

RESPONSE to CONSULTATION

on the

LONDON-WEST MIDLANDS

ENVIRONMENTAL STATEMENT

CF1 Euston Station and Approach

from

Amphill Square Estate Tenants and Residents

Association

February 26, 2014

Amphill Square Estate in context

Amphill Square Estate is an island site and is bounded by the railway cutting out of Euston which forms its western boundary; Harrington Square (part of the Red Route) lies to the North; Eversholt Street to the east and Barnby Street, situated immediately north of Euston Station, to the south.

The estate is owned by the London Borough of Camden. The majority of residents are council tenants. Approximately 20% are LBC leaseholders who have exercised their right to buy a long lease on their properties. A small number of these leasehold properties are let to private tenants by absentee landlords.

Over recent years LBC has invested over £20 million on major regeneration which was completed some 5 years ago on Amphill. In response to local circumstances and in line with residents' priorities, a significant proportion of that investment was used to provide a comprehensive security system. This included improved external lighting, perimeter fencing with fob and remote access via multiple access control gates to all residential block. CCTV was also installed to deter crime and antisocial behaviour and protect residents.

For some dozen years prior to the extensive regeneration, Amphill, in part due to its geographical location together with multiple entrance/exit points, had been a magnet for antisocial behaviour. This included groups of alcoholics congregating in the grounds and drug users and dealers effectively operating a significant drug market from the estate. Amphill was also viewed as a 'battle ground' for opposing gangs some coming from outside the borough. Much of this antisocial behaviour was not confined to the grounds but took place within the blocks themselves, with rough-sleeping particularly the three tower blocks. This was facilitated as the entry system was unable to act as a significant deterrent to unauthorised access. The whole estate had the feel of an 'urban jungle' with large concreted areas and poorly maintained green areas. The regeneration also included a landscaped environment which has recently matured and now provides a delightful setting for our homes. Together these improvements have transformed the quality of life of everyone living on Amphill.

HS2 impacts on Ampthill

Combines adverse impacts from the construction of HS2 are as follows:

- Geographical proximity to Euston station and railway cutting
- Proximity to major works due to replacement and extension of the A400 Hampstead Road Bridge
- Siting of a large works construction compound
- Diversions of multiple utilities through the estate
- Installation of ground anchors
- Proximity of demolition works to the Royal Mail Delivery premises on Barnby Street

Ampthill Square residents will suffer multiple adverse impacts for at least a decade simply due to its location and proximity to Euston Station.

In response to a letter seeking information and written to Roger Hargreaves, Laura Wise of HS2 Ltd replied stating that HS2 Ltd

‘..... are aware that the Ampthill Estate will be affected by proposed HS2 works which are the temporary diversion of utilities through the Estate, installation of ground anchors, the Hampstead Road Bridge works and the associate works compound. These have been assessed to occur between 2016-2922’

‘There are sound, noise and vibration, air quality, cultural heritage, landscape and visual and traffic and transport effects as a result of the proposed works on the Ampthill Estate’

Although acknowledged in the ES it is of note,

- no mention in this letter was made of the adverse impacts of HGV routes around the estate nor demolition, excavation and construction within the and close to the railway cutting and the station itself
- no mention is made of the impacts from demolition of the Royal Mail Delivery and works associated with the construction of the pedestrian/cyclist bridge over the railway

A400 Hampstead Road Overbridge (S) Satellite Compound

The area designated for this site compound has been considerably extended since the draft ES both further along the length of the Ampthill estate boundary and extending further into the estate. It now covers approximately one hectare in area.

- It extends over a public right of way
- It also extends between Gillfoot tower block and Hampstead Road.
- It has already been pointed out to HS2 Ltd that the proposed compound is likely to contravene H&S regulations due to its proximity to the tower block which could jeopardise safe emergency evacuation
- Enquiries have revealed that HS2 Ltd consider that this is necessary in order that contractors will be close to the Harrington Road Bridge/Ampthill Square junction. We do not accept the necessity for the compound stretching unnecessarily for the convenience of contractors at the expense of significant inconvenience to residents and the negative security impacts involved.

