

Appendix 2



HILLINGDON
LONDON

Jo Sloman
Assistant Scrutiny Manager
London Assembly
City Hall
The Queen's Walk
London, SE1 2AA

Ref: JT/20/06/13/HS2/LondonAssembly

20 June 2013

Dear Jo

LONDON ASSEMBLY TRANSPORT COMMITTEE HS2 ROUTE REFINEMENT CONSULTATION

Thank you for the opportunity to provide comments to the Transport Committee to assist in responding to HS2 Ltd's Route Refinement consultation.

Overview and Concerns

As you will be aware, HS2 will generate a huge range of environmental and social impacts in the London Borough of Hillingdon. HS2 is predominantly in tunnel in the east of the borough and emerges at West Ruislip before proceeding above ground and then on a viaduct across the Colne Valley.

To facilitate the delivery of this project, HS2 Ltd 'needs' to undertake a monumental construction project in the west of the borough in Ruislip, Ickenham and in the Colne Valley lasting a minimum of 7 years. The scale of the project is exacerbated by the fact that the tunnel portal at West Ruislip and the start of the Colne Valley viaduct are geographically in very close proximity. The project includes a vast construction compound which would carve out a large swathe of green space between Harvil Road and the proposed cutting for HS2 through New Years Green Covert. A further large construction site is required at the tunnel portal near West Ruislip Station. The subsequent operation of HS2 will damage biodiversity with mitigation measures taking decades to provide



INVESTOR IN PEOPLE

Planning, Environment, Education and Community
Services

T.01895 556 673

F.01895 250 493

jtippell@hillington.gov.uk www.hillington.gov.uk

London Borough of Hillingdon,
3N/02, Civic Centre, High Street, Uxbridge, UB8 1UW

anything like adequate compensation; it will significantly increase noise to areas currently unexposed to high noise levels; there will be a complete change in the landscape of the Colne Valley; and there are currently likely to be significant effects on water resources.

The Council believes that HS2 Ltd has not respected the level of environmental and social impacts in the borough and has not suitably justified why less damaging alternatives have been ruled out.

In particular, HS2 Ltd has provided wholly inadequate reasoning why the Ruislip tunnel cannot be extended throughout the borough to emerge on the west of the Colne Valley

As a consequence, the Council does not support the route refinements set out by HS2 Ltd, simply because they do not go far enough to removing years of construction misery followed by operational impacts without compensation. The Council considers that it is justified in believing it will have 'all the pain and none of the gain'.

The Consultation

The Route Refinement Consultation includes three changes that impact on Hillingdon:

- Northolt Corridor (route refinement 4)
- Heathrow Junction (route refinement 5)
- Colne Valley Viaduct (route refinement 6)

All three pose unacceptable impacts to the borough. The Northolt Corridor refinement increases the amount of excavated material to be managed in Hillingdon; the inclusion of the Heathrow Spur effectively removes the options for extending the Ruislip tunnel; and the movement of the Colne Valley Viaduct does not remove risk to the Hillingdon Outdoor Activity Centre and results in the demolition of an additional dwelling and brings the route and its associated environmental impacts closer to residents.

Why not Tunnel Further?

At the heart of the problem remains HS2 Ltd's inability to present a satisfactory case as to why tunnelling cannot be extended across the Colne Valley. The draft Environmental Statement (dES) consultation running concurrently states:

2.6.17 HS2 Ltd acknowledges that there would be environmental benefits if a tunnel was proposed; however, the use of the viaduct to cross the Colne Valley was based on a combination of practical, financial and safety considerations. The lakes are large former gravel pits and the ground beneath falls well below the water level. This means that tunnelling would likely be more difficult and expensive than elsewhere on the route.

2.6.18 Consequently it was determined early in the project that tunnelling was not appropriate and an option for tunnelling has not been re-visited in detail as part of

the work since the announcement of the scheme in January 2012 (Colne Valley Community Forum Area: Report 7)

This is a clear acknowledgement that HS2 Ltd is not prepared to reassess the cost of tunnelling *versus* the environmental effects even though a considerable amount of environmental and social assessment has been completed subsequently.

Furthermore, the statement '*The lakes are large former gravel pits and the ground beneath falls well below the water level. This means that tunnelling would likely be more difficult and expensive than elsewhere on the route*' has been given less credence by the submission of the preferred route for the Heathrow Spur (**appendix 1**). This clearly shows tunnelling across the Colne Valley, at almost the same location where the viaduct goes. In other words, it is perfectly possible.

