

Hillingdon's response to the Government's Consultation on High Speed 2

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Foreword by the Leader of the Council

Cllr Ray Puddifoot



Hillingdon Council welcomes the opportunity to comment on the proposal for high speed rail as set out in the Consultation documents in February 2011.

The following response sets out our views on the seven questions to which the Government is seeking views.

We would stress that the Council is not against the principle of high speed rail. It cannot however support the HS2 proposals that have been published for Consultation. The Council objects to the Y shaped proposal as described in Part 1 of the Consultation and also the proposed route for the London to Birmingham line as set out in Part 2.

Our principal concern is that the proposals have not been properly justified as being in the national interest. We have carefully scrutinised the evidence, along with the 51M Group, and we cannot find any convincing economic, environmental or social reasons that have been put forward as to why the HS2 proposals should proceed. The details of this are set out in the Council's response to the Consultation questions.

As a Borough, Hillingdon is greatly impacted by the HS2 proposal. HS2 will change the landscape of London's western most borough, as well as having significant environmental and social costs. The Council wants to be assured that HS2's potential impacts have been fully assessed, properly acknowledged, and that any proposed scheme represents the most suitable transport solution, in terms of improving capacity and performance of the UK's rail network, and being justified in the national interest on economic, environmental and social grounds, so as to justify the significant adverse effects at the local level.

We understand that the views of the Council and local residents have been and will continue to be grouped under the 'nimby' banner rather than the more in vogue "localism". However the Council is proud to represent the views of its residents and local businesses and it has a duty to challenge the Government's proposals, particularly when they appear to be under the 'vanity project' banner.

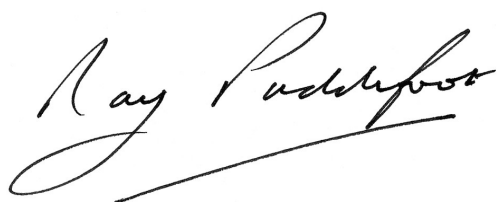
The Council's other main concern is about the way in which the Consultation process has been undertaken. There are a number of issues regarding this. Firstly, it would appear from the strong announcements made by Government Ministers that the Government may have already made its mind up about the outcome of the Consultation. If so, the Consultation process would be meaningless, and may therefore be unlawful. We have however assumed that this is a genuine Consultation. This situation is exacerbated by the Government's decision to choose

the Hybrid Bill procedure, because that will not allow for any future opportunity for public scrutiny of the merits of the proposal. The procedure set up under the Planning Act 2008 for nationally significant projects would have been more appropriate because it would have allowed proper independent scrutiny.

Furthermore, the Consultation process in relation to the London to Birmingham route has been inadequate because there has been so little information provided to consultees. This situation has been worsened by the provision of inconsistent and confusing information.

In addition, the Consultation on the Y network beyond Birmingham is also considered to be flawed because the Government will be deciding on whether to proceed with this, despite the fact that there has not even been an outline shown of the route. This means that individuals who will be directly affected by the two routes northwards of Birmingham are totally unaware and therefore unable to comment on the proposals. If as a result of this Consultation, the decision is taken to proceed on the Y network, the public will not have any influence on the proposals in the future except with regard to relatively minor details of the scheme. Likewise, those that will be affected by the Heathrow link are also unable to comment at this stage, due to the uncertainties about the proposal, and yet the decision as to whether to proceed with the Heathrow link will be made following the outcome of this Consultation. This process does not appear to be in the spirit of a proper and lawful consultation.

The Council objects to the HS2 proposal because it appears to have been formulated with little or no consideration of the environmental and social impacts. The Council also believes that a fully robust business case should have been completed to allow a proper analysis of all the options before considerable public money is spent on a new railway. Notwithstanding that a more appropriate course of action would have been to undertake an integrated transport strategy review (Rail, Road & Air) before embarking on this proposal. The Council wants to see suitable justification that high speed rail is the correct path to take for the future of the UK's rail industry and that the Consultation is a proper democratic process that affords respondents the opportunity to comment in an informed manner to decision makers who are willing to take into account all views.

A handwritten signature in black ink, reading "Ray Puddifoot". The signature is fluid and cursive, with a long horizontal stroke extending from the bottom of the name.

Cllr Ray Puddifoot,
Leader of the Council
London Borough of Hillingdon

QUESTION ONE

This question is about the strategy and wider context

Do you agree there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades?

Executive summary

1. Whilst there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades, Hillingdon Council does not agree that the Government's proposal for HS2 is the best way to address this. There are a number of reasons why the Council has reached this decision, which are summarised below.
2. Firstly, the Council believes that although there is evidence of overcrowding on certain parts of the existing rail network, this could be addressed by better alternatives such as a better value package of rail upgrades and effective demand management measures or by a better alternative HS2 route. In comparison to these alternatives, the HS2 proposal is enormously expensive and environmentally damaging.
3. Secondly, any proposals for major new rail infrastructure should be set within an agreed strategic national integrated transport infrastructure planning framework. The proposals for HS2 have not been set within any such framework.
4. Thirdly, with regards to supporting economic growth, there is no convincing business case for the HS2 proposal, nor is there any sound environmental and social case to justify it. The evidence presented in the Consultation documentation is not robust because the economic benefits appear to have been overestimated, the environmental and regeneration costs have not been properly addressed; and the alternative options have not been properly considered. Furthermore the predictions of future passenger demand for HS2 appear to be vastly overestimated. These high passenger demand forecasts are the basis for calculating the likely revenue from fares, which in turn will be overoptimistic and unachievable, thus resulting in a flawed business case for HS2.
5. Fourthly, the Consultation documentation does not provide enough information for the Council to be confident that the HS2 proposals will reduce the North/South economic divide, which is a key Government objective.
6. Moreover, the impacts on carbon emissions and air quality have not been properly assessed, and it is our view that HS2 will result in an increase in carbon emissions and a worsening of air quality, particularly in areas where EU limits are already exceeded.

7. Furthermore, we consider that the evaluation of HS2, as represented in this Consultation, is seriously flawed and inadequate as a basis for making any decisions on the merits of this major infrastructure project.
8. Finally, we also believe that Question 1 is an unfair and heavily loaded question to ask given that only one proposal is being consulted on. This proposal for HS2 is not in the national interest and the Council therefore believes that the Government should withdraw it.

Introduction

9. The Council, as part of the 51M group, has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. The Council's response to Question 1 is set out below. It draws on the detailed work of the expert advisors, which have been incorporated into the 51M response to the Government Consultation, and should be read in conjunction with this submission as an integral part of the answer.
10. With regard to Question 1, the Council's main issues are that:
 - The capacity and performance of Britain's inter-city rail network could be addressed by alternatives such as a better value package of upgrades and effective demand management measures or by a better alternative HS2 route. In comparison to these alternatives, the HS2 proposal is enormously expensive and environmentally damaging.
 - The proposals for HS2 have not been set within an agreed strategic national integrated transport infrastructure planning framework.
 - There is no convincing business case for HS2. The evidence presented in the Consultation documentation is not robust because the economic benefits appear to have been overestimated and are based on optimistic passenger demand forecasts; the environmental and regeneration costs have not been properly addressed; and the alternative options have not been properly considered.
 - There is insufficient information to be confident that the HS2 proposals will reduce the North/South economic divide.
 - HS2 is likely to result in an increase in carbon emissions and a worsening of air quality, particularly in areas where EU limits are already exceeded.
 - The evaluation of HS2 is seriously flawed and inadequate as a basis for making any decisions on the merits of this major infrastructure project.
 - The consultation process is unfair because the evaluation of HS2, as represented in this Consultation, is seriously flawed and inadequate as

a basis for making any decisions on the merits of this major infrastructure project. In addition, Question 1 is an unfair question to ask given that only one proposal is being consulted on.

11. Each of these key issues is described in more detail below.

Is HS2 the answer to enhancing capacity?

12. We would all agree that rail capacity increases are needed but the Council is of the view that there are rail improvements, already committed, that will bring about improvements to capacity and that there are better value alternatives available for infrastructure upgrades, at a much lower cost than HS2, to provide long term capacity enhancements. Examples of such measures, specifically with regard to the West Coast Main Line, the East Coast Main Line and the Midland Main Line, are set out below and include the consideration of measures such as better demand management to reduce overcrowding at peak times, for example by changing the pricing structure of fares to flatten demand at peak times and reallocating underused first class carriages for second class passengers. These enhancements are referred to in the 51M Consultation Response as the Optimised Alternative.

Enhancements to the West Coast Main Line

13. The HS2 Consultation document states in para 1.49 that:

“The potential to increase the capacity on the West Coast Main Line is limited, as a major route modernisation programme has already been carried out, leaving relatively little scope for additional upgrades.and subsequent additional capacity could only be provided by exceptionally expensive infrastructure solutions”

14. The Council would disagree with this statement for various reasons. Firstly, the key overcrowding issue relates primarily to the standard class seats on departures after 7pm on Fridays when cheaper fares are available, although even at that time the first class carriages are only 20% full.
15. Secondly, the most immediate and more serious overcrowding problem occurs on the fast commuter services on peak trains between Northampton, Milton Keynes and Euston. Urgent action is needed to provide additional capacity and this could be provided by infrastructure upgrades at an estimated cost of £243m and new rolling stock. Construction of HS2 will delay this until 2026 at the earliest. The conclusion is that the construction of HS2 will hinder the urgent need of immediate capacity improvements.
16. Thirdly, significant additional capacity will be provided by investment plans already committed. The capacity could be increased further with a number of specific initiatives, such as conversion of a number of under-used first class carriages to standard class, operation of longer trains, demand management

techniques and targeted infrastructure, which would give an increase in capacity far in excess of the background growth forecast by HS2 Ltd. The conclusion is that there is no case for construction of HS2 to meet the demand in the foreseeable future.

Enhancements to the East Coast Main Line

17. The HS2 Consultation document states in para 1.43 that:

“Long-distance services on the East Coast Main Line also suffer from significant overcrowding, with passengers often having to stand in peak hours.”

18. Para 1.56 of the Consultation document states that:

“On the East Coast Main Line even higher demand growth of around 115% is forecast.”

19. The Council considers that the overall seating capacity can be increased on the East Coast Main Line by a number of specific actions and longer term capacity increases could be delivered with infrastructure enhancements at an estimated cost of £1.159 - £1.615 billion. The Council therefore believes that there is no case for the construction of HS2 to meet the demand for growth in the foreseeable future. Furthermore, the Council is of the view that capacity issues on the East Coast Main Line will not be alleviated by HS2 significantly and in any case not until 2033 at the earliest.

Enhancements to the Midland Main Line

20. The HS2 Consultation document states in para 1.43 that:

“On the Midland Main Line, almost half of all long distance trains arriving into St Pancras International in the peak have passengers standing’. Para 1.56 states that “on the Midland Main Line long distance demand expected to double....seeing daily load factors of almost 70%.”

21. The Council considers that the reason why almost half the trains arriving into St Pancras in the peak have passengers standing is due to the relatively short distance of commuting journeys on this line. In contrast, the current average all day load factor south of Leicester is low. It is the Council's view that the Thameslink project, currently under construction, will deliver a major increase in capacity south of Bedford and give a viable alternative to the Midland Main Line. The conclusion is that it is not value for money to provide expensive additional long distance capacity by means of HS2 solely to provide short distance commuting capacity between Bedford and London.

Enhancement by means of the HS2 proposed route

22. In comparison to these alternatives, the HS2 proposal is enormously expensive and environmentally damaging. The Consultation documents state that the

London to Birmingham route will cost £17 billion, which equates to £27 million per constituency in the UK and will save 35 minutes on the journey time in 2026. The Y shaped network will cost £32 billion, which equates to £51 million per constituency in the UK and will save 55 minutes on the journey time to Manchester and 1 hour to Leeds in 2033. This equates to about £0.5 billion per minute saved.

23. The actual time savings as quoted are misleading. The Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009 is inconsistent with the timings quoted within the Consultation documentation, which are unduly optimistic and the journey time savings are misleading.
24. The Oliver Wyman report makes it clear that the non stop service from London to Birmingham by HS2 would be 45 minutes, compared with the current service on the WCML, which is 72 minutes, thus providing a reduction of 27 minutes. However, if HS2 were to stop at Birmingham International, the service would only save 20 minutes. If it were to stop at Birmingham International and Heathrow, the saving would be 13 minutes. If HS2 were to stop at Birmingham International, Heathrow and Old Oak Common, the saving would be only 6 minutes. This brings into doubt one of the key objectives of this high speed route, i.e. journey time savings. It also casts doubt about the claims in para 1.6 of the Consultation document that:

“It would slash journey times between cities, bringing London within 49 minutes of Birmingham, and to within 80 minutes or less of both Manchester and Leeds.”

25. The Consultation document (Table 2 page 12) shows that the capital and operating costs, plus any cost savings to the classic line facilitated by HS2, (which amount to £44.3 billion for the Y network), will not be met by the projected revenues which are estimated to be £27.2bn. This means that there will be a cost to the taxpayer of £17.1 billion for the Y network, equating to about £28.4 million per annum for life of the 60 year scheme. There would inevitably be implications for other public services where compensatory cuts may be made, such as education, health, social services, policing and other transport schemes.

Where is the national integrated transport planning framework?

26. Many of the problems with the HS2 proposal stem from the fact that it has not been seen within the context of an integrated national transportation framework. In addition, there has not been any meaningful debate on high speed rail or what role it should play in the UK. A long term infrastructure project of this magnitude should be part of an over-arching national integrated transport strategy, which seeks to provide a coordinated approach to modernising all aspects of transport in the UK, including rail, road and aviation.
27. The policy support for HS2 has not been subjected to a public debate. The Executive Summary of the Consultation document states that

“The National Infrastructure Plan sets out the Government’s Strategy to deliver the infrastructure our economy needs to compete in the modern world’. The Consultation document goes on to say in para 1.11 that ‘The Government’s support for high speed rail was clearly set out in its Programme for Government, published on 20 May 2010, ...”

28. The National Infrastructure Plan was published on 25 October 2010. This included (in para 4.24) a number of measures

“To contribute towards sustainable economic growth and tackling climate change’. One of these was ‘investment in a high speed rail network that would make rail increasingly the mode of choice for intercity journeys within the UK and for many beyond. A new high speed rail network could transform journey times on key inter-urban routes and radically reshape the UK’s economic geography: connecting this country’s great cities and international gateways and helping to bridge the north-south divide that has for so long, limited growth outside of London and the South East.”

29. A further note was published in November 2010, setting out the long-term investment needs and priorities for economic infrastructure for the UK, along with the priority actions to deliver them. This stated that

“A long-term plan for UK infrastructure is essential to:

- make choices which will support sustainable economic growth, help meet environmental targets, maintain secure energy supplies, ensure that infrastructure is robust, resilient, reliable and integrated and can meet local and national needs;*
- provide market stability and predictability to private sector investors and the infrastructure supply chain with a consistent pipeline of investment; and*
- manage affordability on behalf of the tax payer and the consumer.”*

30. The Government’s proposals for HS2 appear to have been derived from the National Infrastructure Plan, and yet this Plan has not been subject to any public consultation and nor have the HS2 proposals been looked at within any overall strategic national integrated transport infrastructure planning framework. The Council believes that the decision making process which has been used to promote and progress HS2 is flawed, does not stand up to scrutiny and is undemocratic.

31. Notwithstanding the above, the Council believes that this proposal for HS2 does not meet the criteria in the subsequent note that was published in November 2010 as referred to in para 28 above, because HS2 is not likely to support sustainable economic growth; it will not help meet environmental targets; it is not integrated and it will not meet local and national needs. Details on these areas are given below.

Is the HS2 proposal the best option for supporting economic growth?

32. As set out above, the Council believes that there are alternatives to capacity enhancements that could be achieved at less cost. The Council believes there is no sound evidence to support the business case for HS2. The economic benefits appear to have been overestimated, the environmental and regeneration costs have not been properly addressed; and the options have not been properly considered. These issues are considered in more detail in the Council's response to Questions 2, 3, 4, 5 and 6.
33. The business case for HS2 is very reliant on the assessment by HS2 Ltd on the future level of demand for long distance travel. The Council believes that the evaluation of HS2 has been carried out based on an optimistic and increased passenger demand methodology that is seriously flawed and inadequate as a basis for making any decisions on the merits of this major infrastructure project. The Council believes that there are capacity issues to resolve on the UK rail network, but the use of unsound demand forecasts to justify HS2 distorts the truth and this is not the correct way to justify such a large and expensive infrastructure project.
34. The predictions of future passenger demand for HS2 form the basis for calculating the likely revenue from fares. Any over estimation in the former means that the latter will be overoptimistic and unachievable, thus resulting in a flawed business case for HS2.
35. The Council believes that the demand rail forecasts underpinning the Consultation are flawed because the DfT have assumed that the rapid rail growth post 1995 will continue to 2043. They have not taken into account the fact that a) overall long distance trips on all modes per person has remained constant since 1995, b) that there was no rail growth between 1952 and 1995 and c) that there has been considerable investment (including public subsidy) since privatisation. The assumptions on growth that the DfT have used are based on a methodology that is contrary to their normal forecasting practice. This has resulted in high growth figures which are simply not justified.
36. Unjustifiable growth demand forecasts represents a fundamental flaw in determining the actual requirement for the capacity which is proposed in the case for HS2. Evidence commissioned by 51M Group to support Hillingdon in this Consultation response has indicated a strong likelihood that the rail traffic forecasts are too high and at the very least should be seen as both highly uncertain and subject to a high margin of error.
37. The DfT have recognised the issues regarding demand forecasting and have stated that in the White Paper "Delivering a Sustainable Railway" 2007 that:

“Forecasts have been wrong before and any strategy that tried to build a rigid investment programme based on fixed long-term forecast would inevitably be wrong again.”

38. In addition, using experience gained from the High Speed One project, DfT told the Public Accounts Committee that they had learnt the lesson and that:

“Next time it considered undertaking a major transport project, it would factor more severe downside assumptions into its business case analysis.”

39. But it is clear that despite these public acknowledgements, the HS2 case has been based totally on a fixed long-term forecast with no downside assumptions to inform a robust business case analysis.

40. The Council’s concerns over the capacity requirements and the economic case for HS2 are echoed in the summary of the Oxera report in para 5.2 and 5.3, which states that:

“The monetised estimates are surrounded by a degree of uncertainty – indeed, the sensitivities published by HS2 Ltd for HS2 show a range of 0.7 – 2.7 for the BCR excluding WEI’s (see Table A1.1) and this simply looks at each sensitivity in isolation. The overall balance of non-monetised impacts – which include landscape, carbon and changes in land use – is difficult to ascertain, but is likely to become more apparent as the understanding of the impacts improves over time, and as HS2 Ltd adjusts the appraisal to reflect the DfT’s revised approach to such assessments.

Overall, the case for the High Speed Rail programme seems to depend on whether and when the capacity is needed, the selection of the best VfM approach to delivering that capacity, the degree of uncertainty around the monetised benefits and costs of the preferred options, and judgements on the balance of evidence relating to non-monetised items, such as environmental and regeneration impacts (which are likely to be substantive in their own right but not fully set out in the Government’s assessment).”

41. The Council is concerned that the environmental costs, particularly those relating to carbon emissions have not been properly quantified. Further details on the environmental impacts of HS2 are set out in the in the Council’s response to Questions 2, 3, 4, 5 and 6. The Council’s concerns again appear to be supported by the report by Oxera (20th June 2011), which states in para 3.44 that

“The case for high-speed rail is affected by the impacts on carbon emissions that are quantified, although these do not appear to be included in the BCR. Given the very limited anticipated substitution from air to rail (6%) and car (7%), the substantial volume of new trips (22%) suggested by HS”, and the lower rates of emissions from slower trains, the classic rail options could well involve lower overall emissions. This would bring the comparison of BCRs closer

together for the Y network and generate an advantage for the classic rail options to Birmingham.”

42. The Council believes that other environmental costs such as impacts on the landscape should have been properly assessed and costed. The impacts on the landscape in Hillingdon are significant, as they are in the Chilterns Area of Outstanding Natural Beauty and other areas along the route. Again the Council’s concerns appear to be supported by the report by Oxera (20th June 2011), which states in para 3.45 that

“The AoS does not explicitly consider the landscape impacts of building a new high speed line, which HS2 Ltd rightly believes would be important. Neither are such effects included in the calculated BCRs, and the extent to which they would reduce the measured value for money of a new line is therefore unclear.”

43. Para 3.46 of the report by Oxera goes on to say that:

“Studies do exist of the values attached by people to particular kinds of landscape and Government has in recent years proposed and undertaken new studies. It should be possible to produce broad estimates of the order of magnitude of landscape costs for a new high speed line.”

44. The Consultation document includes very little detail on the Y network and therefore there would appear to be a great deal of uncertainty about the likely costs of the full network, in terms of its construction costs, the rolling stock costs and the operational costs. Until the preferred routes have been identified for each of the legs north of Birmingham, and then properly assessed in terms of the requirements for construction costs, the cost estimates for the full Y network must be very open to errors.

45. The Council believes that not providing any assessment of the Y network with regard to the extent of the impacts, environmental, social and economic is a fundamental flaw in the whole Consultation. This concern is echoed in the Oxera report, in para 3.30 which states that:

“There is considerable uncertainty surrounding the costs of the full Y network – HS2 Ltd has used a ‘higher level approach’. This relates in particular to the costs of delivering a service pattern on the Y network, with no work having yet been undertaken on train diagrams, which would enable detailed assumptions to be made about rolling stock purchases and operating costs. This might be a concern if the case for HS2 rests on its ability to enable the full Y network to be built.”

Does HS2 support economic growth: the north/south divide?

46. There is no robust evidence presented to support the premise that the HS2 network will enhance the North/South economic divide or that the provision of a

very high speed network is the most cost-effective or appropriate solution to achieve long term and sustainable economic growth.

47. This view is supported in the Oxera report which questions the impacts of the HS2 proposal on the cities and areas not proposed to be served by HS2. Paras 3,51 and 3,52 state that:

“However, a number of impacts of the proposed scheme have been assessed at the route level only. This prevents a clear indication of whether the benefits or costs are concentrated in certain regions.”

“When the AoS does assess benefits and costs by route selection, it is not clear whether certain regions benefit at the expense of others.”

48. The Council is also of the view that international evidence suggests that high speed rail is likely to generate, or reinforce, territorial polarisation, with growth more likely to accrue to the capital than the regions.

49. This view is supported by information contained within the Consultation document, which suggests that of the 40,000 new jobs that are likely to arise as a result of HS2, 20,000 are to be at Old Oak Common, and only 9,300 jobs are attributed to the Birmingham area. This means that less than 50% of new jobs will be created in the Midlands, with the major regeneration benefits being focussed on London, which will not help to reduce regional disparities. The likelihood is that there will be a drain of economic activity towards London and its surrounding areas, rather than any gain for the UK as a whole.

50. The prediction that High Speed Rail will generate growth in peripheral cities is mostly based on assumptions which are difficult to sustain after close scrutiny. In France, despite evidence of some benefits in cities such as Lille and Lyon, it is Paris that has gained the most from the network. In Spain, the ridership on the high speed network has remained low and has been deemed to deliver negative economic results, and there is evidence to suggest that the capital city, Madrid has gained most from the connection. In addition, in Germany questions are now being raised about the financial and environmental justification for investing in high speed rail.

51. The comments in para A2.21 of the Oxera report lend support to the fact that London is likely to gain whilst the north will suffer a drain of economic activity, by stating that:

“However, there is evidence that the generation in travel is mostly from outer areas into the city rather than the reverse: in other words, the journey generation is not asymmetric. For example, on the Paris to Rhone-Alps route, flight and train journeys into Paris increased by 144%, but journeys in the inverse direction only experienced a 54% increase due to the high speed rail connection.”

52. A number of previous reports to Government have also questioned whether creating new networks is the most appropriate or cost-effective method to achieve economic growth. The Eddington report in 2006 stated that
- “... the UK’s economic geography means that the principal task of the UK transport system is not, in comparison to the needs of France or Spain, to put in place very high-speed networks to bring distant cities and regions closer together, in order to enable trading and facilitate economies of scale. Instead, because the UK’s economic activity is in fact densely located in and around urban areas, domestic freight routes and international gateways, the greater task is to deal with the resulting density of transport demand.”*
53. It is the Council’s view that the alternatives to High Speed Rail which support improved transport links at the regional and local level (i.e. within travel to work areas of areas needing regeneration) would deliver greater social and economic benefits to the UK as a whole.
54. Despite this evidence the Government still incorrectly assumes in para 1.82 of the HS2 Consultation document that high speed rail is the best option to promote long term, sustainable and rebalanced economic growth.

Where are the carbon gains?

55. The Consultation documentation claims that HS2 is carbon neutral. To have the UK’s single largest public transport intervention in the foreseeable future make no noticeable impact on reducing the UK’s road transport emissions is a fundamental flaw. What is even more worrying is the likelihood that HS2 will increase the UK’s carbon emissions. This goes against everything that the Mayor of London is working so hard to achieve with the support of London boroughs.
56. HS2 will not be broadly carbon neutral. In theory rail infrastructure should provide a greener alternative form of transportation to road and aviation. This theory has been applied to HS2 and there is now a widespread misconception that because it is rail, it is green. This is far from accurate. The Mayor of London has ambitious plans for carbon savings. However, HS2 will only have a detrimental impact on these targets. The Council’s Appraisal of High Speed Rail’s Carbon Impacts, which forms part of 51M’s Consultation response, contains further details on this (see Appendix 1).
57. The principles of any high speed rail should fundamentally address the issue of reducing carbon emissions and ensuring that modal shift was a key objective of the scheme. The consultation report for this proposal admits that the modal shift from road is minimal i.e. 1MtCO₂ reduction in road emissions over 60 years. When compared to the road transport emissions for 2009 which were calculated as 113MtCO₂ this one year alone, the impact is negligible.

58. High speed (340kph) trains have a 90% higher electricity demand than regular (200kph) trains. It is worth noting that the trains proposed by HS2 Ltd will travel at speeds far greater than European high speed trains. In recent months, Chinese high speed rail operators have reduced their high speed trains (340kph+) to reduce the cost of energy. The UK's energy market is neither stable nor self reliant. With reliance on overseas supplies and the decommissioning of several domestic power stations without any permitted replaces, there is no agreed strategy in place to provide a more stable energy market in the UK to date. Consequently HS2's enormous consumption (up to 18 high speed trains per hour between London and Birmingham) is highly vulnerable to an energy market that has seen dramatic price hikes year on year over the last decade.
59. Furthermore, HS2 relies on satisfying a latent demand in travel to and from Birmingham, i.e. people who are only making the journey because of HS2. The report makes no acknowledgement of the amount of additional HS2 passengers and the associated emissions compared with the fewer passengers using domestic aviation. It is likely that the increased demand of energy intensive rail (HS2) will outweigh any reduction in domestic aviation.
60. There are currently no Birmingham flights to London, and in 2008 rail from Manchester to London already had 80% of the market. This has increased in recent years as major airports such as Heathrow has moved away from less profit generating domestic flights. Therefore a modal shift from domestic air to rail is only likely to occur when links to Scotland are realised. Furthermore, there is no acknowledgement of 'interlining'. Even with a high speed rail link, there would still be a 38% aviation share of the London to Edinburgh route. This further undermines the competitiveness of HS2 on domestic aviation.
61. Phase 1 cannot possibly be carbon neutral given that rail already has majority market share and there are extensive emissions associated with construction and operation. HS2 Ltd confirm this in their report. This means that HS2 will rack up considerable carbon deficits prior to any noticeable impacts on domestic aviation. It is misleading to portray the carbon impacts of a fully operational 'Y' network with links to Scotland without considering the 10+ years of carbon deficit.
62. The Consultation documentation also assumes reductions in carbon emissions from fewer domestic flights, but the reality is that such slots would be taken up by more high polluting long haul flights, resulting in an increase in overall carbon emissions. Colin Matthews, BAA's Chief Executive is quoted as saying:
- "...BAA would like more passengers to arrive [at Heathrow] by train. High Speed rail would attract people who currently arrive by short-haul flights, freeing slots for more long-haul flights."*

63. Mention is made of relying on the untried and untested EU Emissions Trading Scheme (ETS) to control the switch from domestic to international slots. As no further work has been done on the EU ETS it cannot be possible to know the impacts it would have on the freed up domestic slots to international flights. Again, the evidence from industry suggests that they would welcome the switch to more international flights regardless of the EU ETS. This means HS2 will free up flight slots for greater emitting long haul journeys. In doing so it has a detrimental impact on the UK's carbon emissions.
64. With reference to our comments above regarding carbon emissions, we would reiterate that there is no robust evidence presented within the Consultation documentation to substantiate the claims of the extent of modal shift from air to high speed rail. Furthermore, there is no mechanism to secure any reductions by means of slot reduction at the airport and therefore no evidence for any corresponding carbon reductions claims. In direct contradiction carbon emissions could in fact rise as, in the absence of any Government policy to allow for slot reduction, the short haul flights could simply be replaced by more polluting long haul flights. In reality the extensive carbon outputs of the construction and operation of HS2 will be added to the carbon outputs of increased international flights.
65. HS2 is likely to have substantial carbon fiscal cost, which should be accounted for in its business case. Due to the lack of data shown, it is not possible to critically appraise the cost of carbon. Nevertheless, HS2 LTD has costed it at somewhere between +£1.37billion and -£4.6billion. However, they acknowledge this could be worse if freed up domestic slots become international flights, which is the more likely option. Again, no figures have been provided or a proper assessment been made. Combined with the unsubstantiated conclusions it is not possible to accurately cost the financial value of the carbon impacts. However, using logical assumptions and more accurate data gathered in other reports, it is more likely that HS2 would be nearer the -£4.6billion than the +£1.37. If the aspirations of the aviation industry are realised, and freed domestic slots are switched to long haul flights, then the fiscal cost could rise further. A multi billion pound transport investment should not have such a high environmental and fiscal cost; costs which will eventually be met by the public in one way or another.
66. The Consultation documentation lacks a proper appraisal of the impacts of this expensive rail scheme. It is not clear what is meant by the proposed route, and nor is it clear whether the 'Y' network is being assessed or just Phase 1. If it is referring to the 'Y' network then the assessment of construction emissions is considerably less (1.2mtCO₂) than a previous Booz Allen report (5mtCO₂) which investigated a much shorter line. If it does refer to just Phase 1, then all the negative impacts of the shorter route are being assessed against the benefits that can only occur from the completed network. This is misleading and would result in any subsequent support for the project to be fundamentally flawed.

67. There is a considerable amount of missing data and evidence to support the conclusions. There is no mention of the construction of brand new stations, no assessment of the loss of important carbon sinks; no presentation of any flight data; no acknowledgement of a Heathrow Spur at all and the HS2 Report even acknowledges important demand forecasting was unavailable. The HS2 Report is therefore not a suitable evidence base on which to make a decision on a £34 billion 'green' infrastructure project.

Will it improve air quality?

68. The HS2 London to the West Midlands Appraisal of Sustainability (AoS) of February 2011, which forms part of the Consultation documentation, recognises that local air quality reduction from a mode shift from car to rail is not expected to be significant. Given that this proposal represents one of the biggest transport interventions that the UK is likely to see for the foreseeable future, it would appear to be a completely missed opportunity not to have looked at alternative options to HS2 or at least to have optimised the route to ensure that modal shift from cars was significant and led to an improvement in local air quality, especially in areas where this is already above acceptable levels.

69. The area around Heathrow is a poor air quality hotspot. If short haul flights are lost to a shift to high speed rail and the slots are then simply replaced by larger aircraft, this could generate even further trips by road from an increase in airline passengers accessing the airport, in an area which is currently suffering from poor air quality. Heathrow is likely therefore to see negative effects. The Council wish to stress that there is no evidence produced to be able to conclude that the local air quality around areas such as Heathrow will not suffer from increased passengers accessing the airport by surface transport, such as road vehicles, as freed up slots are used by larger planes with larger passenger numbers.