Recommendation 1: The London Fire Service needs to be consulted at an early stage to ensure the works compound site complies with H&S legislation;

Recommendation 2: Consideration should be given to alternative positioning of site away from tower block and to allow access to public right of way

Estate Access

- Access to the construction compound is via Barnby Street and the internal estate road.
- Barnby Street is scheduled to be 'stopped up'. Specific enquiries of HS2 Ltd have failed to establish the precise meaning of this phrase relating to current users of the street.
- Barnby Street currently provides access to Ampthill estate for emergency vehicles, resident parking, deliveries, cyclists and pedestrians. Although specific queries have been put to HS2 Ltd no clear explanation has been provided nor any clear explanation of how the 'stopping up' process may/will restrict access nor what mitigation will be provided
- The vehicle security gate adjacent to the community hall will become inoperable compromising security.

Recommendation 3: The London Fire Service and other emergency services must be contacted at an early stage to ensure emergency access routes are not compromised

Recommendation 4: Clear information must be provided at an early stage to all estate access users including clear signage to inform delivery vehicles and others of alternative access arrangement

Community Hall Access

- Unless the HGV route into the site compound on Ampthill is suitably fenced off, safety, particularly of children, would be compromised
- It is difficult to see if fencing the route through the estate is put in place for safety reasons, how access to the Ampthill Square Community Hall will be maintained

Recommendation 5: Should access to the Community Hall be removed for a period of six years HS2 Ltd must provide alternative local facilities.

Blocks significantly impacted

- Gillfoot and Dalehead tower blocks (160 dwellings) along with four blocks (not named !!) will be most seriously affected due to their proximity to demolition, excavation and construction
- We assume that two of these blocks (24 dwellings) will be Stockbeck and Beckfoot, both six-floor maisonette blocks in close proximity to the Royal Mail site which is to be demolished. On part of the cleared site a satellite works compound is to be erected to assist with construction works including installation of the pedestrian/cyclist bridge spanning the railway.
- It is anticipated that two other maisonette blocks will be included in the four 'unnamed' blocks
- Thus, 228 housing units out of a the total 364 are thus identifies to be 'seriously adversely affected' while the remainder will, in our opinion, also suffer significantly from less serious impacts

Suggested noise mitigation

- While offering noise mitigation to premises most seriously affected by noise, it needs to be stated that double glazing is installed in all dwellings on Ampthill.

- In hot weather however, experience tells that without opening windows units especially on the southern and western sides of the tower blocks can become unbearably hot
- Remaining in a 'sealed unit' with no fresh air circulation is not conducive to comfort or health

Recommendation 6: Air filtration systems need to be installed in all affected premises to help alleviate adverse health effects on residents

Parking

- A response from HS2 Ltd suggests that approximately 12 parking bays on the estate will be suspended for 6-year duration of the construction work on site. This assessment is incorrect. In actuality the number of parking bays that will be suspended is over four times this figure - between 50-60
- Coupled with the removal of many hundreds of parking bays in the local area in Somers Town to the east and Regents Park estate to the west the effects will be significant
- HS2 Ltd has completely failed to acknowledge the adverse impacts this will cause.
- With parking costs and difficulties in accessing parking facilities throughout London, it is reasonable to assume that the vast majority of those who own vehicles do so for valid reasons including to travel to and from work and transport family including small children, the elderly and those with mobility problems

Recommendation 7: Alternative parking facilities must be identified and provided by HS2 Ltd to replace those they plan to suspend albeit these might be on a rotation basis

Documentation received from HS2 Ltd

- In regard to utility diversion works, communications was received by all residents completely out of the blue in September (undated) but just several days after the representative from Ampthill had attended the Euston Community Forum where no mention was made of impending communications. These letters included text to the effect that 'HS2 Ltd had

identified land/premises that they would require on a temporary/permanent basis on the estate'. These letters were headed 'IMPORTANT – THIS COMMUNICATION CONCERNS YOUR PROPERTY. A map was included which was very confusing