As a consequence of not tunnelling, the Borough will experience huge misery from the construction and operation as set out below:

1 Construction traffic for 7 years in Ruislip and Ickenham will cause congestion, increase air quality impacts and in some cases may require significant engineering interjections which will need to be managed by Council and TFL resources. HS2 Ltd has presented some construction route information in the dES but this has shocked residents more than it has informed. Attached as **appendix 2** is a map detailing work undertaken by the Council to 'fill in the gaps' in the information disclosed by HS2 Ltd. Included on this plan are key route barriers such as low bridges and (indicated as red circles) the Borough's existing traffic congestion hotspots. Some of the key points arising from this include the following:

- 'A' Roads will come to halt as up to 3300 lorries per day use the local road network to move spoil, workers and construction material.
- These lorry movements and those likely to come from Old Oak Common will use the A40 as the primary route out of London to the motorway networks; despite the fact the A40 is currently exceeding minimum air quality limits on much of its route.
- The attached map (appendix 2) shows the construction traffic will impact on existing significant hotspots of congestion. Some of the routes involve mini roundabouts serving multiple links. It is already difficult for cars to navigate these without significant numbers of large lorries increasing the problems.
- A key access point to the site of the West Ruislip tunnel portal is indicated as being via Hill Lane, a narrow road with very poor visibility splays at its junction with Ickenham Road and also the only access to and from Ruislip Golf Centre, a restaurant, residential side roads and a pedestrian/ cycle route leading to the residential areas of West Ruislip. If, as is suggested, up to 800 lorry movements a day are to use this short road and junction, the Council consider that adequate road safety measures including the possibility of traffic controls would be needed, which would in turn add to the high existing levels of traffic congestion in Ickenham Road.

- There is reference to the possible need to use an alternative construction traffic route via Ickenham Road, High Street Ruislip, Bury Street, Ladygate Lane and Breakspear Road. This is for situations where access under the existing road bridge in Breakspear Road South (carrying the Chiltern Line) is impassable by the vehicles in question. This route would have a severe impact on local roads including a high street and residential roads and a school (Whiteheath School in Ladygate Lane) which is already a daily source of traffic congestion.
- There are many 'A' roads and local roads that are currently heavily used to the extent where busses already have problems. It is very likely that buses will experience considerable disruption to their timetables for several years. The movement of large heavy goods vehicles, for example along Ruislip High Street, is simply untenable because there is simply not enough room for large vehicles to pass one another.
- It is likely that the fire service and other emergency vehicles may experience difficulties as a result of increased traffic on already congested roads and the problems of roads not being wide enough to cope with two large vehicles needing to pass one another.
- The diversion and use of major north – south networks will hamper anyone living in the north of the borough and trying to reach the south. This is worsened by the need to temporarily close two major roads, Harvil Road, and Breakspear Road South.
- Heavy and prolonged use of the borough's north-south roads (such as Harvil Road, Ickenham Road, Breakspear Road South and West End Road) by construction traffic is likely to impinge on people's ability to get to and from work, which will have an impact on businesses and the economy.
- Also attached as **appendix 4** is a bus map for the whole of the Hillingdon, which illustrates the poor existing connectivity between the north and south areas of the Borough. Comparison with the construction routes plan (which includes the relevant bus routes shaded in green) makes it clear that a number of key bus routes will be severely impacted for a period of up to seven years.
- This may need TfL to consider curtailing, diverting or splitting these bus routes into two halves and at the very least will severely detract from service capacity and delivery. Key routes affected include the U9 (one of the very few public transport links of any kind that serves the village of Harefield), the U1 and U10 (both important routes linking Ruislip and Uxbridge, the latter also serving Ickenham).
- Also affected are the special schools-only 697 and 698 services, which connect students in the south of the Borough with faith schools in the north.

2 Millions of tonnes of waste material will need to be managed in and around Ruislip and Ickenham. There is still a lot of uncertainty about when and how the excess material will be used. Experience from the Crossrail project suggests that a considerable proportion of earth excavated from the tunnel may have to be transported by road, despite the suggestion from HS2 Ltd that other means of transport would be favoured.

