially in urban areas, where any impact on ecology will have impacts on urban communities' access to and engagement with nature and a reduction in the benefits associated with this (e.g. health and well-being).

		5.9.20	Camden Council reconfirms draft ES comments on the need to assess impacts on ecosystem services, and welcomes that HS2 LTS is discussing a potential Ecosystem Services Assessment with Defra and DfT.
	5.16		Camden Council notes that flood risk assessments in areas where there is tunnelling, particularly tunnelling close to the surface, will need to consider the risk of 'perching' i.e. water trapped between the surface and the main layer of impermeable rock. Mitigation measures should be introduced to tackle the risk from this and SuDS (Sustainable Drainage Systems) should be a requirement rather than merely considered in the design process.
<b>6</b>			Camden Council considers that it is not possible to provide definitive comments on this section as we do not have detailed information on all the issues raised by respondents to assess whether the summary is a reasonable reflection of the responses received. However, Camden Council considers that given the scale of construction impacts expected within Camden that appropriate weight should have been provided to our responses and expect that this was undertaken.
<b>7</b>	7.1		Camden Council notes the Introduction.
	7.2		Camden Council rejects the basic premise behind the issues and commentary given in 7.2. It considers that the commentary in 7.2 on themes raised by respondents in Camden during the draft ES process has woefully understated or ignored completely major concerns of the Council and of Camden communities who vociferously made their views clear during the consultation process.
		7.2.11	Camden Council considers the response at 7.2.11 to be inadequate. There are no doubt a number of ways in which noise decking of different types might be provided and other ways of screening such that noise might be mitigated in this area. There is absolutely no indication that HS2 Ltd has taken serious account of the community concerns raised and no intimation whatever that they have sought to find solutions - 7.2.11 sounds like a shrug of the shoulders and an "it's all too difficult" brush off.
		7.2.20	Camden Council considers it unacceptable and astonishing that sections 7.2.20 and 7.2.21 do not reflect or give any sense of the many and highly vociferous comments and objections raised by the Council and Camden communities with regard to the Euston station scheme design (Option 8).  The report's sections just airbrush out some of the most significant concerns and comments of people

			<p>regarding the largest, most complex and most impactful component of any part of the HS2 proposal along the whole route. That this cavalier approach deals with the high profile terminus in the nation's capital city in such an offhanded way demonstrates a fundamental misconception of the role and impact of the entire HS2 proposition and shows a complete disdain for views other than those of the project promoter.</p> <p>Camden Council completely rejects the commentary in those sections; they simply do not represent the facts of what happened. In addition, as written in 7.2.21 the words "exhaustive" and "extensively" are used to give the impression that alternatives have been fully examined and their omission justified on a true comparison basis. Nowhere in the ES is there any serious evidence to show this level of assessment and Camden Council is aware that what is said in 7.2.21 is also not factually correct (e.g. HS2 Ltd.'s consultants have openly acknowledged that they misinterpreted and thus mis-assessed one double deck option proposed by a community group which thus has not been assessed properly). The whole approach to alternatives is set within a tone and context that they are raised and passingly mentioned within assertions that benefit the project promoter's views and are there to tick a box and show the HS2 preferred scheme in a good light. Section 2.2.21 is an exemplar of this unacceptable approach.</p>
		7.2.21	<p>Camden Council considers it unacceptable and astonishing that sections 7.2.20 and 7.2.21 do not reflect or give any sense of the many and highly vociferous comments and objections raised by the Council and Camden communities with regard to the Euston station scheme design (Option 8). The report's sections just airbrush out some of the most significant concerns and comments of people regarding the largest, most complex and most impactful component of any part of the HS2 proposal along the whole route. That this cavalier approach deals with the high profile terminus in the nation's capital city in such an offhanded way demonstrates a fundamental misconception of the role and impact of the entire HS2 proposition and shows a complete disdain for views other than those of the project promoter. Camden Council completely rejects the commentary in those sections; they simply do not represent the facts of what happened. In addition, as written in 7.2.21 the words "exhaustive" and "extensively" are used to give the impression that alternatives have been fully examined and their omission justified on a true comparison basis. Nowhere in the ES is there any serious evidence to show this level of assessment and Camden Council is aware that what is said in 7.2.21 is also not factually correct (e.g. HS2 Ltd.'s consultants have openly acknowledged that they misinterpreted and thus miss-assessed one double deck option proposed by a community group which thus has not been assessed properly). The whole approach to alternatives is set within a tone and context that they are raised and passingly mentioned within assertions that benefit the project promoter's views</p>

			and are there to tick a box and show the HS2 preferred scheme in a good light. Section 2.2.21 is an exemplar of this unacceptable approach.
		7.3.7	Camden Council considers that 7.3.7 utterly fails to reflect the many vociferous comments and concerns raised by the Council and local people over the impacts of these works on traffic congestion, diversions, accessibility inhibitions, safety, noise, dust and the like which are considered to have a devastating economic and well-being effect on the entire district, including Camden Town markets and Camden Lock, the second most attractive tourist site in London. This is one of London's most densest developed and complex urban areas and the insouciant, brushing-off, approach evidenced in 7.3.7 is completely unacceptable. Comments made against traffic modelling methodology elsewhere in the Council's response to the current (25 Nov 2013) ES clearly show that the impacts to have been seriously underestimated. The staggering lack of appreciation of the wider impacts evidenced in the derisory response of 7.3.7 seems to show that HS2 Ltd are completely out of touch with, or have blatantly decided not to address, some of the most significant construction stage impacts that will be faced anywhere along the HS2 route.
		7.3.27	Camden Council considers that there has been no adequate evidence base brought forward within the ES for the conclusion reached in 7.3.27. The rejection of a tunnelled option, an expressed objective of many in Camden's communities and elsewhere, has been somewhat summarily dismissed without the opportunity for the relevant local authority to contribute to the balancing of issues and impacts for what is a significant impact within its core area. HS2 Ltd has taken a unilateral decision from a narrow project focused perspective but has also tacitly acknowledged that the decision would have community impacts. There seems no recognition that the construction stage impacts, albeit temporary in principle, will extend cumulatively over many years and inexorably suck the economic life from the area whilst subjecting the wider public to interminable adverse impacts. It is therefore unacceptable that HS2 Ltd has not involved the Council, which has a statutory responsibility for the wellbeing of its area, at the formative stages of its proposals.
8			Camden Council is highly sceptical of the assertions made in section 8. This scepticism is justified by the manner in which alternatives have been presented, and how incomplete commentary and response to matters raised during the consultation has been given. The Council considers that potential changes raised by a wide range of respondents have essentially been brushed aside or used only to embellish the preferred scheme. It considers this unacceptable.
<b>HS2 Draft ES - A Summary of Consultation Responses</b>			

Executive Summary	0.1		Camden Council notes the explanation.
	0.2		Camden Council notes the comments.
	0.3		Camden Council considers that it is not possible to provide definitive comments on this section as we do not have detailed information on all the issues raised by respondents to assess whether the summary is a reasonable reflection of the responses received. However, Camden Council considers that given the scale of construction impacts expected within Camden that an appropriate weight should have been provided to our responses and expect that this was undertaken.
	0.4	0.4.6	Camden Council agrees with the comments raised and still believes that the air quality assessments lack detail on the effect of construction on nearby receptors and that the proposed mitigation measures are not adequate.
		0.4.9	<p>Camden Council agree that a wider and more detailed assessment was needed and notes that the huge difference in the construction emissions estimate from the AoS to the ES further indicates the inadequacy of the AoS methodology. Camden therefore believes that the AoS as a consultation document was not fit for purpose regarding construction carbon emissions.</p> <p>Camden also believes that the huge assumptions and 'very simple high-level design' of the alternative new motorway mean it should not be used as evidence of HS2 being carbon beneficial without a more detailed appraisal.</p>
		0.4.24	Camden Council considers that it is not possible to provide definitive comments on this section as we do not have detailed information on all the issues raised by respondents to assess whether the summary is a reasonable reflection of the responses received. However, Camden Council considers that given the scale of impacts expected within Camden that an appropriate weight should have been provided to responses by those commenting on sections relevant to Camden and expect that this was undertaken.
		0.4.33	Camden Council agrees that future-proofing for flood risk through substantial use of SuDS (Sustainable Drainage Systems) features is crucial if this development goes ahead.
1	1.1		Camden Council offers no comments on this section.



5	5.2	5.2.10 – 5.2.16	<p>Camden Council agrees with the concerns about how impacts have been deemed significant and on the need for mitigation and/or compensation measures. Those measures should include:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas. This would be for all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the in use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to DEFRA and the EU).</li> </ul>
		5.2.18 – 5.2.27	<p>Camden Council would like to question why there is no mention here of the responses regarding the loss of urban open space.</p> <p>Camden Council also agrees with stakeholder concerns about the potential cumulative impacts on communities and argue that this has been given very little consideration. For example, respondents in some locations argue that they suffer already from the impact of traffic noise and are concerned that the line would exacerbate this problem.</p> <p>Camden Council is concerned that properties that will experience a significant amenity effect have not been properly identified and assessed.</p>

			<p>Camden Council considers HS2's methodology in predicting combined effects to be limited and insufficient.</p> <p>Camden Council is concerned that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves.</p> <p>Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p> <p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>Camden Council requests that any mitigation measures be proposed and agreed at least 2 years in advance of works.</p> <p>Camden Council requests that appropriate compensation should be provided to residents for disruption due to mitigation measure installation.</p>
		5.2.55 – 5.2.64	<p>Camden Council considers that it unsurprising that there was a sense of confusion and anxiety amongst respondents in relation to the noise contours and considers this could be due to the short timescale in which respondents were expected to review and comment on a vast quantity of technical information. Camden Council considers that this demonstrates that there is great concern amongst communities regarding the potential impacts of noise and vibration and consider that clear and easily accessible information should be provided.</p>
		5.2.75 – 5.2.81	<p>Camden Council supports the comments about the importance of fully considered the effects of tunnelling and excavation on perched water and does not believe this has been considered in the flood risk assessment.</p>
<b>6</b>			<p>Camden Council is surprised that the report at this point (6.2.8 et seq) does not expressly mention</p>

			<p>the many comments made about the Euston Station scheme design. The Option 8 scheme, which was the basis of the HS2 Ltd proposal under consultation, was widely and adversely commented upon by the Council and Camden's communities. Demands were made that it should be changed. It is perplexing that this major issue is not expressly mentioned in the report. This is a very much wider matter than (as implied by the commentary in 6.2.12) construction impacts alone.</p>
	6.2	6.2.14 – 6.2.24	<p>Camden Council would like to question why there is no mention here of the responses regarding the loss of urban open space.</p> <p>Camden Council agrees with stakeholder concerns about the current shortage of accommodation in North London, and especially within the borough of Camden, and the effects of relocation especially vulnerable people. Respondents see the proposed demolition of dwellings, and especially lower priced accommodation as worsening the issue. The most widely discussed issue in this area is the proposed loss of housing, and the associated forced removal of residents. Particular issues that respondents discuss in relation to this include the effect that this would have on the individuals involved, the effect on the nature of the community, and proposals for mitigation. The Council is a provider of social housing and health care. Where the works impact on the ability of residents to use the property as tenants. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p> <p>Camden Council finds it unacceptable to comment on the ES's assessment of impacts and effects of sounds, noise, and vibration prior to reviewing the Noise Insulation and Temporary Re-housing Policy which has not been published. Does not agree with methodology. Expects full survey of before and after, with full assessment and mitigation of cumulative impacts. Where rehousing necessary – a solution needs to be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being. Camden Council is concerned that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council is concerned about the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions. Camden Council is concerned that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council would require an assessment of cumulative impacts and baseline surveys to be undertaken of properties at risk in advance of works. Camden Council would require that any mitigation measures be proposed and agreed at least 2 years in advance of works to ensure that the impact on residents, including their health and well-</p>

			<p>being is properly considered and managed.</p> <p>Camden Council is also concerned that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be re-house as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council is concerned that HS2 do not have an understanding leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p>
		6.2.33 – 6.2.36	<p>Camden Council maintains its concerns about the already high levels of NO2 and further adds that Camden Council could be at risk of fines for high air pollution if it does not reduce it, a task which will be made significantly harder by HS2.</p>
		6.2.37 – 6.2.41	<p>Camden Council expects that the comments and suggestions made by respondents is given appropriate weight and consideration.</p>
	6.3	6.3.11 – 6.3.16	<p>Camden Council agrees with stakeholder concerns about the current shortage of accommodation in North London, and especially within the borough of Camden, and the effects of relocation especially vulnerable people. Respondents see the proposed demolition of dwellings, and especially lower priced accommodation as worsening the issue. The most widely discussed issue in this area is the proposed loss of housing, and the associated forced removal of residents. Particular issues that respondents discuss in relation to this include the effect that this would have on the individuals involved, the effect on the nature of the community, and proposals for mitigation. The Council is a provider of social housing and health care. Where the works impact on the ability of residents to use the property as tenants. Camden Council will require HS2 to manage such provision or alternative fully compensate the Council for all associated costs incurred.</p> <p>Camden Council finds it unacceptable to comment on the ES's assessment of impacts and effects of sounds, noise, and vibration prior to reviewing the Noise Insulation and Temporary Re-housing Policy</p>

			<p>which has not been published. Does not agree with methodology. Expects full survey of before and after, with full assessment and mitigation of cumulative impacts. Where rehousing necessary – a solution needs to be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 2 years be given to manage resident moves and their health and well-being. Camden Council is concerned that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council is concerned about the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions. Camden Council is concerned that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council would require an assessment of cumulative impacts and baseline surveys to be undertaken of properties at risk in advance of works. Camden Council would require that any mitigation measures be proposed and agreed at least 2 years in advance of works to ensure that the impact on residents, including their health and well-being is properly considered and managed.</p> <p>Camden Council is concerned that HS2 is not sufficiently addressing the concerns of leaseholders. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be re-house as close as possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council is concerned that HS2 do not have an understanding leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.</p>
		6.3.37 – 6.3.38	Camden Council expect that the comments and suggestions made by respondents is given appropriate weight and consideration.
		6.3.40 – 6.3.43	Camden Council absolutely concurs with those that say the Link concept and design is fatally flawed because of its impacts on Camden Town for little or no practical railway purpose. The Council also considers that the work said by HS2 Ltd to have been done to consider alternatives has not been explained or justified as to why any such alternative is worse than the currently unacceptable viaduct based scheme.

	6.3 Primrose Hill to Kilburn (Camden) (CFA 3)		Camden Council has noted that the level of community concern about possible property damage from tunnelling work has sharply increased. It believes that this is, in part, due to a lack of effective community engagement by HS2 Ltd and clear explanation by them of their approach to tunnelling, predicted settlements and illustrations of similar tunnelling impacts on other projects. Lack of HS2 Ltd information has thereby compounded community concern.
		6.3.12 – 6.3.18	<p>Camden Council agrees with stakeholder concerns about the expected loss of accommodation and business premises; the impact of disruptions caused by construction traffic on the functioning of the community; and the need for appropriate compensation for these effects. Camden Council shares concerns highlighted about to impact of HS2 on regeneration possibilities on the Alexandra and Ainsworth Estate. Camden Council is disappointed to find these issues have not been sufficiently addressed in the ES, impacts significantly underplayed, and poor mitigation measures suggested when any have been proposed at all.</p> <p>Camden Council considers that properties that will experience a significant amenity effect have not been properly identified and assessed.</p> <p>Camden Council considers HS2's methodology in predicting combined effects to be limited and insufficient. Camden Council is concerned that the areas affected by HS2 have increased since the draft ES. Numerous properties previously considered unaffected are now at risk. Camden Council is concerned that the ES does not provide sufficient and consistent information about the impact of the HS2 project on properties and therefore cannot provide accurate comments on ES. Camden Council would require a full list of all properties, including addresses, and a full assessment of individual and cumulative impacts on these properties.</p> <p>Camden Council is concerned that HS2 is not sufficiently addressing the concerns of leaseholders in the ES. Leaseholders make up an important part of mix in the community and HS2 should seek solutions to allow all residents to continue to live locally if desired. Camden Council stresses that the draft compensation consultation does not sufficiently consider Camden leaseholders who make up an important part of the local community. Camden Council is concerned that unfair compensation measures will force leaseholder to move out of the borough. Camden Council seeks further commitment from HS2 to compensate leaseholders and ensure they have access to affordable housing locally. Camden Council is concerned that despite raising concerns about leaseholder, HS2 has not sufficiently engaged with the council and residents. Camden Council requests that leaseholders be included in scope for rehousing, and for all residents to be rehouse as close as</p>

			possible to requested need and location noted in the Housing Need Survey carried out by the council. Camden Council is concerned that HS2 do not have an understanding leaseholders in Camden. HS2's Equality Impact Assessment does not include information on leaseholder impacts.
		6.3.19 – 6.3.21	Camden Council expect that the comments and suggestions made by respondents is given appropriate weight and consideration.
		6.3.35	Camden Council shares the view of the local resident reported in this section that community engagement by HS2 Ltd has been inadequate and somewhat selective. It has felt more like paying lip service than genuine consultation and open-mindedness.
<b>7</b>			Camden Council is disappointed to note that little reference has been made to specific comments made by the Council on these sections further to the detailed response provided and given the magnitude of effects which will be evident within Camden. Camden Council considers that given the most impacts of the construction of the proposed development will be within Camden, that the summary of responses should have placed greater emphasis on those comments and responses provided by Camden Council, residents, businesses and visitors.
	7.4		Camden Council is disappointed to note that our comments regarding key issues which could have implications along the route and not only within Camden have not been summarised here, for example, the trigger thresholds for noise insulation and temporary re - housing have not been noted.
<b>8</b>	8.2		Camden Council strongly agrees with the suggestion that the Proposed Scheme should provide betterment over the existing situation as this meets Camden Planning Guidance (CPG3 Sustainability). Camden Council believes this should be amended to meet this.
	8.3		Camden Council appreciates that the ES was at this time in "draft" form and that the project details were rapidly evolving. The test of the complaints reported will be whether the final (25 Nov 2013) ES text and plans are consistent, clear and together adequately explain the full facts and intentions of the promoter.
<b>9</b>			Camden Council has expressed and maintains its opposition to HS2 for many of the reasons captured in this section. As specifically mentioned in 9.2.2 the Council was concerned that the methodological basis for the draft ES was not adequately explained, or explained at all. This was worrying even at the draft stage and the Council will necessarily be concerned to ensure that this defect has not been carried forward in to the final (25 Nov 2013) ES.