70. HS2 Ltd's rationale for including a Heathrow link is to deliver better 'international connectivity'. This implies there is an acknowledgement that freed up domestic flight slots will be switched to international slots. These are larger aircraft carrying more passengers. The Heathrow link will therefore induce more activity around the airport which is not likely to improve air quality conditions.

71. Unless there is a Government intervention to freeze freed up domestic slots and allow them not be used for more international flights, HS2 Ltd cannot claim there will be minimal air quality impacts around Heathrow. The UK is under increasing pressure to meet its EU targets particularly within London where there are acknowledged failings. There cannot continue to be support for new schemes that add to the already costly poor air quality in London. Rail is supposed to be seen as an opportunity to reduce emissions. However, HS2 will not compete with domestic car users, and induce far more activity in some of the poorest air quality areas in the country.

72. We understand that Transport for London (TfL) has concerns regarding the impact of HS2 on Euston and the ensuing passenger dispersal. TfL's own modelling of predicted passenger numbers is significantly higher than the HS2 modelling forecasts and suggests that a more substantial investment in infrastructure will be needed in order to ensure adequate passenger dispersal is achieved. Without a substantial investment in extra rail infrastructure to alleviate the current underground lines there will be even more pressure on the surrounding road network with regard to cars accessing the site, taxis and buses. All of these have the potential to impact on the local air quality levels. Alleviating the air pollution problem may necessitate extra costs to the project and these should be explicitly allowed for in the economic case.
73. The AoS document correctly identifies the issue of poor air quality in London and in Hillingdon. However, there is a concern that reference is made to the area around Euston still not meeting the annual mean objectives for NO₂ or PM₁₀ around Euston station as far ahead as 2026. Para 7.5.15 of the AoS Main Report Volume 1 states that:
- “However it is unlikely that the annual mean objective for NO₂ or PM₁₀ will be met at Euston station by this time.”*
74. As these are European Union limit values that the UK is obligated to meet within strict deadlines it would appear inconceivable that the UK Government would allow this situation to remain as far in the future as 2026. The report goes onto state:
- “After this time (2026) air quality may deteriorate to some extent as increases in road traffic offset other gains, but this is by no means certain.”*
75. It is considered to be unacceptable to put forward a high traffic-generating scheme, such as a high speed rail terminal, where it is acknowledged air quality levels are already over the recognised health-based European Union limit values and not to include details of identified measures to be put in place to address this. It is not clear from the documentation as to why this is the case. However, from this restricted analysis it could be concluded that Euston is not the appropriate place to locate a high trip-generating transport hub, which will increase large numbers of extra road movements from cars, taxis and buses.
76. In particular, it is acknowledged that the Euston station works would take 7-8 years. Air Quality from construction works can be significant, yet this does not appear to have been factored into the HS2 appraisal.
77. The Consultation documentation submitted by HS2 Ltd acknowledges that London will continue to fail to achieve its air quality targets. This is in contradiction to the policies in the London Plan, which the Government has approved and the Mayor's Air Quality Strategy which both stress the need to

improve local air quality, especially in areas where it is above the recognised EU limits.

78. It must be understood that HS2 will cost considerable amounts with regards to EU fines, but more importantly, these poor air quality areas have huge social and health impacts. If these wider impacts of the scheme were given the correct amount weight, it would be inevitable that any serious and logical consideration of the assessment of the scheme would result in the scheme being dismissed.

Is the Consultation flawed?

79. The Government's proposals for HS2 are apparently derived from the National Infrastructure Plan, and yet this Plan has not been subject to any public consultation and nor have the HS2 proposals been looked at within any overall strategic national integrated transport infrastructure planning framework. The Council believes that the decision making process which has been used to promote and progress HS2 is flawed, does not stand up to scrutiny and is undemocratic.
80. We also consider the consultation process to be inadequate because Question 1 is an unfair question to ask given that only one proposal is being consulted on.
81. From the evidence commissioned by Hillingdon as part of the 51M Group in support of its response to this consultation, it is clear that the evaluation of HS2, as represented in this Consultation, is seriously flawed and inadequate as a basis for making any decisions on the merits of this major infrastructure project.
82. The methodology used is fundamentally flawed in several respects and the analysis of the merits of HS2 against alternative solutions has not been properly assessed. Furthermore, the information has been seriously distorted in a way that leads to misleading conclusions on the net benefits of the scheme.
83. The choice by DfT to use a version of the methodology that is contrary to their normal forecasting practice, in order to forecast rail traffic demand is an example of how this Consultation has not used sound science responsibly. It has not ensured that the policy for high speed rail has been developed on the basis of strong scientific evidence, or that sufficient precaution has been built into its analysis to guarantee the business case analysis is robust. There is a strong likelihood that the traffic forecasts for HS2 are too high and, at the very least, it should be admitted that the forecasts are highly uncertain and subject to a very high margin of error.

The Council's recommendation

84. The Council believes that the proposals for HS2 have not been set within an agreed strategic national integrated transport infrastructure planning framework. There is no convincing business case for HS2. The evidence presented in the Consultation documentation is not robust because the economic benefits appear

to have been overestimated and are based on optimistic passenger demand forecasts; the environmental and regeneration costs have not been properly addressed; and the options have not been properly considered. Overcrowding could be addressed by better value alternative measures or by a better alternative HS2 route. In comparison to these alternatives, the HS2 proposal is enormously expensive and environmentally damaging. There is insufficient information to be confident that the HS2 proposals will reduce the North/South economic divide; and the evaluation of HS2, as represented in this Consultation, is seriously flawed and inadequate as a basis for making any decisions on the merits of this major infrastructure project. There is no evidence to suggest that the Government's proposal for HS2 is in the national interest. We also believe that Question 1 is an unfair question to ask given that only one proposal is being consulted on. The Council therefore believes that the Government should withdraw this proposal for HS2. Any future High Speed Rail proposals should be re-evaluated in a more robust scientific manner.

QUESTION TWO

This question is about the case for high speed rail.

Do you agree that a national high speed rail network from London to Birmingham, Leeds and Manchester (the Y network) would provide the best value for money solution (best balance of costs and benefits) for enhancing rail capacity and performance?

Executive summary

1. Hillingdon Council is concerned that this may be a totally rhetorical question because it appears that the Government may have already predetermined its decision about a high speed rail line between London and Birmingham and also the Y network. This commitment appears to be set out in the remits provided to HS2 Ltd. If the Government has predetermined this issue, the Council believes this Consultation would be completely flawed. We therefore hope that this is a genuine Consultation.
2. The Council does not believe that the Government's proposals for a high speed rail network from London to Birmingham, Leeds and Manchester (the Y network) offers the best value for money solution for enhancing rail capacity and performance. There are also no convincing environmental or social benefits from the scheme and it is therefore not in the national interest. There are a number of reasons why the Council has reached this decision, which are summarised below.
3. The Consultation documents do not propose a national high speed rail network because the Y network is a regional project restricted to linking just four cities. There are no proposals for a national high speed rail network to other areas such as the South West, Wales East Anglia and the South.
4. The proposed Y network is a very costly scheme which is not supported by the business case. The Council believes that an optimised package of rail upgrades and effective demand management measures would provide a better value for money solution by delivering the necessary capacity increases for the rail network much sooner than 2033, at lower financial cost, and offering better value to the taxpayer.
5. The benefits of HS2 appear to be contrived, are based on a number of unfounded assumptions and are likely to be significantly overestimated, whilst the economic, environmental and social costs of HS2 have not been adequately assessed.
6. Finally, we believe that the Consultation process is seriously flawed and inadequate because the economic case has been presented in a misleading manner, particularly with regard to the cheaper alternative options to HS2, which have not been properly set out.

Introduction

7. The Council, as part of the 51M group, has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. The Council's response to Question 2 is set out below. It draws on the detailed work of the expert advisors, which have been incorporated into the 51M response to the Government Consultation, and should be read in conjunction with this submission as an integral part of the answer.

8. With regard to Question 2, the Council's main issues are that:

- This may be a totally rhetorical question if the answer has been already predetermined, as suggested in the Government's remits provided to HS2 Ltd. If so, the Council believes this Consultation to be completely flawed.
- HS2 will cost £33bn and it will not be running until at least 2033. It is not supported by the business case. The alternative options do not seem to have been properly evaluated, and the Council believes that an optimised package of rail upgrades and effective demand management measures would provide a better value for money solution by delivering the necessary capacity increases for the rail network much sooner than 2033, at lower financial cost, and offering better value to the taxpayer.
- HS2 is likely to be a subsidy to long distance rail users.
- The benefits of HS2 appear to be based on a number of unfounded assumptions and are likely to be significantly overestimated.
- The economic, environmental and social costs of HS2 have not been adequately assessed.
- The passenger demand forecasts for HS2 (which directly affect revenues and the wider economic case) are unrealistically high and are unlikely to be met.
- The Consultation process is seriously flawed and inadequate because the economic case has been presented in a misleading manner, particularly with regard to the cheaper alternative options to HS2 which are not properly set out.

9. Each of these seven key issues is described in more detail below.

Has the Government already made its mind up about HS2?

10. This is a totally rhetorical question because the answer has been already predetermined in the Government's remits provided to HS2 Ltd. Given this predetermination, the Council believes this Consultation to be completely flawed.

11. It is clear that the previous Government was committed before 2009 to a new ultra high speed railway line from London to Birmingham and beyond, because the DfT report 'Britain's Transport Infrastructure HS2' dated January 2009, specifically stated that the remit for HS2 Ltd was:

“to help consider the case for a new high speed services from London to Scotland. As a first stage we have asked the company to develop a proposal for an entirely new line between London and the West Midlands. To reach a view on this, the company will need to assess the likely environmental impact and business case of different routes in enough detail to enable the options to be narrowed down.”

This first remit clearly asked HS2 Ltd to focus purely on finding an entirely new route and totally excluded any consideration of other alternative proposals.

12. The current Government has continued to progress the proposals for HS2 without challenging the merits of a new high speed network. In the Government's National Infrastructure Plan which was published on 25 October 2010, this stated in para 4.24 a commitment for:

“investment in a high speed rail network that would make rail increasingly the mode of choice for intercity journeys within the UK and for many beyond. A new high speed rail network could transform journey times on key inter-urban routes and radically reshape the UK's economic geography: connecting this country's great cities and international gateways and helping to bridge the north-south divide that has for so long, limited growth outside of London and the South East.”

13. This commitment to HS2 was contrary to a number of previous reports to Government that questioned whether creating new networks is the most appropriate or cost-effective method to achieve economic growth. The Eddington report in 2006 stated that:

“... the UK's economic geography means that the principal task of the UK transport system is not, in comparison to the needs of France or Spain, to put in place very high-speed networks to bring distant cities and regions closer together, in order to enable trading and facilitate economies of scale. Instead, because the UK's economic activity is in fact densely located in and around urban areas, domestic freight routes and international gateways, the greater task is to deal with the resulting density of transport demand.”

14. The Government's commitment was also contrary to the sentiments made by the DfT themselves in the 2007 White Paper Delivering a Sustainable Railway, which states:

“But it would not be prudent to commit now to 'all-or-nothing' projects such as network-wide electrification or a high speed line, for which the longer term

benefits are currently uncertain and which would delay tackling the current strategic priorities such as capacity.”

15. We believe that the option of increasing capacity by means of upgrading the existing network should have been robustly analysed before the option of a high speed railway line was decided.
16. Having considered the Consultation documentation, the various remits to HS2 Ltd and the Government’s National Infrastructure Plan, it is apparent that the Government has already decided to proceed with HS2. No serious consideration has been given to any other alternative options for enhancing rail capacity and performance, and so this Consultation process does not appear to be genuine and it is therefore seriously flawed.

Would alternative options offer better value?

17. The Council does not believe that the proposal for HS2 provides the best value option for increasing rail capacity and performance. The Council is of the view that HS2 is a very costly scheme which is not supported by its business case. Other options, such as an optimised alternative package of rail infrastructure upgrades and effective demand management measures to absorb peak time overcrowding, can deliver more capacity than is needed at a much lower cost and can be implemented faster, in an incremental manner that avoids the risks inherent with long term demand forecasting. These cheaper alternative options to HS2 have not been properly set out.

18. We would echo the sentiments of made by the DfT themselves in the 2007 White Paper Delivering a Sustainable Railway, which states:

“But it would not be prudent to commit now to ‘all-or-nothing’ projects such as network-wide electrification or a high speed line, for which the longer term benefits are currently uncertain and which would delay tackling the current strategic priorities such as capacity.”

19. DfT’s Rail Package 2 was reported by HS2 Ltd to have a ‘Benefit Cost ratio’ (BCR) of 2.4 (High Speed Rail Command Paper, March 2010, table 2.4), comparing favourably with the BCR of 2.0 for the London to West Midlands HS2 line, as reported in the current Consultation document (The Economic Case, Table 10, February 2011). Furthermore research suggests that Rail Package 2 was misrepresented by HS2 Ltd in their reports by not using an optimised version of the scheme and by treating rolling stock as a lease cost, while HS2 had its rolling stock treated as capital. If this had not occurred, the BCR of an optimised Rail Package 2 could be as high as 3.63. The Council therefore believes that a proper evaluation of alternatives would show that HS2 does not represent the best value option for improving rail capacity in the UK.
20. It is worth noting that the report by Oxera (20th June 2011) concluded in para 2.9 that:

“The WEIs for the London-West Midlands strategic alternative Package 2 were previously estimated in the 2010 business case. If these were to be added to the current BCR estimates for Package 2 (ie 1.9), its BCR would reach 2.0 – the same as HS2.”

21. The Council does not believe that HS2 provides the optimum solution to the capacity issues on the rail network. The service specification of HS2 does not appear to be realistic because it refers to 18 trains per hour for the Y network (The Economic Case, Figure A2 on page 61, February 2011), which has not been achieved anywhere in the world for high speed rail. The Tokaido Shinkansen operates at the highest capacity, with up to fourteen trains per hour at peak periods. However, the Japanese high speed network is self contained, and does not connect with or import delays from the ‘classic’ network, which is built to a different track gauge.
22. There are also further doubts raised about the proposed capacity for HS2 because HS2 Ltd has not built into its current specification the proposed services to Heathrow and the link to HS1, which are likely to reduce capacity on the network as there will be train paths lost into Euston for every HS2 train connecting to Heathrow and HS1. This is also likely to have knock on effects on service reliability.
23. More worryingly, HS2 Ltd’s own documentation (High Speed Rail for Britain – a report by High Speed 2 Ltd, para 3.10.17) shows that between phase 1 opening in 2026 and the completion of phase 2 in 2033, there will actually be less capacity on the West Coast Main Line north of Lichfield. So for Phase 1, from 2026 until at least 2032/3 (assuming Phase 2 is built), HS2 Ltd plan to provide 3 x 550 seats to Manchester, a total of 1,650 seats, which is a reduction of 6.6 per cent on the total from 2012 compared with the capacity provided by 11 car Pendolino sets (Chapter 8 of 51M’s TSC submission by Chris Stokes). At the same time, HS2 (in para 3.3.9. of the Economic Case) forecast passenger growth of 107% for phase 1 (more than three times the current total), and claim reduced overcrowding. This is simply not credible.
24. It is stated in the Consultation document (para 1.49) that:

“full and subsequent additional capacity could only be provided by exceptionally expensive infrastructure solutions.”
25. The Council believes that this is untrue. Detailed work carried out for the 51M Group shows that any foreseeable level of demand growth can be cost effectively met by a range of incremental measures, including some specific infrastructure investment, if this proves to be necessary, without the construction of HS2. These measures include:
 - Taking account of the ‘Chiltern Evergreen 3’ works, which will be completed in 2011 and provide journey speeds from London

Marylebone to Birmingham only a few minutes longer than those on Virgin trains. This will reduce demand from Euston and increase capacity, although the works have been ignored in the DfT business case.

- Targeted infrastructure investment to clear selected bottlenecks/ pinchpoints to enable frequencies to be increased.
- More effective demand management, including 'smart ticketing' and use of obligatory reservations when appropriate, to even out peak demands.
- Rolling stock reconfiguration, particularly conversion of at least one first class carriage to standard class, which is where the overcrowding occurs.
- Operation of longer trains (all to 12 cars except for Liverpool which would be limited to 11 cars).
- The outcome of the last two measures would be to provide an additional 4 standard cars per train, i.e. 9 standard cars instead of 5.

26. It should be noted that the DfT and HS2 Ltd have given no consideration to improved demand management and rolling stock reconfiguration, and have not optimised their evaluation either of train lengthening, or of incremental infrastructure investment.

27. The optimised package of targeted incremental upgrades as proposed above also seems to find support in the plans set out by the Government in the National Infrastructure Plan of October 2010. It was stated on page 21 that:

“Where maintenance and demand management investment needs to be supplemented, the focus of new capital investment should be on pinch points to enhance resilience and capacity of the network overall... small investments can often be much more effective at tackling issues like congestion.”

28. As an alternative to HS2, an optimised package of incremental upgrades and improvements to the rail network and management could deliver a trebling of capacity at a cost of 32bn, i.e. a 211% increase over the 2008 base (see fig.1.).

Interventions	Daily trains	Daily standard class seats	% increase above 2008 base	Comments
Train investment with no/little infrastructure investment				
HS2 2008 Base		59,298		Base used by DfT for evaluation of HS2. Predates full WCML upgrade timetable
Current timetable	286	81,924	38%	Includes Voyager services (30 daily)
Evergreen 3	[68]	[28,900] ¹	[55%]	Committed scheme – complete in 2011
Committed lengthening project	286	105,924	79%	Committed scheme – implemented from 2012
December 2013 additional services	306	113,769	92%	Additional hourly off-peak train each way
First class reconfiguration	306	134,379	127%	One car converted from first to standard
12 car sets (except Liverpool)	306	166,908	181%	Major physical constraints at Liverpool
Infrastructure Investment				
Additional services	336	184,326	211%	30 additional daily trains following investment to relieve pinchpoints

Figure 1

29. An optimised alternative package also has the advantage over HS2 of being capable of implementation within 5 years. Therefore its benefits can be felt 10 years ahead of when HS2 would have any positive impact, tackling the capacity issues now. Therefore the Council believes that HS2 is not the only viable method of increasing capacity on the rail network, nor is the most logical solution. As stated in the Eddington Transport Study:

“Because the UK is already well connected, the key economic challenge is therefore to improve the performance of the existing network... There are very high returns from making best use of existing network. Large projects with speculative benefits and relying on untested technology, are unlikely to generate attractive returns.”

30. Notwithstanding the fact that other alternatives to HS2 do not appear to have been properly assessed, the Council also believes that other alternative routes for HS2 have not been properly examined. As stated in our response to Question 3, the provision of links to Heathrow Airport and HS1 have been fundamental requirements in the remit of HS2 Ltd from its conception in 2009. The original conclusion of the HS2 Ltd report in March 2010 was that there was no business case for a link to Heathrow Airport and there was also little demand for a link to HS1. Given this information, the Council believes that the Government should have revisited the remit for a high speed rail network. It is a fundamental flaw to have included these two links within the remit of the line. This flaw in the decision making process then heavily influenced the assessment of the alternative routes and hence the choice of the preferred route. For

example, at the HS2 Roadshow, Hillingdon Officers were told that a more northerly route out of London may have been the obvious choice, if the decision to provide a direct link to Heathrow had not been made at an early stage. The Government should therefore re-think the provision of, and line of route of, any future high speed rail network.

Is this a subsidy for long distance commuters?

31. The case for HS2 is not based on commercial grounds, but it is justified on the estimated social benefits. The Consultation document, in Table 2 page 12 shows that the capital and operating costs, plus any cost savings to the classic line facilitated by HS2, (which amount to £44.3 billion for the Y network), will not be met by the projected revenues which are estimated to be £27.2bn. This means that there will be a cost to the government of £17.1 billion for the Y network, equating to about £28.4 million per annum for life of the 60 year scheme. This represents a public subsidy to long distance rail users. It has not been explained why this group is worthy of such a subsidy. The evidence shows that long distance rail trips are predominantly made by the affluent with 47% of journeys being made by those in the top 20% household income bracket. Furthermore as pointed out in the report by Oxera (20th June 2011) in para 3.49 that the Economic Case:

“estimates that about 67% of the transport user benefits (of the Y network) are likely to go to business users – i.e. individuals who tend to be from higher income groups.”

32. The Council therefore feels that HS2 represents a regressive use of public money. It is worth noting at this point that the £17.1 bn subsidy for the capital and operational costs of HS2 will be on top of the annual subsidy the UK government gives to the rail industry, which is currently between £4-6 bn per year. It is also incongruous that the government should be proposing such a large capital subsidy to HS2 at a time when it has separately commissioned Roy McNulty to investigate the economic state of the UK rail industry in an attempt to reduce its cost to the taxpayers.

Are the benefits of HS2 overestimated?

33. The Council believes that the benefits of HS2 are significantly overestimated, because:
- it is assumed that time spent on trains is wasted
 - it is assumed that that nothing will be done to address overcrowding on the West Coast Main Line until 2026
 - the regeneration benefits have not been properly assessed
34. These three points are discussed in more detail below.

It is assumed that time spent on trains is wasted

35. The economic case for HS2 assumes very high 'transport user benefits' which total £38.3 billion, which is included in Table 2 of the Consultation document 'Economic case for HS2'.
36. The economic case for HS2 is heavily reliant on the monetary value attached to time savings arising from shorter journey times, which is based on the assumption that all time spent on travelling on trains is wasted. However, the Council believes that this approach is flawed and factually wrong, because it takes no account of modern technology which allows business travellers to work on trains.
37. In the current consultation DfT itself acknowledged that this is an outdated assumption by stating:

"Rail passengers are increasingly spending at least some of their time in productive activity."
38. Despite this acknowledgement, time savings are still key to the HS2 economic case accounting for £7.5 billion or 41.9% of the total benefits for the London to West Midlands phase (The Economic Case, Table 10, February 2011). Without this incorrect assumption, there is no business case for HS2.
39. HS2 Ltd have stated in para 7.3.3 of the Economic Case that if productive use of travel time is taken into account, the reduced productivity from having to stand on trains should be taken into account. It goes on in para 7.3.4 to explain that if the business value of time is halved and if crowding impacts are adjusted to reflect the loss of value experienced by business passengers travelling in crowded conditions, the BCR would increase slightly. However the details of this calculation have not been provided for scrutiny. Nor have HS2 Ltd taken account of the fact that the much cheaper alternative proposals have lower levels of crowding than HS2 (HS2 predicts load factor of 58% in 2043, whereas the Optimised Alternative has about 52% and even the DfT alternative RP2 has 51%), and can provide additional capacity sooner.
40. There is also a flaw in the unit costs that have been assumed for earnings. The Consultation documentation with regard to the Economic Case relies on figures that translate into a salary of £70,000 per annum in 2009 money. However the ASHE survey of 2009 (ONS survey) refers to a figure of £47,000 per annum as the mean gross annual earnings for 'managers and senior officials', which would be a far more realistic figure to assume for HS2 business passengers. That change in itself would take about £7 billion from the £44 billion benefits that HS2 Ltd claim, because it affects time savings and reliability calculations.

It is assumed that that nothing will be done to address overcrowding on the West Coast Main Line until 2026

41. The Council believes the benefits of HS2 have been inflated by assuming that in the intervening years between now and HS2 finally opening in 2026, that nothing will be done to ease the burden of overcrowding on the West Coast Main Line. As a consequence, HS2 is found to generate extra benefits by removing overcrowding, as well as providing faster and more reliable services. But this is a false assumption given that some improvement works are currently underway, such as the Chiltern Railways Evergreen 3 scheme. The Council believes that this unreasonable assumption seriously distorts the economic case for HS2.

The regeneration benefits have not been properly assessed

42. The Consultation document states in Table 2 of the 'Economic case for HS2', that HS2 will bring about £4bn of wider economic impacts (WEIs), and that this will give rise to up to £6.3bn for the full Y Network. These WEI's are both central to the economic case for HS2 and also for meeting the government's commitment to provide long term sustainable growth and reducing regional disparities.

43. The Council believes these WEI's have been overestimated. No convincing evidence has been provided to support the rhetoric that HS2 will be able to rebalance the economy and bridge the north-south divide.

44. The Executive Summary of the Consultation document states that the first phase of HS2:

"would support the creation of around 40,000 jobs and contribute to major regeneration programme in Britain's inner cities."

45. However, para 5.89 of the Consultation document states that the proposed interchange at Old Oak Common has the potential to contribute to the creation of 20,000 jobs. The document goes on to state that estimates suggest that the development of the Birmingham interchange could contribute to 3,800 jobs in the area. Para 5.91 refers to the proposed construction of the HS2 terminus at Curzon Street, which could contribute to the creation of 4,500 new jobs. This means that less than 50% of new jobs will be created in the Midlands, with the major regeneration benefits being focussed on London, which will clearly not help to reduce regional disparities.

46. In a report prepared for the Transport Select Committee by Professor Tomaney on the regional impacts of high speed rail (chapter 5), he shows that there is no clear cut evidence to suggest that HS2 would reduce regional disparities. He refers in para 5.26 to the French high speed rail system being:

"one of the most successful in financial terms and in the impact it has had on the cities served." The report notes that that 'there is some evidence that cities such as Lyon and Lille have benefitted from the creation of HSR line.Nevertheless, the French capital has gained the most from the creation of a network that has Paris as its central node 2."

47. Evidence produced by Albalade and Bell in 2010 shows that in the Paris-Rhone-Alps route, flight and rail journeys to Paris increased by 144% whilst those in the opposite direction increased by 54%. Survey based analysis also indicated that the impact of high speed rail on business location was negligible.
48. Professor Tomaney's report also refers to further evidence in Spain that indicates that HS2 may not reduce regional disparities, but could result in further polarisation of activities. He refers to evidence which shows that Madrid has benefitted the most from the high speed rail line between Seville and Madrid, contributing to a greater centralisation of businesses and population to the capital city.
49. With regard to the Government's desire to see the high speed network changing the economic geography of the country, the report by Oxera (20th June 2011) comments in para 3.49 that:

"In practice, there are likely to be higher benefits in the vicinity of high speed rail hubs, so the 'regeneration' benefits to those areas are likely to be understated. However, these may be offset by some economic losses in other areas, including locations not served by the high speed line – the 'tunnel effect'. Thus, the London and Birmingham economies might benefit partly at the expense of areas not served by the new scheme. The precise impacts will depend on the allocation of conventional services on the WCML and elsewhere."

The economic, environmental and social costs of HS2 have not been adequately assessed.

50. The Council believes that the economic costs of the scheme have not been properly assessed for the following reasons:
- no account has been made for the wider economic costs of the proposals.
 - no account has been taken of the economic costs of HS2 that will arise during the construction.
 - there has been insufficient regard to the environmental costs of HS2.
 - no account has been taken of the social costs of HS2.
51. No account has been made for the wider economic costs of the proposals, despite the acknowledgement (in para 4.4.10 of the Consultation document 'The Economic Case for HS2'), that not all effects of the scheme will be positive.
52. The report by Oxera (20th June 2011) assesses the estimates that have been made by HS2 Ltd of the adverse economic impacts on areas not served by the new high speed line. In para 3.51 it concludes that:

"However, a number of impacts of the proposed scheme have been assessed at the route level only. This prevents a clear indication of whether the benefits or

costs are concentrated in certain regions.” In para 3.52 it states that “When the AoS does assess benefits and costs by route selection, it is not clear whether certain regions benefit at the expense of others.”

53. It is clear that while areas such as Old Oak Common and the east side of Birmingham will see regeneration and increased economic activity, it is equally likely that other areas will lose out, as a result of the relocation of existing businesses and also due to less frequent train services and lower investments levels in the classic network serving those cities and towns.
54. The experience of other countries, such as in France and Spain, has shown that train services on the ‘classic’ main lines affected will be reduced. Given that the HS2 business case assumes that long distance travel between the cities served by HS2 would transfer to the high speed line, it would not be sustainable to operate a high frequency service between Manchester and London on the existing route when trains no longer carry end to end traffic. In fact many towns and cities not directly served by HS2 can expect to see a deterioration in the London Inter City services, and this is reflected in the HS2 business case.
55. The Consultation documentation acknowledges this in paras 2.2.7 and 4.2.4 of the ‘Economic case for HS2’ by stating:
- “In addition we can reasonably assume that there would be a reduction in long distance services on the Midland and East Coast Main Lines as the new high speed services were introduced” and “we have also assumed an adjusted service pattern on the WCML, with the withdrawal and adjustment of some long distance services.”*
56. Given the planned reductions in services, HS2 Ltd have included significant savings in operating costs in their overall business case for the Y network at a total ‘net present value’ of £5.4 bn.
57. The Consultation documentation does not refer to the impacts on services on the classic routes after HS2 is operational. However the technical appendices for HS2 published by the DfT in March 2010 provided some information for Phase 1, which is likely to still be relevant. This broadly indicated that some stations on existing routes would see a reduction in the frequency of services to and from London and also, in many cases slower journey times as a result of intermediate stops.
58. With regard to phase 1, this would apply to Coventry, Wolverhampton and Stoke on Trent. With regard to phase 2, this would apply to Leicester, Chesterfield, Peterborough and Doncaster. For example Coventry is likely to see train services to London reduced from three to one per hour, and journey times increased by 10 minutes.
59. There is also a likelihood that all Great Western Main Line services will have to call at Old Oak Common because of the proposed stops in the Heathrow

Express Services. This would increase all journey times to and from Paddington by between 4 and 5 minutes. However HS2 Ltd have not taken account of these increased journey times in the economic case for HS2.

60. The economic costs of HS2 that will arise during the construction period have also not been considered. Firstly, there will undoubtedly be significant disruption to traffic and public transport services during the 7-8 year period of construction, which will add enormously to journey times. In Hillingdon, HS2 will pass over/under 6 roads i.e. Long Drive, Bridgewater Road, West End Road, Ickenham Road, Breakspear Road South and Harvil Road. These roads link key residential and employment areas within the borough. These roads already suffer from congestion during peak hours and the construction of HS2 is likely to cause serious disruption to traffic flows and public transport services, including bus, rail and underground services. There appears to have been no assessment made of the increasing journey times and disruption caused during the construction of HS2, which will be very significant.
61. Secondly a number of businesses will be directly affected by HS2, including businesses that will have to relocate or farms whose land holdings will be severed. In Hillingdon, there are a number of businesses that will be affected. These include the Days Hotel in South Ruislip, Shering Plough in Harefield, Bleinhein Care Centre, the Victoria Road Waste Transfer Station and Park Lodge Farm. Whilst it may be feasible to relocate some of these businesses, others may find it impossible to do so. There will also be businesses that do not need to be demolished as a result of HS2 but who are so adversely affected that the businesses become economically unviable. An example would be the Days Hotel which may suffer a significant loss of business due to the close proximity of HS2. The Council believes that such impacts should be taken into account in assessing the business case for HS2.
62. As stated in our response to Question 1, the Council is concerned that the environmental costs, particularly those relating to carbon emissions have not been properly quantified. Further details on the environmental impacts of HS2 are set out in the Council's response to Questions 3, 4, 5 and 6. The Council's concerns appear to be supported by the report by Oxera (20th June 2011), which states in para 3.44 that:

“The case for high-speed rail is affected by the impacts on carbon emissions that are quantified, although these do not appear to be included in the BCR. Given the very limited anticipated substitution from air to rail (6%) and car (7%), the substantial volume of new trips (22%) suggested by HS2, and the lower rates of emissions from slower trains, the classic rail options could well involve lower overall emissions. This would bring the comparison of BCRs closer together for the Y network and generate an advantage for the classic rail options to Birmingham.”

