



# HILLINGDON

LONDON

## Appendix 1

Ian Williamson  
FAO: The London Assembly Environment Committee  
City Hall  
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Our ref: JT/06/06/2013

6<sup>th</sup> June 2013

Dear Mr Williamson

### **LONDON ASSEMBLY MEETING ON 12<sup>TH</sup> JUNE 2013: ITEM 6 – ENVIRONMENTAL IMPACT OF HIGH SPEED 2**

Following our helpful discussion last week, I am writing to you to request that the concerns in this letter are made known to the Environment Committee when they consider the environmental impacts of HS2.

This letter sets out some key environmental issues in relation to the High Speed 2 draft Environmental Statement (draft ES). It is acknowledged that the London Assembly's Environment Committee are principally concerned with the environmental impacts on London; however, it is worth reviewing some of the strategic matters previously raised by the London Assembly and to consider whether there has been progress. Several of these strategic matters are directly linked to understanding the environmental impacts and indeed whether enough consideration has been given to alternative schemes.

Sections 1 – 5 below relate to a number of key strategic issues and sections 6 – 14 relate to more specific environmental matters arising from the consultation on the draft ES. In light of the concerns raised, we would respectfully ask that the Environment Committee considers the following in its response to the draft ES consultation:

*The Environment Committee has serious concerns over the quality of the draft Environmental Statement in terms of the robustness of the information provided. There are significant omissions and misrepresentations in terms of the baseline information, survey data and what impacts of HS2 have been considered. The draft*

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*Environmental Statement fails to properly consider a number of environmental issues including the impacts on the London overground and underground; the HS1 link; climate change; dispersal of spoil/waste; noise; air quality; ecology and employment. Given the inadequacies of the draft Environmental Statement, a further period of consultation should be carried out once a 'fit for purpose' draft Environmental Statement has been produced.*

## **STRATEGIC COMMENTS**

In its response to the Government's consultation on HS2, in July 2011, the London Assembly's Transport Committee raised a number of concerns including the economic and transport case; the need for a national transport framework for HS2; the Heathrow Spur; the HS1 link; and Crossrail 2. It would appear that almost two years since those comments were made, few of these issues have been satisfactorily addressed.

### **1. No integrated Transport Strategy**

In its response to the Government's consultation on HS2 in July 2011, the London Assembly's Transport Committee concluded that HS2 should be placed within a detailed national transport framework. One of the principle concerns of the London Borough of Hillingdon is that there is still no integrated national transport strategy, and it is assumed that Heathrow will remain the UK's International Aviation Hub. This means that HS2 is still being considered in isolation, and therefore the impending environmental and economic impacts on London cannot be put into an acceptable context. In particular this results in significant problems with the following:

### **2 Heathrow Spur**

In July 2011 the London Assembly's Transport Committee also raised concerns about the Heathrow Spurs. The Council was supportive of the recent announcement that a Heathrow Spur will be removed from the HS2 Phase 2 consultation. Instead it is to be considered at a later date when the Davies Commission reports on aviation. In principle this seems appropriate, but only if the Davies Commission influences decisions on the spur, and not vice versa.

However, HS2 Ltd and the Government are continuing to develop the Heathrow Spur regardless of their announcement to put it on hold. This suggests an element of predetermination, which raises questions about the scope of the Davies Commission. In a recent letter to a Hillingdon resident, HS2 Ltd stated:

*The Government also believes the HS2 network should link to Heathrow and its preferred option is for this link to be built as part of Phase 2. However, the airports commission, launched in September 2012 is recommending options for maintaining the Country's status as an international aviation hub.*

The spur has obvious implications in the wider debate on aviation, and in particular Heathrow expansion. Planning and promoting a Heathrow spur ahead of the Davies Commission report effectively tarnishes the process.

However, continuing to develop the Heathrow spur also has significant implications for how Phase 1 of HS2 is being developed. The Council maintains that the tunnelling in London should be extended through Ickenham and under the Colne Valley. This would remove a number of significant environmental and economic impacts and would follow HS2 Ltd's own objectives of avoiding harm prior to finding mitigation. However, the reason the tunnelling is not being extended is to ensure that the Heathrow Spurs are built into the Phase 1 proposals. In other words the Heathrow Spur is constraining the development options of Phase 1 despite it being on hold. It will lock London in to significant adverse environmental impacts, whether built or not; not to mention the wider implications of adding weight to arguments for expanding Heathrow.

The Government is belatedly attempting to provide some integration between aviation and high speed rail. However, by putting Heathrow spur proposals on hold at the same time as stating they are preferred option and planning Phase 1 to incorporate them, the Government is in danger of predetermining an unwelcome and undeliverable outcome.