## Alternatives report (Ref: volume 5 appendix CT-002-000, ES 3.5.0.18)

Section	Sub Section	Paragraph	London Borough of Camden response
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7			<p>Camden Council is concerned about the lack of detail relating to the Euston options (paragraph 7.1.6). No details are given about a station at Euston with through platforms and about the concept of two independent stations.</p> <p>The Council has concerns about the dispersal of passengers from Euston and is not satisfied that the proposals adequately deal with this. There are insufficient details in the ES to adequately understand what may be being proposed at Euston. Further exploration should have been given to the potential for Old Oak Common (OOC) as a temporary terminus until dispersal issues and design proposals for Euston Station are clear. Further consideration should be given to providing a greater role for OOC in relieving congestion at Euston and the problems related to meeting the demand for onward travel to final London destinations (such as the City and West End) in the most effective manner. Old Oak Common has good connections to central London and other locations, particularly the City and Canary Wharf, via the interchange with Crossrail. If an enhanced Heathrow Airport is the chosen option from the Davies report, the direct connection to the airport from Old Oak Common will result in even more alighters at this station than is being projected. In that event some services could be terminated at Old Oak Common, which would reduce the scale of the proposed station at Euston and the number of platforms required for HS2. The ES does not address these matters.</p>
		7.1.1 – 7.1.5	<p>Camden Council is concerned by the dismissal of Old Oak Common in playing a role for termination of at least some services and playing a greater role in relieving train services demand at Euston. When options for the HS2 London terminus were considered, it appears that Old Oak Common was dismissed at an early stage without proper consideration of such matters.</p>
		7.1.1	<p>Camden Council notes that this section covers alternatives examined at Euston Station, but that there is no evidence that double deck down was considered at any stage. No option to reduce size of Euston by through running trains on HS2 – HS1 has been considered. No option to reduce the size of Euston by maximising use of Old Oak Common and Crossrail.</p>
		7.1.3	<p>Camden Council notes that the HS2 demand analysis for Old Oak Common as a prospective terminus suggested that the journey time penalties for most central London passengers would severely reduce the benefits of HS2. Not clear if onward connection to ultimate destination is included in assessment e.g. Birmingham to West End. As elsewhere in the document OOC is highlighted as being major interchange for West End, so a consistent position is not taken by HS2 in this regard. As example, the final bullet of paragraph 7.1.3 states that “the demand analysis for Willesden Junction and Old Oak Common suggested that the journey time penalties for most central London passengers would severely reduce the benefits of HS2”. Clearly not all final origins and destinations are proximal to Euston station, nor necessarily in central London, but the decision in January 2012 that Old Oak Common would be served by Crossrail changes the focal nature of this location. 8.1.10 states having</p>

			an interchange at Old Oak Common would be justified irrespective of any of the options for serving Heathrow because it offers a faster route than Euston to Central London and beyond for a large proportion of HS2 passengers.
		7.1.5	A key reason given for the Euston terminus relates to cost and engineering feasibility. There is no evidence that the full costs of demolition and provision (e.g. housing) has been included.
		7.1.10	Camden Council notes that the Environmental Statement asserts that the proposed terminus at Euston will allow for the “optimisation of local regeneration benefits”. The project will result in the demolition of properties and businesses in the area. No evidence is presented about regeneration benefits, let alone how they will be optimised. For example, no details are provided for where the proposals would allow for significant over station development and how this could be achieved in the context of the proposed works and known constraints such as subsurface structures associated with the Underground.
		7.1.12	All alternative Euston double deck options considered are double deck up and not double deck down, which should be considered.
<b>11</b>			<p>Camden Council objects to the use of the North London Line (NLL) infrastructure to construct the link on the following grounds:</p> <ul style="list-style-type: none"> <li>• The forecast demand for the link stated in the ES is so low as to seriously question whether it would be economic for an operator to provide a service, especially since journeys can be made in other ways.</li> <li>• The construction of the permanent way for HS2 services involves unacceptable impacts in Camden in the context of other works in the borough, especially including those at Euston station, in such a tight timescale. [refer to details given in response to CFA2]</li> <li>• The link will limit, in perpetuity, the future expansion of service on the Overground network via the NLL, resulting in unacceptable opportunity costs for the rapidly expanding demand for orbital services in North London.</li> <li>• The recent expansion of London Overground services now enables passengers to make journeys orbitally without making inward and outward radial rail journeys that they would have had to make previously. Thwarting further expansion of the Overground therefore has the secondary impact that this will increase demand pressures on radial services.</li> </ul> <p>The recent expansion of London Overground services now enables passengers to make journeys orbitally without making inward and outward radial rail journeys that they would have had to make previously. Thwarting further expansion of the Overground therefore has the secondary impact that this will increase demand pressures on radial services.</p>

			<p>Although the link is being designed to operate a service of up to 3 tph, in practice the number of services that will operate will depend on the demand. If demand is low, the number of trains offered per hour will fall. As service frequency falls, services offered via the link become unattractive to travellers who are liable to seek other ways of making their journey.</p> <p>In general, for journeys taking three and a half hours overall rail can command a majority share of the rail/air market providing certain conditions are fulfilled ("A review of ex-post evidence for mode substitution and induced demand following the introduction of high speed rail", Moshe Givoni and Frederic Dobruszes, <i>Transport Reviews</i>, 2013). Such a journey time not only includes the time by the long haul mode(high speed rail or air), but also the waiting time to board the long haul component and the access and egress times to/from terminals from origins to final destinations. The conditions that must be fulfilled include the relative money price of the journey and also how frequent a service is provided.</p> <p>Camden Council objects to the lack of detail about a service pattern would use the link is not proposed and there are therefore no details about how many trains would use it per hour. The potential demand in paragraph 11.1.3 challenges whether any market segment could be served by the link.</p> <p>Paragraph 11.1.3acknowledges that the market from the West Midlands to Paris/Brussels is so low at 1,050-2,200 passengers per day that this would only be sufficient to fill 2-3 trains per day. What is not stated is that such a low frequently would reduce this potential market further. It acknowledges that without the link at all, more passengers (1,500-3,600) using HS2 would go between Euston and St Pancras to use Eurostar services than would use the link.</p> <p>Paragraph 11.1.8 acknowledges that if a service from Heathrow via the link to the continent were implemented that the forecast demand at 5,000 passengers per day "would not justify more than seven HS2 trains per day, but such a service would not be frequent enough to capture all this theoretical demand." The Council presumes that such a service will not be provided and is concerned that the text does make this clear. Such a service via the link is not warranted since Heathrow passengers could interchange onto Crossrail at Old Oak Common and go to St Pancras by interchanging onto Thameslink Programme services at Farringdon (or interchanging onto Crossrail 2 services at Tottenham Court Road).</p> <p>Paragraph 11.1.3 acknowledges that a continental service operating from a terminal at Old Oak Common via the link could attract 2,100-4,650 passengers per day from GWML and west London.</p>
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		<p>This volume is less than that forecast from Heathrow, and passengers could interchange at Old Oak Common onto Crossrail to travel to St Pancras as stated above.</p> <p>Camden Council objects to the lack of detail concerning the tunnelling options (paragraphs 11.1.17-11.1.19). Without providing details it is an unsubstantiated assertion that the Proposed Scheme is better than tunnelling alternatives</p> <p>One reason why Camden Council objects to the HS2-HS1 link is that it will severely reduce the potential future expansion of service on the Overground network via the NLL, resulting in unacceptable opportunity costs for the rapidly expanding demand for orbital services in North London.</p> <p>Ridership growth on the Overground has been much greater than what conventional service level and fares elasticities would suggest, especially during an economic downturn. The most detailed assessment of passenger demand growth of the Overground and factors affecting it was undertaken by TfL in November 2011 (London Overground Impact Study, for Rail and Underground Panel, TfL, 16 November 2011).</p> <p>Between 2008/9 and 2011/12 train kilometres increased by 109% (Travel in London Report 5, TfL 2012), but this is not enough to account for passenger growth, which is of the order of 190% over this period. Other factors include service quality (including new trains, higher capacity, station upgrades and performance improvements), connectivity and marketing. Further comments on these are given below.</p> <p>In retrospect another important factor, revealed by the 2011 census, is the larger than expected growth in London's population. The Railplan and LTS modelling used for the Network Rail's London &amp; SE draft market study, for TfL's forecasts for Crossrail 2 and for HS2 is based on an expectation that London's population would grow from a forecast population of 7.8 million forecast for 2011 to 8.9 million by 2031. The 2011 census shows that London's population had already reached 8.2 million in 2011 and is now expected to grow to between 9.7 and 10 million by 2031.</p> <p>The Overground's orbital rail services play an important role in serving London's growing population and will play a more significant role for trips made to and from the new housing and employment that is planned in locations served by the Overground. The East London line now operates to a peak service level of 12tph in the core section between Dalston Junction and Canada Water. The NLL</p>
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			<p>operates 8tph in the core section between Stratford and Willesden Junction.</p> <p>More capacity is required to keep pace with increasing demand. The NLL presently operates 4-car trains. The current NLL Upgrade programme in Control Period 5 (2014-19) is undertaking platform and other works to allow 5-car operation. TfL was considering 6-car operation for CP6 (2019-2024) although now TfL are looking to increase capacity by increasing frequency on the core section from 8tph to 10tph. In the longer term further frequency enhancements could be considered by overcoming infrastructure constraints on the route as a whole.</p> <p>The development of the Overground in its present form has created new direct connections between locations. This is particularly evident in the way that Highbury and Islington station now connects to locations on the extended East London line. The connectivity and the higher tph services offered allows passengers to go to destinations orbitally, rather than having to take radial routes in and out to make journeys to their locations. This pattern of journey-making takes pressure off radial rail routes, on both Network Rail and Underground lines. Marketing of the Overground network has resulted in greater awareness of the new connections available. Rebranding on the different services that comprise the Overground into the unified marketing concept of the 'Overground', and the presence of the Overground on the Underground map has had a role in highlighting the opportunity available and consolidating demand for the service.</p> <p>Regeneration and related rail infrastructure improvements close to the Overground network will further increase the demand for the Overground in general, and for the NLL in particular. These include the following.</p> <p>Stratford: Network Rail's Route Plans 2010, Route Plan E North London Line (p13) states "Increases in passenger demand will continue to be generated through CP5 by the Stratford City development and employment in Docklands and the City of London. There will also be a permanent increase following the redevelopment of the Olympic site after the Games."</p> <p>Gospel Oak Barking (GOB) electrification and Barking Riverside: The announcement in June 2013 that GOB will be electrified in the period 2015/6 to 2020/1 (<a href="http://www.tfl.gov.uk/corporate/media/newscentre/metro/28216.aspx">http://www.tfl.gov.uk/corporate/media/newscentre/metro/28216.aspx</a>) is the first step towards the extension of the line to Barking Riverside, one of the largest development sites in London. . Over the next 20 years it is expected that 10,800 new homes will be built to house 26,000 people (<a href="http://www.lbld.gov.uk/Regeneration/BarkingRiverside/Pages/home.aspx">http://www.lbld.gov.uk/Regeneration/BarkingRiverside/Pages/home.aspx</a>).</p>
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		<p>Upper Lee Valley, WAML and Crossrail 2: In June 2013 it was also announced that West Anglia suburban rail services are to be devolved to the Mayor and TfL. ). Up to 4tph additional rail services are planned for this corridor with enhancements to stations (<a href="http://www.modern-railways.com/view_article.asp?ID=6269">http://www.modern-railways.com/view_article.asp?ID=6269</a>). Four tracking of the line is being considered (Minutes of Crossrail 2 Local Authority Forum, 20 June 2013). The expansion of rail services on this corridor will assist the regeneration of the Upper Lea Valley where 15,700 new homes, 21,900 new jobs are planned and up to 15,000 jobs in adjoining areas (Upper Lee Valley Opportunity Area Planning Framework). Crossrail 2's Regional option may use the West Anglia main line corridor via Tottenham Hale.</p> <p>Old Oak Common: Proposals for a new station at Old Oak Common were announced in June 2013 (<a href="http://www.london.gov.uk/priorities/planning/publications/park-royal-planning-framework">http://www.london.gov.uk/priorities/planning/publications/park-royal-planning-framework</a> serving Crossrail, the Overground and HS2. The Mayor of London , TfL and London Boroughs of Hammersmith &amp; Fulham, Brent and Ealing are currently consulting on proposals to create 90,000 jobs and 19,000 new homes (<a href="http://www.tfl.gov.uk/corporate/media/newscentre/metro/28220.aspx">http://www.tfl.gov.uk/corporate/media/newscentre/metro/28220.aspx</a>).</p> <p>If HS2 were to use part of the NLL alignment this would constrain future expansion of Overground services. The above regeneration projects exemplify ways in which London's population and employment is expanding, which itself requires the provision of additional rail services such as those referred to above. London's growing population and changing land uses will require additional rail capacity and if expansion of Overground services is thwarted then in the short to medium term this will create further pressures on radial services, which will require projects on these lines to increase capacity and in the longer term will require the creation of new rail infrastructure. The opportunity costs of constraining future expansion of the Overground to provide very low frequency services on the HS2-HS1 link offers very poor value for money, poor use of available infrastructure and will ultimately lead to much higher levels of expenditure to meet London's growing rail demand in other ways.</p> <p>The demand that is forecast for services that could use the HS2-HS1 link is so low as not to be commercial viable and would be unattractive to a future potential tendered operator, resulting in poor value of money to the public sector, especially given the opportunity costs to the NLL.</p> <p>Volume 2, CFA Report No 4 paragraph 2.1.2 acknowledges that "the option to interchange at Old</p>
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			<p>Oak Common with Crossrail will provide opportunities for quicker access to parts of the West End, the City and Canary Wharf than changing at Euston". This can be readily demonstrated using TfL's journey planner and projected Crossrail journey times (see journey time comparisons below), but furthermore this contradicts the position taken in paragraph 7.1.3 of the Alternatives Report that a terminus at Old Oak Common would result in "journey time penalties for most central London passengers [that] would severely reduce the benefits of HS2" HS2 has not provided evidence that Euston would offer time savings as to qualify this statement, and therefore the assessment in these terms is defective.</p> <p>HS2 acknowledges (Volume 12, CFA Report No 4 paragraph 2.1.1) that a new station at Old Oak Common would enable HS2 passengers to transfer onto Crossrail, Heathrow Express and Great Western Main Line services. Volume 2, CFA Report No 4 paragraph 2.1.4 states that "Approximately a third of HS2 passengers will use Old Oak Common to change onto Crossrail to travel into central London, in preference to staying on until Euston. In addition to providing better journeys for these passengers, this will also reduce the number of passengers moving within Euston and its London Underground connections." There is also scope to connect to London Overground services in which case passengers alighting at would be higher still,. Volume 12, CFA Report No 4 also notes (paragraph 2.1.11) that the <i>Vision for Old Oak</i> (London Borough of Hammersmith and Fulham, London Borough of Ealing, London Borough of Brent (LBB), the GLA and TfL, June 2013) "recognises that Old Oak Common could be one of the best connected railway stations in the UK."</p> <p>Journey time comparisons can be made between Old Oak Common and Euston to central London locations. These comparisons are subject to caveats, particularly whether passengers alighting from HS2 at Euston will be able to use Euston Underground station due to overcrowding (discussed in CFA 01 report: Euston Station and approach (Ref ES.3.2.1.1), paragraphs 12.5.13-12.5.25).</p> <p>Passengers alighting at Old Oak Common would be able to use Crossrail services to destinations in central London, the City and docklands. Crossrail gives estimates of the following journey times between its stations (<a href="http://www.crossrail.co.uk/benefits/a-world-class-new-railway/timetabling?fromStation=21&amp;toStation=4&amp;journey-request=Search">http://www.crossrail.co.uk/benefits/a-world-class-new-railway/timetabling?fromStation=21&amp;toStation=4&amp;journey-request=Search</a>). Times are not given from Old Oak Common, but a station at this location is to the east of Acton Main Line station and journey times would be a minute or two less to the destinations given in table 1 below.</p> <p>Table 1</p>
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			<table><tr><th>Destination</th><th>Journey time (minutes) from Acton Main Line Crossrail station</th></tr><tr><td>Paddington</td><td>6</td></tr><tr><td>Tottenham Court Road</td><td>11</td></tr><tr><td>Farringdon</td><td>14</td></tr><tr><td>Liverpool Street</td><td>16</td></tr><tr><td>Canary Wharf</td><td>23</td></tr><tr><td>Bank (via TCR &amp; interchange onto Central line, assuming 5 mins for interchange)</td><td>23</td></tr></table>	Destination	Journey time (minutes) from Acton Main Line Crossrail station	Paddington	6	Tottenham Court Road	11	Farringdon	14	Liverpool Street	16	Canary Wharf	23	Bank (via TCR & interchange onto Central line, assuming 5 mins for interchange)	23																			
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			<p>The journey times from Euston/Euston Square given in Table 2 are current journey times fderived from TfL’s Journey Planner (<a href="http://journeyplanner.tfl.gov.uk/user/XSLT_TRIP_REQUEST2?language=en">http://journeyplanner.tfl.gov.uk/user/XSLT_TRIP_REQUEST2?language=en</a>). HS2 passengers travelling onto Euston would be subject to a few minutes additional journey time from Old Oak Common to Euston, which ought to added onto the journey times below. For HS2 services stopping at Old Oak Common, HS2 passengers travelling onto Euston would also be subject to a few additional minutes of dwell time, which ought to added onto the journey times below.</p>																																	
			<table><tr><th>Origin Underground Station</th><th>Destination</th><th>Journey time (minutes) on the Underground</th></tr><tr><td>Euston</td><td>Tottenham Court Road</td><td>4</td></tr><tr><td>Euston Square</td><td>Tottenham Court Road (via walk, bus, walk to Warren Street &amp; onto Northern line)</td><td>15</td></tr><tr><td>Euston</td><td>Farringdon</td><td>10-11</td></tr><tr><td>Euston Square</td><td>Farringdon</td><td>13</td></tr><tr><td>Euston</td><td>Liverpool Street (via TCR or Moorgate and interchange)</td><td>16-17</td></tr><tr><td>Euston Square</td><td>Liverpool Street</td><td>21</td></tr><tr><td>Euston</td><td>Canary Wharf</td><td>28-31</td></tr><tr><td>Euston Square</td><td>Canary Wharf</td><td>33-38</td></tr><tr><td>Euston</td><td>Bank (direct via Northern Line)</td><td>11</td></tr><tr><td>Euston Square</td><td>Bank (via TCR &amp; interchange</td><td>16-17</td></tr></table>	Origin Underground Station	Destination	Journey time (minutes) on the Underground	Euston	Tottenham Court Road	4	Euston Square	Tottenham Court Road (via walk, bus, walk to Warren Street & onto Northern line)	15	Euston	Farringdon	10-11	Euston Square	Farringdon	13	Euston	Liverpool Street (via TCR or Moorgate and interchange)	16-17	Euston Square	Liverpool Street	21	Euston	Canary Wharf	28-31	Euston Square	Canary Wharf	33-38	Euston	Bank (direct via Northern Line)	11	Euston Square	Bank (via TCR & interchange	16-17
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			<div> <div></div> <div>onto Central line, assuming 5 mins for interchange)</div> <div></div> </div>	
			<p>The times given in Tables 1 and 2 above are the journey times by rail and do not include the interchange times between HS2 stations and Crossrail/Underground platforms. To compare journey times between the two tables the journey times in table 1 would need to be decreased by a minute or two for trains from Old Oak Common (rather than Acton Main Line) and the times in table 2 would need to be increased by the additional journey time on HS2 from Old Oak Common to Euston. To disperse the increased number of passengers that will arise from HS2 at Euston without additional mass transit capacity, such as Crossrail 2, TfL estimates that in 2033 (with HS2 phase 2) southbound Victoria Line passengers might have to let 8 trains pass before boarding with average wait times of 15 minutes and a maximum of 31 minutes, and for southbound Northern Line Bank branch passengers might have to let 4 trains pass before boarding with average wait times of 7 minutes and a maximum of 21 minutes (<i>London Councils Update</i> presentation slides, January 2012, TfL).</p> <p>Taking all the above into account, it is quicker for passengers travelling to many destinations in central London to go from Old Oak Common rather than Euston. Therefore, the assertion made by HS2 that a terminus at Old Oak Common would result in journey time penalties relative to Euston for most central London passengers is not valid.</p>	
		11.1.1	The Phase One scheme includes a rail link between HS2 and HS1 with a capacity of up to three trains an hour which can be used either for through Eurostar trains to the continent, or to extend Eurostar services to an interchange with HS2 at Old Oak Common, or for Kent trains to interchange with Heathrow Express or Crossrail.	
		11.1.3	Highlights very low demand for international services from HS2 and fails to set out a viable business case. Indeed HS2's analysis shows that there would be a greater demand for passengers to travel via Euston on Foot. In addition, HS2 demonstrate that a better alternative would be to extend some Eurostar trains to OOC. The ES acknowledges (paragraph 11.1.3) that the market from the West Midlands to Paris/Brussels is so low at 1,050-2,200 passengers per day that this would only be sufficient to fill 2-3 trains per day. What is not stated is that such a low frequently would reduce this potential market further. The ES acknowledges that without the link at all, more passengers (1,500-3,600) using HS2 would go between Euston and St Pancras to use Eurostar services than would use the link.	

