

**IN PARLIAMENT  
HOUSE OF COMMONS  
SESSION 2013–14**

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

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

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

**THE HUMBLE PETITION of TRANSPORT for LONDON**

**SHEWETH as follows:-**

1. A Bill (hereinafter referred to as "the Bill") has been introduced and is now pending in your Honourable House intituled "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 (referred to in this Petition as "the Promoter"), supported by The Prime Minister, The Deputy Prime Minister, Mr Chancellor of the Exchequer, Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey and Mr Robert Goodwill.

**CLAUSES OF THE BILL**

3. Clauses 1 to 23 of the Bill together with Schedules 1 to 16 make provision for the construction and maintenance of the proposed works including the 'Scheduled Works' set out in Schedule 1 (references in this Petition to 'Scheduled Work No.' are references to those proposed works contained in Schedule 1). Provision is included to confer powers for

various building and engineering operations, for compulsory acquisition and the temporary use of and entry upon land, for the extinction and exclusion of certain rights over land, and for the grant of planning permission and other consents.

4. Clauses 24 to 36 of the Bill together with Schedules 17 to 26 make provision for the disapplication or modification of certain controls such as those relating to heritage, trees, commons and open spaces, street works and noise.
5. Clauses 37 to 42 of the Bill together with Schedules 27 to 28 make provision for railway matters such as the application (with modifications) and disapplication in part of the existing railways regulatory regime. In particular, they provide for the inclusion of the proposals in the objectives of the Office of Rail Regulation, the disapplication of certain licensing requirements, the disapplication of railway closure requirements, as well as the application (or disapplication) of other railway legislation. Provision is also included to enable agreements between the nominated undertaker and controllers of railway assets and to provide for the transfer of statutory powers in relation to railway assets.
6. Clauses 43 to 65 of the Bill together with Schedules 29 to 31 contain general and miscellaneous provisions. Particularly, these provide for the designation of nominated undertakers, the making of transfer schemes, the power to carry out regeneration and reinstatement works, the application of certain powers in the Bill to future high speed rail works, the treatment of Crown Land, the effect of the Environmental Impact Assessment Regulations and the application of arbitration.

#### *YOUR PETITIONER*

7. Your Petitioner is Transport for London, a body corporate established under section 154 of the Greater London Authority Act 1999 ("the 1999 Act"). Section 141 of the 1999 Act imposes upon the Mayor of London ("the Mayor") a general duty to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. Your Petitioner is tasked with facilitating the discharge by the Mayor of his duties under section 141 of the 1999 Act, with responsibility for most aspects of London's public transport, managing London's main roads and planning and building new infrastructure. Your Petitioner is also responsible for delivering the Mayor's transport policies and strategy for London, as set out in the Mayor's Transport Strategy, a statutory document and a key part of a strategic policy framework to support and shape London's social and economic development.
8. Your Petitioner, together with its subsidiaries, currently manages London's buses, the London Underground railway network, Docklands Light Railway, Overground and Tramlink. Your Petitioner also runs Barclays Cycle Hire and Cycle Superhighways, London River Services, Victoria Coach Station, the Emirates Air Line and London Transport Museum. As

well as controlling a 580km network of main roads (known as the "Transport for London Route Network" or "TLRN") and all of the city's 6,000 traffic lights, your Petitioner also runs London's Congestion Charging scheme and is responsible for the regulation of taxis and private hire vehicles on London's roads.

9. Your Petitioner, its subsidiaries and their respective rights, interests and property are injuriously affected by the Bill, particularly the clauses referred to above, to which your Petitioner, acting on its own behalf and on behalf of its subsidiaries, objects for reasons amongst others, hereinafter appearing.
10. The Mayor, exercising the power of the Authority, also intends to petition against the Bill in respect of the Authority's strategic role in London's economy, housing and regeneration, policing, transport, planning, environment, culture and health improvement.

#### *YOUR PETITIONER'S CONCERNS*

11. Your Petitioner is supportive, in principle, of the proposal to construct a new high speed railway between London and the West Midlands ("HS2 Phase 1"). The Mayor regards the development of a high speed rail network in the UK as representing a key element in reshaping the nation's transport network to enable economic growth, as identified in the Mayor's Transport Strategy.
12. However, your Petitioner is concerned that the Bill in its current form, particularly in those clauses referred to above, fails to provide the best integrated transport solution for London or to address adequately a number of significant adverse impacts which will arise during the construction of the proposals contained in the Bill, with severe consequences for the interests and operations of your Petitioner and its subsidiaries. Indeed, the proposals contained within the Bill fundamentally fail, in a number of respects, to meet the Promoter's own requirements as set down when instructing HS2 Limited to develop the proposals for HS2 Phase 1.
13. Your Petitioner is therefore unable to support the Bill in its current form and Your Petitioner objects to the Bill for the reasons, among others, here stated. Reflective of its wide remit, covering all modes of public transport across Greater London, your Petitioner's concerns as regards the Bill are diverse and varied, both in nature and geographically. However, they can be broadly grouped within five key headline issues. Your Petitioner respectfully submits that the Bill:
  - 13.1 fails to include adequate transport provision for the successful delivery of Old Oak Common as a major new transport interchange;
  - 13.2 contains proposals which in their current form would give rise to unacceptable adverse impacts at London Euston;

13.3 more generally, would give rise to a number of specific adverse impacts on London's public transport which are considered by your Petitioner to be unacceptable and capable of being avoided;

13.4 contains inadequate proposals to mitigate adverse impacts likely to arise during construction of HS2; and

13.5 fails to include adequate provision for an important link between the new HS2 network and the existing HS1 line.

14. Your Petitioner's specific concerns in respect of each of these matters are explained below.

#### *INADEQUACY OF PROPOSALS AT OLD OAK COMMON*

15. The Bill provides for the proposed high speed railway to be served by a new station to be constructed at the site of a former railway depot at Old Oak Common in the London Borough of Hammersmith and Fulham. The new station at Old Oak Common is proposed to include six HS2 platforms, located approximately 15 metres beneath surface level, with HS2 services running in tunnel east-west.

16. Old Oak Common is also the location of a new depot to be constructed as part of your Petitioner's new Crossrail 1 network, the construction and operation of which was authorised by the Crossrail Act 2008. Your Petitioner will run Crossrail 1 as part of its integrated transport services for London.

17. It is proposed that the new Old Oak Common station will also provide an eight-platform interchange with new Crossrail 1 services and Great Western services running east-west, at surface level, with effect from 2026, when HS2 Phase 1 is scheduled to open for public use. With new Crossrail 1 and HS2 stations being proposed there, Old Oak Common is poised to become west London's major rail interchange.

18. Your Petitioner fully supports the proposed creation of a major new transport interchange at Old Oak Common. The area has historically been known for its railway depots but with high speed rail and Crossrail 1 services being introduced there, Old Oak Common has the potential to become one of the best connected railway stations in the UK. This could give rise to significant potential for economic development, employment opportunities and new homes.

19. Sir David Higgins, in introducing his recent 'HS2 Plus' report, recognised the important role Old Oak Common, through linking long-distance and commuter rail services to the West and North, played in maximising opportunities arising from HS2 Phase 1, advising that if the right choices were made, it is destined to become not just a major inter-change for the country, but also a long over-due source of regeneration.

