

PETITION AGAINST A PRIVATE BILL
IN PARLIAMENT HOUSE OF COMMONS SESSION 2015-16

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL (ADDITIONAL PROVISION)

Against Amendment of Provisions— Praying to be heard by Counsel, &c.

TO THE HONOURABLE THE COMMONS OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND IN PARLIAMENT ASSEMBLED.

THE HUMBLE PETITION of CAMDEN CYCLING CAMPAIGN

SHEWETH as follows:-

1. A Bill (hereinafter referred to as “the Bill) has been introduced and is now pending in your honourable House entitled “A Bill to make provision for a railway between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes.”
2. The Bill is presented by Mr Secretary McLoughlin.
3. A third Additional Provision (hereinafter called “AP3”) to amend the powers in the Bill, reintroduced on 28 May 2015, has been introduced into and is now pending in your honourable House.
4. Amongst other amendments, AP3 would amend Schedule 1 to the Bill, to confer additional power to accommodate changes to the design of Euston station and approach area and other design changes in the London Borough of Camden.
5. Your Petitioner is the Camden Cycling Campaign, the local borough group of London Cycling Campaign. Jean Dollimore is the ex-coordinator and a current committee member and is writing on their behalf. Your Petitioner represents more than 600 members and the interests of many thousands of cyclists living or working in the borough of Camden. Your Petitioner works to improve the roads for the safety and comfort of people who cycle and to promote cycling as a sustainable and healthy method of travel. The London Mayor has been spending significant sums of money on the central London Cycling Grid and Quietways in Camden in the last two years and will continue to do so. The aim is to provide better routes so that many new people will feel safe to cycle. It appears from the environmental statement that the HS2 works will ruin some routes with additional Heavy Goods Vehicles (HGV) traffic and remove others altogether.
During construction, the closing of main roads will divert traffic onto the more minor roads that are used by cycle routes. In addition, construction vehicles, mostly HGVs, will be added to these roads; however, it is not safe to mix cyclists with HGVs. Your Petitioner considers it is directly and specially affected by this use of the roads.

6. Your Petitioner and the interests of the group represented are injuriously affected by the Bill, to which your Petitioner objects for reasons amongst others, hereinafter appearing. The Bill includes powers for the Secretary of State and the Nominated Undertaker to carry out construction works that will cause havoc over a wide area in Camden for a period of up to 15 years, followed by the loss of a large area of land around the station.
7. In its Supplementary Environmental Statements and Additional Provisions, HS2 has inadequately considered the needs of cyclists. At least 2,500 cyclists cross Euston Road traveling southbound every morning, using Eversholt Street, Melton Street, Hampstead Road and Ossulston Street. These are mainly commuters who will be not merely inconvenienced but also endangered by the construction works associated with HS2. Furthermore, the area involved in HS2's construction works contains a number of schools, shops and residential areas where cycling and walking should be the preferred mode of transport.
8. There are a number of important cycle routes in the *CFA1* Euston Station and Approach and *CFA3* Primrose Hill to Kilburn area:
 - *GNS1*: north-south quietway route which runs along Park Village East, Stanhope Street, Varndell Street, Cardington Street, Melton Street, Gordon Street where it crosses the Tavistock Place cycle track and continues south via Malet Street and Newton Street and on over the Westminster border.
 - *GNS2 (LCN+ 6a)*: Arlington Road, Mornington Crescent, Hampstead Road, Cardington Street, Melton Street, Gordon Street where it joins *GNS1*.
 - *LCN Kilburn - Primrose Hill*: Elsworthy Road, King Henry's Road, Gloucester Avenue, Regents Park Road to the Delancey Street/Parkway/Prince Albert Road junction.
 - *GEW1*: Delancey Street-Pratt Street, also uses the Delancey Street/Parkway/Prince Albert Road junction.
 - *Barnby Street link*: in the absence of any link from Eversholt Street to Hampstead Road between Euston Road and Mornington Crescent, an informal link through Barnby Street is used which is essential for accessing *GNS1*.
 - *GEW3 (LCN+ 16)*: Goodsway, Brill Place, Phoenix Road.
 - *Hampstead Rd to Oakley Square*: Harrington Square, Lidlington Place and both sides of Oakley Square.
 - *LCN+ 6*: Royal College Street, Ossulston Street, Mabledon Place.
 - *CS11*: Finchley Road, Swiss Cottage, Avenue Road, Outer Circle (both sides), Park Crescent.

