

Planning and Borough Development

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Draft Environmental Statement Consultation

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THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

BY POST AND EMAIL

11 July 2013

My reference: HS2/ES/Response/JM

Your reference:

Please ask for: James Masini

Dear Sir/Madam

I am pleased to enclose the response of the Royal Borough of Kensington and Chelsea to the High Speed 2 draft Environmental Statement (ES).

This response has been broken down into areas of interest, the specific asks of the Royal Borough have been included in **bold** for your convenience.

Socio-Economic

It is noted that the full ES will contain a more detailed breakdown of socio-economic effects. However, we are deeply concerned that this detail is not included at this stage as this is seemingly central to HS2's business case.

We would expect that this study to consider the impact on the Royal Borough caused by the new HS2 hub at Old Oak Common. Whilst the direct economic impact of HS2 will likely provide some minor benefits to the surrounding area, a Crossrail station at Kensal Portobello in the Royal Borough would have had a far greater benefit. Due to the operation of HS2 at Old Oak Common, the Crossrail Joint Sponsors have confirmed that Portobello station is no longer under consideration. This will have serious disbenefits for our borough.

The Department for Transport and Transport for London have commenced work to examine alternative transport connections to Old Oak Common but as this work is at an early stage, no reasonable assumptions regarding positive benefits can accurately be made at this time. If a suitable alternative cannot be found that would result in unlocking a similar scale of regeneration benefits by 2019 (when Crossrail opens), the opportunity to deliver upwards of 2,500 new homes, 2,000 new jobs and £690m Gross Value Added

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for the local area will be lost. This has been quantified in an economic impact assessment produced on behalf of the Royal Borough by Regeneris (reports appended).

The Royal Borough's evidence in support of a Crossrail station remains the only existing basis for calculating economic benefits and disbenefits in our borough. 10.5.9 of Volume 2 notes that residual effects will be considered in the full ES. **We must insist that the Royal Borough's analysis be considered as the evidence base for the full ES to take account of the economic harm caused by HS2 on the Kensal Opportunity Area and the loss of nearly £700m in GVA benefits.**

The draft Opportunity Area Framework for Old Oak Common provides a vision for the area. As part of this work, the GLA and TFL have been charged with seeking connections to the wider area, including the Royal Borough and specifically the Kensal Opportunity Area.

This work concluded that due to a complex series of railway cuttings and viaducts, a direct road (in particular bus travel) between Kensal and Old Oak Common station would be particularly difficult to achieve. The suggested route includes an indirect connection via the land west of Scrubs Lane and the north the canal and would require a new vehicular bridge to be constructed.

The North Pole depot would be the only possible site which could link Kensal to Old Oak Common and is referenced in the draft OAPF. However, this land is currently in use as part of the Intercity Express Programme and will be unavailable until 2039. In the interim, there are no clear links between the two sites and bus connections utilising the already heavily trafficked Harrow Road and Scrubs Lane would provide the only vehicular link.

As referenced above, the Royal Borough has aspirations for a Crossrail station that would link the two opportunity areas, but these aspirations have not been included with the draft OAPF and no alternative option has been identified at present.

Providing links between the Royal Borough and Old Oak Common will be essential if the station is to become anything more than a railway hub. At present there is no evidence to suggest that this will happen. It is frankly, negligible that the draft fails to consider them at this stage.

There are serious concerns that the HS2 remit fails to take into account the needs of local residents. At present part of the Royal Borough around Kensal suffers from a PTAL score of 1. This has contributed to Golborne ward, in which much of Kensal is located, being named as the second most deprived ward in London (IMD 2012 update).

In all likelihood, without meaningful connections to Old Oak Common, this problem will be perpetuated. As currently planned, the HS2 interchange will have no connection to Kensal and will not even include an eastern access to the station. This means that residents living east of Old Oak Common will have an extended journey times to access rail services via either HS2 or Crossrail. At present, HS2 have also failed to include a southern access. This is seen as the only direct means of providing road and pedestrian access between the station interchange and the Royal Borough. However, even if agreed, this would not be delivered before 2039 when the Intercity Express Programme is completed.

The full ES must look at these effects when considering the station interchange at Old Oak Common. Furthermore, we ask that the economic and regeneration benefits of linking to the Royal Borough must be quantified in the full ES to take full account of the socio-economic impacts of an additional 25 year gap in transport accessibility in North Kensington.

Transport – Construction Impacts

As the proposals for HS2 continue to develop, many of the traffic management and transport proposals are not yet fixed. Nothing in the Draft Environment Statement suggests that there would be “significant” impacts on traffic on public transport within the Royal Borough as a result of the HS2 proposals themselves.

The Draft Environmental Statement does not consider the impact of the development of the Old Oak Common Opportunity Area (OOCOA), which would almost certainly occur in tandem with the HS2 delivery works. The development of the OOCOA will affect the proposed traffic management arrangements potentially spreading the effects of construction traffic. **A reference to the cumulative effects of the work should be included in the full ES.**

It is considered that the thresholds of significance to be employed when assessing transport impacts are too high. Notwithstanding, significant impacts are expected in adjoining boroughs. There would be significant impacts on all modes in the vicinity of Old Oak Common during the construction phase when several thousand HGV movements are anticipated daily. Significant traffic impacts are expected on Kilburn Lane (as a result of the construction of a shaft at Salusbury Road, close to Queen’s Park Station).