20. The Mayor also sees HS2 Phase 1 as an opportunity to regenerate the wider area. Your Petitioner, together with the Mayor and the London Boroughs of Hammersmith & Fulham, Brent and Ealing, has been considering the potential for regeneration in this area of west London for some time. Most recently, a public consultation took place in autumn 2013, seeking views on a 30 year vision for Old Oak. This vision could transform the area with up to 90,000 jobs and over 20,000 new homes, schools, open spaces, shops and leisure facilities and the Mayor shortly intends to establish a Mayoral Development Corporation in order to facilitate large scale coordination of investment and planning. If Old Oak Common is to realise its potential, it must be connected to local, regional and national transport networks.
21. The proposals for Old Oak Common contained within the Bill are designed to facilitate strong national and regional transport links and to help relieve congestion at London Euston, through the provision of an attractive alternative for high speed rail passengers travelling to or from London.
22. However, your Petitioner is concerned that the Bill proposals fall considerably short of what is required if aspirations to create a major new transport interchange in west London, serving both to relieve crowding levels at London Euston and to act as a catalyst for wider regeneration at Old Oak Common simply cannot be realised.
23. Your Petitioner has four principal concerns about the Bill proposals at Old Oak Common as follows:
- 23.1 provision for a new London Overground station, connecting HS2 to the local rail network, has been omitted;
- 23.2 there is a lack of provision for a future new rail connection between the West Coast Main Line ("WCML") and the Crossrail 1 network;
- 23.3 inadequate provision has been made for pedestrian, cycle and vehicular access to the station; and
- 23.4 certain specific and general impacts predicted to arise during construction of HS2 will give rise to unacceptable effects on existing transport modes and should not be authorised in their current form.
24. Each of these concerns is explained more fully below.

*Omission of new London Overground Station*

25. Your Petitioner has repeatedly advised the Promoter that its proposals at Old Oak Common should include the delivery of a new London Overground station to significantly improve local connectivity to employment and leisure opportunities and to help relieve congestion at

London Euston, which will increase as a result of HS2 services terminating there.

26. The London Overground is a suburban network of rail services launched in 2007 to provide better connections between areas outside central London. Four routes operate on the network, linking 21 of London's 33 boroughs, carrying more than 450,000 passengers every day. London Overground Rail Operations Limited ("LOROL") operates London Overground rail services on behalf of your Petitioner who is responsible for management of the Overground.
27. Your Petitioner is concerned that the Bill fails to realise an important opportunity created by the relative proximity of a hugely successful orbital local railway network to the new high speed rail station at Old Oak Common. Your Petitioner submits that the Bill should not be allowed to pass into law until additional provisions are brought forward to authorise the provision of a new London Overground station at Old Oak Common. This proposal would give rise to a number of benefits, thereby improving the overall case for HS2 Phase 1.
28. First, it would greatly improve local accessibility to the new high speed railway, by allowing direct rail access to Clapham Junction, Richmond and Stratford. Whilst the Bill proposes a welcome new interchange between HS2 and new Crossrail 1 services running east-west through Greater London, no provision is included for onward rail connections to the north or south, leaving a significant gap in local connectivity and with it undermining the effectiveness of Old Oak Common as a transport hub.
29. If the current proposals contained within the Bill were to be authorised, the closest London Overground station to Old Oak Common would be Willesden Junction. At over 1.5 kilometres the physical distance between the two stations is too significant to offer a feasible or attractive transport interchange between the new high speed railway and the London Overground network.
30. A new Overground station at Old Oak Common would address this deficiency, allowing passengers travelling on high speed services to interchange with the London Overground at Old Oak Common, with direct links to Clapham Junction, Richmond and stations on the North London Line. Delivery of the Overground station would bring an additional 250,000 people and 150,000 additional jobs within one hour's travel of Old Oak Common (and therefore HS2 services), making the new high speed railway far more accessible to northwest, west and southwest London, as well as to destinations on the South West mainline, towards Southampton and Portsmouth.
31. Secondly, the proposal would assist Old Oak Common high speed rail station to realise one of its key objectives, namely to provide an attractive alternative to London Euston as a gateway to the wider London area, thereby relieving congestion at London Euston. Strong local connectivity is essential if passengers are to choose to interchange at Old Oak

Common and the Bill in its current form fails to deliver this.

32. The Transport Assessment published as part of the Environmental Statement deposited with the Bill considered the benefits a connection with the London Overground at Old Oak Common would bring and the results are reported within sections 6.10.5 to 6.10.42 of that assessment. This clearly demonstrates that the inclusion of an Overground station would reduce pressure at London Euston, through the removal of around 4,000 passengers in the morning peak period, equivalent to nearly 10% of HS2 passenger traffic. This would help to alleviate the considerable pressures otherwise predicted to arise on the London Underground network at London Euston.
33. Thirdly, a new Overground station would help Old Oak Common to realise its potential as part of the wider Old Oak Opportunity Area, by providing the local transport links needed to support significant new development, thereby facilitating all of the benefits associated with that development. Studies commissioned by your Petitioner suggest that an additional 20,000 jobs can be facilitated in the Old Oak area with an additional Overground station in place. Moreover, the inclusion of the connection to the Overground network means that the site will not be solely reliant on the east-west Crossrail 1 connection as a means of rail access; the Overground offers direct north-south rail links to the site, adding much needed resilience to the transport network.
34. Fourthly, the Overground station at Old Oak Common would also deliver additional passenger journey time savings. Initial studies undertaken by your Petitioner suggest that as many as 1 million hours per annum could be saved by HS2 passengers. Even taking into account the maximum estimated costs of delivering a new Overground station at Old Oak Common, namely £500 million, these journey time saving could serve to improve the overall Benefit Cost Ratio ("BCR") of the HS2 Phase 1 proposals.
35. For all of the above reasons, your Petitioner respectfully submits that the Bill should not be allowed to pass into law until provision is included for a new Overground station at Old Oak Common.
36. Your Petitioner has already commissioned a detailed engineering study to identify a single preferred engineering solution for linking Old Oak Common station with the London Overground network and the results of this study are expected later this year, such that the physical works required to deliver the Overground station should be identified and ready for inclusion within additional provisions brought forward by the Promoter. By delivering these works as part of HS2 Phase 1, the associated costs and disruption to the rail network would be considerably lower than if a new Overground station were to be deferred until the construction of HS2 Phase 1 had been completed.
37. Your Petitioner is seeking an undertaking from the Promoter to work with your Petitioner to

develop and include the necessary provision for an Overground station at Old Oak Common as part of the additional provisions proposed to be introduced to the Bill in light of Sir David Higgins' recommendations in his 'HS2 Plus' report.