- NOTE: A shaded area across one corner of Gillfoot tower block and accompanying text seemed to put the viability of the tower block in doubt. Despite many phone calls to the HS2 Help Line with contradictory advice and repeated requests from members of the Planning Department for urgent clarification, it took a letter from Mike Cooke, Chief Executive of the London Borough of Camden Ltd to Alison Munro, then Chief Executive of HS2 Ltd, to extract confirmation that there was no scheduled demolition on Ampthill. Thus, it was several weeks before HS2 Ltd deigned to provide basis information to relieve residents' anxiety. Even then they did not have the courtesy to provide advice to residents in writing.
- Several days following deposit of the Hybrid Bill in Parliament quasi-legal letters dated 25th November were received by all Ampthill residents including a map delineating the extent of land required for utility diversion. These were explained by the necessity to reroute utilities due to the removal of Hampstead Bridge
- NOTE: Both maps supplied with letters referred to above were out-of date by at least ten years. Both showed garages and sheds that were demolished a decade ago as well as inaccurate layout of paths and security fencing. Both garages and sheds were mentioned in Schedule A incorporated in the quasi-legal documents sent to all residents by Winkworth Sherwood, Parliamentary Agent ,
- Despite repeated requests that HS2 Ltd attend a public meeting to explain the content of letters received and implications thereof they refused to do so.

Utility Diversion Works

- Elsewhere in CF1 area utility diversions have been routed along streets not though residential housing.
- Querying the need for such diversions through Ampthill HS2 Ltd simply state in their written replay that two options were considered but the alternative was rejected. This gives us no opportunity to critique the rejected option nor to moot others

- The utility diversions indicated by the plans supplied will breach the security system in at least four points around the tower blocks. This not only compromises the safety of the estate but could well render the remote access for visitors unworkable. A further two breaches will be caused by HGV access and site compound. This makes six breaches to our security system which is completely unacceptable
- Planned trenching routes will sever numerous paths across the estate used by residents as well as through pedestrian access.
- Planned trenching also runs through one resident's walled garden
- Planned trenching runs right through the middle of a well-used purpose-built ball court
- Trenching is likely to make access to the children's playground difficult for residents in the three tower blocks
- Trenching is planned across the grassed area between the three tower blocks which is used for social purposes in the summer. This planned trench is mooted to require the totally unnecessary felling of a much-loved mature tree that is very much appreciated in an urban environment.
- Furthermore, over and above the disruption that will be caused by utility diversions, vast numbers of utilities already criss-cross Ampt Hill, including water, sewerage, electricity, telecommunications and cabling for the extremely complex security system. In addition a large gas feeder for community heating also traverses the estate.
- During the extensive regeneration referred to previous and carried out over a number of years on Ampt Hill Square estate there were approximately half a dozen occasions when utility services were damaged accidentally due to contractors excavating at various points.
- It is likely that any diversion of utilities through Ampt Hill could well cause similar accidental damage causing loss of services to residents that could take days to resolve

Recommendation 8: Alternative diversion routes are identified as a matter of urgency to prevent the disruption this will cause to a population already facing serious adverse impacts for at least a decade from the construction of HS2

Estate Security

As discussed earlier, security has been the dominant priority of Ampt Hill residents for historical reasons.

The following is an extract from the London Borough of Camden Environmental Response:

5.4.28 States '**residential properties on the Ampt Hill Estate are predicted to experience in-combination effects**'. The moving of utilities and the compound site will cause their security fence to be unusable. This fact does not seem to be mentioned in the ES. Before Camden installed this fence the area was a haven for drug dealing and severe anti-social behaviour. It is of great concern to all residents living nearby that this may occur once again if the security fence is compromised. What mitigation will there be for residents in this regard?