			There is no attempt to identify other demand for the HS1 link or anything like a business case. There is very limited explanation why other options have been dropped in favour of a link via the NLL.
		11.1.6	The Council does not accept the Government's view (paragraph 11.1.6) "that the strategic case for a direct link between the proposed high speed rail network and the HS1 line to the Channel Tunnel is strong." The demand levels are low and could be served by alternatives rail links.
		11.1.9	Makes it clear that the overriding objective was to produce a low cost option. It is not clear if the resulting negative impacts during construction and including demolition have been included in this assessment.
		11.1.17 – 11.1.19	The Council objects to the lack of detail concerning the tunnelling options (paragraphs 11.1.17-11.1.19). Without providing details it is an unsubstantiated assertion that the Proposed Scheme is better than tunnelling alternatives.
		11.1.18	<p>Sets out the advantages of a tunnelled link to HS1(reducing the need for surface works along the NLL route including viaduct widening, upgrading of Camden Road station and the replacement of eight bridges on the NLL. Nor would there be any risk of a constraint on future enhancements to NLL capacity.)</p> <p>There is a lack of evidence to justify the statement that the construction risks and costs are too high and a lack of detail about different tunnelling options that have been considered or how construction risks could be mitigated. This is a major oversight.</p>

### Cross topic appendix 1: committed developments (Ref: ES 3.5.1.12)

Section	Sub section	Paragraph	London Borough of Camden response
<b>CFA 01 – Euston – station and approach</b>	CT-13-INDEX-CFA1		Camden Council reserve the right to review the information provided in the committed developments information in more detail given an adequate time frame. For now we have provided information about the major committed developments that should be considered in terms of design, construction and operation of the scheme. These are provided in Appendix 2.
<b>CFA 02 – Camden Town and HS1 Link</b>			West of Kentish Town Road, the NLL services follow the Kentish Town Viaduct north and the HS1 Link continues west on the Chalk Farm Viaduct towards Primrose Hill. Both viaducts cross the Hawley Wharf site, which is subject of a committed development for a major mixed use commercial, residential and school development, planning permission ref 2012/4628/P, conservation area consent ref 2012/4641/C and listed building consent 2012/4642/L granted December 2012. This committed

			<p>development will bring a sizeable number of heritage benefits to the area (including the restoration and reuse of the viaduct arches, the restoration of the grade II listed 1 Hawley Wharf, currently on the English Heritage at Risk Register, the refurbishment of 1-6 (consec) Chalk Farm Road (positive contributors in the Regent's Canal Conservation Area) and improvements to the canal towpath). If the committed scheme is not implemented, it is highly likely that the area will not receive these long-awaited heritage benefits.</p> <p>Camden Council reserve the right to review the information provided in the committed developments information in more detail given an adequate time frame. For now we have provided information about the major committed developments that should be considered in terms of design, construction and operation of the scheme. These are provided in appendix 2.</p>
<b>CFA 03 – Primrose Hill to Kilburn (Camden)</b>			<p>Camden Council reserve the right to review the information provided in the committed developments information in more detail given an adequate time frame. For now we have provided information about the major committed developments that should be considered in terms of design, construction and operation of the scheme. These are provided in appendix 2.</p>

## Planning data (Ref: volume 5 appendix CT-004-000, ES 3.5.0.16)

Section	Sub section	Paragraph	London Borough of Camden response
<b>1</b>		1.1.1	<p>Camden Council reserve the right to review the information provided in the committed developments information in more detail given an adequate time frame. For now we have provided information about major committed developments that should be considered in terms of design, construction and operation of the scheme. These are provided in appendix 2.</p>
<b>2</b>		2.1.1	<p>Camden Council reserve the right to review the information provided in the proposed developments information in more detail given more time. For now we have provided information about major proposed developments that should be considered in terms of design, construction and operation of the scheme. We encourage ongoing dialogue with the Council to ensure that impacts on proposed developments are minimised and Council's regeneration proposals are not jeopardised or impacted upon. Details of some of the larger proposed developments are provided in appendix 2.</p>

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## Scope and methodology report (Ref: CT-001-000/1)

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council notes that this report is dated 2012 and precedes both the Draft Environmental Statement consultation (early 2013) and the suite of methodological and explanatory documents otherwise forming the current (25th Nov 2013) Environmental Assessment. In that regard the Council considers that a Foreword or Note should have been included, for avoidance of public confusion, in the document that explains its context, role and purpose within that timeline of multiple documentation.
	1.1		Camden Council draws attention to the comments it submitted on this report during the draft ES consultation. It will review the final (25 Nov 2013) ES documentation to see how, and how well, those comments have been addressed, whether other issues have since arisen that need additional comments and whether it wishes to raise issues or concerns in relation to the then-adopted methodologies. The Council will not make additional comments specific to the present volume.
2	2.1		<p>Camden Council notes Figure 1 within 2.1.2 of the Scope and Methodology report and is of the opinion that the process described within this figure has not been adhered to by HS2 Ltd. Camden Council is of the view that it is regrettable that a sound and proper impact assessment of socio-economic has still not been carried out, despite the Council's comments on the previous scoping and methodology report and draft ES.</p> <p>In respect of Figure 1 and paragraph 2.1.3, Camden Council maintains that:</p> <ul style="list-style-type: none"> <li>• The assessment of the current baseline is inadequate and too narrow in scope, and does not go far enough to determine the socio-economic landscape of affected areas (e.g. fails to acknowledge any deprivation or impacts on sectors or clusters of business activity).</li> <li>• There is limited or no evidence of the EIA projecting future baseline conditions, and therefore the future conditions without the Proposed Scheme (the counter-factual)</li> <li>• The ES lacks transparency in the calculation of socio-economic effects and is mis-leading and inaccurate in its reporting of socio-economic effects in Camden areas affected by HS2</li> </ul>

			<ul style="list-style-type: none"> <li>• HS2 Ltd has failed to listen to or fairly reflect the views of stakeholders through engagement and consultation. For example, Camden Council is disappointed that although community and business engagement has taken place the feedback given to HS2 Ltd has not been acted upon.</li> <li>• The approach to mitigation in the ES is wholly inadequate to the impacts of HS2, for example on Camden's local economy and business community.</li> <li>• The design development process has not adequately prevented or abated the adverse effects of HS2, for example the current proposed scheme for Euston station and the planned HS1 Link work and its adverse effects on local businesses, economy or communities.</li> </ul>
		2.1.6	Camden Council is of the view that the EIA has failed to adequately identify or consider the adverse environmental effects of the Proposed Scheme on businesses and the local economy, both temporal and permanent effects. This includes a failure to value the adverse effects of the Proposed Scheme at a local level, and the failure to clearly identify the adverse temporal effects at each CFA level from isolation and amenity effects.
		2.1.9	Camden Council notes that paragraph 2.1.9 states that the ES will report ranges of magnitude of impacts under consideration because of the uncertainty in predicting future impacts and effects. Camden Council cannot see any evidence of this having been done and seeks clarification from HS2 Ltd on this matter.
	2.2	2.2.2	Camden Council is concerned that the temporal scope of the EIA appears to start in 2017. As Camden Council has communicated to HS2 Ltd, HS2 is already causing blight on land, businesses and regeneration projects. The temporal scope of the EIA is therefore too narrow and should include the 2013-2017 period in terms of adverse or any beneficial effects.
	2.3		<p>Camden Council is concerned that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council considers HS2's methodology in predicting combined effects to be limited and insufficient. Camden Council is concerned that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves.</p> <p>Camden Council considers the ES deficient due to the lack of assessment of cumulative impacts and baseline surveys.</p>

			<p>Camden Council considers that provision for a comprehensive management and monitoring regime should have been included within the ES in order to assess and mitigate adverse environmental health effects of those living within close proximity to construction works for a sustained period of time. Any mitigation measures proposed should be agreed at least two years in advance of works to ensure they are implemented in time to mitigate against the works. Camden Council considers that appropriate compensation should be proposed within the ES to residents for disruption due to mitigation measure installation.</p> <p>HS2 has identified mitigation for severe noise impacts to include both sound insulation and re-housing. Camden Council requests that where rehousing is necessary – a solution be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 18 months be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in assessment where noise insulation is dependent on windows remaining closed. This presents issues during warmer periods especially with older residents or people with long term medical conditions. Camden Council considers mitigation should have been included within the ES that considers how internal temperatures could be managed.</p> <p>Camden Council requests that appropriate compensation should be provided to residents for disruption due to mitigation measure installation.</p> <p>Camden Council is of the view that HS2 Ltd has failed to adequately follow its mitigation hierarchy as set out in Figure 2. The mitigations included in the ES to address adverse impacts on businesses, employment and the Camden local economy are inadequate, too narrow and insufficient to address the impacts of the Proposed Scheme.</p>
		2.3.3	<p>Camden Council welcomes the statement in paragraph 2.3.3 that mitigation opportunities will continue to be identified during the development of the Proposed Scheme. This provides HS2 Ltd with a further opportunity to listen to the views of Camden Council, local stakeholders and businesses to put in place a comprehensive mitigation and compensation strategy for business and employment to address the adverse effects of the Proposed Scheme.</p>
	2.4		<p>Camden Council is of the view that the assessment of cumulative effects is flawed because of how the EIA has assessed socio-economic effects and the significance of effects. The definition of receptors is vague and inaccurate as the impacts on businesses and employment has not been assessed individually and sometimes not at all. Camden Council is of the view that cumulative</p>



			effects has not been assessed adequately because localised impacts have received lower weight in the hierarchy used to assess impacts and the sensitivity of receptors.
	2.5		<p>Camden Council is of the view that the definition of significant effects in the EIA is flawed as it is skewed against local impacts. To quote the ES, minor impacts are where the impact is, “highly localised”, whereas major impacts are, “more than local importance”. Camden Council is very concerned by the lack of fairness in how HS2 Ltd has determined the significant of effects with local impacts down-graded to minor.</p> <p>Additionally, Camden Council believes that scope and methodology used to assess the number of businesses impacted directly and indirectly is wholly inadequate and so it does not take into account the adverse effects on many businesses, such noise and vibration. For example the scope and methodology used to assess significant impacts does not include those businesses affected within most of Drummond Street and the Camden Markets. Where businesses are included, the methodology used to measure the adverse impact is wholly inappropriate and does into account the full impacts caused by the construction period over an extremely long period of time.</p>
		2.5.8	Camden Council disputes the assertion that where effects are significant the ES will show the geographical scale ay which they are viewed as significant as the ES has failed to report temporal effects on businesses and organisations at each CFA level but rather they have been reported without justification only at the route-wide level.
<b>4</b>	4.2		Camden Council considers the ES is deficient in that it does not include an assessment of the impact of the proposed scheme on the urban forest. Camden Council points out that trees in streets, parks, gardens and urban woodlands play a vital and increasingly important role in climate, air quality and temperature regulation, biodiversity conservation, sense of place and landscape character in urban areas; and that local losses of trees can impact on the delivery of these ecosystem services over a wider areas (e.g. regulation of the urban heat island effect). Camden Council points out that the majority of people affected by the proposed route will be living in urban areas (particularly London and Birmingham) and so an assessment of the impact of the proposed scheme on the urban forest should be done as part of a wider Ecosystem Services Impact Assessment, to include baseline data on the number of urban trees and the extend of urban tree canopy cover to be lost.
<b>5</b>	5.2		Camden Council strongly questions the use of the Defra background maps to predict emissions in 2017 and 2026 as this is not likely to be the worst case scenario. The DEFRA background maps are

			highly likely to significantly under-estimate emissions in these years. These maps assume reductions based on improved vehicle emissions which have yet to be realised, and in the past, have not materialised as hoped. Usually, when undertaking assessments of this kind for future scenarios, developers also include current levels as an additional baseline representing a worst case scenario.
	5.3		Camden Council maintains that the scheme will result in a number of negative air quality effects. No detailed quantitative assessment of the dust emissions associated with demolition and construction works has been provided.
	5.6		<p>Camden Council considers that the effects set out in the ES may be underestimated for the following reasons:</p> <ul style="list-style-type: none"> <li>a) Likely underestimation of background concentrations during construction and in use phases – the ES uses DEFRA background maps which have in the past always consistently under-predicted future concentrations, which have not reduced in line with expectations</li> <li>b) Given the scale of the proposed works, the predicted air quality impacts from the HS1 link appear very conservative - no road traffic impacts are deemed to be significant</li> <li>c) The analysis of exactly which receptors are at risk from construction and the reason why these properties have been identified as receptors and others as near to the construction haven't been is unclear</li> <li>d) Indications from Transport Colleagues that have undertaken independent analysis are that the predicted traffic impacts for construction and the in use phase may be underestimates, in which case air quality impacts are also under-estimates.</li> <li>e) Lack of sufficient analysis of and mitigation for locations suffering from cumulative impacts – cumulative impacts of dust and road traffic have not been properly considered and profiled.</li> </ul>
	5.7		Camden Council believes that the baseline data, transport information and detail of construction activities have not been provided in enough detail and with enough accuracy for those assumptions to have been met.
<b>6</b>	6.1		Camden Council notes that by not addressing Climate Change Adaptation in this section, overheating, which is recognised as a key risk particularly in areas affected by the urban heat island, has not been considered. It should be considered as part of a habitability assessment.
	6.2		Camden notes that it will be disproportionately affected by carbon emissions related to both the construction and operation of HS2 due to the location of Euston station in the borough. This means

			that HS2 will have a negative impact on the council's own borough-wide emissions targets up to 2020 and beyond. Camden believes a geographical breakdown of emissions should have been undertaken by HS2, especially in relation to station construction and modal shift of journeys to stations in the operational phase.
	6.3		Camden Council notes that the huge difference in the construction emissions estimate from the AoS to the ES further indicates the inadequacy of the AoS methodology. The AoS as a consultation document was therefore not fit for purpose regarding construction carbon emissions and as there was no information in the draft Environmental Statement, this issue has not been properly consulted on.
	6.5		<p>Camden Council notes that the missing data for construction waste and station fit outs will impact negatively on local level carbon emissions and should be considered.</p> <p>Camden Council asserts that the assumption that all trees will be planted by 2017 is also overly optimistic.</p>
	6.6	6.6.9	Camden believes that the removal of modal shift for domestic flights at Heathrow is arbitrary, given the high level assumptions made for other emissions throughout this footprinting exercise. Camden believes that this should still be included in the operational footprint for the scheme. As it stands the removal of this domestic flight modal shift has artificially reduced operational emissions.
<b>7</b>	7.1		<p>Camden Council has previously commented on this report and these comments still stand. "Camden Council would like to express their dissatisfaction that despite repeated request there is no Camden specific methodology. The HS2 scheme will have significant impacts on Camden's communities, businesses and the environment. As the main transport interface for HS2 in the capital, it is proposed that Euston Station would be rebuilt on an expanded footprint to the west, involving substantial demolition and redevelopment. In addition, tunnelling would go underneath parts of Camden, and two vent shafts are proposed to be built at Alexandra Place West and Adelaide Road. The construction of the HS1 / HS2 link could also have significant impacts on Camden's communities and transport network. The scheme would therefore generate far reaching impacts on Camden, as explained further in the section by section comments below.</p> <p>Given the extensive and unique nature of these impacts the EIA should include a separate section specifically considering the impacts on Camden and its communities. It is considered that the impacts on Camden should be comprehensively set out in the EIA.</p>