*Lack of provision for future WCML Connection*

38. Your Petitioner is concerned that the Bill fails to include any provision whatsoever for a much sought after new rail connection between the West Coast Main Line ("WCML") and the Crossrail 1 network. Your Petitioner submits that there is a compelling case for additional provisions to be added to the Bill to authorise certain enabling works, as part of HS2 Phase 1, thereby allowing the WCML connection to be delivered at a future date without disruption.
39. A new WCML – Crossrail 1 connection has been strongly advocated by a number of interested parties, including your Petitioner, as giving rise to a number of HS2 related and other benefits. It could allow passenger services which currently use the slow tracks on the WCML to travel into London Euston to instead connect with the Crossrail 1 network in the Willesden / Old Oak Common area. The effect of the connection would be the creation of two Crossrail 1 routes on the western side: the already planned Great Western Main Line ("GWML") route and a second WCML route, reflective of the position on the eastern side of the Crossrail 1 network.
40. The new WCML connection could enable stations as far north as Tring and Berkhamsted in the Chilterns to be served by the (extended) Crossrail 1 network, providing them with new direct routes to the West End, the City of London and Docklands. Trains could also serve Wembley Central station, with a link to Heathrow and to the West of England via Old Oak Common.
41. As is demonstrated by the findings of sections 6.10.5 to 6.10.42 of the Transport Assessment which forms part of the Environmental Statement published on deposit of the Bill, a WCML connection would substantially reduce the number of trains and passengers using London Euston, with resultant benefits to the capacity of that mainline station and the Northern and Victoria London Underground lines. Current estimates provided in Table 6.341 of the Transport Assessment suggest the connection could remove 30% of 'classic' (that is non-high speed) rail passengers arriving at London Euston.
42. Your Petitioner is currently undertaking further analysis of options for the proposed WCML connection but in meantime is seeking a commitment from the Promoter to deliver essential enabling works as part of HS2 Phase 1. The enabling works in question involve the construction of a dedicated grade separated junction on the GWML at Old Oak Common, which is currently estimated to cost in the region of £25 million. The reasons why this



investment and these works should be delivered as part of HS2 Phase 1 are explained below.

43. First, were the WCML connection (which, on the basis of studies undertaken to date, has a strong business case) to be delivered independently from the Scheduled Works proposed to be authorised by the Bill this would be likely to result in a longer period of disruption to services, with resultant impacts on passengers, in the Old Oak Common area, particularly on the GWML. This is because the Bill proposes changes to the GWML track layout to accommodate the new HS2 station. As a result, the site will become substantially more constrained than it is presently. It is therefore important to take the opportunity now to deliver the enabling works required. Otherwise, the construction of HS2 Phase 1 will make it much more difficult to construct the connection in future.
44. Secondly, delivering enabling works for the WCML connection as part of HS2 Phase 1 could result in significant financial savings when the costs of doing so are compared with the costs of carrying out those same works after HS2 services open in 2026. Returning to carry out the works at a later date would involve substantially more expensive works, due to the likely lengthy disruption to the GWML. As the Bill already proposes realigning the GWML to deliver a new Crossrail 1 station, there are huge economies of scale associated with undertaking now works that would enable, in future, the Crossrail 1 WCML connection.
45. For the above reasons and having regard to the wider benefits which the WCML connection would bring as identified in the HS2 Transport Assessment, your Petitioner respectfully submits that the Bill should be amended to include additional powers for a grade separated junction to be constructed on the GWML at Old Oak Common and further that the Promoter should provide an undertaking to deliver those works as part of HS2 Phase 1.

*Inadequate provision for vehicular access*

46. The Bill includes provision for vehicular access to Old Oak Common station, once operational, to be taken via a single route along Old Oak Common Lane, located to the west of the proposed new station. Your Petitioner is extremely concerned that this proposal will deliver inadequate vehicular access to a station which is proposed as a major new transport interchange, with resulting adverse impacts on not only the success of the station itself but also local bus services and the surrounding local highway network.
47. Old Oak Common Lane is a narrow highway with single lanes in each direction. The Transport Assessment which accompanied the Bill predicts that high volumes of traffic, more than 300 vehicles per hour during peak periods, will be accessing the station. Your Petitioner is concerned that Old Oak Common Lane lacks the capacity needed to accommodate the high volumes of traffic expected to utilise it.

48. The proposed access via a single route along Old Oak Common Lane will significantly limit the extent to which Old Oak Common station is accessible by bicycle. Your petitioner is concerned that this will fail to make best use of the station's potential to encourage an uptake in active travel, as desired in the Mayor's Transport Strategy and the Mayor's Vision for Cycling in London. The Mayor's Transport Strategy provides that cycling should account for approximately 5% of all journeys made across London by 2030.
49. Further and more significantly, your Petitioner is concerned that nearby junctions on the A40, namely Savoy Circus and Gypsy Corner, which are already operating close to capacity, will be unable to cope with the forecasted increase in traffic movements in consequence of HS2 Phase 1.
50. In addition, the proposed access route along Old Oak Common Lane will require local bus services to adopt sub-optimal routeing to and from the station because it will be necessary for buses to travel down a cul-de-sac in order to access the station before turning back, resulting in wasted mileage and substantial additional operating costs.
51. Your Petitioner submits that further access points are required to help distribute HS2 traffic associated with Old Oak Common across the highway network and to provide dedicated routes accessible to bicycles and pedestrians, to connect Old Oak Common station with the surrounding area.
52. To this end, your Petitioner has previously sought and continues to seek a commitment from the Promoter to deliver an additional vehicular access, with provision for use by pedestrians, cyclist, buses and taxis, to the east of Old Oak Common station connecting the station with Hythe Road by means of a new highway link over the Grand Union Canal.
53. The addition of a new highway link to Hythe Road is forecast to divert approximately one third of vehicular traffic seeking to access the station from the east, helping to distribute the HS2 traffic associated with Old Oak Common across the highway network and thereby relieving pressure on the congested A40 junctions and Old Oak Common Lane. It would also provide an important alternative emergency access to the station in the event Old Oak Common Lane was unavailable.
54. The proposed new eastern route would also provide the added benefit of acting as a catalyst for regeneration by providing a direct connection to 35 hectares of land to the north of the Grand Union Canal.
55. Unless and until additional provision is included for a second highway access to Old Oak Common station, your Petitioner considers the current proposals for vehicular access at Old Oak Common station to be wholly inadequate due to their adverse effect on the local highway network and opposes their authorisation pursuant to the Bill.

#### *Closure of Old Oak Common Lane*

56. The Bill also proposes extended closures of Old Oak Common Lane during the construction of HS2 Phase 1. More particularly, it is proposed to close this road for a period of 12 months, during which a 3.5 kilometre diversionary route is proposed for general traffic, pedestrians, cyclists and local bus services.
57. Your Petitioner is concerned that a 3.5 kilometre diversion for pedestrians and cyclists resulting from the closure of Old Oak Common Lane does not present an acceptable solution to mitigate the impact of the proposed closure. Your Petitioner is seeking an assurance from the Promoter to identify alternative, more direct pedestrian links between Acton and Old Oak Common, for instance through the provision of temporary footbridges under the GWML.
58. Similarly, your Petitioner is concerned that the impacts of diverting bus services at this location have not been fully considered by the Promoter. Bus stop relocations of over 400 metres represent significant extra walking distance for pedestrians, particularly the mobility impaired and elderly. Your Petitioner is seeking an assurance from the Promoter that full consideration will be given to the safety and security of bus passengers as they undertake a longer walk, including through the provision of an appropriate footway and lighting upgrades, where necessary.

#### *Inadequate provision for pedestrian access*

59. Your Petitioner is also concerned that the Bill proposals in their current form fail to make adequate provision for pedestrians at Old Oak Common.
60. Your Petitioner has requested that the Promoter provide a more direct pedestrian (and cycling) link between Old Oak Common and the London Underground station at North Acton. This will ensure that the new station at Old Oak Common is accessible to those living in the surrounding area. This link is essential if the station is to integrate effectively with other modes and support, so far as possible, the use of sustainable modes of travel. A pedestrian and cycling link to North Acton station would serve to reduce the distance between the two stations from in excess of 1,700 metres to 900 metres, and offer an alternative to pedestrians to the current (unattractive) option of travelling alongside very busy roads.