Many of these routes will be disrupted by HS2 construction traffic or are closed during construction or utility works or are scheduled for permanent closure.

9. Your Petitioner has four main areas of concern about the impact of HS2 construction works on cyclists:
 - i. the lack of permeability around the work-sites;
 - ii. the unsuitability of the temporary highway layouts proposed;
 - iii. the dangers posed by the construction vehicles;
 - iv. the impact on air quality.

These issues will be addressed in the following paragraphs.

10. Lack of permeability around work sites: the main and satellite construction site compounds – some of which will be in use for 18 years – will restrict or block roads so that they will be unsatisfactory as cycle routes. Cyclists cannot be expected to use roads that carry high numbers of HGVs. In particular, Your Petitioner’s main concerns about the impact of construction and utility works on roads with cycle routes include:
- *Park Village East* (on the route *GNS1*) 2017-21.
 - *Melton Street and Cardington Street* (on two important cycle routes *GNS1* and *GNS2*) closed in 2017 for ever. The loss of access for cycles will seriously affect cycle travel to UCL and other universities in Bloomsbury. The nearest alternative route via Euston Circus is longer, carries more traffic and is far less likely to attract new cyclists.
 - *Mornington Street Bridge* (a useful link between *GNS1* and *GNS2*) closed to cyclists, open for pedestrians 2018-22.
 - *Mornington Crescent* - closed at the junction with Hampstead Road 2020-22 during Stage 1 of the construction of Hampstead Road bridge.
 - *Granby Terrace bridge* – closed 2018-2020, not open to the public until late 2023.
 - *Prince Albert Road* at the junction with Parkway, 2016-17; concerns about diversion of motor traffic onto Primrose Hill route in King Henry’s Road and Gloucester Avenue.
11. Unsuitability of temporary highway layouts offered: temporary routes should conform to London Cycle Design Standards; cyclists should not be diverted on to busy roads or those with a high volume of HGVs.
- it is unsatisfactory to expect cyclists to dismount when sharing space with pedestrians, as is suggested at Mornington Street overbridge, Park Village East, Melton Street, or the pedestrian route from Euston station (west side) to Euston Street or Stephenson Way. To prevent conflict, sufficient space should be provided for separate space to be allocated to pedestrians and cyclists.
 - *Hampstead Road bridge (GNS2)* 2017-29. Mornington Crescent (S. end) closed in Stage 1. No provision is made for southbound cyclists on *GNS2* who would be forced to come out of Mornington Crescent (N. end) and then go round Harrington Square and Lidlington Place, which is scheduled to be used by HGVs servicing the National Temperance Hospital compound.
 - cycle infrastructure on *Hampstead Road bridge* during Stage 1: advisory cycle lanes do not provide adequate protection on a road with average daily flows of over 30,000 motor vehicles per day, and used by over 2,000 cycles per day. There is also concern about the junction with the station access road.
 - cycle infrastructure on *Hampstead Road bridge* during Stage 2: the segregated 2-way cycle track on the W side of Hampstead Road provides no access to the route *Hampstead Road to Oakley Square*.