63. The Council believes that other environmental costs such as impacts on the landscape should have been properly assessed and costed. The impacts on the landscape in Hillingdon are significant, as they are in the Chilterns and other areas along the route. Again the Council's concerns appear to be supported by the report by Oxera (20th June 2011), which states in para 3.45 that:

"The AoS does not explicitly consider the landscape impacts of building a new high speed line, which HS2 Ltd rightly believes would be important. Neither are such effects included in the calculated BCRs, and the extent to which they would reduce the measured value for money of a new line is therefore unclear."

64. Para 3.46 of the report by Oxera goes on to say that:

"Studies do exist of the values attached by people to particular kinds of landscape and Government has in recent years proposed and undertaken new studies. It should be possible to produce broad estimates of the order of magnitude of landscape costs for a new high speed line."

65. The proposal for HS2 also has a number of significant social costs associated with it. An example of this is the Hillingdon Outdoor Activity Centre. This is a very well used community facility which serves a wide area, including children and adults in west London and Bucks. The Centre is, at best likely to be closed for up to 2 years whilst the viaduct over the lakes is being built. However the worst case scenario is more likely, which is that it will be rendered unusable due to the noise and the number of piers which will seriously affect boating and educational activities. The Centre has grown steadily over a period of 15 years with over 40,000 people using it each year. It is highly unlikely that the Centre could be relocated and the loss of this important community facility will have significant implications. Even any prolonged closure during construction would have serious adverse implications on user numbers even if it is able to reopen, which is unlikely.

66. The Consultation documentation is very brief in terms of evidence to support which particular social groups would benefit from the proposal for HS2. It is clear that the users of HS2 would be largely from the higher income groups and the Government purport that HS2 will change the economic geography of the country. However there is no convincing evidence to support this claim and the report by Oxera (June 2011) has stated that:

"In practice, there are likely to be higher benefits in the vicinity of the high speed rail hubs, so the 'regeneration' benefits to those areas are likely to be understated. However, these may be offset by economic losses in other areas, including locations not served by the high speed line – the 'tunnel effect'."

67. The evidence suggests that the Government does not seriously take on board the social impacts of its proposal for HS2. The Council believes that the Equalities Impact Assessment for the HS2 is not fit for purpose because it is

inadequate as a tool to consider the implications of the Government's proposal on the whole community. It does not appear to adhere to the transparency and accountability element of the Public Sector Equality Duty, and does not appear to assist in eliminating discrimination; tackling inequality; or in targeting resources efficiently.

68. In terms of the effects of HS2 on people's health and well being, the Consultation documentation (para 8.13.1 of the AoS) states that:

"The appraisal has not included a full health impact assessment (HIA), since proposals are not sufficiently refined or agreed at this stage to allow this."

69. The assessment on people's health and well being that is provided in the Consultation documentation is therefore at a very general and it is not based on any evidence. It is assumed in para 8.13.3 of the AoS that health and well being will be improved as a result:

"of improvements in accessibility and changes in economic prosperity and welfare."

70. It is also assumed that:

"Impacts on physical health would derive from the potential for HS2 to encourage a healthier lifestyle (for example through more active travel options). At this stage there is little information about the likelihood of people using active travel to access new stations."

71. The AoS refers to potential adverse effects on people's health and well being, but again it states that in para 8.13.7 that:

"There is insufficient information currently to ascertain the degree of risk to health from such impacts and that HS2 Ltd would consider it a priority to implement sufficient mitigation, both during construction and operation, to ensure that such impacts were avoided where possible."

72. It is not acceptable to assume that it will be possible to mitigate all the adverse impacts that will arise from this major infrastructure scheme. Given the Council's concerns over the construction impacts that are likely within the borough, for which no details have been supplied, and the concerns over the ability of any measures to mitigate against air quality or noise impacts, the Council is not confident that any health impacts arising from this can be reduced to accepted levels.

73. The document states that a full Health Impact Assessment will only be undertaken if the HS2 proposal is progressed further. However that would happen after the proposed route has been agreed and therefore it will not inform the crucial decision making process, but merely endorse it whatever its outcome. The Council believes it is irresponsible not to understand the full implications of a

scheme of such magnitude on the health of local residents, prior to any decision on whether it should go ahead.

Are the passenger demand forecasts unrealistically high?

74. The Council believes that the passenger demand forecasts for HS2 (which directly affect revenues and the wider economic case) are unrealistically high and are unlikely to be met. The case put forward by the DfT for HS2 is based on a social cost benefit, which assumes that 136,000 passengers would be using HS2 per day by 2043 (Economic Case for HS2, para 3.3.9, February 2011). The benefits for HS2 are calculated on such forecasts of numbers of passengers that will use the service, otherwise known as the demand forecasts. This has a large bearing on the economic case for the scheme, because passenger numbers directly affect revenue in terms of fares income and the scale of economic benefits accrued through savings in journey times. The Council believes that the passenger demand forecasts for HS2 are unrealistically high for the following 4 main reasons:

- the wrong methodology for demand forecasts has been used
- the growth in rail travel for business passengers has been overestimated
- a very high modal shift from air travel to HS2 has been forecast
- it is assumed that no premium fares will be charged for the service

The demand forecasts are based on the wrong methodology

75. The issue of passenger demand forecasts for HS2 has been documented in detail in the 51M submission to the Transport Select Committee, in chapter 2 paras 2.14 - 2.19.

76. The demand model used to forecast background growth for the HS2 consultation is the Passenger Demand Forecasting Handbook (PDFH). The background growth in demand for rail travel is the basis for HS2's demand forecasts and also ultimately the business case for the proposals. The Council believes this type of model is best used for short to medium term forecasting and its use as the basis for HS2 is unsound, causing the demand forecasts to be exaggerated.

77. The PDFH is produced in consultation with the industry and assumes that rail travel demand will increase far more quickly than incomes. The model uses income elasticities to predict future trends in travel, meaning that as income grows, demand for rail travel also grows as an increasing rate. The PDFH used to forecast HS2 has an income elasticity of demand greater than 2 i.e. it predicts that demand for long distance rail travel will grow at more than twice the rate of income growth, assuming that real rail prices stay constant.

78. It is generally accepted that in order to take account of market saturation it is necessary to stop or cap the projections at some point, as demand cannot keep

growing at an increasing rate indefinitely. This is particularly important when using a fixed elasticity model (such as the PDFH), as it assumes people spend ever increasing proportions of income on travel. Different views are taken as to when growth should be capped:

- DfT recommend a normal horizon for projecting increases to 2026 i.e. 18 yrs (2008-2026).
- Sir Rod Eddington thought that a 10 year period was long enough.
- Network Rail see a cap as essential, but express concerns about using PDFH for long term forecasts at all. They observe that PDFH was calibrated during a period of rapid rail growth, and has already been amended three times to reflect behavioural changes.

79. The report published in March 2010 by HS2 Ltd capped background growth demand forecasts at 2033. If this same date was used with the growth figures published in February 2011, the business case for HS2 would disappear. The DfT have therefore extended the forecasting period to 2043, using the PDFH to predict for a massive 35 year period, in order to allow background growth in demand to double.
80. The Council believes that using the PDFH for a 35 year forecast is unsound and that this has been done to support the arbitrary doubling of demand in order to justify the business case for HS2. This represents the use of unsound methodology in the demand predictions, based on an implausible assumption that people will continue to spend an increasing proportion of their income on long distance rail travel for the next 30 years, in a market which is saturated overall. Given that the demand forecasts are based on these highly questionable assumptions, the Council believes that they are greatly overestimated.
81. Furthermore, the basis for HS2 demand forecast is based on an out of date version of the PDFH, version 4.1. This version uses income elasticity factors that are higher for longer journeys. This means that long distance trips grow more quickly than shorter trips and therefore this creates unrealistic discrepancies when forecasting for long distance trips.
82. The more up to date version 5 (published in August 2009) has somewhat lower income elasticities and does not use higher elasticities for longer distance journeys, perhaps reflecting the reduction in the impact of the post privatisation influences. DfT have chosen not to use this latest version of PDFH, which would have led to lower background growth forecasts and that would have greatly reduced the business case for HS2. Studies have shown that a revised demand forecast using PDFH version 5 could lead to a reduction in background growth of 29%.

The growth in rail travel for business passengers is overestimated

83. The Government estimates that 30% of passengers using HS2, equating to 40,800 passengers per day, will be travelling for business purposes. However this takes no account of the fact that technological improvements are currently making the need for business travel less and less relevant. Video-conferencing and faster broadband connections are reducing the need to travel for all but the most essential trips and this will only get more pronounced in the years running up to 2026 when HS2 is scheduled to open. At the same time as HS2 Ltd and DfT is forecasting a substantial increase in the demand for rail travel for business in 2026, the Transport Minister Norman Baker, is now seeking to encourage businesses to travel less and take advantage of technological methods that would both save time, money and help the environment. He is quoted as saying:

“Part of my brief as a transport minister is to sometimes encourage you not to travel.”

84. If he succeeds in this, the business case for HS2, both in terms of predicted demand and economic benefits will be severely reduced. As the contradictory government policies make clear, it is questionable whether in this day and age we should be encouraging people to travel more, especially by means of such an expensive single major transport infrastructure scheme.

The forecast for the modal shift from air travel is very high

85. The Council believes that the forecast for modal shift from air travel to HS2 is too high and in reality passenger numbers for HS2 will be lower in practice as less people will actually switch from aviation. It is forecast that 6% of HS2 passengers or 8,160 per day will arise from a modal shift from air travel. This level of shift is facilitated by the DfT forecast of a 128% increase in domestic air travel by 2043. This is unrealistic as evidence shows that demand for air travel has actually been falling since 2004 (see fig.1), which means that the scope for this modal shift from air is in fact far more limited.

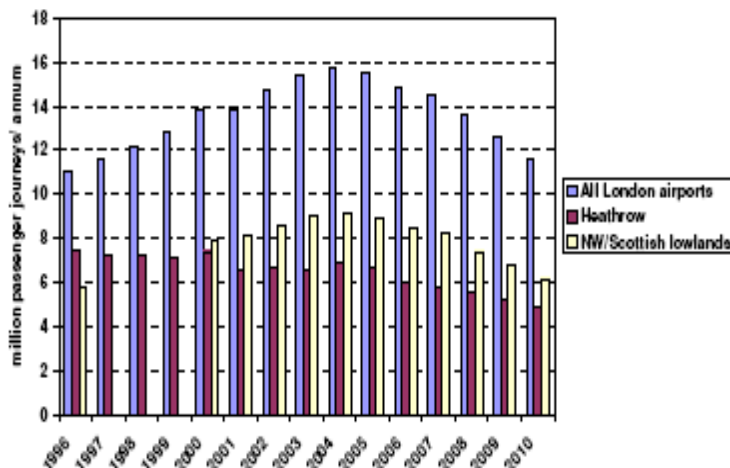


Figure 2 - London domestic air passenger numbers

(from CAA UK airport statistics, Table 10 2 Domestic terminal passenger traffic, Table 12 2 Domestic air PAX route analysis)

86. The DfT forecast of a 128% increase in domestic air travel by 2043 is considered to be unrealistic given that the airports do not have the spare capacity for a 128% increase in demand. This is unlikely to change in the foreseeable future because airports in the south east are being subject to a government moratorium on expansion. Furthermore, there is no evidence to suggest that 8,160 passengers would switch from air travel to HS2.

It is assumed that no premium fares will be charged for the service

87. The demand forecasts in the Consultation documentation are also based on the assumption that no premium fares will be charged by HS2. In practice this does not seem credible, as HS2 will be providing a 'premium service' when compared to its competitors such as the West Coast Main Line or Chiltern Railways, particularly with regard to journey time. This is important as HS2 Ltd estimate that 70% of passengers using HS2 will do so for non-business purposes. But non-business travellers are less influenced by journey time and more influenced by price. It seems likely that HS2 will need to charge a premium fare to help with recover the huge capital and operational costs of the project. Furthermore, unless competition is restricted by government policy, the West Coast Main Line and Chiltern Railways will reduce their fares in order to compete in this market. This will have significant impact of HS2's ability to meet its huge demand predictions from leisure travellers, many of whom may choose longer journey times if fare prices are lower.

88. It seems clear the demand for HS2 will be much lower in practice than is anticipated, which will seriously damage the already weak economic case for HS2, due to decreased revenue from fares and the increased need for a public subsidy.

89. The report by Oxera (20th June 2011) notes in para 3.17 that the base-case scenario for modelling is long term rail growth of RPI + 1%. HS2 Ltd have stated that in April 2011, the assumptions in the model were updated to incorporate the short term impact of RPI + 3% for three years from 2012, as announced by the Treasury in the 2010 Comprehensive Spending Review.

90. The report by Oxera goes on to say in para 3.18 that:

"HS2 Ltd has tested a scenario of RPI + 2% in the long term, and found that this caused the BCR (without WEIs) for HS2 to fall to 0.9%. This indicates that the assumption on rail fare growth is important."

91. The report then goes on in para 3.19 to say that:

“Given the change in BCR resulting from the sensitivity of RPI + 2%, it may be useful to test other scenarios, such as RPI + 0%, or at least anticipate the optimal fares strategy for new services and reflect this in appraisal.”

92. Given the significant impact of fares on the BCR, this does cast doubt over the robustness of the business case.

Is the Consultation flawed?

A pre-determined decision

93. As stated earlier in this response, having considered the Consultation documentation, the various remits to HS2 Ltd and the Government’s National Infrastructure Plan, it appears that the Government may have already decided to proceed with HS2. No serious consideration appears to have been given to any other alternative options for enhancing rail capacity and performance, and so this Consultation process does not appear to be genuine and this is therefore a serious flaw.

Refusal to reveal the evidence base

94. The Council is concerned that HS2 Ltd persistently refused to publish the evidence base, which was used to inform its recommendations to the Government. In December 2009, HS2 Ltd published ‘High Speed Rail London to the West Midlands and Beyond, A report to Government by High Speed Two Limited’ in December 2009. This report stated in para 1.1.16 that:

“From the outset there have been two aspects to our role – both to carry out an objective consideration of the case for HS2, but also to recommend proposals which stand up to scrutiny and reflect the aspirations and concerns of those potentially affected. Throughout this process we have sought to conduct an objective and professional investigation, grounded in a solid evidence base and informed by the varied views of others.”

95. The report by HS2 Ltd went on to say in para 1.1.18 that:

“We have commissioned specialist consultancy advice on a range of topics. The firms that have advised us are listed below and their reports make up several of the supporting documents published alongside the report.”

96. There were 10 specific consultancies listed which were to cover a range of topics. On 30th June 2010 officers at Hillingdon emailed Alison Munroe at HS2 Ltd stating:

“There are 10 firms listed on page 15 of the report by HS2 to the Government, who provided reports to HS2 on a range of matters, such as the wider economic impacts; demand modelling; european cost benchmarking; land and property; commercial advice etc. Only 3 of these (i.e. WS Atkins; Booz and Co Ltd; and Ernst and Young) appear on the list of supporting documents (page 246/7). The

remaining 7 reports have not been made available. Please could we have a copy of these original reports?"

97. We finally received an email response from Matthew Hedges on behalf of Dean Dyer at HS2 Ltd dated 4th August 2010 stating that:
- "I can confirm that the organisations listed on page 15 of the HS2 report provided advice to HS2 Ltd. However, in a number of cases, this advice did not constitute reports to HS2 Ltd. For instance, Eversheds LLP provided legal advice on various issues as they arose during the course of the year."*
98. The implication of this was that there were no other reports than the 3 referred to above.
99. Following the launch of the Government's Consultation on HS2, and in an attempt to fully understand the evidence base on which the HS2 case was established, officers at Hillingdon sent off on 1st April 2011 a Freedom of Information Request (ref. FOI 10/170) to HS2 Ltd stating that:
- "There are eleven firms commissioned (or sub-contracted) to provide consultancy advice to HS2 Ltd listed in paragraph 1.1.18 of High Speed Rail London to the West Midlands and Beyond: A Report to Government, published in March 2010. Only six of these consultancies have provided material published in the supporting documents. We request information on the remaining five consultancies listed in paragraph 1.1.18. For the avoidance of doubt these are: BSL Management Consultants, CB Richard Ellis Ltd, Eversheds LLP, Oliver Wyman Group and Reg Harman."*
100. We specifically requested all reports and documentation provided to HS2 Ltd by the five consultancies listed above together with the brief and/or instructions given to each of the five consultancies by HS2 Ltd prior to their undertaking of the work.
101. On the 9th May 2011, we received the briefs for all five of the consultancies and were informed that it was agreed that work on one of the briefs would not be undertaken (by Reg Harman), and that the report by BSL Management Consultants had been posted on the DfT web site. On the 20th June 2011, HS2 Ltd informed officers at Hillingdon that they were having to conduct a public interest test in respect of some of the information. It was not until the 1st July 2011 that we finally received these 3 remaining reports.
102. The persistent refusal to publish reports which formed part of the evidence base to inform the development of the proposal for HS2 is considered to be unacceptable.

Misleading information

103. The Council believes that the way in which the Consultation documentation has presented the economic case is misleading. Firstly there is insufficient

information to allow proper scrutiny of the economic case. The main economic arguments for HS2 presented in the Consultation document are made using the benefits predicted for the Y network. However, unlike the detailed breakdown of costs that is found in the analysis of the economic case for the London to West Midlands phase, there is no such information to allow proper scrutiny or analysis of the economic case for the Y network, because the potential route alignment has not been defined. Therefore there is no credence for the capital costs that have been assumed.

104. Secondly, the Consultation documentation is considered to be inadequate because there has not been satisfactory sensitivity testing of forecasting results. The demand forecasts for HS2 are believed by the Council and many other parties to be high and are likely to be overestimated. These forecasts are based on out of date data and assume that passenger demand is influenced solely by income over a very long period. As this is the fundamental basis for HS2 we believe sensitivities, including a worst case scenario, should have been tested. In fact in the 2007 White Paper Delivering a Sustainable Railway, the DfT acknowledged the frailty and inaccuracy of the type of demand forecasts they are currently using and state that:

“Forecasts have been wrong before, and any strategy that tried to build a rigid investment programme based on fixed long-term forecasts would inevitably be wrong again. Such an approach could well deliver additional capacity in the wrong place.”

105. The DfT have also been criticised for unrealistic demand forecasts for the Channel Tunnel Rail Link (now HS1), where the actual usage has been drastically lower than predicted and the DfT ensured the Public Accounts Committee that they would learn from their mistakes. Despite this even the most basic sensitivity test, like that which was used in the March 2010 DfT report to Government ‘High Speed Rail’ and showed that a 25% shortfall in their demand forecast will reduce their BCR from 2.4 to 1.5, was not repeated in the current consultation. We believe that the approach taken to forecast demand for HS2, with no sensitivities or worst case scenarios, fails to take into account both their own findings and those of a Parliamentary Committee, and this represents poor practice for a scheme of this importance.

106. Thirdly, the Council believes the way in which the Consultation documentation has presented the economic case is misleading because it has carried out the analysis of alternatives in a distortive way. In any evaluation of a project of the scale and risk of HS2, it is essential that alternative strategies are examined just as carefully and their relative benefits compared with the HS2 strategy. The Treasury’s Green Book and NATA (The National Air Transportation Association) both lay stress on alternatives and considering issues such as policy and pricing, as well as investment. However HS2 Ltd has carried out an analysis of alternatives in a way that seriously distorts the comparison.

107. The DfT compares HS2 with a 'do minimum' case as the reference case for comparison. This 'do minimum' scenario only includes the committed project to lengthen half the existing fleet. The result is that the capacity provided would be inadequate, and overcrowding in this reference case would reach high levels over the period of the evaluation. As a result, HS2 is found to generate high benefits by removing this overcrowding, as well as providing faster and more reliable services. But this is a false comparison since the 'do minimum' is an unrealistic alternative. Claiming that HS2 would create benefits from relieving crowding in a situation that has been artificially created by assuming nothing would be done to relieve it, seriously distorts the economic case for HS2.
108. HS2 Ltd has avoided making a direct comparison of HS2 with the best alternative and instead it has analysed the alternative investment strategies separately, without reference to HS2. What should be done is to compare HS2 directly with the best alternative strategy for dealing with the capacity constraints on the West Coast Main Line. This alternative should combine incremental increases in capacity in line with growth in demand, together with management of peak demand using pricing. It can then be seen whether the benefits that HS2 will bring from shorter journey times, greater reliability and reduced crowding are worth the additional costs over all reasonable alternative strategies.

The Council's recommendation

109. It appears that the Government may have already predetermined its decision about a high speed rail line between London and Birmingham and also the Y network. A robust business case has not been presented by the Government to demonstrate that the HS2 Y Network offers the best value for money solution for enhancing the UK's rail network. The proposal under Consultation is not a national high speed network. There is no evidence to demonstrate that the proposal for the Y network, including the London to Birmingham route, is in the national interest. The information provided in the consultation is misleading and inadequate to enable people to make an informed judgement on the proposals, particularly with regard to the comparison between HS2 and the alternatives, which have not been properly set out. We therefore believe the Government should withdraw this proposal for HS2. The economic and business case for any future High Speed Rail proposals should be rigorously examined, and assessed properly against the best alternatives.

QUESTION THREE

This question is about how to deliver the Government's proposed network.

Do you agree with the Government's proposals for the phased roll-out of a national high speed network, and for links to Heathrow Airport and the High Speed 1 line to the Channel Tunnel.

Executive summary

1. Hillingdon Council does not agree with the Government's proposals for the phased roll-out of a national high speed network. Nor does it agree with the proposals for links to Heathrow Airport and the High Speed 1 line to the Channel Tunnel. There are a number of reasons why the Council has reached this decision, which are summarised below.
2. Firstly, the Council believes that the approach to consult on the principle of the full Y network whilst only giving detail on the first phase could be seriously flawed.
3. Secondly, no robust evidence, from either a policy or from a business case perspective, has been produced in the Consultation documentation to support the justification for a link to Heathrow Airport or a link to the High Speed 1 line.
4. There are also significant concerns about the environmental impacts of the Heathrow link with regards to carbon emissions and local air quality.
5. There are practical concerns in relation to the High Speed 1 link including the impact on the reliability of services, security and immigration issues.
6. Finally, as links to Heathrow Airport and the High Speed 1 have been key fundamental specifications for the design, and choice of, the proposed route, the fact that there is no robust case for their inclusion makes the choice of route as proposed in this consultation, invalid. The Council therefore believes that the Government should withdraw this proposal.

Introduction

7. The Council, as part of the 51M group has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. The Council's response to Question 3 is set out below. It draws on the detailed work of the expert advisors, which have been incorporated into the 51M response to the Government Consultation, and should be read in conjunction with this submission as an integral part of the answer.
8. With regard to Question 3, the Council's main issues are that:

- The approach of consulting on the principle of the Y network without any details of the route is fundamentally flawed.
- There is no clear strategic need for the link to Heathrow given the Government policy support for no expansion at Heathrow airport.
- There is no proven, valid business case for a link to Heathrow Airport.
- The approach of consulting on the principle of a Heathrow link, without any details of the local impacts that such a link may cause, is fundamentally flawed.
- The lack of any policy to ensure there are carbon emission savings arising from a withdrawal of the use of slots at Heathrow Airport is a fundamental flaw in the project.
- A direct Heathrow link would increase the number of people accessing the airport by road, which is unacceptable in terms of local air quality impacts and increased road congestion.
- There is inadequate information provided to be able to robustly conclude that there is a viable, practical business case for the operation of through services to HS1.
- There is no robust case for the inclusion of the links to Heathrow Airport and HS1, which makes the choice of route as proposed in this consultation invalid.

9. Each of these issues is described in more detail below.

Can people comment on the Y network without any details of the route?

10. The Government is consulting on the principle of the Y network without having looked at the details and feasibility of the routes. This means that people on the Birmingham to Manchester and Leeds legs are not being properly informed of the impacts on their areas and therefore they cannot respond in an informed manner. However once the current Consultation is closed, the principle of the Y shaped route will have been decided, which means that their right to respond on the principle of the scheme will have lapsed.
11. The DfT are carrying out the Consultation on HS2 in phases, which mirrors the fact that the DfT have not yet carried out the work required to examine the various route options for the Birmingham to Manchester and Leeds legs. It is quite feasible that having committed work on the London to Birmingham route, that the necessary approvals and funding may not be forthcoming for the routes beyond Birmingham. This would result in an ultra high speed line that stops at Birmingham, which would be an enormously expensive white elephant. The sensible approach would have been to progress the preparatory work and

Consultation for the whole Y network in a consistent way, rather than in the piecemeal fashion that is being done.

Is there a strategic need for the link to Heathrow?

12. The Council has serious concerns over the policy decision behind a direct link to Heathrow. The airport is currently running at near capacity. We believe that increasing the catchment area for Heathrow could fuel demand for travel from the airport and reopen the question on whether or not to expand capacity at the airport either by a change in operation to mixed mode or by means of the construction of a third runway.

13. A key issue with the link to Heathrow is that the evidence shows there is no market for it. The Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009 supports the view that there is very little demand for a Heathrow link because it concludes that:
 - Only 1,247 passengers fly from Manchester to Heathrow each day, and of these, $\frac{3}{4}$'s connect to another flight, leaving only $\frac{1}{4}$ to travel elsewhere. It is not expected that many will therefore switch to rail.

 - HS2 will only be successful if it can compete with the low cost air lines. These offer flights from £35 which HS2 may find difficult to compete with.

 - Intercontinental passengers to/from the Midlands are more likely to be attracted by lower prices offered via continental hubs, rather than go to Heathrow.

 - It is unlikely that there will be enough demand to justify running trains regularly from Heathrow to Paris.

14. Transport for London acknowledges that, given the policy of no further expansion, London already has adequate links to Heathrow. Crossrail in particular would provide a journey time of approximately 15 minutes to Heathrow from Old Oak Common. The Heathrow Express takes only 15 minutes from Paddington to Heathrow, and if it were to stop at Old Oak Common, the journey time into Heathrow would reduce to 11 minutes. HS2 Ltd acknowledge the amount of passengers taking HS2 direct to Heathrow will be relatively minimal, and there is unlikely to be that many trains diverted directly to Heathrow. Crossrail combined with the underground services will provide a highly efficient

service to Heathrow. However, the Government is still pursuing a Heathrow Link as part of Phase 2 of HS2.

15. The Council is concerned as to how the decision to include the link to Heathrow has been made and what evidence such a decision was based upon. There is no quantitative evidence provided to support the Government's claim that there is a '*compelling strategic case*' for the link to Heathrow. With regard to the moratorium of no airport expansion in the south east, there is also a real concern that the provision of a direct spur to Heathrow could simply put pressure on this policy to be challenged. The Council cannot support a link to the airport that has no legitimate proven business case and could simply fuel demand for extra capacity at the airport, resulting in increased greenhouse emissions and poorer air quality. This link to Heathrow should be dismissed.

Is there a proven case for a link to Heathrow Airport?

16. The Council believes that although the potential for a link to Heathrow Airport, was a matter worthy of consideration, it was clear from HS2 Ltd's document 'High Speed Rail A Report to Government' in March 2010, with a policy background of support for a third runway at Heathrow, that there was no compelling case for a link to Heathrow airport:

"...the total market for accessing Heathrow from the West Midlands, North West, North and Scotland is currently around 3.7 million trips. Our modelling suggests relatively little of this would shift to HS2, with the rail share increasing by less than 1 percentage point (about 2000 passengers per day, or just over one train load each way)" (Para 3.3.10)

17. With regards to how a link to the airport should be provided, the spur option was ruled out due its impact on the capacity of the proposed HS2 route and a weak business case for a direct link to Heathrow.

"In the case of a spur option, one complete train path into London would be lost for every train serving and terminating at Heathrow via the spur. Hence it is an unattractive option, as the value of the capacity foregone, threatening for instance the ability to provide a reasonable service to Birmingham or to serve the Leeds via the East Midlands and Sheffield as part of a wider network, would significantly exceed the cost saving of up to £1.5bn. A spur option, therefore, was not considered further." (Para 3.3.21)

18. However, just under a year from the publication of this Report, with a policy background of no further expansion at Heathrow, the principle of a direct link to Heathrow airport is now an integral component of the Consultation and the Consultation Document in para 3.16 asserts that:

“The strategic case for a direct high speed rail line to Heathrow is compelling.”

19. In addition the proposed method of connection to Heathrow in the Consultation Document (in para 3.18) is by means of a spur from the main HS2 line:

“The government considers that the option that best balances the costs of a direct link to Heathrow with its important strategic benefits would be a spur.”

20. The Consultation documents published in February 2011 include very little useful information on the business case for the proposed Heathrow spur. HS2 Ltd has stated at its meetings which have been held as part of the Consultation process that it stands by its comments in their March 2010 report (para 3.3.21.) which makes clear that there is no business case for HS2. The Council is therefore of the view that it is clear that no adequate business case exists for a direct link between HS2 and Heathrow.

21. Like the Y network, this link is being built into this consultation as part of a wider strategy only. No details on how the spur will be constructed or where the airport station will be located are given within the consultation documentation. The cost of the Heathrow spurs is referred to in para 3.17 of the Consultation document as between £2.5 and £3.9 billion. However, no breakdown of these costs is given as apparently, no station or specific route has been decided. The Council has concerns that these costs are likely to be significantly underestimated. If the Heathrow links were to be in tunnel, their length would be about 29km, which compares to the length of the Channel Tunnel. In addition, work commissioned by the Council as part of the 51M Group has confirmed that passenger volumes would be insufficient to justify the construction costs of the spurs.

22. It is acknowledged on page 66 of the Consultation document that a spur link to Heathrow would have an opportunity cost in terms of capacity to central London, because it would mean that a train path to central London would be lost for every train serving and terminating at Heathrow. To minimise this capacity impact, it is suggested that it would be possible to split trains on-route to provide a reasonable service frequency to a range of destinations further north, although this would extend journey times and impact on reliability of services on the London to Birmingham route. With the Y network described as operating at 18 trains an hour, and, without a detailed timetabling exercise, which it is clear has

not yet been carried out, the ability to plan the proposed Heathrow services is unproven and indeed may well be impracticable.

23. The Economic Case for HS2 provides no further details. It is claimed on page 7 that the assessment of the full 'Y' network includes Heathrow, but no Heathrow services are shown in the "Service specification assumptions for the Y network" (on page 61), and there is no published incremental case for the spur. It is not clear whether this is because the work has not been done, or whether the evaluation which has been done shows that there is no case for building the spur on any basis of conventional transport economic evaluation.
24. Given HS2 Ltd's assessment of both the limited demand for the airport link and the problems a spur would cause with regard to time penalties for the rest of the network, there is no evidence within the Consultation documentation as to how it was decided to include these elements in its final proposal. The Council does not believe a link to Heathrow should be included and it does not believe the decision to do so has been based on published evidence or reasoned assessments.
25. Without a detailed timetabling exercise, which it is clear has not yet been carried out, the ability even to plan the proposed Heathrow services, with trains splitting and joining at Birmingham Interchange, is unproven and indeed may well be impracticable.

Can people comment on the Heathrow link, without any details on local impacts?

26. No decision has yet been made as to how the Heathrow spur will operate, where the station will be and no detailed plans are available to assess any local impacts that this may have with regard to either the construction of, or the operation of, a proposed link. There is no clarity about how much of the spur links will be on the surface or in tunnel. Consultees are being expected to comment on the proposal for a Heathrow link without any evidence as to how the link will actually impact. The Council regards this to be wholly unacceptable. No consultation on the Heathrow link, even in principle, should be made until the impacts are fully understood.

Are there any savings in carbon emissions?

27. The Council also wishes to bring attention to the issue of greenhouse gas emissions with regard to aviation. The proposed HS2 route is described in para

2.55 of the Consultation document as a broadly carbon neutral project. There is evidence that in fact high speed travel, at the speeds quoted by HS2 Ltd, is a fairly carbon intensive method of train travel, which will encourage new trips. Furthermore, the HS2 Appraisal of Sustainability by Booz and Temple notes in para 8.3.1 that the scheme would release large amounts of emissions during the long construction phase and the requirement for new rolling stock.