These construction sites will necessarily generate traffic within the wider area including this borough.

Scrubs Lane is one of several construction traffic routes identified from Old Oak Common. Increased traffic on Scrubs Lane could impact on the performance of the Scrubs Lane/ North Pole Road junction increasing traffic at the Borough boundary. Traffic impacts have not yet been quantified.

Construction traffic from the Salusbury Road shaft site would join the Harrow Road at the Harrow Road/ Ladbroke Grove/ Kilburn Lane junction. Additionally accommodating utility (Thames Water) works will be required on the Harrow Road and within the adjacent cemetery. Together this activity will increase traffic volumes on the Harrow Road. This impact is yet to be quantified.

Paragraph 2.3.18 states that Ladbroke Grove would also be used “to join the strategic road network”. The use of Ladbroke Grove should not be necessary as Harrow Road forms part of the strategic road network. This paragraph should be amended accordingly.

The western part of Bus route 228 would be diverted as a result of the works at Old Oak Common. This should not have a significant impact on the operation of the route through this Borough.

We would ask that full details of traffic impacts of the additional volume from construction be submitted as part of the full ES.

Water and Flooding

The water resources and flood risk assessment explain that there could be damage and settlement to the canal wall. This is very serious as it could lead to flooding and may have implications on the historic character of the canal. **It is noted that a condition survey and structural assessment of the southern retaining wall of the canal could be required to quantify the risk of flooding. This should be required up front, before construction starts. A contingency plan should also be included should damage to the canal walls occur.**

The Draft Code of Construction Practice requires in paragraph 16.4.3 monitoring for water pollution, spillages and leakages. **Monitoring should also include settlement and damage to any flood defence structure including the canal wall.**

Air Quality, Land Contamination, Noise and Vibration

The Royal Borough is generally satisfied that due to the depth of the tunnelling work under Kensal Green Cemetery that there is unlikely to be any negative effects with regard to vibration and noise emanating from the tunnel. However, further work is required to confirm that this is the case.

The impact of regenerated noise and vibration should be predicted and quantified in a surface contour plot of tunnel boring and operational trains. **We would expect to see this within the final ES - This should include predictions to include the nearest residential dwelling to the line of the tunnel and to include the chapel and other buildings on the cemetery site.**

Due to the depth of the tunnel, there are considered to be no issues regarding air quality or land contamination and we are satisfied that no further work is required to demonstrate this.

Ecology (full comments from the borough's Ecologist are appended)

The draft ES clearly sets out the areas to be affected by the proposal and the overarching themes which may cause an environmental impact. However, there is much more detail and consideration required around the ecological impacts. The main concern is that not all the baseline or follow-up ecological surveys have been carried out on all sites which raise the concern that not all impacts have been fully explored.

A conveyor belt system is proposed to be installed across the Grand Union Canal to transport spoil around the main work site. There is a risk of contamination from runoff from the works site into the watercourse. **Although this is touched on in the draft ES, more detail is required to demonstrate how this will be managed and monitored.**

Construction traffic and routes to compounds is proposed to include Old Oak Common Lane, Wood Lane and Scrubs Lane via Harrow Road – this will impact Little Wormwood Scrubs SINC by causing increased noise and particulate pollution and disturbance to the

fringes of these habitats. This is not currently highlighted as something that will have an ecological impact. **We would ask that this is included within the full ES.** Should it be required, mitigation measures against this should be considered and included in the LEMP.

Historic Conservation

The Tunnel linking Old Oak Common to Euston will run directly under Kensal Green Cemetery. This is the oldest suburban cemetery in London and the first of the so-called Magnificent Seven, Victorian cemeteries.

The English Heritage Register of Parks and Gardens for Greater London includes Kensal Green (All Souls) Cemetery at Grade II*. The designated heritage assets include a separately listed Anglican Chapel, All Souls, (Grade I), a Non-Conformist Mortuary Chapel (Grade II*), Entrance Gateway (Grade II*), colonnade/catacomb (Grade II), and the gateway opposite Wakeman Road (Grade II). The perimeter walls and railings are listed grade II*. Following a re-listing survey there are 130 listed tombs, memorials and mausoleums, eight of which are grade II. There are three catacombs in the cemetery. Kensal Green Cemetery has been designated a Conservation Area since 1984. **The draft CoCP should include an overview of the architectural and historic value of the cemetery including the Grade I Anglican Chapel and catacombs which are very close to the tunnel passage.**

Kensal Green Cemetery falls within a conservation area and includes many listed buildings and structures as well as scheduled ancient monuments. The depth of more than 30m is considered sufficient to prevent any lasting damage to the monuments within the cemetery.

There is no reference to any potential settlement impact on the listed walls and structures of the Kensal Green cemetery and fails identify it as a listed structure. **A settlement study will need to be included in the full ES, the result of this may lead to a requirement for a greater level monitoring for monuments identified as being vulnerable.**

If you would like to discuss any aspect of this response further, please do not hesitate to contact me directly.

Yours faithfully,



Penelope Tollitt
Head of Policy and Design
Royal Borough of Kensington and Chelsea

Attachments:

Economic Impact of a Crossrail Station at Kensal (Regeneris, 2012);
Crossrail Regeneration Benefits – Kensal Addendum (Regeneris, 2012);
RBKC Full Ecology Service Comments.