#### *Impacts on Crossrail 1 Depot*

61. As already mentioned, Old Oak Common is also the location of a new depot ("the Depot") to be constructed as part of your Petitioner's new Crossrail 1 network, the construction and operation of which was authorised by the Crossrail Act 2008. Crossrail 1 is a £15 billion project which will transform east-west travel across London when it fully opens in 2019. Crossrail 1 will provide an additional (and much needed) 10% to existing rail capacity in

central London.

62. On the basis of the information contained within the Bill and the proposed acquisition and use of land belonging to your Petitioner in this area (namely Land Parcel Nos. 46, 49, 50, 51, 65, 66 and 67 in the London Borough of Hammersmith & Fulham), your Petitioner is gravely concerned that HS2 Phase 1 construction activities at Old Oak Common will result in disruption to the new Depot, with resulting adverse impacts on passengers using the Crossrail 1 network.
63. First, sewer diversionary works (Work No. 1/39) are being proposed on the site of the Depot and your Petitioner is concerned these works will adversely affect construction of and, depending on the timing of those works, operations at the Depot.
64. Secondly, land take is also being proposed at the south west corner of the site which could affect power supply to the Depot, across the throat of the Depot which could affect access to it, and at the southern boundary which could affect maintenance access to the Depot. Further, temporary closures for HS2 construction activities would block secondary / emergency access to the Depot which is required by the London Fire and Emergency Planning Authority for emergency access and to carry out routine and emergency maintenance to the southern facade of the Crossrail 1 maintenance building. If this access road were to be closed, then the London Fire and Emergency Planning Authority might not issue a fire safety certificate which could frustrate the opening of the Depot.
65. Thirdly, proposed highway closures could serve to impede vehicular access to the Depot from Old Oak Common Lane.
66. Fourthly, works are proposed at the throat of the Depot in order to make changes to the layout of the railway track and signalling equipment. Your Petitioner is concerned these works could affect the functionality of the depot and the operation of Crossrail 1 services as a result.
67. Fifthly, your Petitioner is concerned more generally about works proposed to take place near the Depot to construct the new HS2 station, and in particular whether these may give rise to settlement of the surrounding land and adversely impact particularly sensitive operational assets, such as the wheel lathe which is directly adjacent to the station box.
68. The Depot, which will host seven maintenance tracks, one heavy clean track and one wheel conditioning track, is critical to the operation of the Crossrail 1 network. It is the only location at which light and heavy maintenance of the entire Crossrail 1 fleet of trains will be undertaken. It will also provide overnight stabling facilities for approximately half of the 65 strong Crossrail 1 fleet and accommodation for 230 train drivers. The unique facilities and layout of the Depot have been calculated with careful regard to the specific requirements of

the Crossrail 1 fleet and the services proposed to be run on the Crossrail 1 network, with capacity for trains to enter service at the start of each day, to exit service at the end of each day and for every train to be externally washed every 48 hours.

69. Access to the Depot is absolutely critical to achieving the performance levels set for the Crossrail 1 fleet of trains. Failure to achieve those performance levels would have operational consequences, resulting in significant disruption being caused to passengers of the new Crossrail 1 network.
70. In the absence of more detailed information which addresses your Petitioner's above stated concerns, your Petitioner is seeking an undertaking from the Promoter that HS2 Phase 1 construction activities at Old Oak Common will be scheduled in order to avoid disruption to the Crossrail 1 Depot and access to it.
71. Unless and until such an assurance is given, or further information is provided which serves to allay your Petitioner's concerns about the impact of works proposed to be authorised by the Bill on the Depot, your Petitioner submits that the Bill should not be allowed to pass into law due to the potentially adverse effects on the new Crossrail 1 network.
72. Finally, your Petitioner submits that an enhanced western rail access to the Depot is now required, together with access to a carriage washer machine, because HS2 Phase 1 will fundamentally change the Crossrail 1 service pattern and as a consequence the activities that take place at the Depot. When HS2 Phase 1 opens, a number of Crossrail 1 trains will start to enter or exit service at Old Oak Common station (rather than turn back at Paddington as will be the case when Crossrail 1 opens in 2018) and as a result it will be difficult to access the Depot, which will be located slightly to the west of Old Oak Common station, due to conflicting train movements on the GWML.

#### *UNACCEPTABLE ADVERSE IMPACTS AT LONDON EUSTON*

73. The Bill in its current form includes provision for the reconfiguration and enlargement of Euston Mainline Station and London Underground Euston Station ("London Euston").
74. Over 160,000 journeys are made through London Underground Euston Station every day. The station is served by three Underground lines; the Victoria line and both the City and Charing Cross branches of the Northern line with Euston Square Underground Station, being only a short walking distance away, providing further options for passengers using the Metropolitan, Circle and Hammersmith and City lines. For passengers arriving into Euston Mainline Station in the morning peak, London Underground accounts for approximately sixty percent of all onward travel. The Underground station is also a strategically important station for passengers interchanging between Underground lines continuing their journeys both into the City, via the Northern line, and to the West End, via the Victoria line.

75. Over seventy percent of all HS2 journeys are estimated to start or end in London, giving rise to a more than doubling of passengers at London Euston during the peak periods. Having regard to current constraints at London Euston, if additional passenger numbers of the level predicted to be generated by HS2 are to be safely accommodated, existing local transport facilities must not be compromised and significant improvements are required. Your Petitioner submits that the Bill proposals are woefully inadequate in this respect.
76. More particularly, your Petitioner is concerned that the Bill in its current form fails to include sufficient provision at London Euston for:
- 76.1 the safe and continued operation of London Underground services;
  - 76.2 the onward dispersal of passengers on foot;
  - 76.3 the safe and continued operation of London Overground services; and
  - 76.4 mitigation of adverse impacts on the local road network.
77. Unless and until adequate provision is made at London Euston to address the above matters, journey time savings proposed to be enjoyed by HS2 passengers travelling on high speed trains from destinations in the north will be lost if those same passengers then suffer lengthy delays as they seek to travel onwards from London Euston on London Underground services or via other local transport facilities.
78. Your Petitioner acknowledges and welcomes the recommendations contained within Sir David Higgins' 'HS2 Plus' report for the Bill proposals at London Euston. The report acknowledged that the geography, layout and context of London Euston make it a particularly difficult site but recognised nonetheless that an alternative proposal than that contained within the Bill could better connect the station to the local area. Your Petitioner supports the conclusions of the 'HS2 Plus' report as regards London Euston and welcomes the Promoter's confirmation that revised proposals will be brought forward. Your Petitioner submits that it is imperative that those proposals address the above deficiencies.
79. Your Petitioner respectfully submits that the changes it is seeking to the proposals at London Euston will help deliver the changes that were recommended by Sir David Higgins. More particularly, your Petitioner is seeking an undertaking from the Promoter that they will work with your Petitioner to ensure that the revised proposals for London Euston deliver much needed improvements to local transport facilities and mitigate the adverse impacts otherwise predicted to arise to existing facilities, thereby enabling the additional demand to be generated by HS2 to be accommodated and ensuring the future success of the station.