### **3 Crossrail 2**

In July 2011 the London Assembly's Transport Committee supported TfL's proposal that HS2 should be supported by a new line linking Chelsea and Hackney (Crossrail 2). The recent announcement that the Treasury is unlikely to fund Crossrail 2 for some time is also testament to the lack of an integrated strategy. In particular Crossrail 2 is needed to help reduce growing crowding problems on a number of London overground and underground lines. It is possible that funding on HS2 is impacting on the Crossrail 2 solution, even though the former increases the importance of delivering the latter.

Furthermore, the regional option for Crossrail 2 falls approximately 15 miles short of Stansted and slightly less from Gatwick; a transport option that could open up airport growth away from Heathrow.

The continued lack of any joined up transport thinking is impacting on the funding for Crossrail 2 and constraining options for airport growth.

### **4 HS1 Link**

In July 2011 the London Assembly's Transport Committee raised concerns about the HS1 link. The draft ES contains minimal information on the operation of the HS1 Link. It suggests that there would be up to 3 trains an hour in peak times, with these being either single carriage (550 passengers) or double units (1100 passengers). Elsewhere in the ES there is a clear statement that trains operating at peak hours will be double units.

It would appear that HS2 Ltd are unable to say what will happen on the HS1 Link or provide any firm details of the operational arrangements – there is no information on ticketing, security controls, demand or the destination of these trains. This demonstrates that HS2 Ltd are still very unclear on how HS2 will operate.

## **5 Passenger Numbers on HS2**

There is still a lack of publicly available information on the actual usage of HS2. Whilst information has been presented about business cases and impacts on the north, most of which is disputed, there is still no detailed information on how many people will use the trains.

The draft ES also does not provide this evidence in a clear or consistent manner which makes it impossible to understand the true impacts of the operations of HS2. For example, it is not possible to fully understand how many passengers will alight or board at Euston, or what the impacts on other regional rail lines would be.

There is some passenger data within the transport chapters but this does not seem to make sense.

12.7.3[of Curzon Street CFA] ...The Proposed Scheme will result in approximately 2,800 passengers using Curzon Street station in the morning peak hour and approximately 3,200 passengers using Curzon Street station in the evening peak hour in 2026. These numbers increase to approximately 7,000 passengers using Curzon Street station in the morning peak hour and approximately 8,000 passengers using Curzon Street station in the evening peak hour in 2041 (HS2 Phase Two) through increased train frequency and additional national rail destinations. It is expected that over half of the travellers on the Proposed Scheme at Curzon Street station would have an onward rail journey.

12.6.3 [from Birmingham Interchange CFA] With the introduction of the Proposed Scheme in 2026, there would be approximately 1,550 rail passengers boarding, alighting and interchanging at Birmingham Interchange station in the morning peak hours and around 1,750 rail passengers boarding, alighting and interchanging at Birmingham Interchange station evening peak hours. These passengers are forecast to generate around 950 two way vehicle trips in the morning peak hour and 950 two way vehicle trips in the evening peak hour.

The first extract refers to the morning peak hour [8-9am] whilst the latter refers to peak hours [normally 7-10am]. Inconsistencies in methodology aside, the total passenger numbers referred to equates to 4350 people coming and going from the Birmingham Stations. HS2 will operate at 11 trains per hour, with 1100 seats available in the peak hours.

The passenger numbers given for the Birmingham end are significantly less than available seats. There is obviously something seriously wrong with the assessment and highlights a continued concern about passenger numbers.

## **SPECIFIC ENVIRONMENTAL ISSUES**

### **6. General comments**

The draft ES does not contain any background information, and minimal information on the impacts. It is therefore difficult to get a clear understanding of even the likely environmental

effects, let alone the actual effects. For this reason, the draft ES should not be considered in the same manner as a draft strategic plan sent out for consultation. In this example, the draft strategic plan would be a completed document which subject to consultation responses would be suitable to adopt. In contrast, the draft ES is not fit for purpose to be given to a decision maker regardless of whether consultation responses are received or not. It is an incomplete document, with significant amounts of omissions which by HS2 Ltd's own admission requires further extensive work, including detailed field surveys and assessments. This document is not fit for a public consultation and certainly not suitable for interested parties to understand the impacts and effects of HS2.

The following comments expand on these concerns in more detail and relate to some of the individual topics. They highlight some of the concerns about the lack of information, and ultimately demonstrate it is not possible to understand the impacts on London.

## **7 Greenhouse Gas Emissions**

No assessment has been made of the potential greenhouse gas emissions associated with HS2. This means there is no assessment of the likely energy use and in turn the operational costs of HS2.

Importantly though, there is no understanding of how HS2 will compete with domestic aviation or the subsequent impacts on London airports. If HS2 does compete with aviation (unlikely until at least Phase 2) and there is a reduction in domestic slots, then this is most likely to result in an increase in long haul aviation. Less domestic slots, particularly at Heathrow, could result in more long haul flights and more passengers. This puts a constrained airport and surrounding area under further pressure.