Recommendation 9: In the event there is no agreement to remove proposals to divert utilities through Ampt Hill Square estate, HS2 Ltd must provide manned security 24 hours a day to compensate for rendering the security system inoperable

Noise impacts

- The noise contours included in the maps do not include several maisonettes blocks just metres away from demolition of the Royal Mail Delivery premises HGV transit to and from the site compound and construction of the bridge crossing the railway
- These are likely to be among those four unnamed blocks identified elsewhere as facing 'significant adverse impacts'
- Excessive noise does not stop at convenient contour lines and level will fluctuate in response to the activity taking place.
- It is clear that all residents will be subjected to significant noise pollution outside delineated noise contours identified on the map which noise reducing gradually in response to the distance from focus of generated noise.

Recommendation 10: independent noise monitoring within Ampt Hill Square is required allowing recording of both inside and outside the noise identified noise contour

Recommendation 11: Any breaches of regulated noise limits must (i) be reported to the relevant authorities and (ii) attract financial penalties and (iii) measures must be taken to mitigate noise at source

Royal Mail NW1 Delivery Office Satellite Compound (Barnby Street)

- Impacts from the demolition of the Royal Mail Delivery Office will significantly affect a number of maisonette blocks on the Amptill Square estate
- There will also be increased volume of HGV and other construction vehicles accessing the site
- Barnby Street will also be used when constructing the pedestrian/cyclist bridge over the railway.
- Barnby Street is used as a route to schools in Somers Town by many school children from Amptill Square and Regents Park

Recommendation 12 : Special safety measures should be put in place in conjunction with LBC and TfL at the junction of Barby Street/Eversholt Street to reduce accident risk

Recommendation 13 : Serious Consideration should be given to providing school transport from Regents Park and Amptill Square to schools in Somers Town in order to mitigate the significant additional detours many children face to access school and thus provide safe transport to school and reduce accident risk

Proposed bus stand

- As has been highlighted above, serious safety concerns already exist relating to the junction between Eversholt Street and Barnby Street due to Barnby Street being the HGV access route to the works compound on Amptill
- This junction is used by large numbers of children to reach schools in Somers Town as well as elderly and disabled people needing to cross the road.
- The proposal to site a bus stand capable of accommodating eight buses compromises safety even more severely.

The proposed bus stand is an ill-thought out ludicrous proposal.

Siting bus stands in this location

- will increase accident risks significantly for the reasons stated above
- will vastly increase traffic congestion on Eversholt Street which is already a very busy thoroughfare.
- will add significantly to fuel consumption unnecessarily due to vast number of additional bus miles required to and from Euston along Eversholt Street

- fuel consumption might be further increased should buses be required to travel north up Eversholt Street in order to run south along Hampstead Road to access the Euston bus station
- additional congestion will add to air pollution and delayed journey times for all road users.
- While no estimate regarding the number of bus trips this bus stand would generate daily there is no doubt that these will be considerable

Recommendation 14: Plans for bus stands on this site should be scrapped immediately

Hampstead Road Bridge design

- The proposed design of the vastly extended bridge on the A400 Hampstead Road is simply hideous
- There is no attempt at attractive design
- The requirement to raise the bridge level by 4 metres just exacerbated to visual eyesore which will be inescapable.
- Given that the bridge will be elevated higher than current levels, it is uncertain how this will impact access to housing and the right of way across the estate from Hampstead Road.

Recommendation 15 : The minimum requirement must be to provide an attractive bridge design to replace the current proposal

Recommendation 16: Potential access difficulties as a result of raising the bridge level impacting on access to the public right of way through Ampthill and access to the tower block are identified and access is safely maintained

Euston Station Option 8

- The case for HS2 is not made and the social and environmental costs have not been quantified while construction costs escalate rapidly.
- The proposed scheme simply replaces one unsatisfactory proposal (original Option 1) with an inferior unsatisfactory proposal.
- In the event that HS2 gets the necessary parliamentary approval, it is vitally important that the plans for Euston 'get it right' for all stakeholders. Current proposals are the worst of all worlds with all the

negative social and environmental costs but little opportunity to bring local benefit via provision of over-station development of vitally needed housing, retail and commercial space.