28. The Consultation document notes in para 2.55 that reductions in overall UK carbon dioxide emissions would mostly be *“due to reductions in aviation emissions resulting from a modal shift from aviation generated by improved journey times to the north and Scotland”*. However, the Appraisal of Sustainability report (para 8.3.1) acknowledges that modal shift will only bring about a corresponding reduction in carbon if airport slots remain unused. The Council is not aware of any Government intervention or any intent with regards to Government aviation policy that would ensure that any slots released from a switch to high speed rail would be prevented from further use. Without this control, the Appraisal of Sustainability recognises that these slots could simply be used by more polluting long-haul flights. This concern has been reinforced by comments from BAA such as:

“...BAA would like more passengers to arrive [at Heathrow] by train. High Speed rail would attract people who currently arrive by short-haul flights, freeing slots for more long-haul flights.” Colin Matthews, BAA’s Chief Executive, Transport Times, November 2010

and

“No sensible, well-informed person still seriously pretends HS2 is a green alternative to a third runway. The question now is given no third runway, how we can maximise the effectiveness of our limited capacity at Heathrow. That means more long-haul flights...every time BMI or British Airways have cancelled a domestic route in the past, they’ve replaced it with a more profitable medium- or long- haul route. That’s exactly what will happen when HS2 comes and more domestic routes get cut.” Nigel Milton, Director of Policy and Political Relations at Heathrow (ENDS Report 434 March 2011 pp 34-36).

29. BMI’s recent withdrawal of the Glasgow – Heathrow route has demonstrated this very clearly. BMI has not surrendered the slots previously used for Glasgow flights, but is instead using these for longer European routes, resulting in a net increase in carbon emissions.

30. The Council is concerned that there is no robust evidence presented within the Consultation documentation to substantiate the claims of the extent of modal shift from air to high speed rail. Furthermore, there is no mechanism to secure any reductions by slot reduction at the airport and therefore no evidence for any corresponding carbon reductions claims. In direct contradiction carbon emissions could in fact rise as, in the absence of any Government policy to allow for slot reduction, the short haul flights could simply be replaced by more polluting long haul flights. The proposals for a Heathrow link are not justified; they are not in the national interest and they should therefore be dismissed.

Will a Heathrow link relieve road traffic congestion around Heathrow?

31. The Department for Transport (DfT) claims on page 17 of the Executive Summary of the Consultation document that that a direct link “*would contribute to Heathrow’s future development as a multi-modal transport hub*” for passengers travelling to a wide range of destinations in the greater south-east. This is not credible.
32. Heathrow provides much poorer access to the Underground network than central London rail termini. The bus network is only useful for local distribution and coach services are in competition with, not complementary to, InterCity rail. The “Airtrack” project would potentially have provided a useful link, providing a rail connection to South Western suburbs, but Heathrow Airport Limited have recently abandoned this scheme, withdrawing their Transport and Works Act application.
33. The HS2 proposal will not relieve any of the road capacity on the congested road network around Heathrow and it is not projected to do so. As the location of any station at Heathrow has not yet been determined, there is no evidence presented to allay the Council’s concerns that a high speed link would in fact increase the number of people accessing the airport by road, especially from the west where there are no current connections.
34. In theory substantial rail investment should promote a cleaner alternative mode of transportation by generating a modal shift from car (for shorter journeys) and air (for longer journeys). However, the HS2 London to the West Midlands Appraisal of Sustainability (AoS), which forms part of the Consultation documentation, recognises that local air quality reduction from a mode shift from car to rail is not expected to be significant.
35. Given that this proposal represents one of the biggest transport interventions that the UK is likely to see for the foreseeable future, it would appear to be a

completely missed opportunity not to have looked at alternative options to HS2 or at least to have optimised the route to ensure that modal shift from cars was significant and led to an improvement in local air quality, especially in areas where this is already above acceptable levels.

36. The need to improve air quality to acceptable levels is reaffirmed by the Mayor of London who acknowledges air quality in London needs to continue to improve. The Mayor states in his Air Quality Strategy that:

“The overarching aim of this [Air Quality] Strategy is to reduce air pollution in London so that the health of Londoners is improved. The most effective means to do this is to achieve the European Union (EU) air quality limit values as soon as possible.”

37. This proposal for HS2 will not help achieve these aims. The submitted evidence in the Consultation acknowledges that London will fail to meet the European Union air quality limits. This is in direct conflict with the policies in the London Plan and the above stated Mayor’s Air Quality Strategy which aim to improve local air quality.

38. It can be concluded that the HS2 proposal for a link to Heathrow could have a detrimental impact on the Mayor’s attempts to deliver the objectives of the Air Quality Strategy and to ensure that the air quality in London is within legally acceptable limits.

Is there a business case for the link between HS1 and HS2?

39. The Council believes that although the potential for a link to the international high speed line, HS1, was a matter worthy of consideration, it was clear from the report prepared by HS2 Ltd for the Labour Government, published in March 2010, that their conclusion at that time was that there was no business case for a direct link to HS1. Para 3.8.12 states that:

“Running direct services to Paris or Brussels...would bring Birmingham within three hours and attract a significant market share, but the market would not be big enough to fill a 400 metre train a day in 2033. Direct services to destinations North of Birmingham would attract a smaller market share but are competing in a bigger market and might fill another train a day.”

40. It would seem that, in a similar stance to that taken for the Heathrow link, that despite this evidence, the link is now being included within the Consultation

Document High Speed Rail: Investing in Britain's Future" which states in para 3.29 that:

"The Government's view is that the strategic case for a direct link between the proposed high speed rail network and the HS1 line to the Channel Tunnel is strong."

41. It is not clear whether a full evaluation of the business case for the link has been done, or if the evaluation showed that there is a conventional transport economic case for building the link.
42. The estimated capital cost is £0.9 billion for a single track tunnel from Old Oak Common to the North London line. The Economic Case for HS2 provides little more detail. It is claimed that the assessment of the full 'Y' network includes the costs and benefits of the link to HS1 (Page 7), but no through services are shown in the "Service specification assumptions for the Y network" (page 61), and there is no published incremental case for the link. The only figures quoted are that the daily use of the link to and from the West Midlands would be around 4,850 passengers in 2033, and that the benefits of the HS1 link are £0.4 billion (page 30) – the latter figure is significantly less than the £0.9 billion capital cost of the link.

Impact on services

43. It is also clear from the Consultation document, The Economic Case for HS2, that operating services to HS1 would have an opportunity cost in terms of capacity to central London, as a train path to central London would be lost for every train to HS1.
44. The proposals to link HS2 to HS1 are likely to impact on the reliability of existing services and vice versa. The North London Line itself is intensively used for London Overground services and also for freight and there is a real concern that these services will be adversely affected. It may well be that there would be a reduction in the frequency of the London Overground Services on the North London Line to below the planned eight trains an hour in each direction. There are also concerns that it may not be feasible to provide satisfactory links for train paths between HS2, the North London Line and HS1. Without a detailed timetabling exercise, it is unclear whether the proposed HS1 through services are practical or not.

45. The Mayor of London in his letter dated 20th June 2011 to the Cabinet Member for transport at Buckinghamshire County Council states that:

“.. using the existing North London Line as a connection for high speed trains is not acceptable as it will impact negatively on the operation of the North London Line, which has been subject to major investment and is used daily by thousands of Londoners. Furthermore, the current proposal will reduce the running speed of high speed trains significantly, impacting on the business case for HS2. I am pushing Government for a dedicated connection that does not affect the North London Line.”

Security and immigration issues

46. The HS2 Consultation documentation indicates that it is expected that the security and immigration procedures which currently apply to Eurostar will also apply to through trains to HS1. This is likely to require effective separation of the through trains from services to Euston at all HS2 stations at which the HS2 trains will call. This is spelt out for Old Oak Common in Arup's 'Route Engineering Report' of February 2011 which indeed refers to an option, not covered in the main consultation document, for all HS1 services to terminate at Old Oak Common:

“The international aspects of the HS1 to HS2 connection have implications on platform design and access control arrangements...There would be options for platform usage:

- *The central platform could be a terminal 'Europe' platform. Passengers would alight from the HS2 train from the North, and would pass through immigration/security controls as they moved to the 'Europe' platform...[or]*
- *A through-running platform to the HS2-HS1 link... security and immigration issues would have to be addressed, either at the passengers' originating stations, or on the train during the journey.”*
(page 40).

47. It is clear that fundamental issues about the operation of HS1 trains have yet to be resolved, casting further doubts on the claimed benefits of the scheme. The Council believes that there is inadequate information provided to be able to robustly conclude that there is a viable business case for operation of through

services to HS1. The current proposals for a HS2 to HS1 link should therefore be dismissed.

Is the Consultation flawed?

48. The Council believes that the Consultation is flawed on a number of counts. One of the key flaws is the Government's decision making process with regard to the links to Heathrow and HS1.
49. The provision of links to Heathrow Airport and HS1 have been fundamental requirements in the remit of HS2 Ltd from its conception in 2009. This was with the policy background at the time of expansion at Heathrow Airport by means of a Third Runway. Despite the predicted increase in capacity provision at Heathrow, the original conclusion of the HS2 Ltd report in March 2010 was that there was no business case for a link to Heathrow Airport and there was also little demand for a link to HS1. Given this information, the Council believes that the Government should have revisited the remit for a high speed rail network. It is a fundamental flaw to have included these two links within the remit of the line. This flaw in the decision making process then heavily influenced the assessment of the alternative routes and hence the choice of the preferred route. It is possible that a more northerly route out of London may have been the obvious choice, if the decision to provide a direct link to Heathrow had not been made at an early stage. The Government should therefore re-think the provision of, and line of route of, any future high speed rail network.
50. The Council's views, as outlined in the paragraph above, have been confirmed by a conversation, at the HS2 Roadshow in Hillingdon on 30th March 2011, between the Council's Head of Highways, Transportation and Planning Policy and Jill Adam, the Deputy Director for HS2 Consultation and Legislation at the DfT. This conversation was witnessed by the Council's Transport and Aviation Manager and the Council's Senior Policy Officer. The conversation was as follows:

Q. to Jill Adam: "The route between London and Birmingham goes west rather than directly to Birmingham. Can you explain why a more direct route was not favoured, is this due to Heathrow?2

A. from Jill Adam: "Yes the government required a link to Heathrow which put the other alternatives at a disadvantage. There had to be a strategic fit for Heathrow."

Q. to Jill Adam: "Would the M1 route have been more logical otherwise?"

A. from Jill Adam: "Yes it would".

Q. to Jill Adam: "The HS2 reports state that there aren't many passengers wanting to go from the North to Heathrow, the majority want to travel directly into London. Why wasn't a more direct route taken?"

A. from Jill Adam: "That was a government decision."

51. The views expressed by the Deputy Director for HS2 Consultation and Legislation are entirely consistent with the comments made by representatives of HS2 Ltd at the meeting on 29th March 2011 which was attended by the Leader of the Council, three other Cabinet Members, the Leader of the Labour Group, four other local Councillors and 4 officers. At that meeting, the Cabinet Member for Planning, Transportation and Recycling stated that HS2 should serve cities and not act as an airport delivery service and that by HS2 Ltd's own admission Heathrow adds little to the business case. Ian Jordan, Project Sponsor for HS2 responded by saying that the Government feels a Heathrow link is necessary but that HS2 Ltd stand by their earlier report on Heathrow and the business case. The Council's Head of Highways, Transportation and Planning Policy asked if HS2 Ltd had got the wrong brief from the Government. The response from Ian Jordan was "no comment".
52. As stated earlier, the Council believes that people on the Birmingham to Manchester and Leeds legs are not being properly informed of the impacts on their areas and therefore they cannot respond in an informed manner. However once the current Consultation is closed, the principle of the Y shaped route will have been decided, which means that their right to respond on the principle of the scheme will have lapsed.
53. Also, as stated previously, the Council regards it wholly unacceptable that consultees are being asked to comment on the proposal for a link to Heathrow without any accompanying details concerning the local impacts that this may cause. The Council believes that this represents an inadequate consultation which does not allow consultees to respond in an informed manner. The proposal for the Heathrow link should therefore be dismissed.
54. With regards to a link to HS1, it is clear that a detailed timetabling exercise has not yet been carried out and therefore the ability even to plan the proposed through HS1 services is unproven and indeed may well be impracticable. The

Council believes that without adequate information being provided, this represents an inadequate consultation, which does not allow consultees to respond in an informed manner. The proposal for the HS2-HS1 link should therefore also be dismissed.

The Council's recommendation

55. The Council believes that the approach to consult on the principle of the full Y network whilst only giving detail on the first phase is seriously flawed. No robust evidence, from either a policy or from a business case perspective, has been produced in the Consultation documentation to support the justification for a link to Heathrow Airport or a link to the High Speed 1 line. There are also significant concerns about the environmental impacts of the Heathrow link with regards to carbon emissions and road traffic. There are practical concerns in relation to the High Speed 1 link including the impact on the reliability of services, security and immigration issues. Finally, as links to Heathrow Airport and the High Speed 1 have been key fundamental specifications for the design, and choice of, the proposed route, the fact that there is no robust case for their inclusion makes the choice of route as proposed in this consultation, invalid. It has not been demonstrated that these links are in the national interest. The Council therefore believes that the Government should withdraw this proposal.

QUESTION FOUR

This question is about the specification for the line between London and the West Midlands.

Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook?

Executive summary

1. Hillingdon Council does not agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process that HS2 Ltd undertook. There are a number of reasons why the Council has reached this decision, which are summarised below.
2. The Council believes that this Consultation has not allowed any proper engagement in the decision making process regarding the principles, the specification or the route selection process. There has been no appropriate consultation in relation to the role high speed rail could play and the vision of “a truly national high speed rail network for the whole of Britain” as set out in the Consultation document para 1.11, has fallen at the first hurdle.
3. The Council believes that this inadequacy arises from the remit originally presented to HS2 Ltd in 2009, along with subsequent remit changes along the way, all of which have fundamentally failed to address the issue of high speed rail as part of a national transportation framework. The Council believes that this failure has seriously distorted the role high speed rail could play and has failed to ensure the specifications are correct and even practicable for the UK.
4. The ill founded specifications, including a requirement for ultra high speed, have not been properly justified, and they have been presented as a fait accompli.
5. The route selection process has been heavily skewed by the Government’s predetermination for a link to Heathrow and a London interchange at Heathrow. This has favoured the proposed route westwards out of London. All of this has ultimately led to the wrong route selection.
6. The information presented about the principles and specifications for HS2 are totally inadequate for people to comment on. The Council therefore believes that the Government should withdraw this proposal.

Introduction

7. The Council, as part of the 51M group, has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. The Council’s response to Question 4 is set out below. It draws on the detailed work of the expert advisors, which have been incorporated into the 51M response to

the Government Consultation, and should be read in conjunction with this submission as an integral part of the answer.

8. With regard to Question 4, the Council's main issues are that:

- The consultation has failed to provide any evidence that the principles underpinning the HS2 proposals are based on any coherent strategic transport planning policy for the whole of the UK. This error has resulted in a failure to consider the full range of possible options and instead the decision was taken incorrectly to consult only on one predetermined proposal.
- The principle of high speed rail has not been previously consulted on.
- The route selection process that HS2 Ltd undertook was seriously flawed from the outset because the remit given to HS2 was totally incorrect in assuming that a direct link is required to Heathrow.
- The specifications that have been proposed for HS2 are considered to be unacceptable because the justification for such ultra high speed rail services is not robust.
- This Consultation has not provided any opportunity to be able to respond with regards to the design specifications of a high speed rail network, because these aspects have already been decided and incorporated into the overall economic case and presented as a fait accompli.
- The route selection process has not been subjected to an open and transparent decision making process. The consultation represents the route as a take it or leave it choice, with those responding to the consultation unable to engage in the route selection process.
- The Council believes that the Consultation documentation does not represent a proper engagement process on these issues and the proposal should be withdrawn.

Is there a coherent national transport framework?

9. The Council believes that many of the problems with the HS2 proposal stem from the fact that it has not been seen within the context of an integrated national transportation framework. In addition, there has not been any meaningful debate on high speed rail or what role it should play in the UK. A long term infrastructure project of this magnitude should be part of an over-arching national integrated transport strategy, which seeks to provide a coordinated approach to modernising all aspects of transport in the UK, including rail, road and aviation.
10. A consultation on a national policy with regard to inter-city rail services should have looked at other destinations in the UK, for example, the West Country

rather than focusing solely on Birmingham, Manchester and Leeds. This would have ensured optimisation of all aspects of transport to ensure best connectivity at best value costs for the whole of the UK.

11. This error has resulted in a failure of the Government to consider the full range of possible options for the future of the UK's integrated transport network. Instead the Government has consulted only on one predetermined proposal, which amounts to a regional high speed rail link with an airport delivery service, which is not justified. The Council believes that this approach is totally unacceptable.

Is there a need for high speed rail?

12. There has never been any consultation or debate on high speed rail. In fact prior to 2009, previous advice both from the DfT and the Eddington Transport Study had questioned the ability of projects such as high speed rail to have major transformational economic impacts. The Eddington Review in 2006 stated that:

“it is not at all clear that creating new networks is the most appropriate or cost effective method to achieve increased capacity: high speed lines should be assessed coldly alongside other policies for achieving the same objective. Other transport investments are very likely to offer superior returns compared to where projects rely on new and largely untested technologies.”

13. Government policy itself had not favoured high speed rail, as recognised by the DfT in 'Delivering a Sustainable Railway' (2007).

“But it would not be prudent to commit now to “all-or-nothing” projects such as network-wide electrification or a high speed line, for which the longer term benefits are currently uncertain and which would delay tackling the current strategic priorities such as capacity.”

14. Yet in January 2009, the decision to choose high speed rail as the method of expanding the rail network, and, an initial specific strategy, of connecting London to Birmingham was taken in isolation, and without consultation. HS2 Ltd was set up with a remit to devise a new dedicated high speed railway to Birmingham. The Council believes that the establishment of HS2 Ltd and the subsequent development of the HS2 proposals was rushed and lacked a sound grounding. The decision to move forward with high speed rail does not appear to have followed any logical policy development. The Council is of the view that the best approach would have been to examine all options for improving the performance and capacity of the railway network before deciding on a sensible structure to implement findings.

15. With regard to the work of HS2 Ltd, the company was set up with a two part remit. Firstly the Government asked the company, in its report 'Britain's Transport Infrastructure High Speed Two' of January 2009, “to develop an entirely new line between London and the West-Midlands”, and second “to help consider the case for a new high speed service from London to Scotland”. This

two part remit made the company unnecessarily rigid in its approach to developing a new line. It caused HS2 Ltd to view its primary task of devising a route from London to Birmingham as distinct from the design of wider coherent UK network, when in fact these two issues should have been considered together on a conceptual level before deciding on the proposed route.

16. The prescriptive nature of the instructions given to HS2 Ltd meant that all options for a high speed rail network could not be assessed equally, where some perfectly valid options did not meet the specifications in their remit. This is an unacceptable basis for evaluating a project of this nature. HS2 Ltd should have had the freedom to examine all options of whatever nature and balance them out to find the best solution for the UK infrastructure network and report back to Government accordingly. In this case HS2 Ltd had such narrow parameters, that their ability to compare and contrast options for route and specifications was severely hampered. The current, inadequate HS2 proposal reflects this.

17. The Council believes that HS2 Ltd was originally set up with a far too narrow and restrictive remit, which has led to many of the problems that are obvious with the proposals as they stand today. These issues have not been rectified since the formation of the coalition Government in May 2010 in their revised remits for HS2 Ltd. This is despite the approach stated in current Government policy such as the National Infrastructure Plan, October 2010:

“Significant investment in new or replacement infrastructure should only be considered as part of a clear long term strategy, is affordable and where maintenance or small scale investment will not meet future need.”

18. Had this approach been followed, with a clear long term strategy, it would have ensured that any potential for an inclusion of a high speed rail network was nationally appraised and coherent within a framework, appropriately connected and properly considered, maximising benefits from existing infrastructure. Instead HS2, which has been a project devised in isolation, has remained so and is now incorrectly advocated as a solution by the current Government in its Programme for Government, 20 May 2010, as referred to in para 1.11 of the Consultation document.

“Our vision is of a truly national high speed rail network for the whole of Britain.”

19. The Council believes that this Consultation has failed to provide the robust evidence to be able to conclude that this HS2 proposal is part of a strategy to deliver a truly national high speed rail network.

Is the route selection process satisfactory?

20. The route selection process was not subject to an open and transparent decision making process. The Consultation represents a “take it or leave it” situation, with those responding to the consultation unable to engage in the route selection or

see in adequate detail the reasons why other routes were rejected by HS2 Ltd in March 2010.

21. The Council believes that the route selection process that HS2 Ltd undertook was seriously flawed because the remit given to HS2 Ltd was totally incorrect in assuming that a direct link is required to Heathrow. No efforts have been made since to correct these errors in the remits. As set out in the Council's response to Consultation Question 3, there may have been a more direct route out of London, if the decision to provide a direct link to Heathrow had not been made at an early stage.
22. The Council is of the view that the HS2 proposal represents a 'Heathrow-Centric' approach to a high speed rail network. This is because the Government asked HS2 Ltd, in its report 'Britain's Transport Infrastructure High Speed Two' of January 2009 to explore the "*options for a Heathrow International interchange station*". As stated in the Hillingdon response to Consultation Question 3, there is no business case to justify a Heathrow link. Furthermore the decision making process that was taken with regard to the Heathrow link is not supported by the evidence or been subject to public debate.
23. The original case for high speed rail appears to be based on the assumption that a third runway would be built at Heathrow. Indeed it was stated in 'High Speed Rail: London to the West Midlands and Beyond: A Report to Government' that "*a third runway at Heathrow is included in our central case*". However, even with a third runway incorporated in the assessment, this report in March 2010, concluded that there was not a sound business case to justify serving Heathrow directly. In the light of the High Court decision regarding plans for a third runway, the Council believes that the principle, the route and the priorities of the high speed rail network with regard to a Heathrow connection should have been reassessed. In view of the current moratorium on airport expansion in the south-east, it would appear that the case for a Heathrow link has worsened since March 2010. Despite these factors, it has been decided by the current Government that there is a strong case for a link to Heathrow.
24. The Council is of the view that the route selection process has been skewed by the remit given to HS2 Ltd, restricting the number of options, in practice, for a route from London to Birmingham. The route of HS2 has been unduly influenced by the need for a link to Heathrow airport and to Old Oak Common as an interchange, which has skewed the route westwards out of London. As has been stated our in response to Consultation Question 3, the links to Heathrow weaken the business case for HS2, and would also cause unnecessary damage to communities within Hillingdon and South Buckinghamshire and will do little to aid the environmental case and will more likely, to the contrary increase greenhouse emissions and worsen air quality.
25. The Council believes that the entire case for linking HS2 to Heathrow should be re-examined, and in turn the route selection process should be re-evaluated

without the focus on west London and Heathrow airport. This would give a potential high speed network greater opportunity to create a more logical national railway which could serve more cities, have greater connectivity and increased benefits.

Are the specifications for HS2 satisfactory?

26. This Consultation has not provided the opportunity to be able to respond with regards to the design specifications of a high speed rail network. High speed is defined by the DfT as over 150mph/240kph, and therefore a new high speed network that is more efficient, more inclusive, connecting more cities and giving greater environmental gains could be made without the excessive speeds aimed for by HS2. The Government could have provided a wider remit to enable other alternatives to be fully assessed. Not only does the Council believe that the Government's remit of speed was too narrow, but that HS2 Ltd failed within their scope of enquiries to adequately address all reasonable options with their albeit restrictive remit. As a result of this, the Consultation has presented only one proposal for comment, with all the principles and specifications having been predetermined, and incorporated into the overall economic case and presented as a fait accompli. The Council therefore considers this to be an inadequate Consultation.

The need for speed

27. It would appear that, in designing HS2, a 'speed at all costs' policy was used. This reflects back to the original remit given to HS2 Ltd on its inception in 2009, to design a dedicated ultra high speed network. In a letter to the Secretary of State for Transport, HS2 Ltd said of their objectives and remit:

"The new line should be sufficiently high speed to optimise journey time benefits balanced with operational energy costs and achievement of maximum capacity. It is likely to be at least the maximum speed for HS1. It should have the ability to maintain high average speed, which will mean avoiding any permanent speed restrictions (e.g. sharp bends) which also impact on energy consumption, managing the approaches to cities... and avoiding intermediate stops."

28. HS2 Ltd should have been given more flexibility to examine and suggest alternative options for enhancing the national railway network, including lower or conventional speeds, rather than a set specification for a genuine high speed network. As the specifications stand, HS2 will be the fastest railway in the world, despite the UK being a small country with its major cities already well connected.

Figure 3

	Distance	Pre – HSR	Post – HSR
Tokyo – Osaka	515km	6hrs 30mins	3hrs 10mins (now 2hrs 30mins)
Madrid – Seville	472km	6hrs 30mins	2hrs 45 mins (now 2hrs 30 mins)
Paris – Lyon	431km	4hrs	1hrs 55 mins
Frankfurt – Cologne	180km	2hrs 20 mins	1hr 2 mins
London – Manchester	296km	2hr 08mins	1hr 13 mins proposed (from 2032)
London – Birmingham	182km	1hr 24 mins	49 mins proposed

29. The ill founded requirement to have HS2 trains capable of achieving 250mph meant that there was a requirement for it to have very gently curving tracks. If time savings had not been put forward by the Government as a key requirement for HS2, HS2 Ltd would have had far greater flexibility in terms of route selection. The route could have followed established transport corridors or it could have been diverted around the more sensitive environmental sites, thereby causing less damage to habitats, environment and communities. This was never explored as an option for HS2, and the Council sees this as a fundamental flaw in the design of the proposals. This unnecessary requirement for speed has been a serious flaw and has had negative impacts with regard to carbon emissions, safety concerns and achieving connectivity between cities. These issues are discussed below.

The implications of high speed rail on carbon emissions

30. While rail is a reasonably clean form of transport when compared to road and air, high speed rail is a very carbon intensive form of rail travel. Due to its speed HS2 will produce high levels of CO2 related to the consumption of electricity. Department for Transport figures (at http://www.rail-reg.gov.uk/upload/pdf/aea_enviro_rep.pdf) indicate that high speed rail produces 88g of CO2 per passenger kilometre, compared to just 41g for conventional rail. Without this focus on speed for minimal increases in journey times, a significant reduction in carbon emissions could be achieved. It is telling to note that China, currently the only country in the world running trains at speeds comparable to those proposed for HS2, is slowing down their services to conserve energy and reduce unsustainable operational costs.

The implications of high speed rail on safety and reliability

31. The ultra high speeds required for HS2 also create safety and reliability problems for its operations. Within the current route utilisation strategy for the Y network, HS2 is intended to run 18 trains per hour. The planned utilisation of the route is higher than that achieved on any other high speed line in the world. The Tokaido Shinkansen operates at the highest capacity, with up to fourteen trains an hour at peak periods. French high speed lines operate at up to 12 trains per hour at present. German and Spanish routes operate at lower levels of capacity, and in the case of Spain typically at no more than four or five trains an hour.

32. From the evidence presented in the 51M Consultation response it would appear that 18 trains an hour for HS2 is not achievable. The key constraint is not signalling technology but the braking distance for trains from full speed to a stop. If a train comes to a sudden halt for any reason, it is essential that the following train can stop safely without running into the train in front.
33. The speeds that HS2 Ltd has incorporated into its design specification, due in large part to its flawed remit, will in practice mean that the business case on which the proposals rely, of 18 trains per hour, will be undeliverable. Fewer trains will mean fewer passengers, which will in turn impact upon the business case giving even more concern that this is not robust.

The implications of high speed rail on connectivity

34. The requirement to achieve high speed and shorter journey times was also used to justify having no intermediate stations in between London and the West Midlands. An intermediate stop, for example in Milton Keynes could have provided much need regeneration and transport capacity to the city, while improving the HS2 proposals by enhancing its connectivity to existing networks and into wider regions. If these factors had been reasonably taken into account, the benefits of HS2 may have been spread to a much wider region and provided greater connectivity into the existing network. The Council believes that the focus for the transport network in the UK should be on connectivity rather than speed.
35. The whole premise for high speed rail as presented for HS2 relies upon actual time savings. As detailed in the Council's response to Question One, the time savings quoted are misleading. The Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009 is inconsistent with the timings quoted within the Consultation documentation, which are unduly optimistic and the journey time savings are misleading.
36. The Oliver Wyman report makes it clear that the non stop service from London to Birmingham by HS2 would be 45 minutes, compared with the current service on the WCML, which is 72 minutes, thus providing a reduction of 27 minutes. However, if HS2 were to stop at Birmingham International, the service would only save 20 minutes. If it were to stop at Birmingham International and Heathrow, the saving would be 13 minutes. If HS2 were to stop at Birmingham International, Heathrow and Old Oak Common, the saving would be only 6 minutes. This brings into doubt one of the key objectives of this high speed route, i.e. journey time savings. It also casts doubt about the claims in para 1.6 of the Consultation document that cities would be brought closer together.

Is the Consultation flawed?

37. The Council believes that the Consultation is wholly inadequate in terms of enabling people to comment on the principles, specifications and the proposed route. For anyone public reading the HS2 proposals, there is no opportunity to

learn about or question the speed of HS2, or indeed the principle of high speed rail in general. The consultation allows no input into the route selection process, as this appears to already have taken place and was reported on in March 2010.

38. The prescriptive nature of the instructions given to HS2 Ltd has meant that all reasonable options for a high speed rail network have not been equally assessed. This is an unacceptable basis for evaluating a project of this nature. The remit should have had the freedom to examine all options of whatever nature and balance them out to find the best solution for the UK infrastructure network and report back to Government accordingly. In this case HS2 Ltd had such narrow parameters, that their ability to compare and contrast options for route and specifications was severely hampered. The Council believes that the proposals reflect this and therefore that the Consultation does not represent a proper engagement process on these issues and the proposal should be withdrawn.

The Council's recommendation

39. The Council is concerned that this Consultation has not allowed any proper engagement in the decision making process regarding the principles, the specification or the route selection process. The Council believes that this inadequacy arises from the remit originally presented to HS2 Ltd in 2009, along with subsequent remit changes along the way, all of which have fundamentally failed to address the issue of high speed rail as part of a national transportation framework. The Council believes that this failure has seriously distorted the role high speed rail could play and has failed to ensure the specifications are correct and even practicable for the UK. The ill founded specifications, including the need for 'high speed' have not been properly justified, and they have been presented as a fait accompli. The route selection process has been heavily skewed by the Government's requirement for a link to Heathrow and a London interchange at Heathrow. All of this has ultimately led to the wrong route selection.
40. The information presented about the principles and specifications for HS2 are totally inadequate for people to comment on. The Council therefore believes that the Government should withdraw this proposal.

QUESTION FIVE

This question is about the route for the line between London and the west Midlands

Do you agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?