Ultimately, it is not possible to understand whether HS2 will have a positive or negative impact on carbon emissions. The lack of an assessment and any conclusions are conspicuous by their absence. All those across the UK will only become aware of the true carbon emissions of HS2 when the final ES gets submitted to parliament.

## **8 Noise Impacts**

The information on noise is also sparse but the assessment that is presented is misleading. The principle noise impacts, construction aside, will come from the operation of the overground section where the trains emerge and enter the Ickenham High Street tunnel portal and then proceed across the Colne Valley. The above ground section runs parallel with a busy residential area on the Greenways, Ickenham before progressing over the Colne Valley.

The main concern relates to the methodology for assessing noise. The draft ES only measures the average noise levels (to Laq) from the continuous period of 0700 to 2300. In the first instance, this is insufficient since the trains are scheduled to run to 2400. However, more importantly, averaging noise over a vast period of time misrepresents the noise impacts.

Noise from trains is, by their nature, intermittent. There is a sudden and short burst of noise energy emitted before tailing off to background noise levels. At peak time there will be 11 trains per hour in one direction (11 in the other) which will result in periods of respite. These respite periods increase during off peak times, when it is assumed that train frequency is reduced along with the number of carriages. Averaging the noise impacts over 1 hour will mean respite periods are set alongside the sudden bursts of noise. To extend the averaging over the whole day, allows the maximum peak period noise emissions of longer trains at 11 per hour to be weighted against the off peak single unit trains and a less frequent service. This distorts the actual noise impacts experienced by residents, particularly in the sensitive early morning period.

The Council and 51M asked for the noise assessment to be presented to maximum levels (Lmax). This is in accordance with World Health Organisation guidelines which state:

When there are distinct events to the noise such as with aircraft or railway noise, measures of the individual events should be obtained (using, for example, L<sub>Amax</sub> or SEL), in addition to L<sub>Aeq,T</sub> measurements.

In addition we asked for averages to differentiate between peak and off peak times. This has not been done.

The noise chapters allude to an assessment of maximum noise impacts, but the information has been withheld from this consultation. As a consequence, what is left in the assessment is a disappointing misrepresentation of the true noise impacts. It is simply not possible to understand the noise impacts. More worryingly, the information presented is a biased attempt to dilute the likely harm of HS2.

In addition, there is a lack of background data to understand the increases in noise levels. The area impacted in Hillingdon is suburban leading to more rural areas with existing noise levels not likely to be too high. The noise impacts of HS2 need to be assessed not just in total magnitude, but also in the change from the existing baseline. This has not been done.

Finally, the noise contours for the surface route in Ickenham are very similar to the contours where the train passes on the viaduct over the Colne Valley. It does not seem plausible that the geographical extent of noise impacts is the same at ground level with vegetated cover as it is 15m on a viaduct over vast expanses of water in a river valley.

## **9 Air Quality Impacts from Construction Traffic**

There are still a significant amount of gaps in the information on construction traffic movement. Some information has been provided in the transport sections on the likely traffic movements but no assessment has been made of what this means for the current road situations. A lorry moving along a rural road will have less air quality impacts than a lorry stuck in peak time congestion.

There is also no timetable for when construction will occur. For example, to realign Harvil Road in Ickenham there will be more than 100 lorry movements a day for 0.5 years; to create the vent shaft in South Ruislip there will be more than 800 lorry movements a day for 7 years.

In total the report outlines over 3000 daily light and heavy good vehicle movements in the Colne Valley and Ruislip Community Forum areas.

It is not known how many of these vehicle movements will occur at the same time, or full details of the routes to be used. If they all converge on major junctions to access strategic networks at the same time this could have serious impacts on air quality.

The lack of information on transportation also constrains the air quality assessments. The assessment for the Ruislip area amounts to three pages. Each of the assessments contain superficial comments relating to dust, but with regards to traffic emissions Volumes 6 and 7 both state:

Construction activity could also affect local air quality through the additional traffic generated on local roads as a result of construction traffic routes and changes to traffic patterns arising from temporary road diversions. Examination of the changes in air quality as a result of changes in traffic flows for 2017 along the affected roads will be assessed in the formal ES.

Air quality management areas are defined largely due to transportation emissions. Air quality conditions in the urban areas of the borough are particularly sensitive as they are across London. To avoid publishing any form of assessment suggests that HS2 Ltd do not know enough about their scheme or are reluctant to publish information. The final ES is due to be presented to Parliament next year, yet there is still a lot of work to be done regarding air quality. To only present the air quality assessments as part of the final ES when it is submitted to Parliament is naïve and shows a lack of understanding on a hugely important and technical environmental issue.