#### *Protection for the London Underground*

80. Your Petitioner is concerned that the Bill in its current form fails to include adequate

protection for existing London Underground services operating at London Euston. Your Petitioner is seeking an assurance from the Promoter that any revised proposals for London Euston will address the matters explained below.

81. The Bill proposals would involve works being undertaken to the London Underground station at Euston in order to improve vertical circulation through the provision of additional escalators and lifts to platforms. A new passenger concourse is also proposed to be constructed.
82. Your Petitioner has three principal concerns as regards the proposals.
83. First, your Petitioner has serious concerns as regards the operability of London Euston station during construction of HS2, having regard to the current construction phasing plans.
84. Currently, the Bill proposes that works be carried out to the London Underground station between 2020 and 2021, at the same time as works being carried out to the railway concourse at Euston Mainline station.
85. Carrying out both works at the same time would significantly constrain the areas available to passengers and should be avoided, having regard to passenger safety and congestion levels. Your Petitioner submits that works to the Underground station should be brought forward to the front end of the HS2 works programme at Euston, thereby enabling the additional escalators and lifts proposed to be installed before the disruption that is forecast to arise when HS2 tracks and concourse works are undertaken within Euston Mainline station.
86. Your Petitioner respectfully requests that the Promoter be required to undertake further detailed work to develop a revised construction phasing and methodology in order to avoid, failing which to minimise, impacts on the operation of the London Underground and consequently the Network Rail concourse.
87. Secondly, your Petitioner requires clearer understanding of how and when operational assets will be affected and / or relocated in order that operational impacts can be mitigated. For instance, it is proposed that the existing substation on the corner of Drummond Street and Melton Street shall be relocated to Stephenson Way, to make room for the new HS2 platforms. This will have significant operational effects on London Underground lines if an inadequate changeover period is not catered for.
88. Thirdly, the works proposed to the London Underground in order to provide improved access to the platforms may result in operational restrictions being imposed on the use of the platforms, including possible temporary closures.

89. The Promoter is proposing a series of closures that would require London Underground services to run through London Euston without stopping, for periods as long as 5 months in some cases.
90. Non-stopping services are particularly undesirable as they would lead to nearly half of the passengers who would ordinarily interchange at London Euston (around 20,000 passengers in the morning peak) facing severe disruption. In order to access the station, it would be necessary for passengers to alight at and walk from Warren Street or Kings Cross London Underground stations, with resulting longer journey times and pedestrian congestion at street level. Non-stopping services also increase crowding on the remaining transport network in the Euston area. For example, the morning peak on the southbound Victoria line between Euston and Warren Street is already one of the busiest sections of the Underground network and non-stopping services would further exacerbate this.
91. Your Petitioner does not share the Promoter's view that such closures are necessary and considers that these works can be carried out with far less impact on your Petitioner's operations. Your Petitioner is concerned that the Promoter has focussed too heavily on the cost and programme implications of works at London Euston without adequate consideration of the level of disruption that will occur if the works are carried out as proposed. Sufficient work has not been undertaken to assess the impact of the proposed closures, not only on the operation of London Euston, given the implications for access to and egress from the station, but also on the remainder of the London Underground network, as passengers seek to interchange elsewhere.
92. Your Petitioner has offered the Promoter less intrusive solutions for works at London Euston on several occasions but an acceptable solution has yet to be agreed. Your Petitioner is seeking an assurance from the Promoter that it will work with your Petitioner to develop proposals which will not give rise to such significant effects on the operation of London Underground services at London Euston.

*Inadequate provision for the onward dispersal of passengers*

93. The HS2 proposals will result in a significant increase in the number of rail passengers arriving at London Euston station; by Phase 2 of the project, it is predicted that around 200,000 rail passengers per day will arrive at the station, as compared to current passengers levels of approximately 80,000 each day, of which approximately twenty per cent will continue their journey on foot. Consequently, HS2 will result in a significant increase in the number of persons seeking to use local pedestrian crossings and routes to continue their journeys.
94. The principal desire lines for pedestrians leaving London Euston are as follows:
- 94.1 south across Euston Road and along streets such as Upper Woburn Place and



Gordon Street to access jobs and attractions in the Holborn, Bloomsbury and the West End areas;

94.2 east across Eversholt Street and along Phoenix Road / Brill Place and Euston Road to access Kings Cross and St Pancras stations; and

94.3 west across New Coburg Street and along Drummond Street and Euston Road to access jobs around Warren Street.

95. Many of the existing pedestrian routes around London Euston are already operating at or above capacity. In some areas, footways are physically constrained leaving limited room for pedestrian movements. Having regard to the increase in pedestrian movements predicted to arise as a consequence of HS2, your Petitioner is concerned that the existing pedestrian routes around London Euston will not be able to safely accommodate the additional passenger movements predicted to arise in consequence of HS2. Your Petitioner submits that the proposals contained within the Bill to address this are inadequate.
96. In the Hybrid Bill Transport Assessment, it provides that a single new pedestrian subway proposed as part of the HS2 Phase 1 proposals, to be constructed beneath Euston Road at the junction with Gordon Street, will serve to reduce the number of rail passengers seeking to cross Euston Road at surface level by 50 per cent.
97. Your Petitioner welcomes the provision of an additional route for pedestrians seeking to cross Euston Road but is not persuaded that the proposed subway will divert as many rail passengers from crossing at surface level as has been predicted in the HS2 Transport Assessment for a number of reasons.
98. First, the proposed alignment of the subway does not align with the key pedestrian desire line between Euston station and the Russell Square/Holborn area. Using the subway would involve longer walking distances (up to 400m) and journey times and as such, passengers would be dis-incentivised to use it.
99. Secondly, the primary reason for constructing the subway beneath Euston Road is to facilitate greatly improved interchange between Euston Station and Euston Square station and relieve the heavily used Victoria and Northern City branch lines by offering a quick journey to the city via the Metropolitan line. Most of the limited capacity of the 3m wide subway will be taken-up by interchanging passengers. The subway is unlikely to be able to physically accommodate, or meet its prime objective, if the large number of 'surface-exiting' passengers that the Transport Assessment predicts will utilise it. Your Petitioner is concerned that, under the current proposals for which authorisation is sought through the Bill, surface at-grade crossings across Euston Road will still be considerably more heavily used than they would otherwise be.

100. Your Petitioner is seeking a commitment from the Promoter to undertake further work to ascertain whether pedestrian movements predicted to occur at street level at London Euston can be safely accommodated, failing which additional routes must be provided for pedestrians.