3 There are other obvious concerns related to the loss of jobs; the loss of community facilities and the knock on impacts of these; the years of blight which has already begun; and the general change in perception of a vast area of west London which will be changed significantly for at least 7 years.

4 The above ground route will cause unacceptable noise impacts. The noise assessments produced show impacts that are likely to result in a 10db increase over existing situations. This should be caveated by the fact HS2 Ltd has only shown average noise levels, i.e. the noise spikes as a train passes is averaged out by the few minutes of silence that follows.

5 The viaduct results in the loss of important businesses and community facilities. In particular the highly respected and well used Hillingdon Outdoor Activity Centre will have to close, despite HS2 Ltd suggesting the Colne Valley (refinement 6) removes some of the impacts.

6 The dES suggests there will be significant effects on water resources although these will only be assessed through the Code of Construction Practice, i.e. after the scheme is approved.

7 The dES suggest that the some of the Colne Valley lakes may need to be drained. The lakes are home to some of London's most important bird populations and contain a site of special scientific interest. The scheme will also result in the loss of ancient woodland and large areas of the countryside. The mitigation and compensation will never make up for the level of destruction.

8 The viaduct will fundamentally change the landscape in the Colne Valley for the worse.

Heathrow Spurs

Extending the tunnelling beyond West Ruislip and across the Colne Valley solves all these problems. However, the real reason as to why the tunnelling cannot be extended is to ensure that the Heathrow Spurs (refinement 5) can be delivered as part of phase 1. There are a number of concerns with this:

1 The Heathrow link is currently on hold and awaiting the outcome of the Davies Commission on Aviation. This means all the impacts experienced above may be for no good reason if the Davies Commission supports airport expansion in the Thames, at Gatwick or Stansted, or supports Heathrow's expansion out west. In other words, the significant effects are guaranteed, the delivery of the Heathrow link may never happen.

2 Attached in **appendix 3** is a copy of the service specification for HS2, i.e. the timetable of trains. It shows 18 trains per hour in one direction (36 combined). Importantly it shows only two trains per hour in one direction (4 combined) serving Heathrow. One train goes from Heathrow – Birmingham Interchange – Manchester (Outskirts) – Manchester. The other train goes Heathrow – Birmingham Interchange – East Midlands – South Yorkshire – Leeds. There are no trains shown to go from Euston – Old Oak Common – Heathrow. In other words, the service specification on

which the business case is based, shows no usage of the London – Heathrow spur. Which begs the question, why is there a London spur? 18 trains per hour (shown on the service specification) leave little room for a meaningful service from Euston to London in any event.

3 HS2 Ltd has rightly been less than forthcoming about the Business Cost Ratio for the Heathrow Spur which is known to be below 1:1 with evidence presented to the Judicial Review court suggesting it is as low as 0.3:1.

4 A spur to Heathrow may help to predetermine the results of the Davies Commission. However it is clear that Heathrow expansion is not a viable option, with or without a high speed rail link.

Conclusion

The Council is deeply concerned about the impacts of HS2 on the borough. The route refinements do not go far enough. If a case had been presented that tunnelling was technically impossible from West Ruislip to west of the Colne Valley, then the Council would have no choice but to accept this. However, HS2 Ltd has said it is too difficult and costly, whilst simultaneously presenting a preferred route for a Heathrow spur that crosses the Colne Valley in tunnel. Clearly the costs of environmental and social costs, including the disruption on the transport network and its consequences for example on businesses and air quality have not been taken into account.

Hillingdon will experience huge levels of disruption from construction traffic with genuine concern from residents and officers as to how it is practically possible without bringing some areas to a standstill. On top of this there are many other environmental effects which seem to have been irresponsibly dismissed out of hand by HS2 Ltd. It is simply not acceptable to not even review the tunnelling option now that more details on the significant environmental effects have emerged. To continue to pursue a London to Heathrow spur knowing the consequences is considered to be highly irresponsible.

The Council seeks support from the London Assembly to fight the irrational inclusion of the Heathrow Spurs and in turn to help present a case for extending the tunnelling under the Colne Valley in order to mitigate the harmful impacts, including those relating to transport in the borough.

We would welcome an opportunity to put our views to the Transport Committee if that is considered to be helpful. Should you have any queries on our submission, please do let me know and I will be pleased to assist.

Yours sincerely



Jales Tippell

Head of Transportation, Planning Policy and Community Engagement