		7.1.7	<p>Camden Council has identified a further 12 schools and children's centres where it considers there will be a significant effect as a direct result of HS2 as set out below:-</p> <ul style="list-style-type: none"> <li>• Robson House PRU</li> <li>• Netley Primary</li> <li>• St Aloysius Infants and Juniors</li> <li>• St Mary and St Pancras Primary</li> <li>• Regents Park Children's Centre</li> <li>• Christchurch NW1 Primary</li> <li>• Richard Cobden Primary</li> <li>• Agar Children's Centre</li> <li>• Primrose Hill Primary</li> <li>• Former Jack Taylor School</li> <li>• Langtry Children's Centre</li> </ul> <p>Some of these sites are named in the ES, but as having 'no significant effect', however most are not mentioned at all. As a result Camden Council does not feel the ES has adequately assessed the impacts on children's services as a result of the proposed scheme. Camden Council considers the ES is defective as it does not provide an assessment of impact nor mitigation, specifically in relation to how these children's services, particularly in the Euston area, will be able to continue to provide a full offer to local communities whilst construction works are being undertaken and the impact that this will have across the borough on children, young people and their families.</p>
	7.5		<p>Camden Council considers the impact on the Tourism and Visitor economy should be assessed. To claim that it is appropriate to include this in the Agriculture, Forestry and Soils section displays a complete disregard, lack of understanding and lack of assessment of the importance of the sector in Camden's urban environment. This reinforces the need for a Camden specific assessment and methodology.</p> <p>Camden Council considers that as well as within the scope of assessments presented in the Socio-economics chapter the severance of commercial and industrial buildings and land should also be addressed in the communities' chapter as there is a recognised impact on certain businesses and the community.</p>

		7.5.6	<p>The Council is notes from the Scope and Methodology Report that there are no industry-wide accepted methods for assessing community effects for projects of this nature. We note that for the ES methods have therefore been developed for predicting and assessing effects which draw existing guidance, analysis and methods established for other railway and large infrastructure projects. As the size of this development is unlike any other large infrastructure project undertaken in the country we believe that the assessment methods of the community effects are not adequate to assess the impact on Camden. We believe that the particular sensitivities regarding works adjacent to or near children's services have not been adequately considered within the ES</p>
		7.6.8	<p>Camden Council notes that the significance of a community effect will be determined by assessing both the:</p> <ul style="list-style-type: none"> <li>• Magnitude of the impact; and</li> <li>• The sensitivity of the community resources or receptors.</li> </ul> <p>The ES also states that within the Scope and Methodology Report Table 9 - Community receptor value/sensitivity criteria that a high impact will be noted for individuals or groups who are at risk and that have little or no capacity to experience the impact without incurring a significant effect. There is no indication/clarification given within the ES regarding where children's services stand on the scale of sensitivity and, combined with the fact that there is no industry wide accepted method of assessing community impacts, Camden Council therefore consider that the methodology supporting the ES is inadequate and does not allow the scope to identify or mitigate against the anticipated effects of the proposed scheme on children's services. Camden Council believe this is supported by the over-riding lack of significant effects being identified within the ES for the vast majority of children's services impacted by the proposed scheme.</p>
10			<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines</p>

			<p>of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'. The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned. Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retains the right to provide further comments on electromagnetic interference at a later date.</p>
<b>11</b>			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
<b>13</b>	13.1		<p>Camden Council considers that the methodology used to assess the socio-economic impact of the proposed scheme upon CFAs 1, 2 and 3 is not sufficient and in some cases uses inappropriate assumptions and assessment methods. The result is a flawed assessment that fails to accurately</p>

			<p>demonstrate the scope and magnitude of socio-economic effects on the environment.</p> <p>Examples of key defects include:</p> <ul style="list-style-type: none"> <li>• Fundamentally flawed method for assessment of job losses resulting from businesses displaced- Based on an unpublished report on the Olympic Games that is incompatible with the HS2 context in terms of socio-economic environment and impacts (See consultation response Volume 1, section 8.8).</li> <li>• Failure of the scope to include assessment of job losses resulting from adverse impacts on business amenity and isolation at CFA level.</li> <li>• Failure of the scope to include assessment of impacts on employment and skills at a business or individual level, relying on net jobs losses/gains and hence failing to capture the human impacts or impacts on socio-economic groups/sectors or communities.</li> <li>• Inappropriate criteria for determining the significance of effects. <ul style="list-style-type: none"> <li>○ Impact magnitude criteria- The criteria is fundamentally flawed in that the definition uses spatial scale to judge magnitude, hence local impacts are given lower importance.</li> <li>○ Sensitivity of receptors- The criteria is fundamentally flawed in that it fails to consider impacts on individuals which results in some businesses facing demolition not being classified as experiencing significant effects.</li> </ul> </li> <li>• Failure of the scope to assess costs of the scheme- such as lost or delayed economic output or changes to business behaviour at a CFA level.</li> </ul>
	13.2	13.2.1	<p>Camden rejects that statement in 13.2.1 that the design development has been influenced by the need to minimise the negative impacts on the socio-economy of Camden. This is evident in the fact the proposed scheme plans to displace a high number of businesses whilst also having a major and significant impact upon many more within the surrounding area. At Euston, Camden Council believes that an alternative, fully integrated, scheme needs to emerge whose principles ensure incorporation of a new station for both HS2 and classic train services with above station development, and which reflects the needs of local communities, whilst also having vastly reduced negative effects upon the local economy during the construction phase. In respect of the HS1 Link, HS2 Ltd needs to look again at the case for the Link and the design of the scheme to ensure it minimises socio-economic effects.</p>
		13.2.3	<p>Camden Council rejects the statement in 13.2.3 - <i>Stakeholder views will inform how best to approach the more qualitative aspects of the assessment</i>. Although HS2 Ltd have carried out engagement</p>



			work with local businesses, the council and other local stakeholders, they have failed to listen to the repeated concerns of the community regards the significant adverse effects of the construction of HS2 on businesses and employment and how best to mitigate against them. For example HS2 Ltd were sent the Camden Council's mitigation report on Drummond Street in October 2013 which outlined 10 key mitigations, however Camden Council is dismayed to see that following a review of the ES only 3 of these have been included – hoardings, maintaining access and some support for business groups, although there is no actual detail for this last mitigation.
	13.3		Camden Council requests to know how many responses to the consultation on the AoS were received and how many were from Camden residents, and how many of these were business owners or people who work in a business affected by the Proposed Scheme. Camden Council notes that a very high number of responses were concerned about communities having to cope with disruption during construction and that these concerns have not been adequately reflected in the ES.
	13.4	13.4.1	Camden Council is alarmed that the relevant aspects of the Proposed scheme fails to include isolation and amenity adverse effects and the overall blight of HS2. Camden Council is of the view that the inadequacy to address adverse effects includes the failure to consider the impacts of the Proposed Scheme on sector or clusters of businesses, and on individuals that will experience job losses. In respect to mitigation employment impacts, Camden Council urges HS2 to commit to delivering local employment benefits through the HS2 Act and fund an employment, education and training strategy in Camden.
	13.5		<p>Camden Council rejects that the scope of assessment detailed in table 24 section 13.5.1 has been carried out. For example inadequate analysis has been completed on the number and type of jobs which will be lost to the borough from amenity and isolation or other effects and the impact on communities, business clusters or at sector-level as a result of the Proposed Scheme. Additionally the assessment does not consider the effects on individuals relying on net jobs losses/gains and hence fails to capture the human impact on individuals and specific impacts on socio-economic groups/sectors or communities. Also, the scope of assessment fails to assess the impacts of economic output at a CFA level.</p> <p>Camden Council also believes the assessment of loss or impairment of business activities is inadequate. An example of this is the businesses identified in map SE-01-001 as being effected by loss of amenity. Although Camden Council agrees that the businesses identified will suffer from loss of amenity, we are alarmed that only these 3 businesses have been identified. Camden Council has identified that many more businesses will suffer a loss or impairment of business activities and therefore we reject the methodology used to assess what businesses will be affected.</p>

			<p>Camden Council notes the scope of assessment mentions change in employment and skills however there is little evidence to suggest that this assessment has taken place.</p> <p>Camden Council rejects that the EIA has adequately assessed the impact on the amenity value of infrastructure or the severance of infrastructure for businesses and organisations. For example, there is little evidence that the EIA has considered this impact at the spatial scope defined in table 24, namely 250m from the edge of the Proposed Scheme.</p> <p>Camden Council rejects that employment from construction or operations has been adequately assessed in the EIA. In particular the EIA has not been transparent on how gross and net effects have been calculated nor on how it has assessed the additionality of any benefits or adverse effects.</p>
	13.6	13.6.2	Camden Council seeks further clarification from HS2 Ltd on the calculation of gross and net impacts/ socio-economic effects, with clearer transparency on how the counter-factual and additionality factors have been treated.
	13.6	13.6.3	<p>Camden Council notes that paragraph states there is no definitive guidance on significance criteria for socio-economic effects so instead the EIA has drawn on existing industry accepted practice. Camden Council seeks clarification from HS2 Ltd on what practice this refers to and where it has been applied.</p> <p>Camden Council notes that the definition of significance of socio-economic effect in the EIA has been determined by assessing the magnitude of the impact and the sensitivity of receptors. Camden Council is of the view that the definition of the magnitude of impacts has been skewed against local impacts, which are considered to be minor if they operate at this level irrespective of the local impacts on businesses, employment and communities. Camden Council is also of the view that the EIA has failed to fully consider the significance of effects because the impacts on businesses has not been fully considered at a local level, including the lack of reporting of isolation and amenity impacts by CFA and the lack of transparency in many of the assessments in the ES.</p>
		13.6.5	Camden Council rejects that the methodology described in table 25 to assess impact magnitude has been correctly implemented given that many businesses have been assessed as being unaffected when they should have, such as businesses in Drummond Street and Camden Town Markets.
		13.6.7	Camden Council rejects that the methodology used to determine overall significance of effects has been implemented correctly. Many businesses that will suffer adverse effects have been missed from the assessments in the ES and therefore do not have a criterion (within the methodology). For

			example, magnitude of effects being based on spatial scale and demolished businesses being considers not to have significant effects. Consequently the ES has assumed the businesses are not significantly affected, when this is clearly not the case.
		13.6.11	Camden Council is alarmed that the third bullet point in 13.6.11 has not been carried out and that a sound and proper assessment on the direct, indirect and catalytic effects of construction and operation has not been completed as part of the Formal ES; for example the negative catalytic effects on Drummond Street and small trader businesses within Camden Town Markets.
14			Camden Council has commented previously on this document and expect all comments to be fully addressed.
17	17.2		Camden Council notes that for surface water, climate change has not been considered for baseline conditions and this reinforces the need for substantial SuDS (Sustainable Drainage Systems) schemes to be included in the scheme.
	17.4		Camden Council notes that as well as the likely effects of surface water flooding, consideration must be given to the reduced amount of ground available for perching due to tunnelling. This should include areas in CFA2 and CFA3 as well as Euston Station.
	17.6		Camden Council states that the effect on flood risk due to removal of permeable surface and the tunnelling reducing the possibility for perching should also be included.

## Scope and methodology summary consultation report (Ref: volume 5 appendix CT-001-000/3, ES 3.5.0.15.3)

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council would like to highlight the limited usefulness of this information and this report in general - while it gives a feel for the volume and type of comments received in the very broadest sense it does not help individuals or groups assess whether their comments have been analysed, considered and included. Nor does it say where local information/ knowledge was offered as part of the process if and how this was treated. We also contend that where comments have been made in relation to something that is not covered in the SMR that HS2 Ltd should be make it clear where that information is available. Camden Council submitted comments to the consultation and are aware that some of the requested changes were not made/ made in the suitable format. These comments still stand and we refer you to the comments made in our response to the SMR.
2			Camden Council notes the purpose of this report but believes that this or another document should provide more detail about the consultation responses received. There also needs to be a detailed

			analysis of how the comments on the draft Environmental statement have been incorporated into the final ES - there is no indication that these have been considered in a meaningful way.
4			Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
5	5.1		Camden Council would like to highlight the limited usefulness of this information and this report in general - while it gives a feel for the volume and type of comments received in the very broadest sense it does not help individuals or groups assess whether their comments have been analysed, considered and included. Nor does it say where local information/ knowledge was offered as part of the process if and how this was treated. We also contend that where comments have been made in relation to something that is not covered in the SMR that HS2 Ltd should be make it clear where that information is available. Camden Council submitted comments to the consultation and are aware that some of the requested changes were not made/ made in the suitable format. Camden Council does not believe that section 6 provides sufficient detail to be satisfied that all responses have been properly considered, analysed and incorporated - more detail should be provided.
		5.1.5	Camden Council would like to highlight the limited usefulness of this information. The report states that HS2 Ltd have been advised where these comments were already included within the ES but this information has not been shared more widely so does not help respondents identify if their comments have been considered and incorporated, nor does it say how local knowledge and information that was referred to was incorporated and passed on to the relevant design teams. A detailed response to points raised should be provided. The process has been needlessly one sided.
6			Camden Council states that without more detail it is very difficult to say if concerns have been addressed. This document is a very high level response and does not give a feel for the type of responses received from which organisations nor what has been included and what has not. Where a high level of responses are received on a topic more detail of where it can be found should be provided as it suggests a common misunderstanding.
	6.2	6.2.1	Camden Council believe that more information should be provided about how professional judgement will be applied and what this means. Detail should be provided on agreed methodologies and agreed guidelines to help stakeholders to understand the conclusions drawn. A project of this size, impact and cost should be looking to exceed minimum standards and set new benchmarks given the ongoing impacts on people's lives and this includes the scope of the ES. Where no standard methodologies exist, new ones should be worked up, agreed and shared.
	6.3		Camden Council maintains that there needs to be more detail provided in the reporting of alternatives and contends that these should be assessed fully with an EIA.
	6.4		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.

	6.5		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.6		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.7		<p>Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.</p> <p>Camden Council is not satisfied that the full extent or indeed enough information has been provided about utilities works in the ES.</p> <p>Camden Council do not think that enough information exists on what has been done to identify 'relevant groups' nor how their needs have been incorporated into the ES.</p> <p>Camden Council understands that the baseline is based on a point in time but contend that HS2 Ltd need to be clear when this is and that HS2 Ltd has collected and considered all relevant information. Also contend that collating the baseline so far in advance of the start of construction with a project with such a long build period may not generate the most accurate baseline.</p>
	6.8		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.9		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.10		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.11		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.12		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.13		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.14		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.15		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.16		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.
	6.17		Camden Council responded to the scope and methodology report and draft ES and comments made

			in response to these still stand.
	6.18		Camden Council responded to the scope and methodology report and draft ES and comments made in response to these still stand.

### Scope and methodology report addendum (Ref: volume 5 appendix CT-001-000/2, ES 3.5.0.15.2)

Section	Sub section	Paragraph	London Borough of Camden response
1			Camden Council would like to highlight the limited usefulness of this information and this report in general, which highlights the changes made to SMR following consultation. While it provides detail on the changes made to the SMR it does not provide the detailed reasoning for the changes made nor what comments they were in response to. Again there is no information provided on the comments received that fell into one of the categories that did not result in a change to the SMR, nor where the information that is already included either in this report or some other document can be found. The London Borough of Camden submitted comments to the consultation and are aware that some of the requested changes were not made/ made in the suitable format. These comments still stand and we refer you to the comments made in our response to the SMR.
4	4.2		Camden Council considers the ES is deficient in that it does not include an assessment of the impact of the proposed scheme on the urban forest. Camden Council points out that trees in streets, parks, gardens and urban woodlands play a vital and increasingly important role in climate, air quality and temperature regulation, biodiversity conservation, sense of place and landscape character in urban areas; and that local losses of trees can impact on the delivery of these ecosystem services over a wider areas (e.g. regulation of the urban heat island effect). Camden Council points out that the majority of people affected by the proposed route will be living in urban areas (particularly London and Birmingham) and so an assessment of the impact of the proposed scheme on the urban forest should be done, to include baseline data on the number of urban trees and the extend of urban tree canopy cover to be lost.
5	5.1		Camden Council strongly questions the use of the Defra background maps to predict emissions in 2017 and 2026 as this is not likely to be the worst case scenario. The DEFRA background maps are highly likely to significantly under-estimate emissions in these years. These maps assume reductions based on improved vehicle emissions which have yet to be realised, and in the past, have not materialised as hoped.

			Camden Council considers that current levels should be included as an additional baseline representing a worst case scenario as is standard when undertaking assessments of this kind for future scenarios.
<b>6</b>	6.3	6.3.3	Camden believes that the removal of modal shift for domestic flights at Heathrow is arbitrary, given the high level assumptions made for other emissions throughout this footprinting exercise. Camden believes that this should still be included in the operational footprint for the scheme. As it stands the removal of this domestic flight modal shift has artificially reduced operational emissions.
<b>6(A)</b>	6.2		Camden Council considers the ES is deficient in that the methodology fails to consider fully the effect of overheating, particularly in the urban heat island. This will have an important impact particularly on communities both in the short term where noise and dust may make it difficult to ventilate homes and in the future where the removal of green infrastructure.
<b>7</b>			Camden Council provided detailed comments on this para have been made in the response to the SMR. Does not assess cumulative effects nor consider the duration and extent of effects. Please refer to comments provided on SMR which still stand.
<b>10</b>			<p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expect that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'.</p> <p>The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not mentioned.</p> <p>Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p>



			Camden Council retain the right to provide further comments on electromagnetic interference at a later date
<b>11</b>			<p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>
<b>14</b>	14.1		Camden Council notes that the addendum includes material changes to the definition of SOAEL and threshold for significant effect for individual dwellings (LpAeq and LpAFmax). This is discussed further in responses to the Vol 5 Technical Appendices.
	14.2		Camden Council notes that the addendum includes material changes to the definition of SOAEL and threshold for significant effect for individual dwellings (LpAeq and LpAFmax). This is discussed further in responses to the Vol 5 Technical Appendices.
<b>17</b>	17.2		Camden Council accepts that 500m may be an appropriate distance to consider for surface water impact provided the impact of directly entering the urban drainage system is considered for a wider range as its impact can often be significantly further downstream.
<b>Annex A: Air Quality – Technical notes</b>			
<b>1</b>			Camden Council reserves judgment on these as it would need to employ technical resource to assess it and this cannot take place until we are confident that the transport details are correct
	1.1	1.1.1	Camden Council reserves judgment on these as it would need to employ technical resource to assess it and this cannot take place until we are confident that the transport details are correct

<b>2</b>	2.2	2.2.1	Camden Council reserves judgment on these as it would need to employ technical resource to assess it and this cannot take place until we are confident that the transport details are correct
<b>Guidance on Assessment Methodology</b>			
<b>1</b>			Camden Council reserves judgment on these as it would need to employ technical resource to assess it and this cannot take place until we are confident that the transport details are correct
<b>Annex k: Water resources and flood risk - technical</b>			
<b>2</b>			Camden Council notes that there have been regular reports of cellars flooding in recent years suggesting that there may be underground springs or that tributaries of the river Westbourne may still be active. In determining the flood risk for the area, this should be taken into consideration. It highlights the importance of considering the impact of the tunnelling on flood risk in the area through 'perching' i.e. water trapped in the upper surface of the ground unable to soak through the clay and the need for SuDS (Sustainable Drainage Systems) to be investigated to absorb and collect more of the rainwater than is done currently.
<b>4</b>		4.1.1	Camden Council notes that mitigation should also consider flood risk and look at SuDS (Sustainable Drainage Systems) schemes to allow more water to be adequately managed.
<b>5</b>		5.1.1	Camden Council notes that mitigation should also consider flood risk and look at SuDS (Sustainable Drainage Systems) schemes to allow more water to be adequately managed.