*Protection for the London Overground*

101. Your Petitioner is also concerned that the works proposed to be undertaken to Euston Mainline Station will result in substantial adverse impacts on the operation of London Overground services which presently operate there.
102. As already mentioned in this petition, LOROL, under the management of your Petitioner, currently operate the London Overground concession which includes services from Watford Junction to London Euston, calling at all stations between the two. The service operates at three trains per hour throughout the day, seven days per week, approximately between the hours of 05.00 to 00.45. There are a series of Empty Coaching Stock moves outside of these hours to bring and return rolling stock from their overnight stabling locations.
103. London Overground services operate on Network Rail infrastructure and interweave with London Underground Bakerloo line services from Queen's Park to Harrow & Wealdstone. From 2017, the Metropolitan line will be extended to Watford Junction following completion of the Croxley Link and will share platforms with London Overground services.
104. Over ten per cent of rail passengers currently using London Euston do so via London Overground services. This equates to over 4 million passengers per annum.
105. More particularly, your Petitioner is concerned that:
- 105.1 Overground services face a significant performance risk during the construction of HS2 as within the Mainline station it is proposed to reduce the number of platforms available from 18 to 13 for a lengthy period of time, possibly as long as 8 years. It is also proposed to reduce the number of approach tracks from 6 to 4. This proposed reduction in mainline rail facilities will have consequent impacts on other stations along the WCML on the approach into London Euston;
- 105.2 platforms served by London Overground during the construction of HS2 will not be 'revenue protected' for up to 8 years, which will increase the risk of fare evasion and could have negative consequences for the safety of passengers;
- 105.3 the Primrose Hill location currently proposed for the traction changeover on the approach to London Euston is not considered fit for purpose and your Petitioner would prefer to see this relocated to South Hampstead station;
- 105.4 proposals have yet to be brought forward to confirm where the nine Overground

trains currently stabled at London Euston will be relocated to during construction of HS2;

105.5 the interchange between Overground and Underground services at London Euston will be adversely affected by the relocation of Overground services to lower numbered platforms; and

105.6 in the worst case scenario, Overground services and associated staff welfare facilities which are at London Euston might be diverted away from London Euston altogether.

106. There are other interfaces between the works proposed within the Bill and your Petitioner's Overground services which require further consideration.
107. Your Petitioner submits that the Bill proposals require further work in order to satisfactorily mitigate impacts on London Overground services. More particularly, your Petitioner requires an unconditional assurance from the Promoter that London Overground services may continue to operate from London Euston notwithstanding the construction and operation of HS2 and further that any changes proposed to the operation of London Overground services at or into London Euston must be agreed with your Petitioner before taking effect.
108. Demand for London Overground services has tripled over the past seven years since your Petitioner took over the operation of the former Silverlink franchise, and is forecast to increase a further 70 per cent over the next decade. To accommodate this expected growth, your Petitioner has recently invited bidders to submit tenders to supply additional rolling stock. Your Petitioner is also developing locations to stable this rolling stock while it is not in service.
109. Your Petitioner is concerned that the Bill includes proposals for a satellite compound at Willesden 'F' sidings to support construction activities at London Euston, which will adversely impact your Petitioner's ability to deliver this capacity upgrade. Your Petitioner is seeking a commitment from the Bill Promoter to work with it in order to accommodate this requirement.

#### *Impacts on the surrounding road network*

110. Your Petitioner understands that the construction of the Scheduled Works for which provision is made in the Bill will necessarily result in adverse impacts on the road network for which it is responsible, the TLRN referred to earlier in this petition. However, your Petitioner is concerned that the Bill in its current form does not include sufficient provision to mitigate impacts which might otherwise arise to the road network.
111. Your Petitioner has a number of concerns as regards the effects of the proposal on London's roads.

112. Most notably, the Bill includes provision, during the construction of HS2 Phase 1, for the reduction of Euston Road in the London Borough of Camden from three lanes to two lanes, for a period as long as 6 years. Your Petitioner is concerned about the effect of this proposal on the Inner ring road and the wider road network, particularly having regard to other major works taking place in the area. Your Petitioner is concerned that the proposals will adversely affect its ability to carry out its network management duties under section 16 of the Traffic Management Act 2004.
113. Your Petitioner respectfully submits that the Promoter must revise its proposals so far as Euston Road is concerned in order to reduce disruption and is seeking a commitment from the Promoter that Euston Road will remain open throughout the construction of HS2 Phase 1. Your Petitioner is seeking a further commitment from the Promoter to work with your Petitioner in devising a revised solution at Euston Road.
114. More generally, your Petitioner is concerned about the overall effects of the HS2 Phase 1 proposals on its highway network in the vicinity of London Euston and on users of that network. This is because sufficient transport modelling has yet to be undertaken. Your Petitioner is seeking a commitment from the Promoter to undertake additional transport modelling, in consultation with your Petitioner, to ensure that road traffic impacts can be appropriately managed.

#### *SPECIFIC ADVERSE IMPACTS ON LONDON'S PUBLIC TRANSPORT*

115. Your Petitioner is also concerned that the proposals contained within the Bill will give rise to unacceptable impacts on certain of its transport operations in London. Your Petitioner fully appreciates that the construction of a project of the scale of HS2 Phase 1 will necessarily give rise to a certain degree of disruption if it is to proceed.
116. Your Petitioner has been in discussions with the Promoter for some time as regards a protective provisions agreement to mitigate the impact of the HS2 Phase 1 proposals on public transport in London. Generally speaking, your Petitioner is confident that the protective provisions that are close to being agreed with the Promoter will provide sufficient protection for London's public transport. However, certain aspects of the proposals contained within the Bill have been identified by your Petitioner as giving rise to unacceptable disruption which is capable of being, and indeed ought to be, avoided. In such cases, your Petitioner cannot rely on general protective measures which will operate during the detailed design of the Scheduled Works proposed to be authorised under the Bill but instead is seeking amendments now to ensure those Works are appropriately modified before the Bill is allowed to pass into law.
117. Each of your Petitioner's three specific concerns in this regard are explained in turn below.

### *Impacts on Ruislip Depot*

118. Work No. 1/60 of the Scheduled Works for which authorisation is being sought pursuant to the Bill includes provision for the permanent removal of existing railway sidings, 300 metres in length at West Ruislip Station in the London Borough of Hillingdon. Removal of these two existing sidings, which belong to Network Rail, is proposed in order to support the construction of a tunnel portal at West Ruislip.
119. The two sidings proposed to be removed currently support train movements to and from your Petitioner's subsidiary company London Underground Limited's Ruislip Depot which is located between Ruislip Gardens and West Ruislip stations.
120. The Ruislip Depot is the only depot supporting London Underground's track renewal programme and as such it is fundamental to the safe and efficient maintenance and operation of the London Underground network. Without the ability to stable maintenance trains in these sidings, trains would have to travel further to reach the London Underground network. The effect of this would be to prejudice the delivery of London Underground's infrastructure renewal programme which is likely to lead to disruption to passengers using the London Underground network.
121. The sidings proposed to be removed support delivery of new London Underground rolling stock to the network. These sidings are also used to bring heavy materials and longer rails onto the network. For instance, they are presently being used to support the delivery of London Underground's 'S Stock', a fleet of subsurface rolling stock utilised on several lines of the network.
122. Your Petitioner is concerned that the removal of these two sidings, as is proposed within the Bill, will adversely affect the delivery of essential maintenance and improvements to the London Underground network, with consequent disruption to passengers.
123. Your Petitioner has been engaged in discussions with HS2 Limited as regards options to mitigate the impact of removal of the sidings on operations at the Ruislip Depot but a solution has yet to be identified which addresses your Petitioner's concerns.
124. It is proposed that your Petitioner should utilise tracks at West Ruislip Station in place of the two sidings proposed to be used. Limited passenger services are currently operated by Chiltern trains at West Ruislip Station. However, there are future aspirations to significantly increase the frequency of passenger services at West Ruislip Station. Whilst the Mayor is fully supportive of increasing passenger services at London stations, this means that any opportunity for London Underground to utilise track infrastructure at West Ruislip Station is likely to be significantly reduced in future. Your Petitioner is therefore very concerned that the alternative facilities being proposed by the Promoter in substitution for the two sidings to be lost are inadequate.