Old Oak Common as Southern Terminus

Serious consideration should be given to properly developing Old Oak Common as the southern terminus, if not on a permanent basis at least initially. This would provide time to assess from operational experience whether permanently using OOC was found to meet all requirements for a southern terminus for HS2 at a significantly less cost (similar to Waterloo as HS1 terminus ahead of the Stratford connection into St Pancras). This would allow on-going planning to be carried out with relevant authorities and organisations to work up a design for Euston what was world class and satisfied the needs of all stakeholders.

Old Oak Common as a terminus has multiple advantages some of which include:

- siting the terminus at Old Oak Common is infinitely superior to the current proposals to provide the southern terminus at Euston in a dense urban environment with associated dislocation
- it provides significant connectivity advantages including with Overground and Crossrail services
- it provides shorter onward journeys for the vast majority of passengers
- it negates a decade of destruction, blight and economic cost for Camden and its people
- it would save approximately 25% of the cost of Phase 1 budget.

Community Preferred Option

In the event that the southern terminus cannot be terminated at an alternative site, the Pan Camden Alliance (PCA) locally developed Double Deck Down (DDD2 – not to be confused with the deliberately named Double Decker Down design produced by HS2 Ltd)

- With minimal exceptions, require no land take and compulsory purchase as the station is designed entirely within the current Euston station footprint;
- Prevent wholesale demolition of many hundreds of homes,

- Prevent demolition of dozens of commercial properties including the Ibis and Thistle Hotels;
- Prevent the loss of St James Gardens, open space, playgrounds, community halls;
- Reduce by years disruption due to extensive excavation, bridge demolition and rebuilding, utility diversions, etc.;
- Lessen traffic congestion and end-to-end journey times outside the immediate station area
- Significantly reduce the construction period as development around the station could be carried out during station construction;
- Significantly reduce loss and damage to small businesses just outside the current station footprint;
- Remove the requirement to compensate property owners facing compulsory purchase to the tune of many tens of millions;
- Not only would this Double Decker Down (DDD2) station option limit the many adverse effects of the highly destructive Option 8 recommended by HS2 Ltd, it may indeed be more cost effective (Construction of the DDD2 station is not yet costed in detail but it is not envisaged that it would cost significantly more than current proposals but the associated costs of extending the station footprint and the requirement to compensate property owners, etc. would reduce costs massively)

Requirement 17: Should the terminus of HS2 remain at Euston, alternative options for the station design MUST contain the **locally generated and supported Double Decker Down (DDD2) alternative station design**

Unlike Option 8 this PCA plan would comply with the brief of the Secretary of State for Transport's most recent letter containing the statement to the Chairman of HS2 Ltd:

"You should identify and develop options for the development of land at and around the proposed station sites in partnership with local stakeholders. Your proposals should look to maximise the opportunities for local economic growth and early delivery of development."

CONCLUSION

- As previously stated, London Borough of Camden recently invested £20 million regenerating Ampt Hill Square estate much of which was spent on community safety issues. Previous to the installation of the perimeter fence and fobbed access gates the estate had suffered extensive anti social behaviour with significant drug use, rough sleeping in the blocks and gang fighting. Since the security has been installed it has transformed the lives of residents
- Residents are extremely concerned by the multiple adverse impacts they are expected to endure over a ten year period

Given the level of negative adverse impacts that will be experienced on Ampt Hill for at least a decade simply due to its geographical location and proximity to Euston Station, associated demolition, excavation and construction, we feel it is reasonable to expect HS2 Ltd to make every effort possible to reduce further distress and reduction in quality of life for Ampt Hill residents.

We feel strongly that we have been afforded no such consideration

Recommendation 18: To demonstrate genuine community engagement and to provide a more balanced approach between commercial priorities and those of an unwilling 'host' community, HS2 Ltd should concur with recommendations made in this response and make every effort to mitigate negative impacts

Report produced by:

Fran Heron

Chair Ampt Hill Square Tenants and Residents Association