Executive summary

1. Hillingdon Council does not believe that the proposed route is the appropriate choice from either an economic, social or an environmental viewpoint. The benefits that the DfT and HS2 Ltd claim are neither sufficient nor well distributed across the country to justify the high costs in financial, environmental and social terms. There appears to be no convincing business case for HS2 to justify the environmental and social harm that it will cause. It is not in the national interest and the route is unnecessarily destructive and damaging to communities and the environment.
2. Notwithstanding the arguments above, the proposed route itself is fundamentally flawed. The question asks whether or not this is the best option, but this is impossible to answer given the lack of a meaningful comparison with other routes. Only one route is being heavily supported by HS2 Ltd, and only one route has undergone an assessment. Public exhibitions were only held on one route to help understand the impacts. Finally, a sustainability appraisal was only carried out on one route. This appraisal demonstrated that the proposed route is unsustainable at a high level, but there are no comparative assessments. Therefore, HS2 Ltd, the Government, the Council and most importantly the public, are not able to compare all the routes equally and fairly.
3. The main flaw in developing the proposed route is that it relies on the ability to accommodate a link to Heathrow. This is despite previous reports suggesting a direct Heathrow link is highly unfeasible. This conclusion was made prior to the abandonment of a third runway. It is unclear as to why the Government think there is more of a business case for a Heathrow Link now that the proposals for a third runway have been dropped. The Council believes that if the Heathrow link were to be removed in accordance with earlier studies, then there would be no need to pursue the proposed route.
4. The Heathrow link seems to be the only reason why the proposed route is being pursued given its significant impacts on the surrounding landscape, particularly within the Borough of Hillingdon.
5. In reality though, it is almost impossible to consider the proposed route as being the best option. HS2 Ltd has not properly assessed the alternative routes to be able to decide that the proposed route is the most suitable. The lack of comparative assessment of routes, or alternative rail packages undermines the

point of this question. The public cannot be expected to make an informed decision of what the best option is, when only one is being presented in any detail.

6. HS2 Ltd has not provided any commitment to specific mitigation or compensation, and therefore the proposed route can only be described as having a detrimental impact. At this stage of most development projects, it would be fitting for a developer to make commitments for specific mitigation to provide comfort that the positives of a project can outweigh the negatives. HS2 Ltd has not done this.
7. HS2 Ltd has not considered any local impacts. The impacts in Hillingdon, both in terms of the major construction impacts and the longer term operation impacts have been totally underestimated and the information regarding mitigation is inadequate. These local impacts are described in paragraphs 63 to 223 below.
8. The Council does not believe the proposed route has been developed in an open and transparent manner. It would appear that HS2 Ltd has already predetermined the route regardless of the Consultation responses. It is reliant on a Heathrow link that has been considered unfeasible, and without this link, there is no rational reason to pursue the proposed route. The Council does not believe there is sufficient evidence to demonstrate that this is the best option, either as a route or as a wider public transport investment. The Council therefore believes that the Government should withdraw this proposal for HS2.

Introduction

9. As stated in the response to Question 2, which should be read in conjunction with this answer to question 5, the Council believes that the Government's remit to HS2 Ltd in January 2009 was ill-conceived. It asked HS2 Ltd to develop a proposal for a new high speed line between London and the West Midlands, which was to include an assessment of different routes. Unfortunately HS2 Ltd was not asked to consider such routes alongside other alternatives measures, such as a package of upgrades to existing rail networks. The decision on a costly high speed rail initiative was therefore pre-supposed to be the ideal solution to rail investment. The Council does not believe there is a robust business case for this. Notwithstanding that, the Council considers it necessary to answer question 5 as HS2 will have detrimental impacts throughout the Borough that have yet to be properly accounted for.
10. HS2 Ltd has only considered high level regional and national impacts and completely ignored local matters. HS2 is assessed as having a considerable amount of national and regional impacts yet no commitment has been made to ensure these are mitigated at design stage. By not assessing local impacts at all, HS2 Ltd has not properly portrayed the overall effects of HS2.

11. The Council, as part of the 51M Group, has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. In addition evidence has been supplied by expert officers within the Borough. The Council's response to Question 5 is set out below. It draws on the detailed work of the expert advisors commissioned by 51M, which should be read in conjunction with this submission as an integral part of the answer.
12. The Council believes that the choice of the proposed route is unnecessarily destructive, has no proven business case, and therefore does not provide the best option for a new rail line between London and the West Midlands. It is not for the Council to propose an alternative route. It does not have the resources or the responsibility to design and put forward a new high speed line. However, it is clear that the current line is unsatisfactory on environmental, social and economic grounds. It is also the Council's view that a new high speed line is not justified because other alternatives such as an optimised package of rail upgrades and effective demand management measures would have provided a better value solution with the benefits arising sooner.
13. The Council does not support the Government's choice of route. The reasons for this are set out in more detail in Questions 1, 2, 3 and 4. The answers to these form an integral part of the response to this question and should be read in conjunction with it. To avoid duplication, the answer to this question focuses on the process for developing the proposed route; the impacts of the London-centric parts of the route and an overview of the local impacts of HS2 that have so far been ignored.

Is the approach for selecting the proposed route satisfactory?

14. Having presupposed that an ultra high speed rail initiative was needed, HS2 Ltd has put forward a proposed route. This proposed route is one of a number of 'options' included as part of the Consultation document. These routes are detailed in Appendix 2. However, only the proposed route has been put forward as part of any meaningful assessment. The remaining 'alternatives' are hidden in such a way as to suggest they are not options that could be taken forward. Therefore the merits of alternative routes have not been examined in the same level of detail. It would not seem possible for the Government to determine which is the best route when no meaningful comparison has been made with the others.
15. HS2 Ltd has argued in meetings that all the routes are being considered equally. If there is a genuine intention to set out each route fairly and equally, then it is not reflected in the Consultation documentation. Only the proposed route has been subjected to a more rigorous assessment, and there is no sustainability appraisal or public exhibitions for the alternative routes.
16. HS2 Ltd's attempt to provide a true opinion of the proposed route is also hindered by the Consultation document's inclusion of both the strategy

alongside the proposed route. The implication is that if the principle of high speed rail is supported, then the Consultation documentation implies that the route can only go in one location. It is difficult to understand how HS2 Ltd has developed a detailed route, prior to understanding whether the overall strategy is even appropriate. As a consequence, the Consultation document is unclear and does not provide a fair debate about the strategy and the possible routes, which should be considered separately.

17. It is perhaps inevitable that those not on the proposed route are more likely to support it, in order to avoid seeing impacts in their own areas from any alternative routes. However, HS2 Ltd has not provided them with the evidence to be able to ascertain whether any alternative routes may have fewer or more impacts as they have not undertaken any detailed assessments.
18. The lack of any comparative assessment makes it difficult to fully understand what the best option is for a high speed rail route. The proposed route has highly negative connotations, and it is difficult to see that it could be the best option. However, it would be inappropriate to offer up an alternative based on a minimal assessment. It should be for HS2 Ltd to clearly demonstrate which the best option is by making a fair, open and consistent assessment of all the route options.

Should a Heathrow link be included?

19. As stated in the response to Question 3, which should be read in conjunction with this answer, the Council believes that the proposed route has been heavily influenced by a political decision to include a direct link to Heathrow. This decision is contrary to early independent advice which stated that there was no business case for a Heathrow link. However, the Government made a political decision late in the development of the route optioneering, which meant the proposed route was the only feasible option. This political decision ignores the impacts of the proposed route, but more importantly does not allow for a proper comparison to be made with other routes.
20. In HS2 Ltd's original 2009 report to Government titled "High Speed Rail: London to West Midlands and Beyond" the conclusion on a direct spur to Heathrow was stated in Para 3.3.49 of Part 4 of 11:

"The market for access to Heathrow by HS2 is small compared with the market for London. The options for serving Heathrow directly are stations at T5, T6 or a site close to the airport at Iver. Given the uncertainties around future development at Heathrow, and the wider opportunities for improving access from the west, we do not make a recommendation for a preferred option at Heathrow."

21. It should be noted that this was at a time when Heathrow was considering expansion through a third runway. But even in this instance, it was not a sound business plan to pursue a direct HS2 link to Heathrow.
22. The Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009 supports the view that there is very little demand for a Heathrow link because it concludes that:
- Only 1,247 passengers fly from Manchester to Heathrow each day, and of these, $\frac{3}{4}$'s connect to another flight, leaving only $\frac{1}{4}$ to travel elsewhere. It is not expected that many will therefore switch to rail.
 - HS2 will only be successful if it can compete with the low cost air lines. These offer flights from £35 which HS2 may find difficult to compete with.
 - Intercontinental passengers to/from the Midlands are more likely to be attracted by lower prices offered via continental hubs, rather than go to Heathrow.
 - It is unlikely that there will be enough demand to justify running trains regularly from Heathrow to Paris.
23. In March 2010, the Secretary of State for Transport provided a further report to Parliament that concluded in Para 7.7 of High Speed Rail:
- “HS2 Ltd’s analysis also indicates that there is no credible route for a high speed line to the airport – either as part of the main line, or as a loop or spur – which would not pass mainly through residential areas, and would therefore require significant and expensive tunnelling. The only credible option for routing the main high speed line via Heathrow would entail a near-continuous tunnel of around 29 miles – almost the length of the Channel Tunnel – as well as increasing the journey time by around three and a half minutes compared to HS2 Ltd’s recommended route. Even if only a spur to the airport was provided, which would substantially reduce the capacity of the line to central London as Heathrow trains would terminate at the airport, the tunnelling required would lead to costs in excess of £1.5 billion.”*
24. Once again it is worth noting that this conclusion was made when a third runway at Heathrow had not yet been ruled out. It seems nonsensical that once a third runway was ruled out, and the Government decided that capacity at Heathrow would not substantially increase, that all of a sudden it became ‘feasible’ to provide a direct link from HS2 to Heathrow.
25. The insistence on delivering this link against the promoters own advice, provides little choice as to the final route. Consequently, the proposed route was favoured regardless of its negative impacts. More importantly, it means the relative merits of other routes have not even been explored. The route will have significant impacts in the London Borough of Hillingdon, yet HS2 Ltd has been bound by a political decision to deliver an unfeasible Heathrow spur. This limits

the choice of routes available, and further undermines a fair and open consultation of HS2.

26. If the alternative routes were explored without the unnecessary and costly link to Heathrow being such a pervasive factor, other routes may not have been so easily rejected. This would have avoided the hugely costly and destructive route through west London and Buckinghamshire, lowering significantly the environmental cost of the scheme.
27. This question asks whether the proposed route is the best option. Firstly, it is not possible to determine what the best option is without an open and transparent assessment of the alternatives; and secondly, the proposed route cannot possibly be the best option as it relies on a direct link to Heathrow Airport that was considered unfeasible in two separate studies at a time when Heathrow was expected to expand.
28. It is also worth noting the Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009 which concludes that
- Only 10% of passengers and 25% of passenger miles on the West Coast Main Line into London originate from Birmingham or Birmingham International.
 - About 17% of passengers into London on the WCML originate from Milton Keynes and 7% from Northampton.
29. This suggests that there is a real need to increase the capacity from Milton Keynes and Northampton to London. This could be better achieved if a new high speed route followed, for example, the M1 motorway, such that it would pass closer to these towns and achieve better connectivity.

Is the methodology for selecting the proposed route satisfactory?

30. The principles for avoiding harm have been set out in the Appraisal of Sustainability (AoS). At this stage of the process, the only mitigation put forward has been to design the route to minimise impacts.
31. No evidence has been presented as to why HS2 Ltd considers this the best route when compared to the alternatives. More importantly, it is not clear how HS2 Ltd developed the route through the west of London and Hillingdon. For example, the AoS (in para 8.6.6 of the Main Report Volume 1) states that generic mitigation measures for biodiversity include:

“As far as is reasonably practicable, the proposed route alignment has been developed to avoid large areas of open water to minimise adverse operational effects on birds.

Routes would be aligned to avoid designated habitats as far as possible; for example the proposed route has been placed in tunnel to avoid impacts on Long Itchington and Ufton Woods SSSI near Brackley.”

32. The first part of the new line that leaves Ruislip in West London travels directly through a Site of Special Scientific Interest and in 3.7km of viaduct over the Mid Colne Valley Country Park, home to vast expanses of water that attract rare wintering birds.
33. It is difficult to believe that HS2 Ltd has tried to avoid impacts on SSSIs and large expanses of waterbodies by seeking alternative routes.
34. Furthermore, one of these lakes that will accommodate the viaduct houses Hillingdon's Outdoor Activity Centre.
35. The Hillingdon Outdoor Activity Centre (HOAC) is an important community facility for water sports and educational activities and it is used widely by schools and voluntary groups from across north-west London. The facility has an average visitor rate of 40,000 a year, which has grown over a number of years. The Consultation documentation indicates that this facility would be crossed by HS2 on a viaduct directly over the main building and require significant land take. The site is an educational and recreational facility, reliant on its unique setting, tranquillity and open space of land and water, and it would not be viable either during or after HS2 has been constructed.
36. The development of the proposed route has not been done in an open and transparent way, nor has it involved any local considerations. HOAC were first aware of the impacts of HS2 in February 2011 when the Consultation document was published and this prompted them to contact HS2 Ltd themselves. This reflects a poor understanding and lack of regard on the part of HS2 Ltd of the local impacts and the importance of this major public facility. Furthermore, their lack of awareness demonstrates the poor quality of their assessment of local impacts.
37. In general, the methodology for selecting the route in Hillingdon remains unclear. HS2 Ltd has provided no evidence to support the case for dissecting a SSSI and vast expanses of water, which is in direct conflict with their attempts to reduce impacts.
38. Once again, the London Borough of Hillingdon cannot support the proposed route being the best option because of a complete lack of a comprehensive assessment of alternatives. In addition, the section of the proposed route through Hillingdon is contrary to HS2 Ltd's own objectives. It is therefore impossible to support this as the best option. It is also difficult for HS2 Ltd to justify why the proposed route is the most suitable option given the myriad of negative impacts associated with it. It certainly cannot be claimed that the impacts are less than alternative routes, because the alternatives have not been properly assessed.

Have the unavoidable impacts of Phase 2 been considered?

39. The proposed route forms Phase 1. There is minimal acknowledgement of the impacts associated with this Phase, but it should also be noted that it predetermines routes for Phase 2. However, Phase 2 has not been assessed at all, including the link to Heathrow. Once Phase 1 is approved, then there is very little room for manoeuvre when it comes to assessing a route option for the Heathrow link. This would also imply that the link would be delivered regardless of the impacts.
40. Phase 1 cannot be considered independently. Even if the proposed route was considered appropriate, it should not be assumed that Phase 2 would be suitable. In cumulative terms, Phase 1 combined with Phase 2 would have an even greater negative impact and could undermine the scheme entirely. But without an assessment of Phase 2, it is not possible to assess the combined effects. For example, it is acknowledged that there are significant noise impacts from Phase 1, yet the supporting document has not included impacts from Phase 2. This approach is fundamentally flawed. People living along the route in Hillingdon may be subjected to barely acceptable noise levels (unacceptable in some instances) as a result of Phase 1. However, Phase 2 will increase the number of trains at certain times, which may take the noise levels beyond thresholds of acceptability to more people.
41. Phase 1 defines the route for Phase 2 with regards to Heathrow. The Council is therefore obliged to consider the proposed route alongside the Heathrow link. Unfortunately HS2 Ltd has not done this. The Council has not seen any detailed assessment and therefore can only speculate on what the future impacts could be. This further undermines the ability to demonstrate that the proposed route is the best option.
42. If HS2 Ltd were to conclude that Phase 2 impacts of the Heathrow link have not yet been assessed because it may not be delivered, then the Council would further question the proposed route. If the Heathrow link impacts are too great and the link is deemed an inappropriate part of HS2, then Hillingdon is left with the failed legacy of the proposed route.

What are the specific London issues?

Euston

43. The Council is concerned that the magnitude of the work required to incorporate HS2 at Euston has not been factored into the Consultation document. HS2 Ltd is therefore providing a misleading assessment of the impacts which undermine the economic case. This was a concern raised in July 2010 in the Report to Government by Lord Mawhinney:

"I am concerned that adhering to the proposals that Euston should be the terminus from the outset could make the cost prohibitive and therefore threaten the whole project."

44. With regards to passenger dispersal, the Consultation Document, in para 5.4 acknowledges that:
- “By 2043, as a result of the proposed line, the number of passengers per day using Euston Mainline Station is estimated to increase by 31,700.”*
45. It goes on to describe the impact on the London Underground lines as:
- “In the three hour morning peak, would mean 5,500 additional passengers using Euston Underground Station. Both the Northern and Victoria lines which stop at Euston are likely to be heavily crowded even without HS2.”*
46. The above concerns are also shared by the Mayor of London, who states in a letter to Peter Hardy, Cabinet Member for Transport at Buckinghamshire County Council:
- “TfL estimate that there will be more than twice as many passengers arriving at Euston station in the morning peak period as a result of HS2 and the only way this can be accommodated is through additional investment in Underground capacity. I wanted a commitment from Government that their proposals for HS2 would include new underground rail capacity between Euston and Victoria. They do not and on this basis I cannot support the current proposals.”*
47. The Council believes that the Euston connection will put an unsustainable amount of pressure on public transport services into and out of Euston. HS2 Ltd’s assessment raises many questions about one of the most important interchanges in London and how it can link with the London Underground. HS2 is proposed to connect the West Midlands to London and not just Euston. The dispersal of passengers is therefore fundamental to the objectives of HS2 Ltd.
48. However, it would appear that not enough thought has gone into accommodating the number of people travelling through Euston everyday. Without any commitment for funding needed to address this issue, which would impact negatively on the business case, it is not possible to accept that this is the best route.
49. In addition to the amount of passengers going through Euston, the Consultation Document, in para 2.68, indicates how long the construction phase is likely to take:
- “...the major redevelopment project necessary at Euston station, lasting between seven and eight years...”*
50. It is likely that train services into Euston will have to be reduced and disrupted for considerable periods during the construction phase. The reduction in the number of platforms available during construction and a reduced number of approach tracks will disrupt Euston’s ability to function properly. This is likely to affect both Inter-City and commuter services. There is no indication of how the work would be phased, potential reduction plans, and whether the cost

implications of the reduced services have been accounted for in the economic case.

51. Whilst it may appear to HS2 Ltd that there is no direct disruption to the underground lines serving Hillingdon (i.e. the Piccadilly, Metropolitan and Central Lines), in reality, any disruption suffered on the underground around Euston will have significant impacts on the services to Hillingdon. The Underground is a complex network that is notoriously sensitive to disruption.
52. The Council does not believe that HS2 Ltd has fully assessed or understood the impacts of several years of disruption at Euston, which is particularly important when considering the economic case. This itself is questionable, but even more so when the wider impacts on London and the transport networks are considered.

Euston air quality impacts

53. The report for HS2 titled 'HS2 London to the West Midlands Appraisal of Sustainability Main Report Vol 1' of February 2011 correctly identifies the issue of poor air quality in London and in Hillingdon. There is an overall assumption that air quality will improve with time and acknowledgment is made of issues such as increasing housing numbers and proposals for new power stations which may impact upon any improvements.
54. It is of concern that reference is made in the above document to the area around Euston still not meeting the annual mean objectives for NO₂ or PM₁₀ around Euston station as far ahead as 2026. Para 7.5.15 states:

"However it is unlikely that the annual mean objective for NO₂ or PM₁₀ will be met at Euston station by this time."
55. As these are European Union limit values that the UK is obligated to meet within strict deadlines, it would appear inconceivable that the UK Government would allow this situation to remain as far in the future as 2026. The report goes on to state:

"After this time (2026) air quality may deteriorate to some extent as increases in road traffic offset other gains, but this is by no means certain."
56. It is considered unacceptable to put forward a high traffic-generating scheme, such as a high speed rail terminal, in a location recognised as above health-based European Union limit values for air quality, without including details of identified measures to be put in place to address this. It is not clear from the documentation as to why this is the case. However, from this restricted analysis it could be concluded that Euston is not the appropriate place to locate a high trip-generating transport hub which will increase large numbers of extra road movements from cars, taxis and buses. This is in contradiction to policies in the London Plan and the Mayor's Air Quality Strategy which stress the need to

improve local air quality, especially in areas where it is above the recognised EU limits.

Old Oak Common

57. It would appear that the choice of Old Oak Common as a west London interchange station has been, as with the preferred route as a whole, chosen for its proximity to and convenience for Heathrow airport. In light of the weak business case for linking HS2 to Heathrow and given that the airport is at capacity with no scope for expansion within existing Government policies, the Council is of the view that the London terminus strategy of HS2 should be re-examined.
58. HS2 Ltd have stated that the interchange at Old Oak common, or an alternative station, is vital to relieve congestion at Euston. Given the proposal to link HS2 to Heathrow, it is unclear whether there would also be sufficient demand to justify an interchange at Old Oak Common.
59. The proposed interchanges at Old Oak Common and Heathrow will also reduce the journey time savings. Given that journey time savings is reportedly one of the key benefits of HS2, this is clearly ill founded in light of the Commercial Advice that was provided to HS2 Ltd by Oliver Wyman in their report dated 3rd July 2009. This clearly shows that the non stop service from London to Birmingham by HS2 would be 45 minutes, compared with the current service on the WCML, which is 72 minutes, thus providing a reduction of 27 minutes. However, if HS2 were to stop at Birmingham International, the service would only save 20 minutes. If it were to stop at Birmingham International and Heathrow, the saving would be 13 minutes. If HS2 were to stop at Birmingham International, Heathrow and Old Oak Common, the saving would be only 6 minutes.
60. The Oliver Wyman also concluded that the peak capacity on the West Coast Main Line is on the London bound morning service and on the Birmingham bound afternoon service. It advised that a peak only service would capture a third of the demand with just three morning and three afternoon trains, and that an all day Birmingham to London service would capture the remaining demand with largely just one train an hour. This seems to differ quite markedly with the passenger demand forecasts provided in the Consultation documentation, and casts additional doubt on the need for HS2 and the interchanges at Heathrow and Old Oak Common.
61. The Council is concerned about the impact that an interchange with Old Oak Common has with regard to existing services and as to whether this has been factored into the economic case appropriately as disbenefits. The existing services potentially impacted include Crossrail, the Great Western Main Line (GWML) and the Heathrow Express. All GWML trains stopping at Old Oak Common will have journey times extended by 3 to 4 minutes for commuter

trains, 4 minutes for Heathrow Express and 5 minutes for InterCity trains. Using the DfT methodology on time savings, this should result in a cost of the HS2 project, but this is unaccounted for.

62. The Mayor of London also raises concerns regarding the interconnectivity between HS2 and London. In particular the links with Old Oak Common and HS1 do not appear to be properly considered. The Consultation documentation appears to reflect a lack of understanding about how HS2 does not simply stop at the London interchanges and that there is a network of services across London that are co-dependent. The disruption or loss of any of these services has an impact on the wider network of London and not just the direct connections.

What are the local impacts within Hillingdon?

63. Unlike other areas of London where HS2 is proposed to go in tunnel, in Hillingdon the proposed route goes right across the Borough, running through its dense urban areas at surface level and then across its valued Colne Valley by means of a viaduct. This will inevitably affect large numbers of people and yet very little consideration has been given to the impacts of HS2 and no mitigation measures have been put forward in the Consultation documentation. The proposal to provide a Heathrow Link will also have devastating impacts on the Borough and yet again, there are no details provided on this. Appendix 3 shows the impacts on the Borough as provided by HS2 Ltd.
64. Given the lack of provided detail within the Consultation document, the Council have therefore briefly set out below what it understands to be the potential impacts of HS2 on the Borough, and what might be done to mitigate these impacts. From this assessment the Council considers that the HS2 proposal will dramatically change the character and nature of the Borough in the same way that the Runway 3 proposal at Heathrow would have impacted, if not more so.
65. Given the scale of impacts on the Borough that are outlined below, the Council believes that as the HS2 proposal has not been justified in terms of the economic or environmental case, and as it does not have a sound business case it should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact on the Borough. If the proposed route were to go ahead, the only sensible mitigation would be for tunnelling across the whole of the Borough.

What are the potential effects of HS2 on the transport network?

66. The construction of HS2 proposal will require new bridges in Hillingdon at Long Drive, Bridgewater Road, West End Road, Breakspear Road South and Ickenham Road. Harvil Road is also to be permanently diverted over a new

HS2 bridge. These works are likely to take up to 2 years and a key issue of concern in Hillingdon is the disruption to traffic on all the north to south routes in the borough, over an extended period during construction, especially to a network of roads that is already heavily saturated due to the relatively poor links to major distributor roads in the area. The Council's survey of vehicle movements in June 2011 showed that there about were 623,590 vehicle movements on the five main north-south roads in one week (see Appendix 4). Over 35% of these movements were during peak hours. Much of the commercial and commuter traffic in the vicinity already relies upon the A40 Western Avenue, one of the busiest and least efficient radial corridors in London. This will also cause considerable disruption to bus services when roads are closed, or as a result of traffic congestion if the road widths are restricted. These impacts will be felt on neighbouring authorities too, as people try to find alternative routes.

67. In order to appreciate the scale of the concerns, described below are some of the issues that will arise locally. Firstly, the scale of the transport engineering works proposed are outlined, and then consideration is given to the impacts on the road network and public transport services.

Transport engineering

68. Bridges over Bridgewater Road, Long Drive (South Ruislip Station), West End Road and Breakspear Road South will need to be reconstructed to carry HS2. The existing headroom for the roadway under these existing bridges is low. They are prone to accidental damage by vehicles and the new HS2 bridges would exacerbate this. Therefore, the new HS2 bridges would need to be raised to give a minimum headroom of 16'6" (5.03m). They should also be moved away considerably from the side adjacent to the existing bridges, as their proximity would create a tunnel effect for the road users. However, unfortunately moving the new bridges away from the existing bridges would seriously impact on nearby properties. Therefore, to alleviate the problem, either the headroom below the existing bridges should be raised to not less than 16'6" (5.03m) or the existing bridges should be re-constructed at a higher level. Such works would however inevitably cause huge disruption over years to traffic and public transport services.
69. The works will also require the temporary diversion of utilities in the existing road and their reinstatement after the completion of the works. Road and lane closures will be required to carry out the works and again this will certainly cause much disruption on the roads.

Ickenham Road Bridge at West Ruislip Station

70. HS2 Ltd has proposed a new bridge above the high speed line to carry Ickenham Road. It should be noted that Ickenham Road is a busy dual carriageway route over the bridge and already has a steep vertical alignment

due to the existing rail lines below. The traffic survey carried out in June 2011 showed about 184,000 vehicle movements on the Ickenham Road in one week. Over 36% of these movements were during peak hours.

71. However, if the existing bridge is replaced with a new longer bridge or if a new bridge is built beside the existing bridge, it will extend the vertical alignment and would affect many properties on both sides of the road. The construction of a new bridge is most likely to require closure of Ickenham Road for a long period, about a year. This will cause much disruption and delays on the borough road network as motorists will be forced to find other routes. The works will also require the temporary diversion of utilities in the existing road and their restoration after the completion of the works.
72. If the new HS2 line could be constructed within a tunnel under the road, the existing vertical alignment would be retained. A tunnel through the borough in this locality would also enable the road to be kept open, save Blenheim Care Centre from demolition and leave the golf course and the car park unaffected.

Permanent diversion of Harvil Road

73. Harvil Road is proposed to be permanently diverted over a new HS2 bridge. The present bridge carrying Harvil Road over the railway is to be retained, but it is on a sharp bend and the cause of many recorded accidents. Therefore, the Council consider that the proposed diversion is ill considered and should be rejected. If the proposed route is to go ahead, the Council would request that a tunnel be built. Otherwise, as a minimum, the existing road bridge should be demolished and Harvil Road re-aligned with a new bridge over each of the existing railway and HS2 lines. However, this would require significant mitigation to limit the inevitable disruption that it would cause.

The 3.8 km viaduct west of Harvil Road

74. The 3.8 km viaduct west of Harvil Road appears to have a pier very close to the Hillingdon Outdoors Activity Centre. Part of the Centre may have to be demolished to enable the construction of the pier. The open nature of the site and the location of the viaduct is shown in Appendix 5. However, by re-arranging the location of the pier, it may be possible to retain the building itself, although there are other problems with HS2 which may result in the Centre closing.
75. Although the piers are shown spaced at 50m centres, they will appear to be closely spaced when viewed from a distance and effectively slice the open land in two. This will also limit the potential of this vast swathe of land for future recreational and leisure uses. If the proposed route proceeds, we believe that the piers should be spaced at much greater distances and that the bridge be carefully designed to enhance its surroundings. It is unlikely that a concrete

structure would be appropriate because it would inevitably be too bulky, cumbersome and heavy in appearance.

76. It is assumed that a construction of a number of temporary jetties will be required for the building of piers and foundations over the water. These will mean that the lakes will not be open to the public for years and they may not be suitable or attractive for boating and fishing uses once HS2 is operational. Any measures that will be taken to restore the site used for temporary works to its original condition are not known at this stage.
77. Given that the noise from the high speed trains may disturb the wildlife and become a nuisance to people undertaking leisure activities, it is the Council's view that if the proposed route proceeds, a tunnel in lieu of the proposed viaduct should be built.

Impacts on South Ruislip

78. The A40 is a feeder for traffic between central London and the M25 and to destinations beyond, and is therefore a logical route for much of the commercial road traffic in the South Ruislip area, whether servicing areas further in towards central London or outlying areas in the counties around west London.
79. The only accesses for larger commercial vehicle traffic between the South Ruislip Industrial Estate and the A40 is via the junctions at Target Roundabout and the Polish War Memorial Roundabout. Both junctions are, however, only indirectly linked by two key routes and both of these are already severely constrained by rail over-bridges with limited height clearances.
80. The route to and from the Target Roundabout runs via Field End Road towards Northolt, under a rail bridge between the junctions with Bradfield Road and Roubornmead Drive. The route then continues within the London Borough of Ealing, into Mandeville Road, past Northolt LUL station (also likely to be affected by the HS2 proposals) and then to the Target Roundabout.
81. In practice, the more favoured route from South Ruislip to the A40 tends to be via the Polish War Memorial roundabout. This route runs via Victoria Road, Station Approach/ Long Drive and West End Road, passing under the rail overbridge at South Ruislip station. The bridge at South Ruislip station is in fact a series of separate bridge decks, carrying the Central Line and Chiltern Line. Despite over-height vehicle detectors, bridge strikes are not unknown, which reinforces the case that this is a critically important route for commercial vehicle traffic.
82. Residential roads to the north of Station Approach also suffer to a significant extent from heavy goods vehicle traffic, which use these roads as a means of getting between West End Road and Victoria Road. The attraction of these roads (some of which nevertheless have restrictive weight limits, one-way working, width restrictions and other traffic calming measures), is that they are

perceived as a means of bypassing Station Approach/Long Drive and in particular the limited-height rail bridge. The traffic survey carried out in June 2011 showed 142,260 vehicle movements on Station Approach in one week. About 32% of these movements were during peak hours.

83. Initial discussions with HS2 Ltd have indicated that a new bridge will be constructed at South Ruislip, although it is as yet unclear how this bridge will be fabricated. It may be built in a nearby site, constructed in situ or brought from a remote site. If the new bridge were to be constructed at the same level as the existing Chiltern Line and Central Line bridges, then there would presumably be potential to use the existing bridges for temporary diversions of rail services during construction, but at the cost of exacerbating the existing height clearance problem for the road underneath, without substantial and invasive excavation.
84. If on the other hand, the new rail bridge were to be constructed at a greater height than the existing bridges, then the potential to divert services between them would appear to be more limited, and the existing bridge height would remain as an unresolved issue that already blights the area.
85. Construction of the new bridge is likely to cause major traffic disruption, as there is relatively little working space owing to the immediate proximity of South Ruislip station to the road, and other buildings nearby.
86. As part of the construction process, it is highly likely that HS2 Ltd's contractor will seek to identify a major compound within the HS2 corridor, and potential candidates for this include part of the Waste Transfer site in Victoria Road. This would add considerably to the volumes of heavy goods traffic in the area, which would still be forced to rely on the inadequate road network referred to above.

Impacts on Ruislip Gardens

87. The next major road crossing disruption along the HS2 corridor comes at Ruislip Gardens, where the existing steel truss bridge crosses West End Road at an angle and already passes near a number of existing properties. To the west of this site is a long, narrow LUL depot site that services the Central Line. It is conceivable that HS2 Ltd will wish to explore using some of this site as a construction compound, which will inevitably add to local traffic levels over and above the disruption caused by demolition and construction associated with the new bridge crossing.
88. Residents in the large area of Ruislip Gardens to the south and west of this site rely entirely on West End Road as their link to destinations in the north of the borough. A school which is situated at the western extremity of the area also has associated vehicular and pedestrian traffic from the wider catchment area. The traffic survey carried out in June 2011 showed about 140,000 vehicle movements on West End Road in one week. Over 32% of these movements were during peak hours.