## Wider effects report (Ref: volume 5 appendix CT-005-000)

Section	Sub section	Paragraph	London Borough of Camden response
<b>1</b>	1.1		Camden Council notes the background purpose of the document.
	1.2		Camden Council notes the context as stated.
<b>2</b>	2.1		Camden Council considers that reference in 2.1.1 to the bus station in the narrow manner discussed there entirely fails to recognise that the bus station location and design needs to be considered in context of both the station itself and the much wider considerations of integrated site related development, which the ES recognises elsewhere. The impact of potentially increasing the height alignment of Hampstead Road Bridge, described in 2.1.2, would be highly significant because of the close proximity of residential dwellings. Section 2.1.2 does not give a clear sense of the likely impacts on those residents but describes matters in an excessively anodyne way that does not enable a clear

			understanding to be gained. This is unhelpful.
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### **London Borough of Camden consultation comments made on Draft Code of Construction Practice November 2013**

#### *Technical Comments*

Please find below Table 1 detailing technical comments in Chapter Order

**Table 1 – Technical comments arranged in Chapter order**

<b>Paragraph number</b>	<b>Issue under discussion</b>	<b>Camden Council's comments and recommendations where applicable</b>
Document as a whole	Development of the CoCP.	Camden Council is disappointed to note that many of the comments made by Camden Council on previous drafts have not been incorporated into this latest version. Camden Council considers that further consideration should be given to the comments provided by the Council given the scale of the impact of construction expected with the borough. Camden Council consider that reference should be made to the Crossrail lessons learnt document to ensure that all past lessons learnt are fully incorporated into the HS2 construction project.
Document as a whole	Mitigation	Camden Council is considers that there are many references within the Environmental Statement on reliance on the CoCP for providing mitigation measures. Camden Council does not consider that the CoCP is <i>in fact</i> providing the mitigation measures that the Environmental Statement suggests will be in place. Camden Council recognises that some mitigation measures have been noted within the CoCP but do not consider these to be exhaustive in scope. Camden Council therefore expects that the LEMPs will provide greater

		detail and emphasis on appropriate mitigation.
Document as a whole	Identification of impacts	<p>Camden Council considers the ES is deficient in that there are impacts noted with the Environmental Statement which do not have appropriate mitigation identified within the CoCP. Camden Council considers the ES is deficient in that the impacts may be greater than initially realised as the baseline data could be weak in some areas, for example, ecology surveys at Adelaide Road Nature Reserve.</p> <p>Camden Council considers that the CoCP and the LEMPs must have sufficient flexibility so as to include and address any new impacts as they are identified.</p>
Document as a whole	Monitoring	<p>Camden Council considers the ES is deficient in that the monitoring regimes noted are in the main the responsibility of the contractors and are concerned at the lack of independence of this approach. Camden Council considers that such monitoring regimes should be undertaken by an independent body or at the very least audited by a third party.</p>
Document as a whole	Electromagnetic interference	<p>Camden Council recommends that information be provided on the assessment of potential impacts and proposed mitigation from electromagnetic interference in relation to human health impacts.</p> <p>Camden Council notes that information has been provided regarding electromagnetic interference within the ES. Camden Council expects that the methodology and assessment of risks has been undertaken in accordance with all relevant guidance and best practice and expect HS2 to minimise and mitigate against all risks to ensure they are as low as is reasonably practicable. Camden Council considers that human health risks must be comprehensively accounted for in addition to impacts on wireless telecommunication systems.</p> <p>The electromagnetic fields produced by the development are expected to comply with the guidelines of the International Commission on Non-Ionizing Radiation, as set out in the Health Protection Agency's advice paper titled 'HPA</p>

		<p>recommendations for the information and methodology required to examine health effects in an Environmental Impact Assessment (EIA) at the Scoping Opinion stage'.</p> <p>The initial assessment as described in the Electromagnetic Interference sections of the HS2 Phase One ES suggests that this would be the case for magnetic fields in adjacent areas which are accessible by the public, but it is not possible to assess the electric fields as these are not</p> <p>Camden Council requests that the matters relating to electric field are formally consulted with the Office of Rail Regulation.</p> <p>Camden Council retains the right to provide further comments on electromagnetic interference at a later date.</p>
Document as a whole	Parks and open spaces	Camden Council seeks assurance that any park, open space, sports or community facility used or affected during the construction phase will be temporarily re-provided elsewhere during the period of construction use.
Document as a whole	Design on highway structures and appropriate weight limits	Camden Council considers that in line with the forthcoming EU Directive, HS2 should design their highway structures to 40 tons load capacity and this should be reflected within the CoCP.
Document as a whole	There does not seem to be any reference to green infrastructure or site connectivity in the document.	Camden Council considers that the value of green spaces does not only lie in their individual value, but in their combined value as functioning networks. Camden Council considers that HS2 should seek to result in an overall positive contribution to green infrastructure, in addition to taking individual site conditions into account.
Document as a whole	There does not seem to be a recognition that the effects of the various impacts could be increased in areas of higher density or where there are buildings of higher occupancy for instance tower blocks and	Camden Council would like to see a recognition that when assessing the effects of the possible construction impacts, consideration will be given to the density and occupation of the buildings, businesses and areas in question, particularly in areas where there are estates and schools over a number of floor levels and for consumer based businesses such as retailers.

	schools.	
Document as a whole	Codes of practice for design and construction referenced throughout the document.	Camden Council considers that the Codes of Practices used for design and construction should comply with European Codes which are effective from April 2013 and supersede the British Standards referenced within the CoCP.
Document as a whole	Evacuation procedures	Camden Council considers that this issue needs further consideration and consultation and should include evacuation procedures in case of a failing building, loss of ground or undermining of buildings. Camden Council considers that the following should be accounted for when drafting the evacuation procedures Police/Ambulance/Social Services/Utilities/Party wall notices.
Document as a whole	Health and Safety	Camden Council considers that a Health & Safety Plan should be drafted, listing all potential risks associated with construction of the development and the necessary controls.
3.4	Environmental Management System -ISO 14001	Camden Council considers that this could potentially be a box ticking exercise. Camden Council query whether it is possible to add any total quality management systems to this to show true commitment to EMS.
4.1.2	Enforcement	Camden Council is concerned that the compliance of this CoCP will be the responsibility of the nominated undertaker. Camden Council considers that this method of self-regulation may not be effective and consider that an independent arm's length organisation be established which is appropriately resourced and commissioned to undertake compliance monitoring and enforcement for the CoCP. Camden Council considers that the enforcer should be independent of the promoter, be appropriately resourced with officials who have the expertise to undertake proactive monitoring and enforcement activity, where necessary, and be readily accessible to anyone who wishes to raise any concerns regarding the works. Camden Council considers that the enforcement sanctions should be appropriate and proportionate to the noncompliance identified. Camden Council considers that Local Authorities should be properly resourced to undertake any compliance monitoring and enforcement activity where required.
4.3.1.	Monitoring mitigation measures	Camden Council seeks details of the methodology to be used to monitor

		mitigation measures.
4.3.5	All lead contractors will be required to sign up to Considerate Construction Scheme	Camden Council considers that all contractors, including subcontractors should sign up the scheme and not only the lead contractors.
5.1.1	Stakeholder engagement framework	Camden Council considers that we are unable to comment on the proposed framework at this stage until it is released. Camden Council would welcome the opportunity to comment and work with HS2 on the development of this framework on this at the earliest opportunity.
5.1.1	Stakeholder engagement framework	Camden Council considers that this should include the opportunity for the community to feed into, and work with the nominated undertaker to develop mitigation measures during the period of construction as and when issues arise.
5.1.1	Community relations etc. in case of emergency	Camden Council considers that in case of emergency works its impact on communities, evacuation procedures and emergency services access must be outlined and assessed.
5.1.1	Community relations	Camden Council considers that there should be a reporting procedure in place to ensure Camden Council is provided with information, enquires and/or complaints from the local community as they arise.
5.1.1	Statement that "HS2 will take reasonable steps to engage with the community"	Camden Council considers that clarification is required as a priority on what reasonable or appropriate steps means, in order to ensure there is a robust and adequate engagement framework/ strategy in place for businesses (and other groups. Camden Council considers the current wording in the ES to be qualified and vague.
5.1.1	Community relations	Camden Council considers that HS2 should manage the interface with utilities providers and to provide information to residents about all temporary and/or permanent impacts to utilities service through effective communication channels. Camden Council considers that registers of vulnerable residents should be maintained so as to identify those households who would require



		immediate support in the event of a utilities failure.
5.1.1	Community relations	Camden Council considers that registers of vulnerable residents should be maintained and updated by HS2 so as to identify those households who would require immediate support in the event of a utilities failure.
5.1.2	Meetings held at community forum locations	<p>Camden Council considers that this commitment should be strengthened as follows:</p> <ul style="list-style-type: none"> <li>- Meetings should be held when requested by the local authority or representatives of the local community and not solely when required by all parties. The nominated undertaker or principal contractor should not be in a position to veto whether a meeting is held or not.</li> <li>- Other interested parties should be invited to the meetings e.g. TFL</li> <li>- The agenda of the meeting should be set to discuss issues arising and potential options for resolution, not solely the forthcoming programme of works.</li> </ul>
5.1.1 and 5.1.2	Liaison with businesses	<p>Camden Council notes that “local businesses” could now be interpreted as being included in the “regular meetings to be held at Community Forum locations”. However, Camden Council considers that it is not clear what ‘experienced’ means in paragraph’s 5.1.1 and 5.1.2. Just because someone is experienced does not mean that the extent of support is adequate or robust. Camden Council asked for clarification on this point as part of its response to the draft CoCP which has not been actioned. This continued lack of clarification on the support measures is unacceptable to both the Council and the businesses concerned.</p> <p>Camden Council considers that the information within paragraph 5.1.1 and 5.1.2 is not meaningful as currently drafted.</p> <p>Camden Council considers that in developing the CoCP, it will be essential that HS2 Ltd learns lessons from the Crossrail development. In the GLA’s report, “Light at the end of the Tunnel”, it was highlighted that, “an effective dialogue between Crossrail and affected businesses was not established early enough in the process.” A key recommendation of the report was that a dedicated</p>

		<p>point of contact should be made available to businesses as well as one-to-one support for each affected business.</p> <p>As the construction period of HS2 will be prolonged and extensive with many adverse effects, HS2 Ltd should put in place on-going dialogue mechanisms and one-to-one support for businesses and business groups in Camden, both prior to and throughout the duration of the construction phase. Camden Council has made representations to HS2 Ltd over a number of months that they should put in place a business advice and support service for affected businesses and formal mechanisms to ensure ongoing dialogue and communication with affected businesses and groups of businesses.</p>
5.1.2	Support for businesses	<p>Camden Council considers the ES is defective in that that there is no mention of specific trained personnel to provide dedicated and independent one-to-one support to affected businesses in relation to mitigating and minimising construction blight, as well as broader considerations such as compensation issues, legal matters, business relocations and business support. Camden Council has made representations to HS2 Ltd that it should put in place a business advice and support service to provide this type of support as well as access to property expertise for businesses forced to relocate because of HS2.</p>
5.1.2	Compensation and safeguarding for businesses	<p>Camden Council notes that in the streets surrounding Euston station, there is an abundance of independent retailers and restaurants. Such businesses depend on footfall and passing trade for their survival and will therefore be particularly vulnerable to road closures, noise, dust and vibration occurring on or in close proximity to their premises.</p> <p>Camden Council considers that blight mitigation measures and full compensation are therefore of particular importance for both businesses in and near to the safeguarding area before, during and after what will be a lengthy construction period. Camden Council considers the ES is defective in that there is still no mention of adequate compensation for businesses in this version of the Construction Code and considers that the proposed approach is</p>

		inadequate.
5.1.2	Equalities	Camden Council considers that the equalities impact assessment would form the basis from which HS2 would plan mitigating the community impacts of construction, particularly in Euston which has a number of people with disabilities, in care and from ethnic minorities. Camden Council considers that reference to this would be worthwhile.
5.1.2	Support for community organisations	<p>Camden Council considers that where there is reference to support for local businesses, this should also include support for voluntary &amp; community organisations (VCOs), especially community centres, that derive income from room hire and activities and events where residents and others pay to attend e.g. fitness classes, crèches etc.</p> <p>Camden Council considers there may be cases where access or noise puts people off from attending activities and events at Castlehaven Community Centre, Maiden Lane Community Centre, BW Surma Centre which results in a loss of income for the VCO.</p>
5.1.3	Community relations	Camden Council notes and welcomes the statement that the nominated undertaker and its contractors will consider local employment, apprenticeships and education initiatives when recruiting staff. Camden Council has made representations to HS2 Ltd of the need to put in place a comprehensive employment, skills and training strategy to enable the local communities in the areas most severely affected by HS2 to access these opportunities and to help tackle social and economic deprivation. Camden Council urges HS2 Ltd to commit to an employment strategy in Camden, and to agree to specific local employment, education and recruitment targets and outcomes. HS2 Ltd can build on the Council's experience in managing apprenticeship programmes, education links and local employment recruitment.
5.1.4	Advance notice of works	Camden Council considers the ES is defective in that in relation to notice of advanced works, the CoCP continues not to set out how long in advance the works will be informed or the methods by which this will be done.

		<p>The proposed approach to the advanced notice of works remains unacceptable to Camden Council and suggests that HS2 Ltd is not taking seriously the significant impacts of the construction period on businesses in Camden. Businesses affected by the proposed HS2 scheme need certainty on the impacts of HS2 and long-term notice to be able to adapt their business practices. Certainty and long-term planning are also essential to prevent disinvestment and decline of areas in Camden affected by the HS2 scheme.</p> <p>Despite making comments at the time of the draft ES, Camden Council is disappointed to note that there is still no indication of clear time-lines but only a vague reference to “discussions of forthcoming works during regular community forum meetings” with no indication of how far in advance of the works these discussions will be.</p> <p>Camden Council would expect HS2 Ltd to develop – in consultation with the Council and partners - a detailed construction programme time-line of the phases of the work in different locations of Camden two years in advance of each construction phase starting. This will need to be communicated with business interests, affected businesses, business representative organisations, local community organisations, local residents and others. The construction programme should be adapted to reflect local concerns and kept under regular review. There should be subsequent periods of consultation with businesses and business groups as the plans firm- up. Camden Council would expect permission to be sought for each phase of the construction work 6 months in advance of the work starting.</p>
5.1.2	Advance notice of works	<p>Camden Council require confirmation about how long in advance of the works affected residents will be informed, especially around the timing of particularly disruptive construction work. Good channels of communications should be set up - by what means will be residents/occupiers be informed in advance? Camden Council considers that communications are to include the timing, nature, and construction activities to be undertaken, predicted noise and vibration levels and the mitigation measures that will be taken.</p> <p>Clarification is needed that the helpline service will also include businesses.</p>

		<p>However, Camden Council believes that a dedicated resource is required to support businesses affected by the construction period which goes beyond a helpline service or social media feed.</p>
5.1.3	<p>The nominated undertaker and its contractors will consider local employment, apprenticeships and educational initiatives when recruiting staff.</p>	<p>Camden Council advises that it's nominated undertaker and contractors link in with existing employment and training structures in the Borough, including the King's Cross Construction Centre and local voluntary organisations WEPs One Stop Shop and the Bengali Workers Association. This would be more efficient and has the potential to increase take up.</p>
5.1.6	<p>Community helpline</p>	<p>Camden Council considers that this service would have to provide customer service personnel who are multilingual due to the ethnic diversity of Euston. Bengali would be essential. It should also provide services for the hard of hearing.</p> <p>Camden Council welcomes the inclusion with the draft CoCP of the helpline being available in 'different languages'; however it would be appreciated if HS2 could expand on what it means by a 'case-by-case basis' and how will the nominated undertaker agree on the language? Camden Council considers that the nominated undertaker should liaise with Camden Council in agreeing the provision of different languages. Furthermore, HS2 should also refer to equalities issues and find innovative ways of allowing hard to reach residents access to information.</p> <p>While Camden Council has noted that businesses are now included as users of the helpline in this version of the CoCP, the Council would like to reiterate that a dedicated resource is required to support businesses affected by the construction period which goes beyond a helpline service or social media feed. This should form part of a dedicated business advice and support service for affected businesses and business groups in Camden.</p> <p>An addition of 'outreach work' would be useful to equality groups, therefore HS2 should have support staff who link in with social service networks operated by Camden Council and other support agencies in the community. This would be particularly helpful for older people, disabled and minority ethnic groups.</p>

		Camden Council welcomes the inclusion of 'different languages'; however it would be appreciated if HS2 could expand on what it means by a 'case-by-case basis' and how will the nominated undertaker agree on the language? Camden advises that the nominated undertaker liaises with Camden Council in agreeing the provision of different languages. Furthermore, HS2 should also refer to equalities issues and find innovative ways of allowing hard to reach residents access to information.
5.1.6	Community helpline	Camden Council considers the helpline should also be able to deal with enquiries from the general public regarding any loss of services during the construction works, for example should broadband service be affected due to the construction works residents should be advised to contact the HS2 community helpline and receive an adequate level of service including provision of information on likely service resumption.
5.1.6	Community helpline	Camden Council considers that a process for handling enquiries should mirror that for handling complaints so that there is a timeframe in place for answering them
5.1.6	Helpline enquiries	Camden Council considers that information is required on the key performance indicators i.e. timescale for answering complaints and % answered enquiries first time. Camden Council requests information on what the escalation process consists of if there are serious complaints or a person feels a complaint has not been dealt with effectively.
5.1.7	Complaint handling	Camden Council welcomes measures for dealing with complaints and would like more information on this process to be included at this stage. The information that would be beneficial is: complaint response times, escalation routes, resolution mechanisms and the role of the independent Complaints Commissioner.
5.1.9	Community emergency plan	Camden Council considers that the community emergency plan should be implemented in the case of a major power supply failure such as the loss of gas, electricity or water and provision must be made for emergency temporary