125. Your Petitioner is seeking an assurance from the Promoter that, notwithstanding the construction of the Scheduled Works, alternative access from Network Rail's network to the London Underground network via Ruislip depot should replicate current functionality and allow trains to enter from either the London or the Country end without disrupting National Rail operations and increasing London Underground's costs. Your Petitioner is also seeking an assurance that a future increase in passenger services at West Ruislip Station will not be precluded in consequence of the Scheduled Works.
126. Unless and until such assurances are given by the Promoter, your Petitioner opposes the inclusion of Work No. 1/60 within the Bill for the reasons hereinbefore appearing.

*Impacts on London Underground's Central Line at Greenpark Way*

127. Work No 1/1 of the Scheduled Works for which authorisation is being sought pursuant to the Bill includes provision for a ventilation and intervention shaft to be constructed within land parcels 784 and 785 at Greenpark Way in the London Borough of Ealing. The vent shaft is proposed to be constructed on vacant land on the northern side of London Underground's Central line railway, approximately 500 metres east of Greenford Underground station. Land parcels 784 and 785 are also proposed to be used during construction of the Scheduled Works as the location from which four tunnel boring machines are to emerge from the ground following the excavation of the Northolt tunnel.
128. In connection with the use of the Greenpark Way site for this purpose, the Bill includes provision, in the form of Work No. 1/54, for the temporary realignment of Network Rail's existing Wycombe Single line along a distance of approximately 0.81 kilometres. The Wycombe Single line is located on the site of the proposed ventilation shaft and is currently used by freight services and two passenger trains per day.
129. To facilitate Work No. 1/54, the Bill would grant powers for the acquisition of land parcel 782 which belongs to your Petitioner's subsidiary company London Underground Limited. Land Parcel 782 comprises part of the embankment serving London Underground's Central Line railway.
130. At this location, the Promoter intends to temporarily realign the Wycombe Single line in a southerly direction, towards the Central Line railway during the construction of the Scheduled Works and, although your Petitioner is unclear as to the longer term intention of the Promoter, it is presumed that the Wycombe Single line will ultimately be reinstated in its original location.
131. In order to deliver the proposed temporary realignment of the Wycombe Single railway, the Promoter is proposing to cut into the existing Central Line railway embankment. Having regard to the level of information provided, your Petitioner remains unclear as to the Promoter's intentions as regards these works to the railway embankment but understands

that the Promoter intends to construct a retaining wall adjacent to the Central Line railway at a location between Greenford and Perivale stations.

132. Your Petitioner has grave concerns about the impact of Work No. 1/54 on the integrity of the existing embankment which supports its Central Line railway and the likely need for temporary closure of the Central Line railway for a period of around 8 weeks. Your Petitioner is concerned that it will not be possible to cut into the railway embankment without requiring a closure of the Central Line. Similarly, any new retaining wall would require construction of substantial structure and your Petitioner is concerned that this too will necessitate a lengthy closure of the Central Line, or possibly even diversion of that line. Your Petitioner is strongly opposed to any closure of London Underground's Central Line railway in this location.
133. The Central Line is one of the busiest lines on the London Underground network with approximately 900,000 passengers boarding every weekday. The impact of a closure of the West Ruislip branch would not only affect that branch line; it would have a consequent effect on the remainder of the Line. A prolonged closure of the branch line would result in a reduction of available train stabling facilities, as the West Ruislip depot would not be accessible during any such closure. This would serve to reduce the frequency of Central Line trains travelling through Central London, from the current frequency of 33 trains per hour at peak times to 30 trains per hour, resulting in congestion across the entire Line.
134. Your Petitioner submits that such a closure of the Central Line could be avoided. An alternative means of mitigating the impact of the Greenpark Way extraction site on the nearby Wycombe Single line would be for the small number of passenger and freight services which operate on that line to be accommodated on the nearby Greenford branch line, allowing a temporary closure of the existing Wycombe Single line until the Scheduled Works at Greenpark Way have completed.
135. Your Petitioner submits that the Greenford branch line would provide an appropriate diversionary route. It is currently used by one passenger trains per weekday (per direction) during both peak and off-peak periods. Having regard to the level of passenger and freight traffic on the Wycombe Single line, your Petitioner submits that there is sufficient capacity on the Greenford branch line to accommodate this traffic were it to be diverted there on a temporary basis. Trains could re-join the Wycombe Single line at Greenford East junction, to the east of the proposed extraction site at Greenpark Way. This alternative proposal would provide a satisfactory diversionary route whilst avoiding the need to temporarily realign the Wycombe Single line and any resulting impacts on the safe and continued operation of London Underground's Central Line. In addition, rail services currently using the Wycombe Single line are likely to be diverted east of Greenford station as the Wycombe Single line in the longer term as that line will be permanently disconnected at Old Oak Common once HS2 works commence there.

136. Your Petitioner submits (for the reasons hereinbefore stated) that Work No. 1/54 is not necessary and should be removed from the Bill. Similarly, the proposed acquisition (or indeed any use) of land parcel no 782 is not necessary. Your Petitioner seeks an assurance from the Promoter to adopt an alternative solution for the mitigation of impacts on the Wycombe Single line and to remove Work No. 1/54 and land parcel 782 from the scope of the Bill.
137. Your Petitioner also seeks an assurance from the Promoter that he will take all reasonable measures to avoid any disruption to or closure of London Underground's Central Line railway during the construction of the Scheduled Works, and in particular works at Greenpark Way in connection with the extraction of tunnel boring machines.

*General mitigation of construction impacts*

138. Your Petitioner is concerned that the proposals contained within the Bill do not generally include adequate provision for the mitigation of impacts which will arise during construction of the Scheduled Works in a number of respects. This concern is compounded by the lack of modelling information that has been provided by the Promoter as the full extent of construction impacts remains unclear.
139. First, your Petitioner is concerned as regards construction traffic impacts on London's road network. In particular, your Petitioner is concerned as regards the volume of construction traffic predicted to arise, the locations proposed for construction compounds and the proposed accesses and routes to and from those compounds. Your Petitioner is seeking specific assurances from the Promoter that construction impacts on the road network will be minimised so far as reasonably possible and more particularly that:

139.1 Euston Road shall be kept open at all times during construction and that any impact on capacity shall be kept to an absolute minimum at all times;

139.2 the Promoter shall support and implement local policies during construction to mitigate impacts from construction traffic, for example HS2 contractors must sign up to the Safe Cycling scheme, to ensure cyclists are fully protected;

139.3 all contractors appointed for or in connection with the construction of the works proposed to be authorised by the Bill have:

- (a) at least bronze membership of the Fleet Operator Recognition Scheme ("FORS"), an accredited scheme that aims to improve fleet activity in London;
- (b) fit safety equipment to vehicles (Side Guards, Close Proximity Mirror, Class VI mirror) and display prominent safety signage to warn cyclists;
- (c) undertake Driver Licence Checks;



- (d) undertake Approved Driver Training; and
- (e) complete collision reporting and FORS Reporting.