Impacts on West Ruislip

89. There is likely to be major disruption to the existing road links by West Ruislip station, which at present serves both the Chiltern Line and forms the western end of the Central Line. A new bridge is proposed, to the north of the existing road bridge. The road itself, Ickenham Road, is one of the few links for residents of Eastcote and Ruislip who wish to travel to and from the A40. Traffic levels are already very high at peak periods and this is expected to grow in the coming years, as the large housing development on the former RAF West Ruislip site is redeveloped.
90. Construction details of the new bridge are again unknown, although because of the spans required it seems likely to involve at the least substantial in-situ bridge piers and possibly in-situ construction of the bridge itself. The proximity of the rail sidings by the Central Line and Chiltern Line may prove attractive as a compound, but this would generate significant heavy goods traffic and add to the congestion within the surrounding areas.

Impacts on Breakspear Road South

91. Despite its deceptively rural appearance, Breakspear Road South is an important link between, on the one hand, Harefield, Northwood and Ruislip, and on the other, Ickenham, the A40 and Uxbridge. Morning southbound peak traffic often queues from the junction with Swakeleys Road, as far as the junction with Copthall Road West, and the route is very susceptible to downstream traffic congestion. The traffic survey carried out in June 2011 showed 93,530 vehicle movements on Breakspear Road South in one week. Over 41% of these movements were during peak hours.
92. The alignment of HS2 means that an all-new rail bridge will be required to the south of the existing Victorian Chiltern Line bridge. The narrowness of Breakspear Road South at this point, and the close proximity of highway and property boundaries, suggest that significant long-duration road closures may be required during construction. This will impose substantial additional pressures on to the local network, with traffic being forced onto other routes such as Ickenham Road and Harvil Road, which is also affected by the other planned HS2 road crossings.

Impacts on Harvil Road

93. Harvil Road is a vital link between Harefield and Ickenham, the A40 and Uxbridge. The U9, which runs along Harvil Road, is one of the few bus services that links Harefield directly to the heart of the Borough. At present, the existing road bridge over the Chiltern Line, just north of the junction of Harvil Road and Skip Lane, is a sub-standard width structure, which is also very poorly aligned and has been the site of several serious road accidents in recent years.

94. Traffic queues from Harefield in the morning peak, heading towards Ickenham, frequently tail back from the junction with Swakeleys Road well beyond the junction with The Drive and sometimes as far as Skip Lane, thus demonstrating the crucial importance of this road to Harefield. Some peak traffic also comes from Ruislip via New Year's Green Lane, and more is likely to divert here in any periods if and when Breakspear Road South is closed. The traffic survey carried out in June 2011 showed about 64,480 vehicle movements on Harvil Road in one week. Over 40% of these movements were during peak hours.
95. The present details of the road links and bridge works proposed by HS2 here are again unclear. The Consultation documentation appears to show Harvil Road being diverted onto the unclassified road that serves the Hillingdon Outdoor Activities Centre (HOAC). This has been poorly thought through, and is unlikely to be feasible.
96. The Mayor's Transport Strategy shows that more than 70% of trips of under 5km are to schools, local shops, leisure centres, health centres and banks and that all journeys tend to start and end on the local transport network.
97. For many residents in Harefield, already disenfranchised by a low level of public transport provision, and no access at all to London's rail services, the need for these short journeys is especially acute and the disruption due to HS2 construction will be immense. Car-borne traffic between Harefield and Uxbridge is likely to rise sharply, in stark contrast to the aims that the Mayor and the Council share for a transport modal shift.
98. Three key routes serve Harefield and West Ruislip; namely Ickenham Road, Breakspear Road South and Harvil Road, with a tangential link from Harvil Road/ Church Hill to Denham via Moorhall Road. All will be affected by HS2 in some way, and the traffic and public transport disruption will place enormous strain on the remaining minor accesses to the A40 and beyond.
99. Traffic levels along Moorhall Road (which carries the 331 bus route) to and from Denham are likely to be greatly increased as Harvil Road itself is affected by HS2 construction. Some of the more rural routes from Harefield, such as Park Lane, Springwell Lane and Woodcock Hill that link to Rickmansworth and the M25, may suffer much more commuter traffic at levels not normally seen. Many of these roads, quite apart from their quiet rural nature, are simply unsuited to heavy use, in particular by larger commercial vehicles.
100. The importance of this issue should not be underestimated. The disruption to Harvil Road in particular, due to the major construction and earth-movement work associated with the road diversion, viaduct construction and the creation of a massive open-cutting scoring through New Years Green Covert will, quite apart from the environmental destruction, cause major disruption to this crucial road link.

101. The Council has actively sought additional investment by the Mayor into public transport routes to better serve these residents, only to be told that the necessary funding for new or significantly better routes is not available. The sums required would be a tiny fraction in proportion to the levels of investment planned for HS2.
102. The Mayor has committed in his Transport Strategy to develop the bus network to support other transport infrastructure investment, citing Crossrail as an obvious example, but as Phase 1 of HS2 has no interaction within Hillingdon in transport terms, this would appear to disqualify the Borough and in particular the residents of Harefield for such critical public transport investment based on these parameters.

Impacts on the wider area

103. Major disruption to the existing local road network, in particular the three key routes in the west affected by HS2, namely Ickenham Road, Breakspear Road South and Harvil Road, will inevitably put great strain on the remaining access routes to the A40 and beyond.
104. Traffic levels along Moorhall Road, to and from Denham, are likely to be greatly increased as Harvil Road itself is affected by HS2 construction. Similarly some of the more rural routes from Harefield, such as Park Lane and Woodcock Hill that link to Rickmansworth and the M25, will suffer much more commuter traffic at levels not normally seen. Many of these roads, quite apart from their quiet rural nature, are simply unsuited to heavy use, in particular by larger commercial vehicles.

The potential effects for the Chiltern Line

105. The HS2 route is to go alongside the existing Chiltern Line from Northolt to West Ruislip. The construction works are likely to affect South Ruislip and West Ruislip Stations. They will also involve the reconstruction of road bridges, which are used by the Chiltern Line, so that HS2 can pass over Long Drive, Bridgewater Road, West End Road and Breakspear Road South and under Ickenham Road. This may cause significant disruption to Chiltern Line services for an extended period of time.

The potential effects for the Central Underground Line

106. The HS2 route is to go alongside the existing Central Line from Northolt to West Ruislip. The construction works are likely to affect South Ruislip, Ruislip Gardens and West Ruislip Stations. They will also involve the reconstruction of road bridges, which are used by the Central Line, so that HS2 can pass over Long Drive, Bridgewater Road and West End Road. This will undoubtedly cause significant disruption to Central Line services for a significant time.

The potential effects for the Metropolitan and Piccadilly Underground Lines

107. The HS2 route is to pass over the Metropolitan and Piccadilly Underground Lines near West Ruislip, although these construction works should be capable of being carried out with minimal disruption to services.

The potential effects for the London's bus services and traffic in general

108. The Council is concerned at the certainty of disruption, some of it potentially long-lasting, to the five crucial bus routes which cross the alignment of HS2. The borough already faces poor quality north-south transport links, a subject of high-level member and officer engagement with the Mayor and TfL directors, and the impact of diversions that will almost inevitably be required as a consequence of HS2 construction are a matter of serious concern both to the council and to our residents. The construction works are likely to affect the routing, frequency and reliability of bus services.
109. The key Metropolitan Town Centre of Uxbridge lies some way to the south of the proposed HS2 alignment, and yet a significant proportion of the borough's residents, many of them older people, live in areas well to the north of the HS2 route. For many residents, public transport to Uxbridge and beyond is an essential lifeline and with the relative paucity of direct high-quality road links, any disruption to the affected bus services will seriously affect their quality of life.
110. Harvil Road, to the west of the Borough, carries a typical daily flow of around 10,000 vehicle movements and carries the U9 bus route, a critical link between the village of Harefield and the major employment, retail and transport hub in Uxbridge. The major disruption and diversions indicated at the intersection of HS2 and Harvil Road are likely to have severe and possibly long-lasting impacts on the U9 route. The 331 bus route also serves Harefield and links with Uxbridge via an alternative route, through Denham, via Moorhall Road. It is also likely to be affected by the HS2 works, in particular to the viaduct.
111. Near West Ruislip Station, the U1 bus route will be severed by any closures in High Road Ickenham. This route links Ruislip and Uxbridge, a popular destination via a typically very busy road. Further east, West End Road, which is one of the borough's more highly congested routes, links the town centres of Ruislip and South Ruislip with the A40 Western Avenue. The E7 bus route links Ruislip LUL station ultimately to Ealing Broadway, and is therefore a highly important longer route of particular importance to older residents. This bus route is also likely to be adversely affected by the HS2 works.

Unknown transport impacts from Phase 2

112. Even if the Phase 1 was considered appropriate and built, it should not be assumed that Phase 2 would be agreed and built. In cumulative terms, the impacts on London's transport network of Phase 1 combined with Phase 2 are likely to be even greater and could undermine the scheme entirely. But with no

assessment of Phase 2, it is not possible to assess the combined effects at this moment in time.

113. Phase 2 will inevitably generate many more people travelling to London, which would increase the subsequent impacts on air quality and carbon emissions and noise. This also includes a link to Heathrow (shown in Appendix 3), though it is not clear where this link would go. Once Phase 1 is approved, the addition of Phase 2 can only have a significant adverse impact on Hillingdon, and the adjoining areas at vast cost.

How could the adverse transport of HS2 on the transport network be mitigated?

114. We do not believe that the HS2 proposal has been justified in terms of the economic or environmental case. It does not have a sound business case. It should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact upon Hillingdon's roads. However, if the proposed route were to go ahead, the only sensible mitigation would be for a tunnel across the borough.

What are the noise and vibration impacts?

115. HS2 will potentially have substantial noise and vibration impacts as the route passes through Hillingdon. The trains in the HS2 proposals, travelling at the high speeds described in the Consultation documentation generate more noise than existing services. HS2 claim that noise impacts can be greatly reduced by application of noise mitigation measures such as noise barriers. However, we are doubtful as to how practicable and effective these mitigation measures would be given the close proximity to houses and businesses.
116. With regards to the impact on Hillingdon there are two distinct noise issues of concern. As the route passes through the urban areas in Hillingdon, passing close to residential housing and other sensitive receptors such as schools and residential care homes, this will add considerably to existing noise levels. In addition, as the route leaves the current rail corridor and on to a newly formed track on a viaduct, this exposes new, currently tranquil areas of the borough to substantial new noise levels.
117. The Council is also particularly concerned regarding the lack of acknowledgement of Phase 2 impacts. Phase 1 cannot be considered independently. People living along the route in Hillingdon are likely to be subjected to unacceptable noise levels as a result of Phase 1. However, Phase 2 would increase the number of trains, which may take the noise levels beyond thresholds of acceptability to a lot more people. By the time this is determined though, it would be too late to find appropriate mitigation.
118. HS2 Ltd was keen to attempt to reassure the public that noise impacts would be minimal and went as far as installing noise booths in their public exhibitions to

demonstrate the impacts of HS2. The overall impression given was that the noise impacts would be minimal. Hillingdon have serious concerns over the use of the noise booths. The representation was portrayed at a distance of 75m from the proposed track with an apparent high barrier in place. This does not represent the situation in Hillingdon where properties are within a few metres of the line and there may not be sufficient room for mitigation barriers.

119. The Council has employed noise consultants to assess the noise assessment as provided within the Appraisal of Sustainability (AoS). A number of concerns have been identified regarding the accuracy and adequacy of the information supplied. Further details are given in Appendix 6. In summary the main concerns include:
- Use of inappropriate noise criteria with regards to the impact of noise levels on residents, and no assessment at all for community facilities or other non-residential buildings.
 - No assessment of the impacts of the peak noise level during train pass-by; of the night noise impacts; of the actual magnitude of the noise increases; or of ground borne noise and vibration.
 - Insufficient evidence regarding mitigation measures such as predicted reductions in source noise levels from future trains, and the ability of noise barriers to mitigate the noise levels.
 - Whilst the AoS assumes aerodynamic noise becomes predominant at speeds above 300km/h, other estimates recognise this can become predominant at around 250 km/h. Therefore the AoS noise assessment may have significantly over-estimated noise barrier performance.
 - Insufficient detail as to whether adequate mitigation measures can be set in place in areas where the train passes close to residential areas and on the viaduct where noise impacts will be propagated from a height across a tranquil valley.
 - No assessment of noise and vibration impacts from construction of the proposed HS2 rail line through the borough.
120. The Council has serious concerns over the ability of mitigation measures to adequately address the noise impacts as predicted to occur in Hillingdon. The assumption that the new future trains will be 3dB quieter than those of today requires a leap of faith as to how robust this assumption will actually be in the future. In effect HS2 Ltd have relied on noise mitigation assumptions that include 'phantom' trains that do not actually exist yet.
121. For the urban areas in Hillingdon where dwellings are very close to the railway line, the use of measures such as potential 3m high noise barriers may not even be acceptable to locate in such confined spaces, such as on embankments at

the rear of relatively small gardens, due to the likely ensuing adverse impacts on visual amenity and overshadowing, which could affect the enjoyment of people's homes and gardens. Such mitigation measures could result in even more properties being unacceptably impacted.

122. As the route emerges onto the viaduct in Hillingdon, there is an added complication that as the speed increases, the aerodynamic noise of the actual train dominates the noise levels, rather than the noise from the rails which is easier to mitigate with barriers. The Council has serious concerns regarding the effectiveness of a 2m barrier, as proposed by HS2 Ltd, to mitigate the propagation of noise from a viaduct across an open valley.
123. The Council firmly believes that the noise assessment supplied in the Consultation does not portray an accurate representation of the impacts, either in urban areas or in the tranquil areas. The inadequate quality of the information in the AoS does not form a proper basis for making such significant decisions that could affect the quality of lives of so many people.

What are the impacts on landscape?

124. Hillingdon provides the western gateway to London and to Buckinghamshire. This important gateway to London is represented by a uniquely important open countryside that has been developed out of man made gravel pits. The Mid Colne Valley is a Regional Park, which is a site of Metropolitan Importance for nature conservation. It also contains a number of Special Sites of Scientific Interest (SSSI). The route of HS2 is proposed to run through this highly valuable area to the west of London. The importance of this cannot be understated in terms of its landscape value and its use for recreational and leisure purposes and biodiversity. Appendix 7 provides a visual representation of the existing landscape.
125. The AoS considers the potential beneficial and adverse, national and regional, sustainability impacts of the proposed scheme. In Volume 1 of the AoS (paragraph 7.4.1) it is stated that:
- “Natural and cultural resource protection and environmental enhancement, at this level of appraisal, considers statutorily protected environmental features (of international and national importance), and other relevant non-statutory features where information is readily available. No site surveys have been undertaken at this stage. The resources considered by the AoS are listed below and illustrated within the detailed plans, contained in Volume 2 to the main report. - National Parks, AONBs, London Protected Views, and Local Landscape Designations.”*
126. It should be noted that there is no mention of Regional Parks in the AoS, such as the Colne Valley Regional Park, or the London Regional Landscape Framework (2010). It is therefore apparent that HS2 Ltd has not given any

weight to the regional impacts that the route would have on London's important landscape. The failure to consider the London Regional Landscape Framework is particularly concerning, as that was published in 2010.

127. The Council's concerns appear to be supported by the report by Oxera (20th June 2011), which states in para 3.45 that:

"The AoS does not explicitly consider the landscape impacts of building a new high speed line, which HS2 Ltd rightly believes would be important. Neither are such effects included in the calculated BCRs, and the extent to which they would reduce the measured value for money of a new line is therefore unclear."

128. Para 3.46 of the report by Oxera goes on to say that:

"Studies do exist of the values attached by people to particular kinds of landscape and Government has in recent years proposed and undertaken new studies. It should be possible to produce broad estimates of the order of magnitude of landscape costs for a new high speed line."

129. In Volume 1 of the AoS (paragraph 4.1) it is stated that:

"Further appraisal and assessment (as part of EIA) would be integral to design development through close working with both HS2 Ltd and the wider engineering team; and conclusions that emerge from the AoS would feed the independent reporting of scheme performance and would assist the future consideration of mitigation to help overcome particular issues of concern."

130. If Phase 1 is approved, it will be too late to consider the landscape impacts which should be mitigated through avoidance, unless there was a commitment by Government to tunnel through this Borough. The full impacts of Phase 1 on this important landscape should not be left until post determination; they should be integral to the decision.

131. From Old Oak Common towards the M25, the route would run along the Chiltern Line corridor to West Ruislip and then cut across the Colne Valley Regional Park on a two mile (3.8km) long viaduct before entering a six-mile long tunnel immediately before the M25 junctions. A future connection to Heathrow would be provided in the section between West Ruislip and the M25.

132. In addition, it is explained in Volume 1 of the AoS that:

"Just beyond Northolt station the proposed scheme would include a grade-separated junction to enable a future connection to Heathrow airport. This would necessitate a corridor width sufficient to accommodate the twin Central Line tracks and the four HS2 tracks and the junction, but the link itself would not form part of the proposed scheme."

133. In Volume 1 of the AoS (para 7.4.3) it is mentioned that Natural England has defined (in 2009) national character areas of broadly homogenous landscape.

Defining what makes the character of these areas distinct helps to identify the features that give a locality its 'sense of place', and pinpoint what makes it different from neighbouring areas. In this way it is possible to understand the elements of each landscape which are relatively more sensitive to change and equally what kinds of change might be deemed more acceptable. Twelve character areas are crossed by the proposed route.

134. The AoS refers to impacts on 6 national character areas in the South East and London region as designated by Natural England. However, the AoS fails to acknowledge the Thames Valley character, even though the viaduct would run across this character area.
135. The Thames Valley (Landscape Character Area 115) is described by Natural England as:
- Hydrological floodplain of the River Thames as a landscape feature provides unity to the large areas of fragmented poor agricultural land.
 - The western Thames valley is wide and flat with the river barely discernible, occupying only a small part of the wider geological floodplain.
 - Woodlands characterise the north-western area, the wooded character extending up to the southern edge of the Chiltern Hills.
 - To the south, the open Thames floodplain dominates with its associated flat grazing land, becoming characterised by a number of formal historic landscapes on higher ground such as Windsor Park.
 - Towards London in the east, the natural character of the area is overtaken by urban influences; a dense network of roads including the M25 corridor, Heathrow Airport, railway lines, golf courses, pylon lines, reservoirs, extensive mineral extraction and numerous flooded gravel pits.
136. Natural England further define the character area of the Colne Valley:
- “Rapid development has often left new structures and buildings unrelated to the landscape around them...” and ‘The M25, M40 and M4 corridors are a major feature of the Thames Valley with associated development often poorly contained and tending to dominate the floodplain. The fringe zone to Greater London has seen rapid and often haphazard development which gives the overall impression of a lack of co-ordination between the numerous activities and land uses. Heathrow Airport is a large dominating influence in the flat landscape around the M25...’ (Natural England, LCA 115, 2009)*
137. The character areas above should have been taken into account by HS2 Ltd, but they have not. However, it is also important to further define the areas

within the character areas. The area HS2 will cross is not the same as the southern areas of the Colne Valley which have already had considerable impacts from major infrastructure. This clearly differs from the approach to HS1, which was to develop a route that follows existing transport networks, and therefore landscape impacts from crossings of rivers and open areas was minimised by existing infrastructure.

138. The Council believes the HS2 viaduct would be another 'haphazard' development superimposed on part of the valley that is not currently dominated by development unlike the area around Heathrow Airport to the south, west of Slough. The Mid Colne Valley Regional Park in this area is devoid of 'eyesores' to the same extent as the southern areas. The viaduct would therefore have a much greater impact than HS2 Ltd currently acknowledge.

139. The London Regional Landscape Framework was produced in April 2010 and identifies the Colne Valley as one of 22 Natural Landscape Areas (NLA). The Framework describes the Colne Valley as a:

"fast-flowing, clean river set within floodplain meadows bordered by damp woodland' and identified as 'one of the finest river systems in London."

140. The 3.8 km long HS2 viaduct, between the high ground on the western and eastern sides of the valley, and up to 15m above the valley floor / floodplain, would be a dominant, alien and urbanising feature in the northern Colne Valley.

141. The AoS fails to give proper consideration to the Colne Valley Regional Park, which covers about 110 km² (43 square miles) of countryside, lakes and rivers, from Rickmansworth in the north to Staines in the south. It lies on the west side of London, and includes several country parks, including Bayhurst Wood (in Hillingdon) and Denham.

142. In 2007 as part of a project, English Heritage, Buckinghamshire County Council and Groundwork Thames Valley undertook a historic landscape characterisation for the Park, and identified several distinctive historic characteristics, including the series of flooded mineral extractions sites between Batchworth Lake and Denham Quarries, and the registered historic park at Denham (Country Park).

143. In the Project Report, the 19 km² of the Park in the London Borough of Hillingdon is noted as representing:

"one of the better-preserved areas of pre-twentieth century landscape, and due to the creation of the Green Belt, the settlements in this area remain small and the majority of the landscape varies from the pre 18th century to 19th century farming landscapes."

144. It also noted that:

"The landscape immediately to the east of the River Colne and separating Buckinghamshire from Hillingdon exhibits the highest level of modern impact

through the extensive network of flooded mineral extraction sites that stretch from Rickmansworth to Denham.”

145. The landscape of the Mid Colne Valley was born from previous human interventions. The extent of the gravel pits would once have dominated the western edges of what are now the western boundaries of London. This landscape also represents what can be achieved once man made landscapes are returned to natural features. Whilst the southern areas of the Colne Valley have had to accommodate new infrastructure and extensive development, the northern areas are relatively free from impacts.
146. It is clear that HS2 Ltd has not properly considered the impacts on the Mid Colne Valley. They omit references to important documents outlining the importance of the character areas, and by not properly liaising with local authorities, they have missed out on recent character assessments.
147. As a consequence, HS2 Ltd has completely underplayed the value of the northern areas of the Colne Valley, where a 3.8km viaduct will travel. There is no existing infrastructure that minimises impacts as there was with HS1, making HS2 a visible and unsightly addition to the western boundary of London.
148. This assessment of HS2 Ltd’s appraisal was supported in Oxera’s report to the Government Transport Select Committee which stated:
- “3.45 The AoS does not explicitly consider the landscape impacts of building a new high speed line, which HS2 Ltd rightly believes would be important. Neither are such effects included in the calculated BCRs, and the extent to which they would reduce the measured value for money of a new line is therefore unclear.*
- 3.46 Studies do exist of the values attached by people to particular kinds of landscape, and Government has in recent years proposed and undertaken new studies. It should be possible to produce broad estimates of the order of magnitude of landscape costs for a new high speed line.” (Review of the Government’s case for a High Speed Rail programme June 2011)*
149. It is suggested that HS2 Ltd should reconsider the landscape impacts of the scheme and give appropriate weight to the Colne Valley Regional Park and the potential impacts of the viaduct. The Council also has concerns about the methodology for seemingly ignoring the impacts on the Park. Once again, a proper appraisal may unbalance the limited benefits that HS2 Ltd has provided and could result in a negative scheme. It should be noted though that the Council already considers the scheme highly negative and this is just another example of the lack of consideration by HS2 Ltd of the wider impacts.

What should be done to mitigate against the landscape impacts?

150. Although it may be possible in some areas for mitigation to be achieved by utilising existing topography and land use features to screen views of the line, this type of information has not been included in the Consultation documentation. Bunding and additional planting may help to reduce the impact of the line on wider views, however, given that the route passes through some tightly developed areas, there are some locations where mitigation may not be possible. In addition, some features, such as the viaduct, are extremely large and cannot be screened. In such cases the quality of their design will be paramount. As yet, there are no draft designs for these structures, which would help assess their impact. Furthermore, there is no commitment from HS2 Ltd to set out clear guidelines on their proposed approach to mitigation.
151. Given the scale of impacts on this highly valued landscape, the Council believes that, as the HS2 proposal has not been justified in terms of the economic or environmental case, and it does not have a sound business case, it should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact on Hillingdon's landscape. However, if the proposed route were to go ahead, the only sensible mitigation would be for a tunnel through the borough.

What are the impacts on biodiversity?

152. HS2 will have a significant negative impact on wildlife and biodiversity within the borough. The borough classifies its important sites into 'sites of important nature conservation (SINCs)'. These are defined by a 4 tier hierarchy of status below the nationally designated Sites of Special Scientific Interest (SSSI):
- Metropolitan: These are designated by the Greater London Authority and are considered regionally important.
 - Grade 1: These are designated by the Borough and are considered to be some of the most important nature conservation sites to Hillingdon.
 - Grade 2 and Local: These are designated by the Borough and represent sites with more local significance.
153. All the sites above are important to the Borough and any loss or adverse impacts are to be avoided wherever possible. Appendix 8 shows that HS2 is located within or in close proximity to a number of SINCs (either proposed or designated). The AoS does not give any consideration to the borough grade SINCS within Hillingdon and provides minimal information on the impacts on the Mid Colne Valley Metropolitan site and SSSI. With regards to the SSSI, the AoS states:

"The proposed scheme would also cross the southern and western-most part of the Mid Colne Valley SSSI on a viaduct, but effects on the site and particularly open water habitats are likely to be limited by the alignment of the route."

154. Appendix 5.2 of the AoS only sets out the broad assessment of the biodiversity impacts. Instead it relies on approaches used for HS1 to suggest possible mitigation measures. However, HS2 Ltd has not done a proper assessment to be able to fully understand what the impacts would be. For example, the quote above seems to imply there would be limited impact on a SSSI and Metropolitan Site of Nature Conservation. This is wildly optimistic and not supported by an evidenced base assessment. Adverse impacts on critical sites such as the SSSI cannot be overcome by funding enhancement works elsewhere along the route. HS2 Ltd has suggested that they have tried to avoid major impacts where possible, yet the route goes straight through a SSSI. HS2 Ltd does not provide an explanation as to why these impacts could not be avoided, either via a tunnel or an alternative route.
155. In addition to the above, the following examples are areas that will be significantly adversely impacted by HS2:
- Mid Colne Valley Site of Special Scientific Interest (SSSI)
156. Within the Borough of Hillingdon, HS2 will cross the Mid Colne Valley SSSI, which also runs into South Buckinghamshire District Council. The Mid Colne Valley is of significant ornithological interest, particularly for the diversity of breeding woodland and wetland birds, and for the numbers of wintering wildfowl. On the eastern valley slope is one of the last remaining examples of unimproved chalk grassland in Greater London. The ornithological interest of the site is considerable with over 70 breeding and 80 wintering species of bird regularly recorded. This high diversity reflects the close proximity of the wide range of habitats present: woodland, scrub, grassland, running and standing water, marginal fen and gravel banks. Breeding woodland birds include kestrel, lesser whitethroat, nuthatch, tawny owl and three species of woodpecker. The gravel pits and River Colne attract one of the most important wetland breeding bird communities in Greater London and the Colne Valley: coot, greylag goose, little ringed plover, kingfisher, mute swan and tufted duck nest regularly, while others such as gadwall and shoveler are resident and occasionally breed. Recently a heronry has become established on the islands in Broadwater and is expanding rapidly. Many species of wintering wildfowl are attracted to the extensive water areas; the numbers of tufted duck frequently reach levels of national importance, and pochard and shoveler occasionally reach levels of similar significance.
- Mid Colne Valley (Metropolitan Site)
157. This section of the Colne Valley includes a diverse range of high quality habitats. Several waterways include the Frays River, from which 53 species of aquatic and wetland plants have been recorded. The unimproved wet pastures of Frays Farm Meadows (a Site of Special Scientific Interest and Local Nature Reserve managed by the London Wildlife Trust and Hillingdon Natural History Society) support a very rich flora, including locally uncommon species such as

marsh-marigold and ragged-robin. The invertebrate fauna includes the locally declining glow-worm. The meadows support wintering waders such as snipe, as well as a population of harvest mice. The adjacent Denham Lock Wood (also Site of Special Scientific Interest) is one of few wet alder-willow woods in London, and supports a rich fen flora including the very localised small teasel. Invertebrates here include the nationally rare species Desmoulin's whorl snail and the balsam carpet moth. The extensive flooded gravel pits are very important for breeding and wintering waterfowl, and also for passage migrants. The site is important for its population of the specially-protected water vole and there are also recent reports of otters in the vicinity.

- Newyears Green Covert (Borough Grade 1 Importance)

158. This woodland is believed to have been planted in the late 19th century. The canopy is dominated by pedunculate oak, ash, hornbeam, English elm, blackthorn, hawthorn and hazel. Also present is the locally scarce, buckthorn along with Midland hawthorn, spindle and field rose. The ground flora is dominated in parts by bramble and common nettle with some germander speedwell and violets. It estimated that the construction of the route of HS2 will require the removal of up to 3,000 trees from this site.
159. There are a number of other sites along the route that will be impacted in some way. The biggest concern at this stage of the Consultation is that HS2 Ltd has not committed to any strategy for mitigating loss. Simply relying on offsetting impacts, by allocating funds for as yet 'unknown' projects is not acceptable. The Council needs to be reassured that every effort has been made to avoid the impacts. The fact that HS2 Ltd has simply dismissed any possible impacts on the Mid Colne Valley SSSI, suggests that the first consideration was to appease concerns by offering 'offsite compensation'. This is considered to be unacceptable.

What should be done to mitigate against the biodiversity impacts?

160. The Council accepts that any new major infrastructure project will have negative impacts on the land. However, in these circumstances, the Council would expect much clearer evidence that the route designers have tried to avoid the impacts. If it is still not possible, following alternative route optioneering, to avoid adverse impacts, it is necessary to develop strategies that commit design and implementation stages to appropriate mitigation.
161. It is unclear why one of its most important biodiversity features in the Borough, the Mid Colne Valley, is proposed as the preferred location for HS2 to go through, but without any suggested mitigation measures. HS2 Ltd appears to have adopted approaches used for HS1, particularly regarding offsite compensation works. HS2 Ltd should provide sufficient evidence to demonstrate that a) all the impacts are known, b) attempts have been made to

avoid the impacts and c) there are suitable opportunities near to the location of the adverse impacts to provide compensatory measures.

162. Given the scale of impacts on biodiversity in this area, the Council believes that as the HS2 proposal has not been justified in terms of the economic or environmental case and it does not have a sound business case, it should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact on Hillingdon's biodiversity. However, if the proposed route were to go ahead, the only sensible mitigation would be for a tunnel across the borough.

What are the impacts on Rights of Way?

163. There are 8 Public Rights of Way taken from the LBH Definitive Map & Statement: U34 & U75 and U42, U45, U46, U47, U81 & R146 (there are maps of these in pdf format). In addition, the links to two important trails across Hillingdon will be impacted:

- Celandine Route: A walk of 12 miles along the River Pinn from Pinner to the Grand Union Canal at Cowley. This goes through green spaces, conservation areas and wildlife havens. HS2 intersects with this right of way where it crosses the River Pinn to the east of Breakspear Road.
- Ickenham Marsh Trail: This runs from Ickenham Marsh Nature reserve to Ruislip Lido. HS2 intersects with this right of way as it runs parallel to the Chiltern Line train tracks within the grounds of Ruislip Golf course.

164. These Public Rights of Way and trails are well used and valued by the local communities and those in adjoining areas. Some of these also provide necessary routes linking the north and south of the borough and it is crucial that they are not severed. It is also important that the attractiveness of these routes are maintained to ensure that they continue to be well utilised and valued by the public in the long term.

What are the impacts on heritage?