		<p>re – housing in such instances. Particular attention must be paid to those residents who are known to be particularly vulnerable or dependant on continuous gas and/or electricity supplies or water e.g. those relying on medical equipment, babies and the elderly and data must be collected on the location of vulnerable persons so they can be swiftly identified and assisted in the case of an emergency.</p> <p>The London Borough of Camden requests that HS2 have an Emergency Response plan in place to deal with any utility failures that have resulted from the construction works. Loss of utilities can affect all our communities and HS2 should have an Emergency Plan in place to respond to both short and long term failures. This plan should include provision to provide temporary accommodation, transport, food and other support to those residents who have suffered utility failure for a long period of time.</p> <p>Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.</p>
5.1.9	Community emergency plan	<p>Camden Council request that HS2 attend the Camden Borough Resilience Forum so that all our Category 1&amp;2 partners (emergency services, hospitals, NHS and transport providers) are aware of the plan and able to comment and feedback as necessary. Along with the plan Camden Council also request that HS2 have a Crisis Support Team in place to deal with emergencies and evacuations which includes venues, staff to support the evacuees and transport providers to assist in moving the evacuees</p> <p>Camden Council request the when HS2 develop the Community Emergency Plan they take into account the needs of the business community, the resident community and the visitor community as all three are largely represented in Camden.</p> <p>Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.</p>



5.1.10	Small Claims Procedure relating to claims of physical damage to property	<p>Camden Council considers that a draft policy document is required prior to adequately commenting on this procedure.</p> <p>Camden Council notes that the reference found within previous drafts of the CoCP stating that “this policy is current being drafted and will be consulted on alongside the draft CoCP in Spring 2013” has been removed. Camden Council is disappointed to note that this commitment appears to have been rescinded.</p>
5.1.14	Claims up to £7,500	<p>Camden Council acknowledges that the figure of up to £7,500 has been selected for the Small Claims procedure, based on similar claims processes for the construction of the Channel Tunnel, the Tunnel Rail Link and Crossrail. Camden Council welcomes the Small Claims procedure but requests further clarification on why this figure has been selected and the proportion of claims as part of the above scheme fell within this threshold.</p> <p>Camden Council considers this figure to be insufficient and should be revised.</p>
5.1.15	Scheme not open to Local Authorities	Camden Council considers this scheme should be open to Local Authorities to be able to make small claims for example for damage to property or land.
5.1.15	Operation of small claims procedure	Camden Council considers that the relevant Local Authority should be kept informed by the nominated undertaker of all claims made and performance around remedies
5.1.21	Remedies and monitoring	Camden Council advocates that local structures are in place to review and monitor HS2's performance around dealing with complaints and claims. Linking in with local forums and Camden Council is advised. Furthermore, information on how complaints and claims are monitored would be beneficial to understand, such as reports on complaints/claims hotspots and methods of resolutions/remedies would be helpful. This is particularly useful when Camden services are affected and therefore require collaboration in dealing with issues.
5.2.1	Working hours - consents	Camden Council understands that the HS1 project included site specific working hours requirements in the LEMPs, which caused immense confusion when the contractors were appointed at a later date and requested different hours. The HS1 LEMPs were submitted to the LPAs as part of the Construction Arrangements for LPA approval. Where contractors stipulated different working hour requirements in their S61 applications to those approved in the LEMP, it

		<p>became necessary to revisit the approvals again and create more flexibility. Camden Council considers that HS2 should learn from this experience and implement procedures which will overcome this.</p>
5.2.2	Core Working Hours	<p>Camden Council notes that the CoCP states that core working hours will be from 8.00am to 6.00pm on week days and from 8.00am to 1.00pm on Saturdays. Camden Council notes that these working hours replicate normal business working hours and therefore do not offer any special dispensation to businesses who will bear the brunt of the construction work (e.g. the Camden Markets) nor do they take into account the working day of schools and children's centres. Camden Council considers the ES is defective in that Saturday working is proposed in Camden Town for the HS1 Link. Given that weekends are the most busy period for Camden Markets the resulting impact has not been properly assessed. Any 24 hour working, to which the ES makes general reference and appears to leave options open, would greatly exacerbate these adverse community and business impacts. Such additional impacts are not identified nor mitigation measures identified.</p> <p>Camden Council will expect HS2 Ltd to mitigate and minimise the significant blight and negative impacts of any construction period on Camden's business community through a range of initiatives, including projects to ensure businesses and commercial areas are able to continue operating and trading successfully, through open for business marketing campaigns, shop front improvements, access arrangements, streetscape, signage and public realm improvements and sensitive hoardings, businesses and where works are taking place in the vicinity of schools and children's centres. Camden Council will expect HS2 Ltd to mitigate and minimise the significant blight and negative impacts of any construction period on Camden's business community through a range of initiatives, including projects to ensure businesses and commercial areas are able to continue operating and trading successfully, through open for business marketing campaigns, shop front improvements, streetscape, signage and public realm improvements, public art and sensitive hoardings, events and open markets, a strategy to deal with empty properties (such as pop up shops), and financial support for promotional offers such as on Saturday afternoons and Sundays. In addition, the Council will expect that any works adjacent to schools, children's centres and educational institutions will be undertaken</p>

		<p>outside of normal working hours so as not to lose curriculum teaching time. Particular attention will need to be paid in times when exams are taking place</p> <p>Camden Council considers that further clarification is required from HS2 on core hours and any variations to it and how this will be programmed to minimise disruption on local small businesses and is considers the ES is defective in that there is still no clarification on this point in the latest version.</p>
5.2.5	Start up and close down periods	<p>Camden Council notes that the operation of plant or machinery likely to cause a disturbance will not be included within the start-up and close down periods. Camden Council request a definition of “disturbance” be provided.</p> <p>The COCP includes a number of caveats and exemptions which make it very unclear what works within Camden would be carried out outside of normal working hours. It is also unclear at what times construction vehicles may need to be managed to minimise impacts on residents / businesses and the highway network. The details concerning construction vehicles should be covered in the LEMP.</p> <p>The COCP should include that detailed discussions and agreements should be put in place about working hours in general and specifically in relation to construction traffic hours to minimise the impacts on residents / businesses, rail passengers and the highway network. These agreements should be clearly set out in the LEMP prior to any construction commencing.</p>
5.2.6	Additional working hours	<p>Camden Council considers that the works noted within this paragraph to be carried out 24 hours a day, 7 days a week should be by exception and full details of the works must be submitted to and agreed by the local authority prior to works commencing. Camden Council considers that such works are to be agreed on a case-by-case basis, with any required noise controls to minimise noise and other impacts.</p> <p>More generally, the quantum and complexity of HS2 works in Camden’s neighbourhoods would seem inevitably to lead their project managers to consider 24 hour working in many cases, if only to mitigate already unacceptable daytime impacts on issues such as traffic diversions and congestion. Examples may be with the many large scale bridge works. It is</p>

		therefore something of a fiction for the ES to intimate that these will be by exception when the sheer density and tightly constrained distribution of works in Camden will undoubtedly lead to this outcome. There is neither effective assessment nor mitigation in the ES for the raft of situations where this is likely to happen over the construction period of 10+ years; this failure to assess and mitigate for 24 hour working is completely unacceptable to Camden Council.
5.2.6	Additional working hours	The ES is not clear as to whether works undertaken on the railway by Network Rail outside of core hours to facilitate the HS2 project but may not be in direct relation to it, will be subject to same proposed controls as noted within the CoCP and the LEMP and will be subject to S.61 consents, in the same way as works directly linked to the HS2 project.
5.2.7	Activities outside core working hours...will be kept to a reasonably practicable minimum"	<p>Camden Council considers that the reference to "as far as is reasonably practicable" is not sufficiently firm.</p> <p>Camden Council considers the ES is defective in that works can easily be classified as an "emergency" in order to avoid working within the pre-defined core hours and there will be limited mechanisms in place to avoid this.</p> <p>In the latest version of the CoCP Camden Council considers that this point has still not been addressed and there is no reference to obtaining consent via Section 61 of the Control of Pollution Act 1974 within the "additional working hours" section of the CoCP, and consider that this would be helpful.</p>
5.2.10	Repairs or maintenance of construction equipment.	Camden Council considers that this statement should be qualified with the statement "with the consent of the relevant authority".
5.2.11	"..where pouring concrete takes longer than planned due to equipment failure"	Camden Council considers that contractors should plan sufficiently for equipment failure and a commitment to that effect should be noted within the CoCP.
5.3.1	Construction site layout and good housekeeping Statement - "To reduce the likelihood of nuisance"	Camden Council considers that "nuisance" should be defined – does this mean statutory, public or private nuisance?
5.3.1.	Additional measures are recommended	<p>Camden Council considers that this list of measures within the CoCP is not exhaustive and consider that the additional measures should also be included:</p> <ul style="list-style-type: none"> <li>- Damping etc. for dust management</li> </ul>

		<ul style="list-style-type: none"> <li>- Management of staff congregating outside of site prior to commencing work</li> <li>- Storage of liquid and gas inflammable substance in nominal quantities in a secure and safe place.</li> <li>- Reduction of risks to trees</li> <li>- Reduction of soil compaction on sites/ compounds.</li> <li>- A monitoring regime for each site. Camden Council note that this measure was included in the previous draft and are disappointed to note its removal and request it is reinserted.</li> </ul>
5.5	Security within the area more generally and not limited to work site security.	<p>Camden Council considers that in addition to considering worksite security there is a need to consider security within the area during the construction phase more generally. Camden Council considers that vacated buildings provide opportunities for misuse and illegal occupation, e.g. squatting, raves and inactive sites contribute to feelings of neglect which may succumb to 'broken windows' effects.</p> <p>Camden Council considers that property guardians should be made available as temporary businesses or low-cost dwellings to reduce the risk of squatting or neglect within the area.</p>
5.5	<p>Security within the area more generally and not limited to work site security.</p> <p>Natural surveillance and CCTV throughout the area during the construction phase.</p>	Camden Council considers that natural surveillance and CCTV to be considered and enhanced through improved sight lines and lighting where necessary.

5.5	<p>Security within the area more generally and not limited to work site security.</p> <p>Designing out crime.</p>	<p>Camden Council considers that consultation should take place with Crime Prevention Design Advisors and that “designing out crime” techniques should be utilised during the construction phase includes the design of buildings, street and open spaces and the materials used.</p>
5.5.2	Worksite security	<p>Camden Council considers that the following measures should also be included:</p> <ul style="list-style-type: none"> <li>- Secure perimeter fencing and gating to reduce the risk of misuse of sites and buildings.</li> <li>- Secure scaffolding to reduce opportunities to access restricted sites and facilitate the commission of crime and disorder.</li> <li>- Restrict access to construction materials and plant increases risk of theft, other crime and disorder.</li> <li>- Remove any opportunities for unauthorised access to sites and materials through appropriate fencing, gating and locks.</li> <li>- Consider the use of patrolling services.</li> <li>- Ensure scaffolding does not facilitate access to restricted areas and properties.</li> </ul>
5.6.1	Hoardings and fencing	<p>Camden Council considers that long and blank facades (in-active frontages) decrease movement opportunities, guardianship/ place managers and natural surveillance and there is a potential for this to occur in areas where there are hoardings and fencing.</p> <p>Camden Council considers that natural guardianship should be increased by minimising inactive frontages and encourage land uses to increase pedestrian activity.</p>

5.6.5	Hoardings, fencing and screening – Businesses located close to hoardings will be consulted on their design, materials and construction to reduce impacts on access to and visibility of their premises	<p>Camden Council considers that consulting with local businesses located close to hoarding is welcome but HS2's approach needs to go beyond this to commit to using hoardings to promote local business areas (and help meet other local community aspirations). Since the last consultation, there is no mention of the active promotion of local business areas.</p> <p>Camden Council considers that the design of hoardings is an important issue for local businesses and commercial areas, for example the restaurants in Drummond St that have significant trade from Euston station and the market stalls in Camden Town. Access and permeability must be retained and not adversely affected by HS2.</p> <p>Camden Council considers that hoardings should play a role in the mitigation of the scheme as appropriate to each locality to include green (planted) hoardings to help reduce air pollution – these should be planted with plants proven to be most adept at capturing particulate pollution.</p> <p>Camden Council considers there should be a clause stating that the design and location of hoardings should be subject to assessment in the local area management plans to be agreed with the Council considers the ES is defective in that there is no mention of consultation with the Local Authority in the latest version of the CoCP.</p>
5.6.7	Hoarding, fencing and screening	Camden Council's view is that there should be a commitment to considering the movement of wildlife into and out of the sites.
5.7.1	Unexploded Ordnance	<p>Camden Council considers that emergency response procedures should consider potential temporary road closures, station closure and evacuations.</p> <p>Camden Council suggests that any plans to deal with unexploded ordnance are discussed at the Camden Borough Resilience Forum so that our Category 1 &amp; 2 partners are aware and can provide feedback. Along with the plan Camden Council also suggest that HS2 have a Crisis Support Team in place to deal with emergencies and evacuations which includes providing suitable venues, staff to support the evacuees and transport provision to assist in moving the evacuees.</p>



		Camden Council expects HS2 to be responsible and liable for all costs for any emergency related provision.
5.11.1	All reinstatement will be completed in accordance with the requirements of the hybrid bill	Camden Council considers that this statement is vague. Camden Council suggests that minimum requirements be quoted
5.12	Pollution incident control	Camden Council considers that mention should be made of training so as to prevent such an incident occurring. Camden Council suggests that the contractors have available maps of sensitive areas on site so that these are responded to and dealt with first should there be a pollution incident.
5.12	Reference to pollution incident control plan	Camden Council suggest criteria is included of a pollution incident that would require such a plan to be implemented.
5.12.3	Reference to organisations that are consulted.	Camden Council appreciate that the organisations mentioned do not constitute an exhaustive list, however, it is recommended that Public Health England are included.
5.12.7	Emergency access	Camden Council considers that emergency access for fire and ambulance services must also be maintained for properties including residential, business and school buildings within the vicinity of the construction works where access may be impeded due to the provision of hoarding and road closures. Camden Council considers that early discussions must take place with the relevant emergency services to discuss, plan and agree access routes.
Chapter 6 – Agriculture and Soils	Reference to agricultural land	Camden Council considers that many of the points regarding agriculture management are not directly relevant to Camden due to the lack of agricultural land within the borough. However, the principles in relation to soil protection, reinstatement etc. should be applied to all open spaces (and not just agricultural land).
6.1.2	Soils	Camden Council seek assurance that this approach will also be applied to urban park land used temporarily during the construction phase
6.2.	Measures to reduce potential impacts on agriculture, forestry and soil resources	Camden Council considers there will be a need for surveys to be undertaken on the seed bank in the soils removed as there could be important species lying dormant.

6.2	Measures to reduce potential impacts on agriculture, forestry and soil resources	Camden Council is of the view that consideration must be given to the reinstatement of soils so as to reverse the negative effects of soil compaction, for example.
Chapter 7	Air Quality – General Provisions	<p>Camden Council note below an outline of all of the major mitigations and compensations required to help alleviate and compensate for the devastating impact of the construction works on local air quality and consider these points must be included within the CoCP:</p> <ul style="list-style-type: none"> <li>• Commitment to pay part of any devolved fines from the EU resulting from breaches in air quality objectives worsened by the works or the operation of the new station</li> <li>• Commitment to fund air quality and health advice and support for residents and visitors to the affected areas</li> <li>• Commitment to fund air filtration systems for shops and houses in the affected areas (see below table). This would be all the buildings that will have moderate or substantial adverse impacts from traffic as well as a currently unspecified number from dust.</li> <li>• Commitment to provide green hoardings and green screens containing plants which research indicates are most effective at capturing particulate pollution during the construction phase</li> <li>• Commitment to using the lowest emission construction vehicles and machinery that are available at the time of the works, as well as ensuring they adhere to the latest EU and GLA emissions limits</li> <li>• Commitment to install sufficient real-time air pollution monitors (both for construction dust and NO<sub>2</sub>) during the construction phase, and to continue to fund monitors in Euston during the In Use phase</li> <li>• Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences, to assess both PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>2</sub>. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research, as well as enabling us to assess the proportion of concentrations attributable to the construction works (for reporting to Defra and the EU)</li> </ul>

		<ul style="list-style-type: none"> <li>An Ultra-Low Emission Zone around the station during the In Use phase, to include restrictions that only allow zero and low emission vehicles to service the station, as detailed in the Euston Area Plan. Camden does not accept that this will happen naturally as a result in improvement in vehicle technology, as this has been promised in the past and has not materialised.</li> </ul>
7.2	Measures to reduce potential impacts on air quality	<p>Camden Council considers that the following measures should be include:</p> <p>HGVs used to supply the site should be a minimum of Euro 6 (or the latest Emission Standard in use at the time of the works).</p> <p>Camden Council expect all fixed plant and non-road construction mobile plant to be powered by electricity where such technology exists, where it does not, the equipment used must be the lowest polluting equipment available at the time of the works. It must also comply with the latest EU and GLA standards for NRMM.</p> <p>Camden council also expect a strict no idling policy to be in place and fully enforced for all vehicles and machinery.</p> <p>In addition, either in this document or in the LEMP Camden Council require significantly more detail about how local residents and ecosystems will be protected, as much of this work will take place in very residential areas which are experiencing both high levels of development and elevated levels of pollution. Camden Council require the most stringent practices possible to ensure that emissions are kept to a minimum, with specific focus on the identified receptors in the area (schools, residents, nature areas etc.). In addition to all the measures outlined in the Plan, we suggest the following:</p> <ul style="list-style-type: none"> <li>- Policies in place to restrict polluting activities when air pollution in the area is forecast to be moderate or above (linked into AQ forecasting systems).</li> <li>- Careful consideration of timetabling of operations taking into account factors such as peak daily pollution times near busy roads, school</li> </ul>