12. Dangers posed by construction vehicles: the number of construction vehicles, mostly HGVs, will greatly increase on roads that are used by existing cycle routes. It has been established that it is dangerous for cyclists to share road space with HGVs. Statistically, HGVs pose a significantly higher risk to cyclists and other vulnerable road users than any other type of vehicle. In 2013 more than half the cyclist fatalities in London involved a heavy goods vehicle. Hundreds of extra HGVs per day concentrated around the Euston Road site will inevitably result in lethal risks to cyclists in London. The serious dangers for cyclists are shown in a study by Transport for London (TfL) which concluded that cyclists involved in collisions with HGVs are 78 times more likely to be killed than those hit by a car.
13. The impact on air quality: air pollution levels on the Euston/Marylebone Road where the work is to be concentrated are among the highest in London and already breach EC directives, technically exposing the UK to a potential £300 million fine and damaging the health of residents and commuters. Saturation levels of traffic with hundreds of extra HGVs per day will cause heavy congestion and add to air toxicity with further lethal risks to cyclists as exposed road users. The solution is for all construction materials, equipment and spoil to be transported by rail since this is a railway project.
14. Your Petitioner's main concerns about construction impacts which will pose dangers for cyclists include:
 - *The Temperance Hospital compound: 2016–33, 300 – 450 HGVs per day, busy 27 months.*
 - *Euston Square Gardens (west) compound: 2016–33, 140 – 200 HGVs per day, busy 10 months.*
 - *Granby Terrace compound: 2016–2026, 260 – 280 HGVs per day, busy 4 months.*
 - *Carriage Shed and Park Village East compound: 2016–2026, 160 - 250 HGVs per day, busy 23 months.*
 - *Park Village East (north) compound: 2018–2024, 90 – 140 HGVs per day, busy 14 months.*
15. Your Petitioner's main concerns about the impacts of utility works:
 - Parkway traffic management measures Stage 2. Work sites (on west side) narrow Parkway to 6m on both sides of the junction with Prince Albert Road.
 - Parkway traffic management measures Stage 3. Work sites (on east side) narrow Parkway to just over 6m on both side of the junction with Prince Albert Road.
 - Parkway traffic management measures Stages 4–6 impact Gloucester Gate and Albany Street.
 - Closure of Adelaide Road, 2020–23. Diverting of motor traffic onto King Henry's Road will adversely impact the *Kilburn - Primrose Hill* cycle route.
16. Your Petitioner's main concerns about HGV traffic on cycle routes are as follows:
 - *GNS1* on Stanhope Street and *GNS2* on Hampstead Road affected by satellite compounds on Mornington Terrace and Mornington Street overbridge.
 - *GNS2* on Arlington Road south of Mornington Street.
 - *GEW3* Goodsway and Pancras Road.
 - *GEW1* on Delancey Street and Pratt Street.
 - *Hampstead Road to Oakley Square* by HGV movements on Harrington Square.

17. Your Petitioner's main concern about the permanent damage is from the loss of Cardington Street and Melton Street. The alignments of cycle routes *GNS1* and *GNS2* on Cardington Street, Melton Street and Gordon Street will be permanently lost. It is absolutely unsatisfactory to require cyclists to use Hampstead Road to cross Euston Circus, whose new design fails to cater for safe north-south crossing by cyclists.
18. Your Petitioner is particularly concerned about the permanent changes to layout from the possible loss of access via Varndell Street which is on the route *GNS1*.
19. Your Petitioner objects to the powers that are proposed to be provided by the Bill to the Secretary of State and the Nominated Undertaker and respectfully submits that the Bill should be amended or undertakings should be required so that HS2 Limited, the Secretary of State and/or the Nominated Undertaker must review the construction strategy for the project and its related works by considering their cumulative impacts on people who travel by cycle both during the construction stage and after completion of the project.
20. In order to mitigate the above adverse impacts on cyclists, your Petitioner requests the Promoter be required to ensure the following:
 - In order to avoid cyclist casualties, all diverted traffic should avoid cycle routes.
 - For the convenience of cyclists, their routes (including contraflow cycling) should be maintained throughout the works and they should not be diverted on to routes used by HGVs.
 - Since Gordon Street will be closed to motor traffic, a very safe cyclists' crossing should be made over Euston Road from Melton Street.
 - Rail haulage should be used for the delivery and removal of construction materials, equipment and spoil.
 - All HGVs should conform to Construction Logistics and Cycle Safety (CLOCS) standards and Freight Operator Recognition Scheme (FORS) and in addition have direct vision cabs, which have been shown to reduce the number of collisions with cycles.
 - All HGVs should use routes which are part of the Transport for London Road Network and Strategic Road Network, not local distributor routes or access roads.