165. HS2 will have an impact on a number of designated and identified historic assets and their wider settings within the Borough. These include listed buildings, conservation areas, Locally Listed Buildings and a Scheduled Ancient Monument. There may also be hidden assets that are revealed during the course of works, an approach to which has yet to be agreed. The impacts along the route are as follows:

Eastern Borough boundary to South Ruislip

166. This section of the route would have a direct impact on the setting of South Ruislip Station and also that of the Middlesex Public House, both of which are

Locally Listed buildings. The former is a particularly attractive building with a polygonal clerestory and entrance hall designed by F F Curtis. Both of these are landmark buildings and have strong community associations.

South Ruislip to West Ruislip

167. The proposed embankment runs immediately south of The Bell Public House, which is an attractive 1930's building with a large half timbered gable corner feature. This is a location where lack of space may make mitigation measures difficult.

West Ruislip to Harvil Road

168. The route runs north of the existing railway embankment and the Brackenbury Farm Moated Site Scheduled Ancient Monument. This site also includes the Grade II listed Brackenbury House and Farmhouse. Whilst it is unlikely that construction work would have any direct implications with regard to the archaeology of the ancient monument, or the fabric of the listed buildings, there are concerns that additional noise and disturbance from the new line may have an impact on the long term viability of the site.

Harvil Road to West Boundary

169. Within this area the new line would cut through designated Green Belt land, crossing the Colne River Valley, which includes numerous flooded gravel pits and the Grand Union Canal. This area has an attractive and distinctive character and contains a number of heritage assets. The route would cross close to the southern part of the Widewater Lock Conservation Area and the proposed viaduct, which would be 15 m high and 3.6 km long, would be widely visible from this area, the neighbouring Black Jacks and Copper Mill Lock Conservation Area and in longer views from the Harefield Village Conservation Area.
170. The viaduct would also be located very close to the Locally Listed Dews Farm Cottage. This was originally a 15th century farm house associated with the Brackenbury Estate, which was largely rebuilt in 19th century. The building has an attractive garden setting and a rebuilt walled garden. The close proximity of the viaduct would seriously detract from the setting of the building and potentially endanger its long term viability as a residential unit.
171. HS2 will also run through an area along the western boundary of Hillingdon that is to be designated as an Archaeological Priority Zone. This has not been formally adopted but it is an extensive area where archaeology will be a key consideration for any development.

What should be done to mitigate against the heritage impacts?

172. Although it may be possible in some areas for mitigation to be achieved by utilising existing topography and land use features to screen views of the line,

this type of information has not been included in the Consultation documentation. Bunding and additional planting may help to reduce the impact of the line on wider views, however, given that the route passes through some tightly developed areas, there are some locations where mitigation may not be possible. In addition, some features, such as the viaduct, are extremely large and cannot be screened. In such cases the quality of their design will be paramount. As yet, there are no draft designs for these structures, which would help assess their impact. Furthermore, there is no commitment from HS2 Ltd to set out clear guidelines on how impacts will be mitigated.

173. Given the scale of impacts on heritage in this area, the Council believes that as the HS2 proposal has not been justified in terms of the economic or environmental case and it does not have a sound business case, it should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact on Hillingdon's heritage. However, if the proposed route were to go ahead, the only sensible mitigation would be for a tunnel across the borough.

What are the impacts on flood risk?

174. Parts of the proposed route that follow the existing lines in Hillingdon cross areas with a 'High Probability' of flooding. These are shown in Appendix 9. The AoS does not properly acknowledge the extent of flood risk, which should be given further consideration. In the urban areas, the extent of further works could increase the risk of flooding to people and property and should be given sufficient weight in developing the proposed route. It is not clear if this has been done.
175. Outside of the urban areas, HS2 will be constructed in greenfield areas, some of which is designated as floodplain. As the AoS fails to acknowledge the level of risk, it is not clear whether HS2 Ltd has given the correct amount of weight to the issue of flooding. HS2 is unlikely to significantly increase the risk of flooding to people and property to extensive rural areas. However, there is concern of the increased risk of flooding to the operations of HS2.
176. HS2 Ltd has not adequately considered flood risk and therefore mitigation measures are not acknowledged. HS2 could result in increased flood risk to people and property, along with operational concerns from flooding. The Council would expect HS2 Ltd to acknowledge the levels of risk and provide commentary on the approaches to be adopted. In particular, if HS2 has a flooding impact on people and property, then there should be scope for future mitigation and compensation.

What are the impacts on water resources?

177. The AoS describes both sections of the route, Old Oak Common to West Ruislip, and West Ruislip to Aylesbury, as being unsupportive of HS2 Ltd's water resources objectives. This is largely due to the presence of ground water protection zones on principal aquifers as shown in Appendix 10.
178. The proposed route will require significant works on highly sensitive areas of groundwater, which has not yet been given proper consideration. Source protection zones (SPZ) are areas around water abstraction points and are separated into a 3 tier hierarchy. SPZ1 is the area in need of the most protection, as it represents the least time for water to travel to the point of abstraction. Any adverse impacts on these areas could undermine the abstraction point, in terms of quality and quantity. Engineering solutions are available, but can be costly on a scale of development this large. No mitigation is proposed by HS2 Ltd and there is an assumption that solutions will be found at a later date.
179. No work has yet been done to demonstrate that the impacts would not be adverse, and HS2 Ltd has acknowledged the high level of risk. Other routes may provide less risk, or not require significant levels of investigation at later dates. However, as no proper assessment has been undertaken, it is not possible to determine if the level of risk is appropriate. Given the lack of information on mitigation, the Council believes that no decision should be made on the HS2 proposal until further details are made available.

What are the impacts on the Victoria Road Waste Transfer Site?

180. Unlike the rest of London where HS2 is to be tunnelled, in Hillingdon the proposed HS2 route runs at surface level through a heavily built up area. As a result HS2 will directly and indirectly affect a significant number of businesses and some will need to be demolished, but no mention is made of these in the published literature. Of particular concern is the loss of a major waste site that serves West London.
181. West London Waste Authority's Solid Waste Transfer Authority's site at Victoria Road is used for the bulk removal of all types of waste. The Consultation documentation does not refer or consider the potential impact of HS2 on this regional facility. The Waste Authority officers believe that a 15 metre wide strip of land along the southern side of the boundary will be lost. This strip of land includes the rail sidings. This facility is reliant on removing waste by rail and will not be a viable refuse site without its railway siding, as moving the huge quantities of waste by road will be impractical owing to the existing road access and traffic problems in this area.
182. The facility is not only used by Hillingdon, but also by the neighbouring London Boroughs, Harrow, Ealing and Brent. This is the only facility which handles

hazardous waste and its loss will mean that materials such as asbestos may well get fly tipped. The high cost for the removal of the fly tipped material within the borough boundary by specialist waste removal companies will have to be met by Hillingdon's Waste Services.

183. The Victoria Road Solid Waste Transfer station is located in South Ruislip and is run by the West London Waste Authority. Its primary purpose is to bulk up locally collected waste from four boroughs, namely Hillingdon, Harrow, Brent and Ealing. This waste is then loaded onto a train for transfer by rail, for landfill disposal in Buckinghamshire. The site is safeguarded within the London Plan as an existing waste management site, and any detrimental impacts on this facility will be contrary to the Mayor's Waste Strategy. The site is currently the main waste transfer station in the north of the West London Waste Authority's area, accepting direct deliveries of municipal waste from Hillingdon, Harrow and Ealing. Commercial waste is also accepted at this site at present. The site is licensed to handle 263,000 tonnes per annum and in recent years has been transferring approximately 160,000 per annum.
184. Loss of this site will have huge implications for Hillingdon and other west London authorities. This will also have knock-on effects on road traffic and carbon emissions, as removing waste from London by rail from South Ruislip is a far more sustainable way than the alternative road options that will be used if this site is forced to close.
185. The timing of the Consultation could not have come at a worse time for the West London Waste Authority. The Authority is urgently seeking alternative waste treatment facilities to move away from landfilling waste for obvious environmental improvements and financial improvements. The Authority has secured agreement with its leased holder to redevelop the site by the addition of extra plant and equipment to allow waste to be processed on the site with materials such as recyclate and refuse derived fuel being exported from the site by rail. The Authority is in the process of procuring a private sector partner to provide waste treatment for up to 300,000 tonnes of waste per annum. It is estimated that the value of the contract over a 25 year period could be up to £485 million. Of the three sites within the Authority's control that could be redeveloped as part of this procurement process, Victoria Road is by far the best in terms of total size and shape. However the potential development of the site is severely compromised by the potential impact of the proposed HS2 route, and particularly the uncertainty and blight that this poses, which is already having an impact. Yet, it is unclear how any business loss will be mitigated or its loss compensated.
186. The site is referred to as a 'good site' in the emerging West London Waste Plan and therefore may be suitable for expansion due to its links with the railway. Whilst the decision on HS2 remains pending, there is unlikely to be any

investment in this site. If HS2 were to proceed on the proposed route, then it would be highly unlikely that further investment would be put into this waste site.

187. If the site were to be able to continue operating with the loss of the rail sidings, there would need to be a significant modal shift from rail to road. This vast increase in additional heavy goods vehicles would create huge difficulties on the surrounding road network. It is far from clear how this would be achieved. The loss of this important waste transfer site would not be consistent with the London Plan, which was approved by the Government. The Council does not believe that the scheme should progress to the next stages without any clear understanding of the future operation of the waste site and general waste arisings in west London.
188. This site could be avoided if other better value alternatives to HS2 were properly considered, or an alternative route. If it is decided to proceed with the proposed route, HS2 should run across Hillingdon in a tunnel, which would leave this site unaffected.

What are the impacts on other businesses?

189. Many businesses are likely to lose some land and possibly face threat of at least partial demolition. These have not been specifically identified in any of the Consultation documentation. The Council believes that this information is known by HS2 Ltd and should have been provided within the Consultation documentation, so that consultees were fully informed of impacts when responding to the Consultation. Even without the direct loss of property, some businesses, as a result of their close proximity to the proposed railway, may no longer be viable. These include the Days Hotel in South Ruislip and the Bell Pub in Ruislip. It is unclear how any business loss will be mitigated or its loss compensated.
190. The Blenheim Care Centre is affected by the bridge works at Ickenham Road adjacent to West Ruislip Station and would almost certainly need to be demolished. The HS2 will also require land from the nearby car park and the golf course (see below).
191. The route will pass through the fields of Park Lodge Farm, leaving one field potentially inaccessible. It is again unclear how this loss will be mitigated.

What are the impacts on housing and garden land take?

192. The route of HS2 in Hillingdon will require the demolition of properties and the loss of large amounts of land, including residential, commercial and community facilities. The Consultation Document acknowledges potential demolitions in the Hillingdon area (para 5.69):

“Along the route between Old Oak Common and West Ruislip, where around 15 residential properties would be demolished.”

193. The direct loss of housing should not be disregarded. This will have an enormous impact on existing communities and families. The lack of early and sympathetic engagement with these communities will develop mistrust for authorities and future decision making. It is clear that HS2 Ltd will not absorb the burden of the impacts that HS2 will have on communities. This Council has previous experience of blight due to Runway 3 and it will have to 'pick up the pieces' after HS2 has inflicted such blight. This would have been easier to manage had HS2 Ltd given due consideration to the local impacts and in particular those whose homes will be lost and which communities will be affected.
194. Hillingdon already faces serious issues of blight in the south of the borough which has arisen from the Heathrow Airport expansion proposals. Since March 2010, such blight is now severely affecting the north of the borough and impacting on the property market. The areas affected in the north of the borough are well established residential areas with a high proportion of families. The likelihood is that families will move away and properties will become rented out, resulting in a total change to local communities.
195. This lack of sympathetic consideration is compounded by HS2 Ltd's reluctance to actively engage with all those affected. Belatedly, those who will lose their homes were contacted, but after much discussion it became evident that HS2 Ltd is also aware that the scheme will have much greater impacts on homes.
196. During the Consultation period it came to light that HS2 Ltd had developed buffer zones along the route which showed the amount of garden landtake required to accommodate the high speed line in Hillingdon. HS2 Ltd has acknowledged the loss of houses, but has not given much consideration to those houses that will remain but face a loss of vital amenity space. This generates further blight, so far undisclosed by HS2 Ltd, who have only produced maps upon direct request. The Council believes that this information should have been provided as an integral part of the Consultation, so that residents could fully understand the impact that this scheme will have upon their property.
197. These have not been specifically identified in any of the Consultation documentation. Based upon the line drawings supplied by HS2 as part of the Consultation, the Council believes a large residential Care Home is also under threat of demolition.
198. The lack of suitable consultation further undermines the approach taken by HS2 Ltd to select a route and engage with those along the proposed route, particularly given that Question 7 of the Consultation asks respondents to comment upon which compensation scheme best suits individuals. It also demonstrates that HS2 Ltd has undertaken considerable work on the proposed route without disclosing information. If this is a true Consultation, and the routes

are subject to discussion, then it is questionable as to why HS2 Ltd has undertaken so much additional work for only one of the routes.

What are the impacts on community facilities?

199. A number of key community facilities will be severely affected in Hillingdon. Examples of these are detailed below and these indicate some of the areas that HS2 will need to consider with regard to mitigation measures.
200. As stated previously, the Hillingdon Outdoor Activity Centre (HOAC) is an important community facility for water sports and educational activities and it is used widely by schools and voluntary groups from across north-west London. The facility has an average visitor rate of 40,000 a year, which has developed over a number of years. The Consultation documentation indicates that this facility will be crossed by HS2 on a viaduct directly over the main building and would require significant land take. The site is an educational and recreational facility which is reliant on its unique setting, tranquillity and open space on land and water, and it will not be viable either during or after HS2 has been constructed. The freehold to the site is owned by London Borough of Hillingdon and leased to the registered youth educational charity, HOAC. In terms of practicality there are very few other suitable sites that this hugely valued community facility could relocate to, and certainly none within Hillingdon or the local area, that could be leased to HOAC on favourable terms. It is unclear how, or if indeed it is even possible, for this loss to be mitigated.
201. Ruislip Golf Club will see a strip of land taken by HS2 of between 20 and 30 metres wide, which will cause disruption. This will potentially require the redesigning of parts of the course. This would incur costs to the operator and possibly to the Council, who own the site, and whilst these works take place parts of the golf course will not be available for use. Any prolonged temporary closure will result in the loss of the regular customer base, which has taken a considerable time to develop. Directly in the line of the proposed HS2 route within the grounds of Ruislip Golf Club lies Ruislip Rifle Club, that will also be lost. Unfortunately it is not clear how these losses will be mitigated.
202. Two recreation grounds in Hillingdon, including school playing fields, will see land taken to construct HS2, as well as the ensuing loss of tranquillity in these locations once the railway becomes operational. Unfortunately it is not clear how these losses will be mitigated;
203. Two quarries that are used for fishing in the borough will be unavailable for use during construction. The lakes contain valuable fishing stock and it is likely that the fish will have to be relocated elsewhere. There do not appear to be any suitable sites locally. The likelihood is that construction works may render these lakes unsuitable after the construction works have been completed, as they will not be such appealing sites for fishing. Unfortunately it is not clear how these losses will be mitigated.

204. Given the scale of impacts on community facilities in this area, the Council believes that as the HS2 proposal has not been justified in terms of the economic or environmental case and it does not have a sound business case, it should therefore be dismissed. There are better value alternatives to improving the capacity and performance of the national rail network, and there are alternative routes which have not been properly considered, which would not impact on Hillingdon's community facilities. However, if the proposed route were to go ahead, the only sensible mitigation would be for a tunnel across the borough.

What are the unknown impacts from associated infrastructure?

205. HS2 Ltd appear to have presented a fairly lightweight assessment of the impacts of the proposed route. Furthermore, no information has been presented regarding impacts from associated infrastructure such as transformer points, or feeder stations. The London Assembly should be mindful of the Council's concerns regarding the location of this additional infrastructure. The Council considers that the environmental and social impacts are already at such an extent that the proposed route becomes untenable, particularly as there is no comparative assessment of other alternatives. However, HS2 Ltd has not set out how much worse these impacts will get with the location of essential infrastructure to support HS2.

206. HS2 Ltd has not been forthcoming with the extent of other infrastructure required to aid the operation of an ultra high speed line. The line itself is of great concern, but it was only through discussions and a later invitation to a HS1 tour that the Council learned of other impacts. The lack of open acknowledgement or assessment of these additional impacts further concerns the Council as to the level of work undertaken by HS2 Ltd. In particular Hillingdon has concerns that such impacts have not been taken into consideration when assessing the viability of this scheme. With such a lack of transparency in the assessment process, the Council is wary of what other information may be available to fully portray the impacts of HS2. Without access to the full details of the scheme, the Council has not been able to properly assess the potential impacts of HS2.

What is the commitment to compensation?

207. HS2 Ltd acknowledges that those whose homes will be lost will receive some form of compensation. However, what is not clear is HS2 Ltd's approach to those who have not seen direct loss. For example, it should be acknowledged that HS2 will have significant impacts on a number of businesses, both during construction and through the operational stage.

208. HS2 Ltd are aware of the detrimental impacts on the property market arising from the HS2 proposal. They commissioned CBRE (CB Richard Ellis) to look at the property market before (from October 2009 to March 2010) and after the

announcement in March 2010 (from April 2010 to September 2010). The report by CBRE ‘High Speed 2 – Blight Study’ was prepared in December 2010. It concluded that:

“Our research found that the housing markets in areas next to the proposed route have weakened since the announcement. Generally we have found that in these areas house prices and sales volumes have fallen since the announcement. Further away from the line values and volumes either rose or fell to a lesser extent.”

209. The findings of the report are as follows:

Type of property	Impact on house prices			Impact on volume of sales		
	Zone A	Zone B	Zone C	Zone A	Zone B	Zone C
All types	-1.3%	+3.7%	+7.2%	-4.5%	+8.4%	+3.0%
Flats	-2.2%	+10.2%	+6.1%	-2.5%	-2.1%	+0.8%
Terraced	+1.0%	+3.3%	+2.5%	-5.1%	+7.3%	-2.7%
Semi-detached	+1.4%	+5.4%	+5.9%	+4.2%	+11.4%	+6.5%
Detached	-1.8%	-0.2%	+2.3%	+6.3%	+17.2%	+6.9%

Note: Zone A is nearest to the proposed route

Zone B is furthest from the proposed route

210. This evidence shows that there has been a detrimental impact on house prices and also on the volume of sales close to the proposed route. In Hillingdon, the perceived impacts of a high speed rail network have already resulted in a significant level of blight on properties in the Borough, because local residents are experiencing difficulties in selling their homes and businesses are unwilling to invest in case if HS2 were to go ahead.

211. HS2 Ltd has not committed to a level of compensation for those that will be impacted. In the London Borough of Hillingdon these numbers could be significant, yet the benefits of HS2 will not be seen in the Borough but elsewhere. HS2 Ltd should provide commitment at this early stage to satisfactory compensation packages for those indirectly affected.

212. The best route option is one that avoids the impacts. However not all impacts will be avoidable, and in such circumstances it is not considered appropriate for HS2 Ltd to simply ignore the damage HS2 will cause. The best route must therefore be seen as the one with the least impacts, but it should also be set in the wider context of the whole scheme.

213. In this wider context, HS2 Ltd has not put forward a scheme that is fair or transparent to the people of Hillingdon. HS2 Ltd could so easily have set out measures to reduce the impacts, but they have not. It is therefore impossible to support the route or the process by which HS2 Ltd is ignoring the local impacts.

What is the commitment to mitigation?

214. The proposed route should not solely be determined as a simple line on a plan. All the associated impacts need to be considered before making a determination on the proposed route. Unfortunately, HS2 Ltd has presented the proposed route in simple mapping terms, and it is expecting agreement that this is the 'Best Option' without full acknowledgement of the impacts.

215. The Council and the public cannot be expected to support the proposed route, which clearly demonstrates far more harm than benefits. In these circumstances, most developers would actively demonstrate how their proposals could mitigate the negatives. HS2 Ltd has not done this. It would appear that they are instead relying on the argument that this is in the national interest and that local matters can therefore be overlooked.

216. In the same way that HS2 Ltd should commit to compensation for losses, they should also commit to providing specific mitigation to overcome the vast negatives associated with the proposed route. Without this commitment, the proposed route represents a destructive line on a plan with no supporting policy framework to ensure it will be a sustainable project.

217. By ignoring the local impacts, the necessary mitigation, and the subsequent impacts from disruption, HS2 Ltd is effectively asking others to accommodate the problems. This may allow HS2 Ltd to reduce their fiscal risks and reflect it in the business case, but it will cause significant problems for those left to take care of the wider impacts.

218. The Council will have to use considerable resources to manage the disruption caused by the impacts on local communities, homes and transport networks, all of which will affect the Council's finances. The disruption in London, particularly Euston, will need to be managed by other boroughs and businesses, and therefore will result in a much wider dispersal of risks than HS2 Ltd has considered. These are risks that HS2 Ltd should have accommodated within their own business case.

219. It is therefore impossible for the Council to support the proposed route or for HS2 Ltd to claim that it is the best available option. There is far too much disruption, destruction of countryside, loss of houses, impacts on lives, with far too little justification from HS2 Ltd. In fact these local impacts are particularly unpalatable given that there is no sound business or environmental case for HS2 at the national level.

What is the best alternative solution?

220. The Council cannot support the proposed route. If the Government were to proceed with HS2, without a sound business case, and thus ignore the local impacts, or the presentation of alternatives, then the Council would suggest an alternative proposal. The surface route of HS2 through Hillingdon, with its heavily built up areas and treasured amenity land, will cause a huge amount of damage and financial cost to the project, far above that which has currently been factored into the costs of HS2. The Council therefore feels that continuing the route of HS2 through Hillingdon in a tunnel is, if the scheme were to go ahead, a preferred approach in terms of minimising environmental and social harm.
221. The cost of tunnelling is stated in the Consultation documentation to be up to five or six times more expensive than an equivalent surface route. In a supplementary route report by HS2 Ltd, the extra costs of a tunnel under Northolt and Hillingdon was estimated at £275 million in November 2010. This represents 1.6% of the total cost of the HS2 project for the London to West Midlands route. However we believe that this option will have large cost savings for HS2 due to avoiding the negative impacts in Hillingdon. These savings include:
- No impacts on the Chiltern Line, foregoing the need to realign the tracks at South Ruislip, which would require major engineering works and weekend closures for the company which would both require compensation.
 - No impact on Victoria Road Waste Transfer Station, which under the HS2 proposals would lose the heavily used railway siding. This would, in a best case scenario, require major engineering works to realign the siding to cross over HS2 and rejoin the main railway, or in worst case scenario if the siding cannot be replaced, make continued use of site unviable, requiring major compensation for the West London Waste Authority, and the four London Boroughs who utilise the site.
 - No impacts on the busy north-south roads in Hillingdon while engineering works take place on their bridges. The knock on effects to commuters journeys to work, commercial transportation impacts and costs of the engineering works themselves would all tolled be significant, and would therefore represent a large financial saving. The costs saved in not having to construct the six extra bridges in Hillingdon would be considerable, including the large scale works required to remodel the bridge at West Ruislip Station.
 - No impacts on these major roads in Hillingdon during construction with all the associated economic costs of delays and disruption on local road and public transport.

- No impacts on the various community facilities which are highly valued for the social and educational benefits that they provide.
- No compensation necessary for the demolitions of the residential properties due to be demolished in Hillingdon due to HS2, which will be at least 10 and could be many more. The compensation that will be due to the dozens on homes blighted by increased noise levels under statutory compensation schemes will also be saved.
- No compensation would be necessary for the numerous businesses lost or those that would need to be relocated due to HS2.

222. The Council's views are supported by the HS2 Route Engineer, John Castle who was asked by Council officers at the High Speed 2 Roadshow on 30th March whether, *“given the disruption to traffic and noise impacts to residents etc could be avoided by a tunnel through the built up areas, would a tunnel option not be better?”* The response was that *“Yes a tunnel option would be better taking into account the disruption costs.”*

223. The Council believes that if the current HS2 proposal was to go ahead, a tunnel under Hillingdon could be a solution to minimise the identified impacts. However given the costs attached with tunnelling, the Council believes this could have yet another detrimental impact on an already poor business case.

Is the Consultation flawed?

224. The Council believes the Consultation process in terms of seeking views on the proposed route for the line between London and the West Midlands has been inadequate in several respects. These are detailed below.

225. The Consultation has been on only one predetermined route, with no level of detail for any of the other alternatives to enable consultees to engage in a meaningful manner as to whether this is the best option. This approach is considered to be unacceptable. This is compounded by issues such as the Heathrow link, which has been fundamental in predetermining the direction of the route, yet its inclusion has not been subject to proper public debate. In addition, consultees are expected to be able to make an informed choice as to the principle of a link to Heathrow without knowing where the route will go and hence what the likely impacts may be. This potentially disadvantages those who live between the HS2 proposed route and Heathrow because the principle of the Heathrow link is being consulted on now and yet any future Consultation on Phase 2 will only relate to the location of the Heathrow interchange and the exact route of the Heathrow link. This does not appear to be a fair, open and transparent process.

226. The Consultation is presented as being about both the strategy for a high speed rail network and also on the detail of a proposed route. From the level of detail given there does not appear to be the option to agree to the principle of high

speed rail and yet disagree with the proposed route. This 'all or nothing' approach would appear to make the Consultation meaningless.

227. Local impacts have not been properly accounted for, and hence, it is unclear as to whether the business case accurately reflects the costs arising from these impacts and any subsequent mitigation measures. This includes local concerns, such as noise impacts, which have not been appropriately assessed; residential and business dwellings impacted by both the operation of the line and by unknown construction impacts; transport disruption during the extensive construction phases; and impacts on biodiversity and landscape. In addition, major regional facilities such as the Hillingdon Outdoor Activity Centre and the Victoria Road Solid Waste Transfer station have not been identified as potential impacts within the Consultation documentation. Given the significance of mitigation and/or compensation measures that would be involved in regard to these facilities, it would appear that the Consultation information has been inadequate in identifying the impacts and hence identifying the costs.
228. The level of engagement in the Consultation process is considered to have been barely adequate, given the scale of the impacts in Hillingdon. For example, the HS2 Roadshows in the Borough were held in Ruislip, one of the impacted residential areas, and both sessions were very well attended, despite very little local publicity by HS2 Ltd beforehand. It is unclear as to why, despite requests from the Council, the provision of the Mobile Roadshow to areas such as Harefield, was not deployed. This area will be impacted in a different way from the more urban areas in the Borough and this should have been addressed.
229. Council officers received several complaints from residents about the HS2 Roadshow. These included the following:
- Officials at the Roadshows were inconsistent with the advice that they gave to residents, i.e. residents found out that different answers were given to the same question.
 - Some officials at the Roadshows were unhelpful, rude and dismissive of residents.
 - HS2 had underestimated the turn out at the Roadshows and therefore there were insufficient handouts for residents.
230. At the Roadshows it became clear that information, which would have allowed residents to understand the impacts more fully, has been withheld from the main Consultation material. At the Roadshows, some very concerned residents were advised by HS2 Ltd officials to write in and seek further clarification about their individual properties. Those residents who were made aware of this and wrote in were given further information regarding whether they were in a 'buffer zone' and supplied with more information about this. If such available was available,

this should have been an integral part of the Consultation documentation and not reliant on individuals having to be proactive.

231. It is very apparent that repeated requests for Consultation material have been inadequately dealt with by HS2 Ltd. Even simple requests by Council officers for extra copies of the Consultation documents to be supplied to ensure residents were informed were unacceptably delayed. Council officers were supplied with only one set of the Consultation documentation. Given the level of concern that would inevitably be raised by this Consultation, and which the DfT must have anticipated, it is unclear as to why sufficient information was not provided in the appropriate format and in a timely manner.
232. There were repeated requests for HS2 Ltd to meet with local residents groups and action groups to discuss local issues of concern. Eventually a meeting was arranged on 20th May, but despite the offer from Council officers to host this in the Borough, unfortunately it was held at the HS2 Ltd offices at 105 Victoria Street, London. This made it difficult for many to attend and although the meeting was very helpful, the information gleaned was therefore only available to a handful of people.

The Council's recommendations

233. The Council is concerned that the proposed route may not have been developed in an open and transparent manner. The proposed route is reliant on a Heathrow link, that has been considered unfeasible, and without this link, there is no rational reason to pursue the proposed route. The Council does not believe there is sufficient evidence to demonstrate that this is the best option, either as a route or as a wider public transport investment.
234. The question asks whether or not this is the best option, but this is impossible to answer given the lack of a meaningful comparison with other routes. HS2 Ltd has not properly assessed the alternative routes to be able to decide that the proposed route is the most suitable. The lack of comparative assessment or routes, or alternative rail packages also undermines the point of this question. HS2 Ltd has not provided any commitment to specific mitigation or compensation, and therefore the proposed route can only be described as having a detrimental impact. This is exacerbated by the fact that HS2 Ltd has not considered any local impacts. The impacts in Hillingdon, both in terms of the major construction impacts and the longer term operation impacts have been totally underestimated and the information regarding mitigation is considered to be inadequate.
235. Hillingdon Council does not believe that the proposed route is the appropriate choice from either an economic, social or an environmental viewpoint. The benefits that the DfT and HS2 Ltd claim are neither sufficient nor well distributed across the country to justify the high costs in financial, environmental and social terms. There appears to be no convincing business case for HS2 to justify the

environmental and social harm that it will cause. It is not in the national interest and the route is unnecessarily destructive and damaging to communities and the environment. The Council therefore believes that the Government should withdraw this proposal for HS2.

QUESTION SIX

This question is about the Appraisal of Sustainability.

Do you wish to comment on the Appraisal of Sustainability of the Government's proposed route between London and the West Midlands that has been published to inform this consultation?

Executive Summary

1. The Appraisal of Sustainability (AoS) presented as part of the Consultation documentation demonstrates that HS2 will not be a sustainable project. The Government has set out aspirations of a sustainable transport sector in its White Paper: 'Creating Growth, Cutting Carbon', as well as within the DfT 5 year Business Plan. The Government has long since pledged that sustainable growth is at the heart of all new development projects. However, the AoS provides a negative assessment of environmental and social factors related to HS2. The only positives relate to economic objectives, which as we have set out in our response to Questions 1 and 2, are not plausible.
2. The Government sets out stringent requirements for local authorities when undertaking sustainability appraisals to ensure the development of a plan considers environmental, social and economic targets equally. Indeed, on 14 June 2011 Greg Clark MP addressed the Royal Town Planning Institute to explain the new approach to development. This approach requires new development to be considered favourably, *"unless to do so would significantly and demonstrably outweigh the policy objectives of sustainable development - defined, economically, environmentally and socially."*
3. The AoS demonstrates there is no equitable consideration of the three sustainability sectors for HS2.
4. At the core of the AoS is an unsatisfactory attempt to provide precise and accountable measures to reduce the negative impacts. Although HS2 Ltd acknowledges that the scheme will have many negative impacts, there is no formal commitment to mitigate these. Clear mitigation should be provided to demonstrate how HS2 can go from being 'unsustainable' to 'sustainable'. HS2 Ltd should set out the proposed mitigation and commit later design stages to include it. This would then provide a meaningful consultation exercise as consultees, including the public, can provide comments on the type of mitigation required.
5. Unfortunately, this approach adopted by HS2 Ltd contradicts the requirements set by Central Government on Local Government when developing Local Development Frameworks. It also fails to satisfy the public and local authorities that HS2 Ltd is not solely developing HS2 for economic purposes.