## **10 Air Quality Impacts from Passenger Dispersal**

There is still a distinct lack of information on the actual passenger demand and the dispersal at the 4 stations on the route; Euston, Old Oak Common, Birmingham Interchange and Curzon Street Birmingham. This means that it is not possible to fully understand how many people will be actually using HS2, where they come from, how they will complete their London side journeys and the impacts on existing services. For example, the document talks about 2500 new modal trips around Old Oak Common but does not break this down for each mode. For example, it is not possible to understand how many more vehicle movements this would be. It is therefore impossible to get an understanding of the impacts on air quality, whether good or bad. This is particularly disappointing given that there are many areas around Euston and Old Oak that suffer from poor air quality.

## **11 Ecology**

There is no ecological survey data provided but the conclusions of the assessment suggest there would only be significant effects at a local level. Impacts on birds, including native and migrating species are not considered likely to be significant, but the draft ES does acknowledge that bird surveys are required. It is not appropriate to make conclusions on the impacts of schemes prior to completing survey work.

There is a lack of clarity about how much woodland will be lost, where it will be lost from, and what and where mitigation will be delivered. There is no assessment of the longer term impacts on the integrity of the Mid Colne Valley SSSI which is a nationally designated site.

The Colne Valley is a hugely important resource for London and represents the western boundary enjoyed by vast numbers of people. It is home to an exceptional range of wildlife, including European protected species. The report is lacking any evidence to support the conclusions that impacts will be as low as suggested. No survey data has been presented.

In reality, the temporary construction period and the permanent placement of the route, particularly the viaduct, is likely to have a significant environmental effect. There is local knowledge of significant populations of bats along with other UK protected species which have been ignored.

The assessment of the ecological impacts would not be sufficient to accompany a small planning application let alone a scheme of this nature. Far more work needs to be completed in a very short space of time.

## **12 Landscape and Visual Impact Assessment**

The Colne Valley landscape is disturbed by the intrusion of a new viaduct. The landscape impact assessment is not compliant with industry standard assessment guidelines, and the photomontages showing the Colne Valley viaduct are deliberately misleading and demonstrate the assessor's bias in portraying the impacts. The use of a particular camera angle, using a light grey structure on a light grey background is a technique designed to reduce the appearance of the viaduct when presenting a photomontage.

The written assessment sets out the impacts but does not set out mitigation as to how to reduce the significant effects. For example, the image of the viaduct shown in the photomontages is of bland structure that has no relationship with the surrounding area. We have consistently asked for a commitment to an aspirational viaduct design and potentially opening up to a design competition. No such commitment has been made. The impacts on the Colne Valley have clearly been given little consideration or development work is still being undertaken.

## **13 Economic Impacts**

The draft ES assesses the potential socio economic impact as well as environmental impacts. For London the information is particularly weak. Each Community Forum assessment area sets out the likely impacts on jobs and the potential job creations.

Assessing the 7 relevant volumes for London reveals that a total of 3775 jobs will be displaced. This should be tempered by a lack of complete assessments. For example, the Colne Valley volume shows only 5 jobs will be displaced although we know the impacts on the Hillingdon Outdoor Activity Centre (HOAC) will result in a lot more. HS2 Ltd is still completing their assessments so this figure is likely to change. Furthermore, there is no information on where these jobs are or what they relate to.



In mitigation, HS2 Ltd has presented the potential construction job creations in person years. Across London this will equate to 17,900 person years of construction employment. Alternatively this could be read as 2,557 people employed for 7 years each.

There is no wider assessment of the implications for the loss of jobs, for example, significant community businesses like HOAC cannot be simply portrayed in terms of job numbers. Furthermore, the implication that lost jobs could be mitigated for by the creation of 'person years of construction employment' is wholly inappropriate, particularly if there is no understanding of the types of jobs being lost.

Finally, there is no analysis of how long the negative impacts would be outweighed by the positive. It could be years of negative impacts before any positive benefits are realised. In areas where there are not stations, such as Hillingdon, there is no rationale thinking to suggest that benefits of connecting London to Birmingham will migrate to local areas. This is further justification for minimising the environmental harm through tunnelling the complete length of the borough.

## **14 Summary**

The London Assembly is seeking to understand the possible impacts of HS2 on London; however, based on the information provided so far this is not possible. HS2 Ltd has provided insufficient background information, no survey data, and provides little or no details on what or where they have considered impacts. The ES is not a draft in the sense it is a document that is complete subject to further comments. Instead it is a draft in the sense of being a half completed document. This is a fundamental flaw in this consultation which provides no scope for understanding the impacts of HS2. In light of these concerns, we would respectfully ask that the Environment Committee considers the suggested response to the draft ES consultation as set out in paragraph 3 of this letter.

Should you have any queries on the matters raised in this letter, please do not hesitate to contact me.

Yours sincerely



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