		<p>timings, the needs/requests of local residents, seasonal pollution fluctuations and the timings of other construction activities in the area.</p> <ul style="list-style-type: none"> <li>- Provision of a clear timeline of construction and the main dust producing activities, which demonstrates that the above two points have been considered</li> <li>- Green hoardings planted with plants recognised as being the most adept at capturing particulate pollution</li> <li>- We would expect adherence with IAQM guidance on construction impacts and the assessment of impacts of construction on Air Quality and the determination of their significance (published in 2012 or if superseded by a newer version by the time of development). We require the latest IAQM guidance to be followed in full, examples of items that are missing are listed the bullet points below.</li> </ul> <ul style="list-style-type: none"> <li>• Keep site fencing, barriers and scaffolding clean.</li> <li>• Depending on the duration that stockpiles will be present and their size - cover, seed, fence or water to prevent wind whipping.</li> <li>• Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site.</li> </ul> <p>Monitoring</p> <ul style="list-style-type: none"> <li>• Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked.</li> <li>• When activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions increase the frequency of inspections</li> <li>• Carry out regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of site boundary.</li> <li>• Agree dust deposition, dust flux, or real-time PM10 continuous monitoring</li> </ul>
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		<p>locations with the Local Authority. Commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. A shorter monitoring period or concurrent upwind and downwind monitoring may be agreed by the local authority. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.</p> <p>Camden will require at least 4 real time dust monitors at all of the key dust-producing sites. Dust monitoring proposals should be produced by an independent specialist and provided to Camden for approval as part of the LEMP process.</p> <p>There are other potential impacts, such as the release of heavy metals, asbestos fibres or other pollutants during the demolition of certain buildings or the removal of contaminated soils. The release of certain fungal spores during the demolition of old buildings can give rise to specific concerns if immune-compromised people are likely to be exposed, for example close to an oncology unit of a hospital. These issues need to be considered on a site by site basis and may increase the dust category of a site under this Guidance and particularly stringent dust mitigation measures will be required for these sites, which will also need to comply with the Health and Safety at Work etc. Act 1974 and the Construction (Design and Management) Regulations 2007 (as may be amended from time to time).</p> <p>Camden Council considers that the dust control measures noted within the COCP are very general and due to the close proximity of residents to the proposed construction site throughout LB Camden the risk is high. The detailed content of the LEMPs is critical and as they have not yet been drafted for our viewing, Camden Council cannot be confident that the magnitude of impact is reduced in the worst case to slight adverse as stated in the dust impact assessment.</p>
7.2.1	Site management - hoardings	Camden Council seeks assurance that this will include the use of green walls

		to capture and help in the control of dust.
7.2	In Use Phase	<p>Camden Council recommend the creation of a zero emission zone in the area, to include the following:</p> <ul style="list-style-type: none"> <li>• A delivery management plan for premises in the station to consolidate and reduce deliveries, and maximise use of rail freight. In addition, only zero or ultra-low emission vehicles should be allowed to service the station (to include construction, servicing and taxi and private hire vehicles).</li> <li>• Improvement and expansion of urban realm and green space in the area, including ground level landscaping, green walls and green roofs, and wherever possible adapting the urban realm to create walking and cycling routes in the area which by-pass the Euston Road and therefore provide cleaner and safer alternatives.</li> <li>• Provision of sufficient secure cycle parking, and adequate cycle hire facilities.</li> <li>• Vehicle recharging points and infrastructure in or around the area – to possibly include electric, hydrogen, and gas, including bio-methane.</li> <li>• Optimising energy efficiency and maximising use of renewables in order to avoid combustion of fuels for power</li> <li>• Strong, permeable and at-grade walking and cycling routes within and through the EAP running east-west and north-south of the area</li> </ul>
7.2.5	Demolition Activities	<p>Camden Council note that the CoCP states that dust pollution from demolition activities will be limited through use of a range of different measures. However, there may still be a risk that neighbouring residents and businesses will be adversely affected by dust. It is therefore recommended that residents and businesses are adequately compensated for any necessary expenses incurred in procuring specialist cleaners and where properties will be affected by dust payment should be made for installations of ventilation systems or upgrades of existing ventilation systems. Where businesses' trade is affected by or increases in road traffic and congestion, compensation should be payable.</p>
8.1.1	Cultural heritage assets	<p>The section does not seem to include any reference to the community value of spaces (i.e. places can still be valued highly by the local community even if not designated).</p> <p>Camden Council considers that the list of cultural heritage assets does not seem to include Local Lists.</p>

		<p>Camden Council is disappointed that the final report no longer includes identifies “green spaces or community spaces that have a cultural heritage value”. The HS2 development would affect an array of cultural venues/organisations in the area, such as: Museums (such as London Jewish Museum, Wellcome Collection and British Library); Galleries (such as Proud Gallery, Cob Gallery, 43 Inverness Street Gallery, David Roberts Art Foundation and Swiss Cottage Library Gallery); Music/dance venues (such as the Roundhouse, KOKO, Cecil Sharp House, Jazz Café, Hawley Arms, Dingwalls and Electric Ballroom etc.); Theatres (such as Shaws Theatre, Camden People's Theatre, Bloomsbury Theatre, Etcetera Theatre and Young Persons Theatre); as well as public art in the area, such as the piece that is currently being commissioned from Britannia Junction in Camden Town.</p> <p>Not only do these organisations needs have to be addressed in the mitigation strategy (e.g. how will the Roundhouse continue to attract 283,886 paying visitors per year, when it is adjoining a building site), but how do we also assess the impact on the area as a whole and the ensure that the cultural value is not diluted in an area that is core to London Borough of Camden's visitor economy (Camden Town/Euston accounts for 16.24% of the borough's visitor economy. In 2012 these areas generated an assessed 2,926,448 visitors and an estimated expenditure of £342 million in 2012). Camden Council notes that there is no mention of mitigation against impact on visitor economy or local lists in this version of the draft CoCP.</p>
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8.1.3	Cultural heritage management measures	<p>Camden Council considers that the following points should be included: General Cultural Heritage management measures will include:</p> <p>Second bullet – delete ‘detailing the implementation’</p> <p>Add bullet Cultural Heritage management and mitigation measures included in staff induction and training programmes where appropriate</p> <p>Confirmation is needed that the Local Authority will have sufficient time to check the list of assets in their area to ensure it is comprehensive.</p> <p>Since the last consultation, Camden Council notes that the second bullet point above have not been actioned, nor has the additional bullet on additional heritage management.</p> <p>Camden Council is also dissatisfied that there has been no confirmation that sufficient time will be allowed to check the list of assets in their area is comprehensive.</p> <p>Camden Council also notes in 8.1.3 that there is no confirmation that the nominated contractor will require its contractors to monitor compliance using appropriately qualified environment management staff or have in-house expertise in environmental management</p>
8.1.4	Heritage Assets	Camden Council recommends the addition of the wording <i>procedures adopting prior to excavation work commencing</i> under bullets 3 and 4.
8.3	Monitoring	Camden Council considers that baseline condition surveys are necessary to enable ongoing monitoring to take place. Verbal advice has been that this would only occur to properties on top of tunnels, but impacts have since been stated to be wider than this, e.g. settlement of listed buildings adjacent to the cutting at Park Village East. Further information is therefore needed on the extent of condition survey and monitoring.
9	Ecology	Camden Council seek assurance ecology protection measures are applied to all trees of a high conservation value inclusive of mature London Planes
9.1	Ecological management	Camden Council seek assurance that full ecological surveys will be undertaken on all sites identified for use during construction inclusive of those adjacent to

		construction sites that have a local ecological value.
9.1.2	Sites for nature conservation and nature reserves	Camden Council supports the inclusion of Sites of Importance for Nature Conservation and Nature Reserves.
9.1.2	Parks and open spaces	Camden Council considers that “parks and open spaces” should be included within ecological resources
9.2.6	Species licencing	Camden Council notes that complying with species licenses is a legal requirement and considers this should be made clear within the text.
9.3	Monitoring	Camden Council considers that monitoring and survey work must be informed by data held by local environmental records centres; in London this is Greenspace Information for Greater London (GiGL).
9.3	Monitoring	Camden Council considers that any survey data collected as part of this project should be submitted to local environmental records centres (such as GiGL) to ensure that data informs future site management and biodiversity conservation.
10.1	Ground Settlement	Camden Council considers the ES is defective in that there is no reference to any dispute resolution mechanism or who would act as the arbiter in the instance of a dispute regarding allegations of ground settlement. Camden Council considers that such a mechanism must be considered and drafted for inclusion with the CoCP or the settlement policy.
10.2.1	Settlement policy	Camden Council request input into this policy at the earliest opportunity.
10.2.1	Settlement	Camden Council as that special attention be paid to the impacts of settlement on listed properties
Chapter 10	Surveys and monitoring	<p>Camden Council is disappointed to note that the paragraphs relating to surveys and monitoring have been removed from this latest version of the CoCP and request that these paragraphs are reinstated along with the recommendations that Camden made on the previous draft of the CoCP which are outlined below:</p> <ul style="list-style-type: none"> <li>• Camden Council considers that details are to be submitted under the Party Wall etc. Act 1996 to the relevant parties and this should be referenced as such.</li> <li>• Camden Council considers that HS2 Ltd need to clarify how they will identify which properties may be potentially subject to ground</li> </ul>

		<p>settlement/movements above threshold values that could possibly lead to damage.</p> <ul style="list-style-type: none"> <li>Camden Council understands the process of carrying out the surveys is ongoing, but there is enough information in the public domain to do preliminary measurements</li> <li>Camden Council considers the monitoring period should be carried out for a year and not for 3 months.</li> </ul>
11.2.6	Control measures for land affected by contamination	<p>Camden Council considers that all investigation procedures and remediation options are to be discussed and agreed with the local authority prior to commencement of works.</p> <p>Camden Council considers the information provided in desk-top studies and initial findings of stage 1 risk assessment to be inadequate and therefore consider the assessment process to be deficient. It is considered that the initial assessment of potential land contamination has not been sufficiently carried out and that historical and planning data relating to areas assessed as not posing risks of contamination have not been adequately researched. Therefore the sites have not been suitably risk assessed and the ES is considered to be deficient as a result.</p> <p>Camden Council considers that an inadequate risk assessment may have implications regarding potential adverse impact on ground water resulting from land disturbance.</p> <p>Camden Council considers that areas inadequately assessed as not posing risk of contamination may, during the lifetime of the project, be used for residential developments, therefore presenting risk to human health arising from relevant land use.</p> <p>Camden Council considers that inadequate contingency measures relating to land remediation have been outlined because some land plots have not been identified as potentially posing a risk of contamination. Camden Council considers the ES to be deficient in this regard.</p>

11.2.6	Appropriate remedial treatments to contaminated soils	Camden Council considers that more emphasis should be placed on the remediation strategies implemented being sustainable solutions.
Chapter 12 – Landscape and Visual	Chapter Title	Camden Council considers that “Features” should be inserted to the chapter title
12.1.1.	Specialist staff	Camden Council considers that any staff involved with landscape works must have ecological supervision, especially in relation to vegetation clearance/tree works etc.
12.1.1.	Landscape management	Camden Council seek the inclusion of temporary planting projects to mitigate against the landscape impact of construction
12.2	Protection of Trees	Camden Council note there is no reference to the protection/impact on privately owned trees and liaising with Camden’s Trees & landscape officers/tree owners on trees covered by Tree Preservation orders & Conservation Area. Camden Council considers that this should be included.
12.2.	Removal or damage to trees	Camden Council considers that any tree removal, damage to trees during the progress of works and trees that have been subject to excessive tree work should be subject to compensation based on CAVAT valuation.
12.2	Protection of Trees	Camden Council considers that the removal and replacement of trees and species selection should be agreed with Camden Tree officers and/ or an Arboricultural Consultant (approved by the Arboricultural Association).
12.2	Protection of Trees	Camden Council note there is no mention of bat protection in relation to trees. Camden Council considers that reference should be made to the Conservation of Habitat & Species Regulation 2010.
12.2	Protection of Trees	Camden Council note there is Also no mention of the Wildlife & Countryside Act 1981, As Amended, and the Countryside & Rights of Way Act 2000. Camden Council considers that all tree works should be in carried out with regard to these Acts.
12.2	Protection of Trees	Camden Council considers there is no mention of Transplanting Root balled trees – BS4043, 1989 and Nursery Stock, Part 1, : Specification for Tree &

		Shrubs, BS3936,1: 1992, which are relative and should be included.
12.2.3	Tree related monitoring	Camden Council note there is no mention of tree related monitoring under BS5837 by an appropriately qualified Arboricultural consultant, who should be approved by the Arboricultural association. Camden Council considers this should be included.
12.2.3	Linking with paragraph 12.2.2	Camden Council considers that all of section 12.2.3 should refer to section 12.2.2.
12.2.6	Trees that are accidentally felled or die	Camden Council considers that the true value should be used to pay for the replacement of any trees that are accidentally felled or die, not just a like for like replacement where reasonably practicable.
12.2.6	Tree planting and replacement	Camden Council seek assurance that trees will be planted on a 2 for 1 basis, and that trees planting following the Council's tree policy inclusive of the right tree for the right location.
12.2.7	Reference to British Standards	Camden Council considers that the British Standard's quoted should have the appropriate latest addition quoted, such as: BS5837-2012, BS3998 – 2010 etc.
12.3.1	Measures to reduce potential impacts	Camden Council seek assurance that this will include Adelaide Local Nature Reserve
12.3.3	Consultation on proposals	Camden Council request further information on the consultation process and the status it will have.
Chapter 13	Noise and vibration – General Provisions	<p>Camden Council note below an outline of all of the major mitigations and compensations required to help alleviate and compensate for the devastating impact of the construction works on the local sound environment and consider these points must be included within the CoCP:</p> <ul style="list-style-type: none"> <li>• Commitment to fund noise and health advice and support for residents, businesses and visitors to the affected areas</li> <li>• Commitment to using construction vehicles and machinery with the lowest noise and vibration emissions that are available at the time of the works.</li> <li>• Commitment to install sufficient real-time noise and vibration monitors during the construction phase, and to continue to fund monitors during the In Use phase</li> </ul>

		<ul style="list-style-type: none"> <li>Commitment to provide funds to Camden to enable us to undertake an on-going independent assessment of the real-world impacts of the construction once it commences. This will enable Camden to put forward additional mitigation proposals on an on-going basis as informed by the independent research.</li> </ul>
13.1.1	Identification of receptors	<p>Suggest all receptors are considered in the first instance as due to the timescale of the project, receptors which may not be residential or sensitive now, may be such as the project progresses.</p> <p>Camden Council seek assurance that the Noise Insulation and Temporary Re-Housing policy will apply to receptors identified as residential after the Royal Assent and not only those which are residential before the Royal Assent (to account for any new residential receptors, particularly those in areas where properties are being built to accommodate residents who are being displaced by the project).</p> <p>Camden Council considers that particular identification should be made of any residents or occupiers e.g. within local hospitals who may have mental health issues, as research shows that such groups can be particularly vulnerable to noise impacts and therefore mitigation should be appropriate and targeted.</p>
13.1.1	Identification of "other sensitive receptors"	<p>Camden Council notes that other sensitive receptors specifically references "local businesses and quiet areas designated by the local authority". However, Camden Council does not consider that this goes far enough and in particular the reference to quiet areas is too restrictive. Camden Council considers that in a densely populated urban location such as Camden all areas of relative quiet and tranquillity are considered sensitive receptors and the impact of noise on them should be adequately considered.</p>
13.2	Measures to reduce potential noise and vibration impacts.	<p>Camden Council is of the view that consideration should also be given to non-residential historic structures which may also be affected by the noise implications of construction works. Camden Council considers that any historic structures affected are protected appropriately during the works.</p>
13.2.4	Noise and vibration management	<p>Camden Council notes the methods outlined here are high level</p>

	methods	recommendations when compared to the level of detail outlined within, for example, the Crossrail CoCP or the air quality section of this CoCP. Camden Council recommend that further technical detail is provided on management methods.
13.2.4	Noise and Vibration Management Plans	Camden council notes that the noise and vibration management plan will be prepared as part of the Principal Contractor's EMS therefore Camden Council cannot comment on the content or suitability of these plans at this stage. Camden Council requests the noise and vibration management plans are made available to relevant Local Authority for review and approval.
13.2.4	Noise and vibration management methods and impacts on local businesses	Camden Council notes that the management of noise and vibration during the construction period, the CoCP states that, "details of construction activities, prediction methods, location of sensitive receivers and noise and vibration levels will be discussed with the relevant local authority both prior to construction work and throughout the construction period". As businesses will be directly impacted by this disruption, they should be kept up-to-date and aware of these plans and developments by HS2 Ltd, through the availability of dedicated business advisors, within and independent to HS2 Ltd. Camden Council considers that the proposals are not adequate and consider there is a need for dedicated resources to support businesses affected by HS2.
13.2.4	Preparing risk assessments to inform structural surveys	Camden Council considers that HS2 Ltd need to clarify how they will identify which properties may be potentially subject to vibration from construction and hence may need a risk assessment undertaking.
13.2.5	Section 61 consents	Camden Council considers that information about Section 61 consents should be included in the stakeholder liaison strategy, where up-to-date information is communicated.
13.2.5	Section 61 consents	Camden Council consider the proposed amendments to the appeal provisions under the Control of Pollution Act 1974 and the available defences under statutory nuisance provisions could make it more difficult for affected persons to be effectively protected from noise and statutory nuisance and for appropriate remedies to be implemented quickly and effectively and therefore consider this to be an unsuitable proposal which should not be implemented and the current legislative proposals should remain as they are currently.