6. The AoS has not been properly carried out or consulted upon for the other alternatives, such as improving the capacity of existing rail services. It is therefore not possible for the public to have an understanding of the sustainability performance of the alternative options. HS2 Ltd has assessed the proposed route as having considerable negative impacts. This makes it even more important to provide an understanding of why the proposed route is being promoted ahead of the other options.
7. The AoS is further undermined by the lack of any consideration of local impacts. It focuses solely on national and regional assets which means that local people, local areas of nature conservation, local economic centres are all ignored.
8. When local impacts are added to the vast range of negative regional and national impacts, the AoS would further portray HS2 as being highly unsustainable.
9. HS2 Ltd has concluded that HS2 is in the national interest. However, Government policy on sustainability does not allow for environmental and social costs to be ignored at the expense of the economy. Even if this were the case, the Council considers that the economic case for HS2 is seriously flawed as set out in our response to Questions 1 and 2. As it stands the proposals do not meet any of the three sustainability topics. The Government is being asked to support a scheme that would have detrimental environmental, social and economic impacts with no mitigation or policies in place to control later design stages.
10. The Council therefore believes that HS2 is currently appraised as an unsustainable project. It should not proceed to design stages until it can be proven that there is a commitment to specific and detailed mitigation policy requirements, which are clear and transparent in addressing the negative impacts and that further work is undertaken to clarify the unknown issues. It is not in the national interest to proceed with HS2 as it has been currently appraised. The Government would be ignoring its own commitments to sustainable growth and development if it supports HS2 which has been shown by its own promoters to be unsustainable.

Introduction

11. The Council, as part of the 51M group, has commissioned evidence from expert advisors to enable the Council to respond robustly to this question. The Council's response to Question 6 is set out below. It draws on the detailed work of the expert advisors, which have been incorporated into the 51M response to the Government Consultation, and should be read in conjunction with this submission as an integral part of the answer.
12. With regard to Question 6 the Council's main issues are:

- The AoS concludes that HS2 is effectively an ‘unsustainable’ project in all but the economic categories, and the Council further doubts whether HS2 will meet its economic objectives. However the Government’s White Paper on transport titled ‘Creating Growth, Cutting Carbon’ sets out an equitable approach to transport infrastructure that places economic expansion alongside environmental and social growth. Furthermore, sustainable development is at the heart of the planning process for all new development. New infrastructure projects, especially if they are considered essential for the national interest, should be carried out in a sustainable way.
- Booz and Co Ltd and Temple Group Ltd were commissioned to prepare the ‘HS2 London to the West Midlands Appraisal of Sustainability’ by HS2 Ltd and the DfT. This has managed to appraise the sustainability of HS2 to a limited extent but the purpose of an appraisal is not to arrive at a negative outcome. The main aim should be appraise the project and put forward mitigation to offset any negative impacts. The AoS should therefore not only set out the assessment of the environmental, social and environmental impacts but demonstrate what is required to ensure HS2 is a sustainable project. This provides the links and controls necessary to ensure that the design stages will not deliver an unsustainable project. The HS2 Consultation documentation fails to set out how the final scheme can be made sustainable.
- The AoS has only assessed regional and national impacts and no local impacts have been considered. Consequently, HS2 is likely to have much more of negative impact than that already acknowledged by HS2 Ltd.
- The published AoS resembles an initial statement of the high level sustainability performance of HS2. It would normally be expected that a further stage would be completed to demonstrate how the negative impacts can or will be reduced. Instead the AoS is a free standing document that commits HS2 Ltd to nothing at the design stage. This undermines the purpose of asking for people’s opinion on the outcome of the AoS.

13. The following comments provide a robust analysis of the AoS. They consider the process by which the AoS was undertaken, and an assessment of the conclusions. This is not a critical appraisal of the findings of the more technical work, which will be addressed in a response to question 5 and the wider 51M response.

What are the conclusions of the Sustainability Appraisal?

14. The main issue with the AoS is that it concludes that HS2 is effectively an ‘unsustainable’ project. The report uses a scoring system to assess a number

of objectives for the project. Paragraph 4.5.1 of the AoS sets out the scoring methodology:

--	Highly unsupportive of objective
-	Unsupportive of objective
0	Neutral
+	Supportive of objective
++	Highly supportive of objective

15. 18 sustainability objectives have been considered, against which the scoring was completed. The table below sets out the topic areas and a summary assessment of HS2's performance against each one.

No.	Topic	Summary Score	
Reducing greenhouse gas emissions and combating climate change			
1	Climatic factors and adaptability	-	Unsupportive
2	Greenhouse gases	U	Unknown although in reality it is likely to be highly unsupportive
Natural and cultural and resource protection and environmental enhancement			
3	Landscape	- --	Unsupportive to Highly Unsupportive
4	Cultural heritage	- --	Unsupportive to Highly Unsupportive
5	Biodiversity	-	Unsupportive (although no consideration of local sites or protected species so likely to be highly unsupportive)
6	Water resources	--	Highly Unsupportive
7	Flood risk	-	Unsupportive
Creating sustainable communities			
8	Air quality	U	AoS claims it is likely to be Unsupportive but scores it unknown
9	Noise and vibration	-	Unsupportive
10	Community integrity	--	Highly Unsupportive
11	Accessibility	- +	Unsupportive to Supportive . However, this appraisal does not take into consideration loss of classic line services.
12	Health and well-being	- 0	Unsupportive to Neutral
13	Security and safety	0	Neutral

14	Economic prosperity	+ ++	Supportive to Highly Supportive
15	Economic welfare	- ++	Unsupportive to Highly Supportive (most of the sub sections in this objective score positively).
Sustainable Consumption and Production			
16	Soil and land resources	- 0	Unsupportive to Neutral
17	Waste generation	- U	Unsupportive to Unknown
18	Resource use	U	Unknown

16. The table above shows that HS2 will be unsupportive of all but the economic objectives. The scheme is unsupportive of any of the environmental and social objectives.
17. Furthermore, the Council believes that the economic case for HS2 is seriously flawed as set out in our response to Questions 1 and 2. HS2 Ltd acknowledges that the scheme has no environmental or social benefits, and the Council considers the economic arguments have been overestimated. This results in the promotion of a significantly flawed scheme.
18. In standard appraisal methodologies, if a high level plan or project scores as lowly as HS2 has done, then either an alternative is selected or considerable high level work is undertaken to turn the negatives into positives. This would include committing to the types of mitigations and policies necessary to ensure future implementation stages are sustainable. This approach provides the link and control between high level appraisals and ensuring the more detailed development stages can deliver sustainable outcomes. Indeed, the Government require local authorities to take this approach when considering their own Local Development Frameworks.
19. The generic mitigation measures outlined in the AoS for each topic area are only very broad and they are not set out as a specific policy requirement for later stages to adhere to. For example, the generic mitigation measures for community, accessibility, health and well-being include:
- Opportunities could be considered to enhance facilities for cyclists and pedestrians to encourage, amongst other things, healthier lifestyles.
 - Where community impacts are anticipated, notably at Euston and Washwood Heath, HS2 Ltd would work closely with local authorities and with local people, businesses and community representatives to help to ensure that issues are managed sensitively.

20. Another example of very broad generic mitigation measures are those for biodiversity, which include:
- Mitigation measures for where habitat impacts are identified, compensation could be made through optimising habitat management of site.
 - Mitigation measures for land take and fragmentation impacts could be considered where they occur along the proposed route.
21. These mitigation measures are far too general to have any practical weight at future decision making stages. The mitigation details provide no accountability or comfort that suitable measures will be put in place in the design stage. The consultation documentation is highly non-committal regarding mitigation which undermines the point of a sustainability appraisal. Therefore, the AoS for HS2 scores the project as unsustainable but there are no suggestions to put it right.
22. It would be expected that further detailed mitigation methods or policy requirements would be presented at this stage to demonstrate how the project could be supportive of the sustainability goals set by HS2 Ltd as opposed to the unsupportive project it currently is. Such mitigation measures could for example include;
- In terms of the loss of trees and biodiversity, HS2 Ltd could set out specific areas for compensation, or policies committing later stages of detailed planning to sufficient mitigation.
 - In terms of accessibility, HS2 Ltd could identify the footpaths to be severed, and could map alternative arrangements to mitigate for the loss. This would provide a suitable context for seeking views from a consultation exercise.
 - The route between West Ruislip and Aylesbury has been scored highly negatively. The AoS could provide policy assurances to set out mitigation to reduce the impacts. For example, policy commitments about viaduct design, or for more sections to be placed in cuttings to provide a link between the high level AoS and the design stages.
23. Instead of committed mitigation and detailed policies for the design stages, HS2 Ltd has instead relied on unsubstantiated sums of money to provide comfort that compensation and mitigation can be delivered. This amounts to £939 million and £215 million respectively as set out in Table 7 of the Consultation document dated February 2011, the 'Economic Case for HS2'. These sums are provided without doing any high level work as to what the mitigation may look like, its actual cost, or where it may be located. In addition there are no policy commitments to ensure design stages will take into account the sustainability objectives set by HS2 Ltd.

24. If the Government decides to proceed to the next stage based on the information provided, they would be backing an unsustainable project, and putting fiscal growth ahead of social and environmental considerations. Although HS2 Ltd do not provide an overall conclusion for the scheme, it is clear from their scoring that the proposals presented to the public are not sustainable.
25. The AoS also highlights the Government's failure to follow its own political agenda if it were to proceed to the next stage of HS2. For example, the carbon impacts are considered unsupportive of HS2 Ltd's climate change objectives. This undermines the Government's assertions that all transport decisions will consider growth and carbon in equal measures as set out in:
- Creating Growth, Cutting Carbon. Transport White Paper (Jan 2011)
 - DfT's 5 year Business Plan 2011 - 2015
 - DfT's April 2011 Transport Business Case
26. The HS2 proposals put too much emphasis on economic development and assumptions that the proposals are in the national interest. The Council believes that it is not in the national interest to proceed with a scheme that has highly negative environmental and social impacts and is considered unsustainable by its promoters.
27. It is the Council's view that there is a significant disconnect between the high level AoS and the design stages. There is no commitment to policies on specific mitigation which in turn means that there is no commitment from HS2 Ltd to find solutions to the myriad of negative environmental and social impacts they have found.

Have alternatives routes been properly considered?

28. The AoS has only been carried out in detail for one rail option. The process by which the proposed route has been defined has not been carried out in an open and transparent way. Appendix 6 of the AoS assesses some of the alternative routes, in particular routes 2.5 and 4.0. Slight variations have also been assessed such as a new station at Iver. The first issue to note is that these have been compared against a March 2010 route and not the proposed route as part of the consultation which differ slightly. Furthermore, this assessment only provides a very broad desktop assessment with generalised statements. A multi billion pound transport investment is deserving of a more scientific approach. Finally, the summary conclusions are very weak. The summary on route 2.5 states:

"The introduction of the Line of Route 2.5 alternative (hereafter called the LoR 2.5) between the Colne Valley and Brackley would result in few significant differences from the HS2 March 2010 preferred scheme in terms of sustainability impacts. It would have a less adverse impact on landscape, but

greater impacts on townscape. Impacts from operational noise would be less, but impacts from vibration, greater if not mitigated. Its greater lengths of tunnel would result in larger quantities of spoil which impose their own impacts on the land resource and climate change. Impacts would be little different in terms of cultural heritage, biodiversity, water resources, flood risk, community integrity and health risks.” (Appendix 6.3, Page 58)

29. In terms of the scoring, this line appears to score better than the proposed route’s assessment contained in Appendix 2. However, there is no commentary as to why route 2.5 was not selected instead of the proposed route, or the March 2010 preferred route against which it was assessed.
30. The routes selected for the comparison were also very similar. It would have been expected that other routes, for example going out of London in a more direct route should have been included in a very basic assessment. As a consequence, there is insufficient evidence that HS2 Ltd has properly investigated the merits of each route to determine the best option.
31. By not undertaking a comparative high level assessment of the alternatives to HS2 and the proposed route, it is not possible to determine whether the scheme proposed is the most sustainable. The assessment highlights a range of negatives with the proposed routes and it would therefore be prudent to carry out a more rigorous assessment to determine whether a greater range of alternatives are more sustainable.

Have other strategic alternatives been considered?

32. It would also be expected to see a comparison with strategic alternatives, such as an optimised package of rail upgrades, using the same methodology. It would appear that the decision on high speed rail was made without a comparative sustainability assessment. As a consequence, it is not possible to understand how the strategic alternatives would have scored in terms of the sustainability objectives set by HS2 Ltd.
33. To make the consultation on the AoS relevant, it would be expected to understand how the promoted scheme compares with the performance of the alternatives. HS2 Ltd has suggested that the proposed route is open to consultation responses, implying that alternative options to a new high speed rail network could be preferred. However, none of these have been appraised in the same manner as the proposed route. Therefore, the public has not been made aware of what is the most sustainable option, and the one that is more likely to meet the environmental, social and economic objectives.
34. In particular, it would be prudent to outline the performance of all the alternatives against the sustainability objectives. It is clear that HS2 is being pursued as primarily an economic scheme and therefore social and

environmental matters are almost entirely ignored at this stage. The Prime Minister is quoted in the Birmingham Post as saying:

“And if you want to make sure that in the future the whole of the country can share in the economic prosperity, and it’s not so constrained to the south-east, I think this is the sort of thing [HS2] that needs to go ahead.”

35. Yet there is no AoS comparison made with the strategic alternatives which are likely to have much wider connections beyond the 4 cities named by HS2 Ltd, and with a lot more money for available for alternative projects.
36. HS2 Ltd has not demonstrated that HS2 is the most sustainable option.

Have local impacts been considered?

37. The AoS was not developed with any meaningful consultation with local authorities who are key environmental, social and economic bodies. The project has therefore been progressed without their input. As a consequence, the AoS has only considered regional and national impacts and no local impacts have been considered. This means that the impacts on local features such as nature reserves, landscapes and settings, employment areas and waste sites are all ignored. Consequently, HS2 is likely to have much more of negative impact than that already acknowledged by HS2 Ltd.

Have the regional and national assets been properly considered?

38. The AoS only focuses on regional and national assets and completely ignores the local context. However, it still does not adequately set out the specific areas that have been considered in the appraisal. It does not provide a list of all the sites that have been designated as regional or national assets. As a consequence it is not possible to fully appraise the HS2 assessment. For example, the AoS scores regional landscape impacts on the West Ruislip to Aylesbury route as ‘unsupportive’ of the sustainability objectives. However, at this location HS2 is proposed to dissect a Country Park and a SSSI by means of a 3km long viaduct as the route leaves London and enters Buckinghamshire. This impact should be scored as highly unsupportive. This provides an example of the difficulties in scrutinising the AoS, which in turn makes the Consultation process quite meaningless.

Is the consultation flawed?

39. The published AoS consists of an initial statement of the high level sustainability performance of HS2. It lacks any detail on what the impacts are and how the negative impacts can or will be reduced. Nor does it commit to anything at the design stage. Furthermore, there has been no proper appraisal of the other alternatives, such as improving the capacity of existing rail services. This approach totally undermines the purpose of asking for people’s opinion on the outcome of the AoS and is considered to be totally unacceptable.

Is the appraisal process flawed?

40. The normal approach to large scale projects, is to decide on the strategy first and provide an opportunity to comment on what the correct approach should be. Once agreed, a consultation on the options should be undertaken to determine the most suitable. Alternatively, the development of the options could occur directly with those the scheme will effect, for example Core Strategies are developed overtime in partnership with local communities and statutory bodies.
41. DfT has not yet decided on the strategy, but has progressed to a detailed proposed route without any public input into the options development. As a consequence, most of the background work has not been undertaken in an open and transparent way and the public and local authorities have therefore been excluded from the process.
42. As a consequence of this approach, HS2 Ltd has put forward only one appraisal for the proposed route leaving little opportunity for the public and local authorities to understand whether this is the best option. For example, a spur to Heathrow was ruled out early in the process by 2 independent reports. However, the consultation document on the proposed route shows that a Heathrow spur will be included.
43. The public has a right to know how this was factored into the sustainability process and how this decision was reached. The AoS is the method for setting out the process that was taken to get to the proposals set out in the consultation document. However, it fails to do this resulting in a 'behind closed doors' process that the public is unable to influence or understand.
44. HS2 Ltd should not be relying on the detailed Environmental Impact Assessment (EIA) process to deliver sustainability. This later stage is the pre-development works and there is no further requirement to assess the sustainability credentials of the scheme. This is the one and only stage in which sustainability is assessed and therefore the time to set out the context for making the scheme the sustainable. If the HS2 proposal proceeds to the next stage, there is no guarantee that the £215m put aside for 'mitigation' will make the scheme sustainable.

The Council's recommendation

45. All high level sustainability appraisals are open to levels of subjectivity due to officer opinion. However, the sustainability appraisal process should not be a one off task to provide a set of definitive results. Instead, it should provide the start to an iterative approach to ensuring a project provides the best outcomes. The HS2 AoS does not clearly set out how sustainability has been assessed at each stage of the development process and it does not provide any links to the design stage.

46. To add to this flawed process and of particular concern, the AoS provides a highly negative assessment of the HS2 scheme in terms of environmental and social impacts. It also wrongly assumes that the economic impacts will be positive, when there is no convincing evidence to support this. Yet unlike requirements set elsewhere by Government, no attempt has been made to set out policies or assurances relating to mitigation and compensation to reduce these negative impacts. This is a serious flaw in the Consultation documents.
47. The published AoS resembles an initial statement of the high level sustainability performance of HS2. It would normally be expected that a further stage would be completed to demonstrate how the negative impacts can or will be reduced. The AoS should set out policy criteria for mitigation to provide a link with the design stage of the scheme. Instead the HS2 AoS that has been produced is a free standing document that commits HS2 Ltd to absolutely nothing at the design stage. This means it is highly likely that some of the negative impacts will never be resolved. It also undermines the purpose of asking for people's opinion on the outcome of the AoS. HS2 Ltd should not move to the EIA stage until it can be assured there is a sustainable scheme in place.
48. As submitted the AoS further demonstrates that HS2 is purely an economic project, which fails to meet the sustainability rhetoric set out in the White Paper 'Creating Growth, Cutting Carbon'.
49. The Council recommends that prior to any further stages of the design process a further iteration of the AoS is undertaken to provide suitable policy criteria to minimise the negative impacts. This would ensure this Government proposal follows its own requirements for sustainability appraisal.
50. The Council also recommends that this further AoS iteration includes adequate consideration of local impacts, and the relevant mitigation measures required to address them.

QUESTION SEVEN

This question is about blight and compensation.

Do you agree with the options set out to assist those whose properties lose a significant amount of value as a result of any new high speed line?

Executive summary

1. With regard to answering this question about the options to assist property owners who would be affected by HS2, Hillingdon Council is concerned that there is insufficient information provided in the Consultation for interested individuals to respond to this question in an informed manner.
2. In terms of commenting on the options that have been proposed, the preference will clearly depend to a large extent on the circumstances of the individual. However the Council has set out some general comments in relation to the options that have been put forward.
3. Whilst the Council supports the principle of the Exceptional Hardship Scheme, it does not consider the current Scheme to be satisfactory, because the criteria for the Scheme are so strict that many of those property owners who are already affected by blight are being excluded from any support.
4. Whilst the Council supports the principle of introducing discretionary compensation measures, the Council does not agree with any of the measures that are proposed in the Consultation documentation, because again they do not provide reasonable compensation. The principle of the 'Hardship-based property purchase scheme' is supported, although the details of the scheme are too strict and need to be extended to cover a wider group of affected property owners. The 'bond based scheme' has positive aspects, but needs to be revised to ensure that the wider impacts of the scheme on the local community are properly addressed. A revised 'bond based scheme' in conjunction with an extended and continued hardship based scheme would be needed to provide reasonable compensation as a result of HS2. On the basis of the information provided to date, the 'compensation bond scheme' would be the least favourable option

Introduction

5. Question 7 is asking interested parties to provide a view on whether the three options set out at Annex A of the Consultation document, provide adequate assistance to those persons whose properties will lose a significant amount of value as a result of the new high speed line.
6. Obviously the issue of compensation and loss of value to properties is a significant concern to the residents of the London Borough of Hillingdon and Hillingdon Council.

7. Hillingdon Council has conducted a number of public meetings over the course of the last year and a large number of resident questions relate to compensation.

Flawed consultation

8. Based on the limited information available at this time, residents of Hillingdon and this Council are finding it very difficult to establish exactly what impact the high speed line will have upon individual properties along the line of the route. The information available does not provide property owners with confirmation of whether their property will need to be compulsory purchased, in whole or in part, nor whether it will be subject to mitigation measures only and if so, what those measures may be.
9. In light of the above, Hillingdon Council feel that it is inappropriate to ask interested parties to comment on question 7 at this time. This is because in order to establish which measure best suits an individual, that individual needs to be fully informed as to the impact that high speed rail will have upon their property. At present, in the vast majority of cases this remains unknown and therefore interested parties will be unable to submit a properly informed response to this consultation question.
10. Further to this the Council has concerns that, following the close of this consultation the Government only intends to carry one of the three measures forward for further consultation and implementation. The wording in para 31 of the Consultation document seems to suggest that the responses on this question will:

“help to inform the detailed development of a scheme. This will include exactly what any scheme might look like, how it might operate, who would be eligible and how it would be administered.”
11. This is of particular concern, in light of the fact that at this stage there is insufficient information available in order to allow interested parties to respond in an informed manner. The Government also seem to be closed to the option of having more than one option carried forward in order to adequately address the problem of blight for the majority of those affected.
12. The above is the Council’s starting position and we strongly urge the Government to take into account the above considerations when reviewing the approach that they have adopted for this consultation. However, if the Government proceeds on the basis that it is appropriate to request views on question 7 at this stage, then the Council’s response to this question is detailed below.

Generalised blight

13. The consultation details three discretionary compensation measures which are currently under consideration by Government. The Council cannot comment on these measures in isolation without reviewing the effect that generalised blight is having on communities now and the measures that are available to land owners either by way of statute or through Government schemes. The following section provides background and commentary on this very issue.

14. On 11 March 2010, the previous Government published its response to HS2 Ltd's report in the 'Command Paper' entitled High Speed Rail, in which it accepted HS2 Ltd's recommendation of Route 3.

15. Following this announcement some property owners discovered that their properties were already suffering the effects of generalised blight. This is referred to in the introduction to the CBRE report with 'High Speed 2- Blight Study, of December 2010:

“with some media commentary suggesting that houses within 500 metres of the proposed route may lose as much as 20% on the asking price.”

16. In December 2010 HS2 Ltd commissioned CBRE to examine whether the announcement in March 2010 impacted upon the local housing market activity along the length of the proposed route.

17. In formulating a decision, CBRE compared residential property transaction levels and values in the six months before and after the announcement. They also considered areas next to the line (which they refer to as Zone A) and compared these to changes with those further away from the line (which they refer to as Zone B). They also considered activity in areas far enough away to be unaffected by way of a control sample (which they refer to as Zone C).

18. The conclusions of CBRE in their report, High Speed 2- Blight Study of December 2010 included the following:

“Our research found that the housing markets in areas next to the proposed route have weakened since the announcement. Generally we found that in these areas house prices and sales volumes have fallen since the announcement.

Further away from the line, values and volumes either rose or fell to a lesser extent.

Areas immediately around tunnel portals saw a negative change on prices and volumes where the tunnelled line emerges into an overland section. Conversely we identified a positive change on the other side where the line is underground.”

19. The results of the CBRE report were clear. The announcement in March 2010 had a negative impact upon property prices along the route of the line,

particularly in relation to Zone A properties characterised as those closest to the route. In addition to this, the Council has no doubt that this position has worsened further since the launch of this consultation.

20. In responding to this question, this Council has been very mindful of the above. In formulating a view, the Council has considered what compensation measures are available now, what compensation measures will become available in the future (either discretionary or statutory) and if so, when and we have also considered whether these measures provide for property purchase or compensation only. This form of analysis has enabled the Council to properly identify the approach that this Government should adopt when considering which options to carry forward in order to assist those property owners who are not currently afforded sufficient protection.
21. In order to address the issue of generalised blight in the short term, the Government has introduced the Exceptional Hardship Scheme. The Exceptional Hardship Scheme (EHS) is a voluntary purchase scheme designed to assist certain property owners whose properties may be affected by the proposed route, and who urgently need to sell their properties before any final decision on a high speed rail line is taken. In order to qualify for this assistance, the property would need to be on or in the vicinity of the Government's preferred route, which was published on 20 December 2010. The Government has made it clear in the consultation document that it does not wish to acquire too many properties. Thus, in order to qualify under the Exceptional Hardship Scheme, applicants must satisfy strict criteria and at present, only a small number of applications have been successful. Indeed, upon speaking to residents of this Borough a number of potentially eligible candidates have been reluctant to apply as they have already formed the view that they would not be successful.
22. In formulating the five criteria for this scheme, the Government has been careful to use terms which are not defined, and instead provides examples of instances of when you may satisfy that criterion. For example; the second question requires that you live:

“directly on the line of the proposed route or are in such close proximity to the proposed route that it would be likely to be substantially adversely affected by the construction or operation of the new line, if it were to go ahead along that route.”
23. The application form directs residents to maps and location plans in order to establish how close they will be to the line and the impact that this will have upon them but the maps are just not clear enough to establish this. In addition, the fifth criterion requires land owners to have a pressing need to sell. Examples provided include divorce, danger of repossession of property and ill health. However, a number of residents satisfy all of the other criteria, except the fifth, as they want to sell their properties now as a direct result of the Government's

proposal for high speed rail. The Government are not providing assistance in these cases.

24. The Council acknowledge that the Exceptional Hardship Scheme, together with the three measures outlined in the Consultation document, are discretionary measures and are not required by law and this Council is fully aware that once a safeguarding direction is made by the Government, statutory blight provisions under the Town and Country Planning Act 1990 will take effect for those property owners who satisfy the eligibility criteria.
25. However, the Consultation document itself estimates that the first Compulsory Purchase Orders will not be made until at least 2015 and that the timetable does not provide for any unforeseen delays. There is also no guarantee that both parties will agree on the level of compensation to be paid, resulting in the need to adjourn to the Lands Tribunal for adjudication. This could significantly delay full payment of compensation to property owners beyond the 2015 date outlined above.
26. If land owners fall outside of the safeguarded area, but will suffer loss of value to their property due to physical factors (such as noise) from the operation of the line, statutory compensation measures may assist them. However, under the provisions of Part 1 of the Land Compensation Act 1973 claims for compensation can only be lodged once the railway line has been operational for a year. On the basis of the current Government timetable this would not be until 2027. It should also be noted that this statutory measure does not provide for the acquisition of their property, so although the land owners would receive compensation if they were unable to sell and did not meet the strict criteria laid down in the Exceptional Hardship Scheme they would have to remain in their properties.
27. In view of this, the Council has serious concerns that the Government is not doing enough to support those affected property owners who want to move now, regardless of circumstance and in addition to this, those property owners who fall outside of the safeguarded area but who are so severely affected in terms of physical factors that they want to move rather than just receive compensation and mitigation.

The proposed discretionary measures

Option 1- Hardship-based property purchase scheme

28. If it is the intention of Government to simply continue, without amendment, with the existing Exceptional Hardship Scheme then the Council would not be able to fully support this option.
29. As mentioned above, this is because the criteria for the existing scheme is far too restrictive and has rendered many applications unsuccessful. In determining the criteria for any future hardship based scheme, the Government should take

into consideration the fact that many property owners simply wish to move now because they do not wish to live alongside a railway line which will impact upon the enjoyment of their homes. Property owners who purchased their property before March 2010 did not know that this development was going to take place and therefore the Government should offer to purchase their property if it is likely that the high speed railway line will adversely impact upon their property. If the criteria could be extended to catch a wider group of affected residents then the Council would support a continuation of this form of scheme.

Option 2- Bond based scheme

30. The Council is aware that this type of scheme has been used in areas surrounding Heathrow by BAA.
31. It is fair to say that there are positive aspects to this scheme. It will provide eligible [emphasis added] property owners with the right to apply to Government for a bond or guarantee to purchase the property at a future date. This means that those eligible property owners who know that they will be affected by the proposed route, but who nevertheless want to remain in their property up until a particular point of the development, will be given the option to stay in their homes with the comfort that they will be able to sell their property at its unaffected market value. The Council also welcomes the fact that this option is transferable to new owners.
32. However, the Council has the benefit of previous experience with this type of scheme. BAA acquired a number of properties in this way with a view to building the third runway at Heathrow Airport. In particular parts of the Borough, many owners utilised the option to sell the property at quite an early stage of the development process and the ownership of these sites duly transferred to BAA. Despite the fact that some time has passed since the acquisition of these properties, BAA are yet to lease or sell many of them and so they remain empty. Many of the properties have been rented to single person households or to people who are looking for temporary accommodation. This has an impact on the character of the local community. This is clearly not a favourable position for the Council and therefore prior to this scheme being carried forward, the Council would require confirmation from the Government that the above scenario could be avoided.
33. In addition to this, the Council has concerns that the Government is not doing enough to provide property owners outside of the safeguarded area, who will be affected by physical factors, such as noise with the option to sell. This Council would therefore urge the Government to extend this scheme to those property owners in order to provide sufficient redress to all those affected. As such, this Council would require further information on the eligibility criteria that will apply to this scheme before it can fully support this option. If the criteria are too strict, akin to the Exceptional Hardship Scheme, then this scheme would be of very little benefit to residents of our Borough and the Council.

34. In light of the above, this Council would suggest that there is a significant need for both the continuation of a hardship based scheme together with the bond based scheme in the terms outlined above. This approach will assure the Council that the Government are doing everything it possibly can to assist those property owners affected by the proposed route and particularly those who would not qualify for alternative assistance under statutory regimes.

Option 3- Compensation bond scheme

35. The wording of the Consultation document makes it clear that this is the Government's preferred option. This is because the Government does not wish to end up with a large number of properties in their ownership as a result of high speed rail and this option does not result in the Government purchasing properties outside of the safeguarded area.
36. Although the information contained in the consultation document relating to this option is limited, the Council understands that the scheme will provide property owners with a guarantee that, if a property were to lose significant value, the property owner would receive compensation for that loss.
37. This raises a number of issues. Firstly, this compensation would not be payable until at least 2027 (based on the Government's current timetable) and in any event one year after the line is operational. This scheme will not assist property owners who wish to move, as the Government will not acquire properties and it does not assist those who wish to stay in their properties until many years have passed.
38. In addition to this, the Consultation document suggests that this option will only be available to those persons who suffer 'significant loss', but no further guidance is provided as to how this will be measured and who will be eligible.
39. The use of the term 'significant loss' also suggests that this scheme fails to assist those property owners who are outside of the safeguarded area but who would still be adversely affected by the route. If this is correct, then this measure adds nothing to the statutory compensation measures that would already be available to those owners.
40. The Consultation document does state that the level of loss will be assessed by independent valuers. Again, if valuers fail to agree on the level of compensation to be paid, this could result in long delays before payment and presumably referral to the Lands Tribunal for adjudication.
41. Although the compensation bond is transferable to new owners, it is likely that new purchasers would seek significant reductions in the property price, as the effects of the operational line would not be known at that early stage. Regardless of whether compensation would be payable, new owners would still want to understand the effects of the development in order to assess whether the quality of life would be acceptable to them.

42. In light of the above, the Council are of the view that this is the least favourable option.

The Council's recommendations

43. Hillingdon Council is concerned that the Consultation is flawed because there is insufficient information provided in the Consultation for interested individuals to respond to this question in an informed manner.
44. The Council does not consider the Exceptional Hardship Scheme to be satisfactory, because the criteria for the Scheme are so strict that many of those property owners who are already affected by blight are being excluded from any support. The principle of the 'Hardship-based property purchase scheme' is supported, although the details of the scheme are too strict and need to be extended to cover a wider group of affected property owners. The 'bond based scheme' has positive aspects, but needs to be revised to ensure that the wider impacts of the scheme on the local community are properly addressed. A revised 'bond based scheme' in conjunction with an extended and continued hardship based scheme would be needed to provide any reasonable compensation as a result of HS2. On the basis of the information provided to date, the 'compensation bond scheme' would be the least favourable option. The Council therefore recommends that the discretionary measures be improved, in line with the suggestions above, to provide fair and reasonable compensation to affected property owners.