140. Secondly, your Petitioner is concerned that the Promoter has, contrary to relevant policy, (for instance proposal 38 of the Mayor's Transport Strategy and policy 7.30 of the London Plan) assumed that construction and other materials will be transported by road and failed to give adequate consideration for transportation by rail, canal or river. Further work is required in this regard and your Petitioner is seeking assurances from the Promoter to give consideration to options to reduce construction traffic on London's roads.
141. Thirdly, the draft Code of Construction Practice ("CoCP") which has been produced by the Promoter fails in a number of respects to follow best practice being used on other major railway projects, such as Crossrail 1, or make adequate provision for the control and mitigation of construction impacts. In particular, your Petitioner is concerned that the CoCP does not adequately commit the Promoter to seek to minimise use of the road network for the movement of construction workers and materials, to employ the use of safer construction vehicles or to adequately mitigate air quality and noise and vibration impacts arising from construction at three major construction worksites, namely London Euston, Old Oak Common and West Ruislip. Your Petitioner submits that further measures can and should be committed to in order to avoid, failing which to reduce, these impacts.
142. Your Petitioner is seeking an assurance from the Promoter that the final terms of the CoCP will include more rigorous proposals as regards:
- 142.1 the measures to be taken in order to minimise the quantity of construction traffic using the road network, including wherever possible through the delivery and removal of construction materials and material excavated during tunnelling works by rail or river;
  - 142.2 the selection of safer construction vehicles; and
  - 142.3 the application of strict noise and vibration and air quality mechanisms and other measures.
143. Your Petitioner further submits that the final terms of the CoCP should be agreed with your Petitioner and the relevant local authorities and is seeking a commitment from the Promoter to so agree its terms.

#### *FAILURE TO INCLUDE ADEQUATE PROVISION FOR HS1 LINK*

144. Work No. 1/20 of the Scheduled Works contained within the Bill as deposited included a stretch of railway within the London Borough of Camden designed to link the new HS2 railway with the existing high speed railway between London St Pancras and the Channel Tunnel in Kent ("HS1"). This link would have comprised a single track railway which would

run partly in tunnel and partly on existing connected railway viaducts (the existing HS1 Viaduct, the North London Line ("NLL") Viaduct, the Kentish Town Viaduct and the Chalk Farm Viaduct) that, with the exception of the HS1 Viaduct, serve the London Overground and freight services.

145. Whilst your Petitioner is supportive of the creation of a direct rail link between the proposed HS2 and existing HS1 railways, your Petitioner strongly opposed the link originally contained within the Bill due to the unacceptable effects it would have given rise to on existing transport infrastructure and the planned upgrade of Camden Town Underground station as well as the significant constraint it would have created on high speed services between HS2 and HS1.
146. In light of the above concerns, your Petitioner supports the conclusions contained within Sir David Higgins 'HS2 Plus' report of 17 March 2014 and welcomes the Promoter's confirmation that the Scheduled Works which would have delivered the link will be removed from the Bill.
147. However, your Petitioner is extremely concerned that, following the removal of the current proposals, the HS2 Phase 1 Bill will fail to include any provision whatsoever for a link to be provided now, or in the future, between HS2 and HS1.
148. Your Petitioner considers there to be a number of benefits associated with the future provision of a fully segregated tunnelled link between HS1 Phase 2 and HS1. Without such a link, high speed rail passengers wishing to travel beyond London would require to disembark at London Euston before travelling on foot or otherwise to Kings Cross St Pancras in order to board high speed trains travelling to destinations in continental Europe. Similarly, high speed rail passengers seeking to travel to and from destinations in east London or to destinations south east of the City, would have to interchange at London Euston. Increased passenger numbers at London Euston would further exacerbate your Petitioner's concerns about the capacity of London Euston to accommodate HS2 passengers. No evidence has yet been produced by the Promoter to demonstrate the effect removal of the link might have on passenger movements at London Euston, or indeed of the impact on local pedestrian routes. If passengers are to interchange at London Euston, this would also add considerable time and inconvenience to HS2 passengers, thereby reducing the benefits of the HS2 proposals.
149. In light of the benefits that would arise from a connection between the two high speed railways (which include helping to address your Petitioner's concerns about the number of HS2 passengers seeking to interchange at London Euston) and for the reasons explained below, your Petitioner submits that the Bill ought to include passive provision now for a tunnelled link with HS1 to be developed and constructed in the future.

150. If the Bill is not amended to include passive provision for a tunnelled link, this could serve to significantly prejudice the delivery of a tunnelled link with HS1 (and all of the benefits associated with it) in the future. This is because it would be extremely difficult to retro-fit such a link with HS2 for two key reasons.
151. First, it would be significantly more expensive to undertake subsequent engineering works to build a new link to the HS2 Phase 1 tunnels after those tunnels have themselves been constructed. It would be far cheaper and simpler to include provision for a future link during the original HS2 tunnelling works. Secondly, once HS2 Phase 1 has opened for public use, any works to the HS2 tunnels to create a tunnelled link to HS1 would be likely to give rise to disruption to the running of high speed trains, with consequent disruption to high speed rail passengers. As such, a failure to deliver passive provision now could effectively serve to frustrate the future delivery of a tunnelled link with HS1.
152. A physically segregated tunnelled link is essential as it would not only minimise any negative impacts on the conventional rail network but also provide sufficient capacity and flexibility to meet the longer term needs of the UK, including non-Central London domestic trips and any recommendations from the Davis Commission on future airport strategy.
153. It is therefore imperative that the opportunity is taken now to provide a tunnel portal that would enable the future development of a tunnelled link with HS1 and your Petitioner submits that the Bill should not be allowed to pass into law unless and until this omission has been addressed.
154. Your Petitioner is seeking an assurance from the Promoter that appropriate passive provision, in the form of the construction of a tunnel portal in the Old Oak Common Area, should be included within Additional Provisions brought forward in respect of the Bill.
155. Your Petitioner seeks a further assurance that the Promoter and HS2 Limited will fully engage with your Petitioner in developing longer term solutions for better connections to HS2 in the future which will not give rise to adverse effects on existing and planned transport infrastructure.

## *CONCLUSION*

156. Your Petitioner submits that the Bill fails to safeguard and protect and so injuriously affects the interests of Your Petitioner and should not be allowed to pass into law without these issues being addressed.
157. For the foregoing and connected reasons your Petitioner respectfully submits that unless the Bill is amended as proposed above, so far as affecting your Petitioner, the Bill should not be allowed to pass into law.

158. Further, there are other clauses and provisions of the Bill which, if passed into law as they now stand, will injuriously affect your Petitioner and its rights, interests and property and for which no adequate provision is made to protect your Petitioner.
159. YOUR PETITIONER THEREFORE HUMBLY PRAYS your Honourable House that the Bill may not be allowed to pass into law as it now stands and your Petitioner may be heard by its Counsel, Agents and witnesses in support of the allegations of this Petition against so much of the Bill as affects the property, rights and interests of your Petitioner and in support of such other clauses and provisions as may be necessary or expedient for your Petitioner's protection, or that such other relief may be given to your Petitioner as your Honourable House shall deem meet.

AND YOUR PETITIONER WILL EVER PRAY, &C.

Pinsent Masons LLP

PINSENT MASONS LLP  
Parliamentary Agents

IN PARLIAMENT  
HOUSE OF COMMONS  
SESSION 2013-14

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

PETITION  
of  
**TRANSPORT for LONDON**

Against, the Bill – On Merits –

Praying to be heard by Counsel, &c.

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