21. To maintain cycle routes, your Petitioner requests the Promoter be required to ensure the following :
- *Park Village East*: space to be provided for safe cycling through the works. Dismounting is not acceptable. This is on route *GNS1*.
 - *Mornington Street Bridge*: to be made available for cyclists as well as pedestrians between 2018–22.
 - *Hampstead Road bridge*: 2017–29:
 - Stage 1: to alleviate the discontinuity of route *GNS2* at the southern end of Mornington Crescent, a route should be provided for southbound cyclists enabling them to go from the southern end of Mornington Crescent to the southbound route on Hampstead Road.
 - Stage 1 cycle infrastructure on bridge: provide kerb-segregated cycle tracks; and provide signals to protect cyclists at side-road junctions.
 - Stage 2 cycle infrastructure on bridge: provide a means of two-way access to the route *Hampstead Road to Oakley Square*.
 - *Granby Terrace bridge*: Provide a protected cycle route through here from 2020 to alleviate the closure of Park Village East.
 - Provide continuous cycle and pedestrian access through the period of closure of Gordon Street.
 - Maintain properly protected cycle routes through Parkway at the junctions of Prince Albert Road, Gloucester Gate and Albany Street.
 - Provide a link through Barnby Street as an alternative to using Hampstead Road.
22. To compensate for the permanent loss of cycle routes due to permanent closures, your Petitioner requests the Promoter be required to carry out the following :
- To compensate for the closure of Cardington Street and Melton Street, a new alternative route should be provided e.g. between North Gower Street and Gower Street with a safe crossing over Euston Road.
 - Cycle access should be ensured between Hampstead Road and Varndell Street, a useful link to *GNS1*.
23. East-west cycle and pedestrian access across the new station via a bridge linking Robert Street to Phoenix Road was promised in the original Bill, but is not mentioned in AP3. The current station is already a barrier to east-west movement across the area it occupies and the new station will not ameliorate the situation. Your Petitioner considers this east-west bridge is essential to completing an east-west cycle and pedestrian route north of the Euston Road. Your Petitioner requests that the Promoter reinstate this east-west bridge and to provide it at the earliest opportunity in the final scheme
24. To keep the additional HGVs off cycle routes that operate as ‘Quietways’, without any segregation, your Petitioner requests that the Promoter be required to modify the access plans to avoid the use by HGVs of:
- Arlington Road south of Mornington Street, to protect route *GNS2*.
 - Goodsway and Phoenix Road, to protect route *GEW3*.
 - Stanhope Street – Varndell Street, to enable safe use of what remains of *GNS1*.
 - *The Outer Circle*, to make it safe to cycle on *CS11* which will have no segregated tracks.

25. To protect cycle routes from the side-effects of road closures your Petitioner requests that the Promoter be required to ensure the following:
- During the closure of Adelaide Road, motor vehicle drivers must be prevented from using diversions via King Henry's Road.
 - Measures should be taken to allow cyclists on a variety of Quietways to bypass the jams at Gloucester Avenue/Oval Road.
 - Traffic management plans must be modified to ensure that disruptions are kept away from the LCN route in Regent's Park Road and Gloucester Avenue; for example, during the Parkway utility works, the motor vehicle diversion should avoid Gloucester Avenue.
26. Your Petitioner requests that the Promoter be required to provide plentiful, secure, weather-proof and easily-accessible cycle parking for commuters at Euston Station.
27. If this project goes ahead, Your Petitioner requests that the Promoter should contact Camden Cycling Campaign to discuss how to limit the resulting major impact on Camden's cycle highways and significantly increased risks to Camden's cyclists.
28. There are other clauses and provisions in AP3 which, if passed into law as they now stand, will prejudicially affect your Petitioner and their rights, interests and property and for which no adequate provision is made to protect your Petitioner.

YOUR PETITIONER THEREFORE HUMBLY PRAYS your honourable House that the Amendments of Provisions may not pass into law as they now stand and that they be heard by themselves, their counsel, agents and witnesses in support of the allegations of this petition, against so much of the Amendments of Provisions as affect the property, rights, and interests of your Petitioner and in support of such other clauses and amendments as may be necessary and proper for their protection and benefit.

AND YOUR PETITIONER will ever pray, &c.

Signed Jean Dollimore.....