13.2.6	Section 61 consents	Camden Council notes that the CoCP states that final detailed construction programmes are only likely to be available a short time in advance of work starting on site. Camden Council will expect to see construction programmes presented and communicated to the local community well in advance of works starting on site. Without a detailed construction programme it is difficult for Camden Council and HS2 Ltd to assess the full impact of the works on the borough.
13.2.10	Section 61 consents	Camden Council considers that further information on the proposed strategy for S.61 consents should be submitted either before or within the formal ES.
13.2.10	Information on S.61 consents tied in with Information on Working Hours in Chapter 5.	Camden Council considers it would be useful if the information on S.61 consents could be tied in with the information on working hours within Chapter 5 so that all information on working hours strategy is presented together.
13.2.10	Temporary re – housing	Camden Council considers that where rehousing is deemed necessary a solution needs to be identified for provision of temporary housing supply that is appropriate to the needs of residents displaced, and at least 18 months be given to manage resident moves and their health and well-being. Camden Council considers the ES is defective in that full consideration has not been given to cumulative impacts and pressure on housing in local area to accommodate temporary moves. Camden Council considers the ES is defective in that it does not properly assess the impact of re-housing on the physical and mental health of residents, especially the most vulnerable such as children, elderly, and those with medical conditions.
13.2.10		Camden Council considers the ES is defective in that the emphasis placed on noise and/or vibration impacts has meant that other impacts which could affect the habitability of properties during the construction phase have been neglected. Camden Council considers that properties that will experience a significant amenity effect have not been properly identified and assessed. Camden Council would require an assessment of cumulative impacts and baseline surveys to be undertaken of properties at risk in advance of works. Camden Council would require that any mitigation measures be proposed and

		agreed at least 18 months in advance of works to ensure that the impact on residents, including their health and well-being is properly considered and managed.
13.2.10	Noise Insulation and temporary re – housing policy	<p>Camden Council considers that based on experience, it will take at least 18 months from the date of identifying which properties require noise insulation packages to its installation, due to factors such as the requirement to undertake a public procurement exercise, the commissioning of the works, and the notification and engagement processes with residents. It is therefore considered that the noise insulation / temporary re-housing appraisal needs to be submitted at least 18 months in advance of works to allow for consultation and reasonable notice given to residents and to ensure that these works can be satisfactorily completed in time for the commencement of the construction works. This means the noise insulation /temporary re – housing appraisal process must begin at least 2 years prior to the anticipated commencement of the works to ensure all measures will be implemented in time.</p> <p>Camden Council considers, based on previous experience with other projects, that on occasion construction works commence without the appropriate noise insulation packages installed. Camden Council considers that this position is unacceptable and will undertake any such measures necessary to ensure that such a situation does not arise within Camden. Camden Council considers that the proposed wording on the timing of the installation of noise insulation measures prior to the commencement of works is loose and does not provide a strict commitment to having it in place prior to the commencement of the works. Camden Council considers the wording should be revised to adopt this commitment.</p>
13.2.10	Noise Insulation and temporary re-housing policy	<p>Camden Council considers that this policy should be made available for comment, review and approval by the Local Authority as soon as possible. Camden Council is disappointed to note that this document has not yet been made available to the Council and considers that this puts the Council in a difficult position to adequately comment on the proposals within this draft CoCP.</p>

13.2.10	Noise Insulation and temporary re- housing policy	Camden Council considers that it is necessary for HS2 to identify potential temporary re – housing needs as early on in the process as possible as any potential housing provision needs to be factored in to the current re-provision plans. Active discussions on the potential for temporary re –housing and its provision must be held with Camden Council on a regular basis.
13.2.10	Noise Insulation and Temporary Re- housing policy	Camden Council request clarification on who within the process will be responsible for administering the policy and the scheme.
13.2.10	Noise Insulation and temporary re-housing policy	Camden Council considers that the proposed policy needs to link with the proposed LEMPs and Section 61 applications/consents to identify the number and type of re-housing required.
13.2.10	Noise Insulation and temporary re-housing policy	Camden Council considers that information should be provided on what type of re-housing is proposed, who is providing it and where will it be located? Camden Council considers that this information should have been available prior to the Bill deposit and are disappointed to note that it was not.
13.2.10	Noise Insulation and temporary re-housing policy	Camden Council seeks clarification on what duration defines housing as 'temporary'. Camden Council considers that more than 6 months would be considered permanent.
13.2.10	Noise Insulation and temporary re-housing policy	Camden Council considers that information must be provided on the policies in place to protect non-residents, e.g. schools, health care facilities such as hospitals and surgeries, residential/respite care homes and businesses. Camden Council considers there must be a mechanism in place for considering each on case by case basis.

13.2.10	Noise Insulation and temporary re-housing policy – Impact on businesses	<p>Camden Council notes that under this policy, the CoCP states that additional protection will be given to residents in the event that it is not practicable to mitigate noise, or reduce its exposure through the installation of noise insulation. However, it is not clear from the CoCP whether these measures will also apply to businesses. It is essential that the same mitigation and compensation measures are offered to businesses in Camden affected by the HS2 proposals.</p> <p>Camden Council considers that each affected business will need an assessment of noise impacts and the offer of insulation or other mitigation solutions to be paid for by HS2 Ltd. If insulation or another mitigation solution is not practicable or businesses choose not to take it up because of the disruption it will cause, they should be fully compensated.</p>
13.2.10	Noise Insulation and temporary re – housing policy	Camden Council considers that provision is required for effects from vibration in addition to noise, and should be addressed by this policy.
13.2.10	Noise Insulation and temporary re – housing policy	Camden Council considers that provision should be given for effects from ground borne noise in addition to airborne noise is required and should be addressed by this policy.
13.2.10	Noise Insulation and temporary re – housing policy	<p>Camden Council consider that particular attention must be given to those properties which will exceed the noise insulation trigger levels and are listed heritage assets, because conventional noise insulation packages might not be appropriate for such properties. Support and advice must be made available to residents who may be affected in this way and Camden Council consider that this specialised advice and support should be provided for and paid for by HS2. Support and advice could include for example professional technical advice on making a planning application or listed building consent application and paying for the application fees and associated consultants' fees necessary for the preparation of a suitable scheme of mitigation measures.</p> <p>Camden Council consider that measures must be taken by HS2 to identify which properties could be affected in this way and early discussions held with the affected residents and the Council to determine how this issue might be overcome. Camden Council consider that these properties could be at</p>

		a greater risk of temporary re - housing during the construction phase if the noise insulation packages would not be feasible due to the heritage status of the properties and consider that this should be noted and assessed within the ES.
13.2.12	Trigger levels	Camden Council note that the interpretation of the trigger levels is different to those adopted for Crossrail, in so far as the consideration of existing ambient noise level is applied differently. Camden Council considers that justification for an alternative approach to that used for Crossrail is required at the earliest opportunity.
13.2.12	Noise Insulation and temporary re-housing policy	Camden Council note that more than one incident (above tolerable levels) per year would be considered a trigger to permanent re-housing. Each case would be agreed in consultation with the tenant. Camden Council considers it would be reasonable to offer permanent re-housing with the right to return between periods of disruption.
13.2.13	Noise Thresholds for noise insulation/temporary re housing	Camden Council note there is a variation in the threshold used for noise insulation within this CoCP compared to that which is understood to be in place for the Crossrail project. This specifically relates to the cut off point for the timing of day time and night time criteria for between Sundays and public holidays. The HS2 CoCP places the cut off at 22:00 whilst that of Crossrail places it at 21:00, thereby offering a better level of protection for residents. It is recommended that the latter threshold, as that used for Crossrail, is utilised for HS2. Camden Council considers that justification for an alternative approach to that used for Crossrail is required at the earliest opportunity.
13.2.16	Vibration thresholds and actions	Camden Council requests confirmation as to how, and against what levels, public and community buildings (such as schools and children's centres) will be measured.
13.2.18	Vibration trigger values	Camden Council suggest that the trigger value for "dwellings" also includes hospitals
13.2.19	Vibration trigger values	Camden Council note the reference to "routinely exceeded" and consider that the word "routinely" should be omitted. Camden Council considers that this wording is open to interpretation in its current form and therefore requires amendment.
13.2.22	Detailed assessment	Camden Council seek clarity on the buildings and construction activities that

		qualify for vibration assessment and monitoring. Camden Council considers that the information should be publicised.
13.2.22	Protection of buildings from damage	Camden Council considers there should be the inclusion of the aim to cause no damage and that no construction methods that could be expected to cause damage will be used.
13.2.23	If vibration levels are predicted to be above acceptable levels those potentially affected will be notified in advance of the works.	Camden Council seek confirmation of how long in advance of the works residents are to be informed.
13.2.26	First bullet point - "...seek to agree with the local authority..."	Camden Council considers that the wording "seek to agree" should be "agree" or "obtain". Camden Council note that the Crossrail CoCP committed the Nominated Undertaker 'to obtain' s61 consent. This is a weaker position for the LPAs when compared to Crossrail and Camden Council seeks justification for this approach and amendment to the position utilised for Crossrail as soon as possible.
13.2.26	Third bullet point – "carry out a condition survey before and after the relevant works..."	Camden Council considers that an independent surveyor is to carry out the condition survey before and after the works and HS2 is to cover cost. Camden Council considers the wording should reflect this.
13.2.26	Reference to surveys of properties.	Camden Council considers that any structural survey should consider the combined impact of excavation in close proximity, as well as the effect of prolonged vibration activities on the buildings. For example, the tower blocks on Amptill and the flatted developments on the Regent's Park Estate need to be carefully assessed prior to works and closely monitored during both excavation and vibration works.
13.2.2 and 13.2.10	Best Practicable Means and mitigation for schools and children's centres.	Camden Council note that temporary re-housing will not be appropriate for schools and children's centres and therefore Camden Council will expect to see tough measures in place and increased flexibility with regards to works and construction traffic that may affect schools and children's centres.
Chapter 13 generally	No reference to protection of open spaces from noise and vibration during construction phase	Camden Council considers that information should be provided on how the open spaces will be protected from noise and vibration during the construction phase. Camden Council considers that the reference to quiet areas is too restrictive and that the relative quiet and tranquillity of parks and open spaces should also be considered in a densely populated urban location such as Camden.
Chapter 14	Road closures and/or diversions	Camden Council considers that road closures and/or diversions should be kept

	and impacts on residents	to a minimum and that access should be maintained to ensure that essential services such as refuse collections and meals on wheels services can continue in areas affected by construction.
Chapter 14	Road closures and impact on businesses	Camden Council notes that in our response to the Government's HS2 consultation in November 2011, we identified the need for the number and duration of road closures to be minimised to support businesses during the construction phase. Road closures should be a last resort and enforced only where strictly necessary. Businesses will need long-term advanced notice of any closures. Camden Council considers it will also be essential that access to streets is not adversely affected by the HS2 construction period or is mitigated, particularly for small, independent retailers and restaurants who depend on passing trade for their livelihood. Camden Council notes that in the latest version of the CoCP, point 14.1.1 mentions only that impacts of construction traffic will be minimised and that public access will be maintained where reasonably practicable but does not mention limiting road closures and there is no specific reference to access to streets.
14.1.1.	<p>Traffic management – general provisions</p> <p>Use of rail to deliver or remove materials as part of construction.</p> <p>Lorries</p>	<p>Camden Council is of the view that rail should be used to remove waste and supply materials. There should be a commitment from HS2 to maximise the use of rail for these purposes.</p> <p>Camden Council that HS2 should minimise the number of construction vehicles through efficient management and phasing of construction activities.</p> <p>Camden Council request details on how controls for vehicle types etc. would be introduced and managed should be included in a CMP.</p> <p>Camden Council considers there needs to be a clear Lorry Management Plan (LMP) to ensure that construction vehicles are actively managed to minimise disturbances and impacts on Camden's highway as well as adjacent highway authorities. It needs to include as appropriate:</p> <ul style="list-style-type: none"> <li>• local routes to be used by lorries generated by construction activity;</li> <li>• lorry holding areas;</li> <li>• lorry route signing strategy;</li> <li>• means of monitoring lorry use and any routes prohibited from use.</li> </ul>



		<p>Camden Council considers that Highway works required to accommodate construction traffic should be identified and detailed in the Environmental Statement.</p> <p>Camden Council considers that the construction sites should not include any car parking for workforce or visitors. A travel plan should be prepared at the appropriate time to set out how these journeys can be made using sustainable travel modes – public transport, walking or cycling.</p>
14.1.1	Traffic and transport	Camden Council requests that information is provided on vehicle movements in which phase, when this will peak and at what times of the day will traffic flow be at its highest.
14.1.1	Traffic management during construction	Camden Council considers that public access should be maintained and measures should be implemented to ensure the safety of children and to provide safe crossing places.
14.2.	Measures to reduce potential transport impacts during construction	Camden Council considers that the lists produced here for generic measures and site specific measures are not exhaustive and therefore consider all reasonable steps must be taken to minimise transport impacts to as low as reasonably practicable. Camden Council do not consider that the measures are able to adequately account for congestion, for example.
14.2.2	Generic and site specific traffic management measures	<p>Camden Council considers there should be a commitment for traffic management to be developed to minimise the impacts on highway users. Additional details are needed about specific traffic management and the process of submission and approval:</p> <ul style="list-style-type: none"> <li>• An appropriate application and consent process needs to be developed and implemented in partnership with the local authority.</li> <li>• The process for consents of traffic management would need to be clarified to ensure that a local authority is able to assess and respond to applications.</li> </ul> <p>Camden Council considers that Traffic Management Plans (TMPs) should be produced in consultation with highway authorities and the emergency services and other key stakeholders. The TMP should include, as appropriate:</p> <ul style="list-style-type: none"> <li>• site boundaries and the main access/egress points for the worksites;</li> </ul>

		<ul style="list-style-type: none"> <li>• temporary and permanent closures and diversions of highways and public rights of way;</li> <li>• the proposed traffic management strategy</li> </ul> <p>Camden Council considers that drivers are to be registered with the Fleet Operators Recognition Scheme (FORS) and attain bronze standard – as FORS members have shown significant falls in collision rates.</p> <p>Drivers to have completed Approved Driver Training with the Safe Urban Driving Certificate of Professional Competence (CPC) module which includes practical “on-bike” experience.</p> <p>Camden Council considers that lorries attending the site to have specified safety measures e.g. cycle activated sensors to minimise the risk of cycle casualties particularly at junctions.</p> <p>Camden Council considers that all construction vehicles to conform to the latest EU emissions standards to minimise the impacts on air quality.</p> <p>Camden Council considers that all drivers of construction vehicles should be fully trained to the latest driving standards including cycle safety awareness and fuel efficiency.</p> <p>Camden Council considers that specific attention and measures should be put in place on routes around schools and children’s centres in recognition of the need for safe routes to be maintained and high footfall at specific times of the day.</p>
14.2.2	Maintenance of public access and site boundaries	<p>Camden Council notes that the COCP refers to maintaining public access where practicable. Camden Council considers this does not go far enough. The site boundary must be designed to ensure that footways of adequate width to facilitate pedestrian flows are provided on all streets impacted by works at all times.</p> <p>The site boundary and resulting traffic management on impacted highways must provide a safe environment for cyclists. Nearside carriageway lane widths must be designed at 4.5m.</p>

		<p>Camden Council considers that the designated work sites should be sufficient to allow construction to be undertaken without additional land being required after the hybrid bill process.</p> <p>The design and layout of hoardings need to fully take account of community safety issues. Clear sight lines must be maintained with hoardings erected parallel to kerb lines / carriageway to remove isolated areas where anti-social behaviour could occur. Proper consideration needs to be given to lighting levels in the vicinity of hoardings to ensure that lighting levels meet existing standards (refer to Camden's Conditions on Temporary Structures).</p> <p>Hoardings need to also incorporate Legible London pedestrian signs to facilitate pedestrian access around the site boundary.</p>
14.2.4	Site specific measures	Camden Council considers that key on street facilities required to facilitate construction, such as lorry holding areas, site compounds need to be identified as part of the TMP/CMP and Environmental Statement
14.2.4	Highway reinstatement	<p>Camden Council considers that where temporary alterations to the highway are required, there must be a commitment for the highway to be restored to the satisfaction of the local authority.</p> <p>Camden Council considers that surveys are to be carried out prior to construction to establish the condition of the highway at that stage and after the completion of HS2's works, in consultation with the highway authority.</p> <p>Camden Council considers that all reinstatement should be undertaken in a timely manner and agreed with the local authority.</p>
14.2.4	Haul routes and site access	<p>Camden Council considers that internal haul routes and site access should be designed to facilitate safe access to the highway in a forward gear when entering and leaving the site.</p> <p>Camden Council considers that site access points must be designed to minimise queuing traffic adjacent to access points; also need to minimise impact on the Strategic Road network (SRN), sensitive streets and junctions.</p>
14.2.6	Road cleanliness	Camden Council requests clarification on how run off from cleaning vehicles

		will be dealt with.
14.3.1	Monitoring	The process for monitoring impacts of traffic management needs to be clarified and agreed along with a commitment to have regular liaison with highway authorities and the emergency services.
Chapter 15	Waste and materials	Camden Council considers there should be weighting towards re-use, reduce and recycle so as better manage waste and reduce waste to landfill. Camden Council queries whether there is scope to have a minimum amount of spoil recycled and used on other sites to reduce the amount going to landfill
15.3.1	Monitoring	Camden Council notes the waste management and monitoring measures are to be put in place during the lifetime of the project and would like see transparent and non- technical data made publically available for any interested parties.
16.3.3	Flood risk impacts	Camden Council considers this paragraph should read as follows: The contractors will obtain copies of Lead Local Flood Authority's Flood Risk Management Plans and prepare site specific flood risk management plans for those areas of the site at risk of flooding. These would include all areas within Flood Zone 3 and areas considered at "more" risk of flooding on the EA's surface water flood map or any additional mapping produced by the LLFA.
Annex 2 – Sustainability Policy		Camden Council considers that the reference to the project causing "some local effects on communities, the natural and the built environment" underplays the real impact that this proposed scheme will have on an area such as Camden. To summarise the huge impacts of this scheme including the loss and devastation of homes and communities into this one sentence does not provide adequate weight to the adverse significant impacts. Camden Council do not consider that the project meets many of its key themes within Camden, particularly in the balance of community, environmental and economic factors.

Annexe 3	Template for Local Environmental Management Plan	<p>Camden Council considers that the template LEMP does not provide sufficient detail to be able to consider whether the content of the LEMP will be effective and fit for purpose.</p> <p>Camden Council considers that an example LEMP for a community forum area should have been submitted alongside the hybrid bill in order to provide further information on its likely content to enable meaningful comment on the content and likely efficacy of the LEMP.</p> <p>Camden Council considers that the LEMP should have sufficient regard to the uniqueness of green spaces in an urban environment.</p>
Annexe 4	Section 61 consent	<p>Camden Council considers that that the example 61 consent form does not provide sufficient information that will be required by the Council to make a judgment on the application.</p> <p>Camden Council considers that information should be provided on the development of guidance on the procedures for Section 61 including the development of dispensation, variation and overrun notification documents.</p> <p>Camden Council requests that either the s61 template is removed from the Code of Construction Practice and placed into a standalone guidance document along with other relevant material (including dispensation, variation and overrun templates), or the necessary detail is included in a revision to the CoCP. Camden Council considers that the current content is insufficient either way.</p>

**Please note – all references in this document to “concerns” raised by the Council, should be read as an expression of deficiencies in relation to the Environmental Statement.**