



HILLINGDON

LONDON

Appendix 3

To be emailed to:

HS2DesignRefinement@ipsos.com

Dear Sir/Madam

HS2 London-West Midlands Design Refinement Consultation – Response of London Borough of Hillingdon

Thank you for the opportunity to respond to the proposed design refinements for the HS2 Phase One route as outlined in the above consultation document. This letter represents the formal consultation response on behalf of the London Borough of Hillingdon.

You should be aware that Hillingdon Council strongly opposes the HS2 proposal and we are taking legal action to challenge the Government's decision to proceed with the scheme. In the event that the HS2 proposal goes ahead, we would like to be assured that our views are taken into account and acted upon.

You may be aware that three of the proposed refinements directly impact on the borough and our response to these is detailed below. As the proposal for HS2 will generate significant environmental and social impacts on the borough we have outlined, in our response below, further route refinements we wish HS2 Ltd to include. We hope that these comments will be carefully considered and taken into account in revising the scheme.

Question 4 - Northolt Corridor

Question

This proposed change consists of replacing the proposed surface section of the route between Old Oak Common and Northolt with a bored tunnel including three new vent shafts. Please give your views on this proposal, indicating whether or not you support the proposal together with your reasons.

Hillingdon's response

1. You should be aware that Hillingdon Council strongly opposes the HS2 proposal and we are taking legal action to challenge the Government's decision to proceed with the scheme. In the event that the HS2 proposal goes ahead, we would like to be assured that our views are taken into account and acted upon. We are supportive of the increased tunnelling to avoid the impact of the tunnel portal and its construction in Ealing and the eastern part of Hillingdon. However given the additional impacts of this proposed route

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refinement, we formally request a further route refinement to extend the tunnel throughout Hillingdon to emerge to the west of the Colne Valley. We believe that this route refinement, which would involve 5,780 metres of additional tunnelling to replace the 3,840 metre long proposed viaduct, should have been included in the route refinement consultation. The proposed construction site at West Hyde has easy access to the M25 and therefore would therefore not result in significant impacts on the local road networks.

2. The reason for this request for a further route refinement is because the construction impacts in Hillingdon of the HS2 tunnel and viaduct over 7 years are untenable and the long term impacts in the borough of HS2 will damage biodiversity with mitigation measures taking decades to provide 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.

3. 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 by HS2 Ltd. We are very concerned that no detail is given in terms of the potential impacts caused by the removal of the additional excavated material arising from the Northolt Corridor route refinement, which has been identified by HS2 Ltd as around 1.3 million cubic metres, which will need to be removed from the tunnel worksites in the industrial areas adjacent to Old Oak Common and West Ruislip.

4. The extended tunnel will result in huge volumes of waste material that 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.

5. Given the lack of information by HS2 Ltd on the construction impacts for construction traffic around the West Ruislip tunnel portal construction site, we have therefore carried out our own assessment of likely impacts on the transport network based on information provided in HS2 Ltd's Draft Environmental Statement (**see Appendix A**). This shows that the scale of the impacts on Hillingdon are worsened because the tunnel portal at West Ruislip and the start of the Colne Valley viaduct are just 2,210 metres apart. This means that there is a vast construction site between Harvil Road and the proposed cutting for HS2 through New Years Green Covert, and a further large construction site at the tunnel portal near West Ruislip Station.

6. As a consequence of not tunnelling across Hillingdon, its residents and businesses will experience immense misery from the construction and operation as set out below:

- '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 A) 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 B 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.

7. The proposals for HS2 have led to many other obvious concerns as follows:

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

8. We believe that all this grief and long lasting damage could be avoided if the proposed 3,840 m long viaduct could be replaced by 5,780m of additional tunnelling. Otherwise in Hillingdon, we will have the tunnel portal just 2,210m away from the viaduct and the area in between will become a massive construction site within a densely populated area with no easy access to the A40 or motorway network.

Question 5 - Heathrow Junctions

Question

This proposed change consists of making provision so that a future link to Heathrow can be connected to the Phase One main line with the minimum of disruption to HS2 train services. Please give your views on this proposal, indicating whether or not you support the proposal together with your reasons.

Hillingdon's response

1. This response should be read alongside our response to Question 4.
2. We do not support this proposal. It is our view that the inclusion of the Heathrow junctions in HS2 Phase One is pre-judging the outcome of the final recommendations from the Airports Commission which are due in 2015. The two strategies i.e. high speed rail and aviation, should be aligned in terms of timescales.
3. As the remit of the Airports Commission includes assessing all options for the UK, this has led to calls for evidence on concepts such as new hub airports and also the potential closure of Heathrow. It is ill-judged and premature to pave the way for the junctions prior to a decision on the future of Heathrow airport.
4. The service specification for HS2, as set out by HS2 Ltd i.e. the timetable of trains 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) leaves little room for a meaningful service from Euston to London in any event.
6. The map in the consultation document for this route refinement proposal has no accompanying detail of the eventual route alignment and no detail of any resulting potential impacts should this ever proceed. With no proven business case for a link to Heathrow, and, as there is a current aviation strategy vacuum on decisions for the future of airports, we firmly believe this route refinement should not proceed. Instead the Heathrow Spur from Heathrow Airport to Euston should be deleted.

6 Colne Valley Viaduct

Question

The proposed change consists of moving the proposed alignment of the Colne Valley viaduct by up to 60 metres to the north to reduce the disturbance to the River Colne. Please give your views on this proposal, indicating whether or not you support the proposal together with your reasons.

Hillingdon's response

1. This response should be read alongside our response to Question 4.

2. We do not support this proposal. The movement of the line towards residential housing in South Harefield has the potential to increase noise impacts from the operation of the high speed line.

3. The loss of the Harefield Outdoor Activities Centre (HOAC) as a viable business is still under threat and there are still potential impacts in terms of loss of amenity with the line now potentially more visible to areas of South Harefield. The impacts on Hillingdon properties remain significant. No details have been given to reassure the Council that this would not impact on visual, landscape or noise levels for our residents and therefore, the consultation is also inadequate in relation to sufficient information being made available to be able to make an informed response.

4. As stated in our response to Question 4 of this consultation, we wish to add at this point a formal request for a further route refinement to be considered which would relieve all the environmental impacts within our borough namely an extension of the current proposed tunnel from West Ruislip through Ickenham and through the Colne Valley. We firmly believe that this option has been dismissed without appropriate consideration being given to the environmental and social benefits such a route refinement would bring.

5. We note that the *Community Forum Area report – South Ruislip to Ickenham, no 6*, accompanying the draft Environmental Statement Consultation, refers to a proposal for a tunnel extension to the western end of the Northolt Corridor tunnel portal further to the west. The current proposed scheme has sited the tunnel eye 70m west of Ickenham Road. However, we note that consideration was given for an extension to the tunnel to 1.15km west of the original 2012 announcement. This option is referred to as:

“the preferred option on environmental grounds as it reduces the effects of operational activities on the residential properties on The Greenway (south of the route). However, this option was not selected due to the engineering and cost reasons”. (para 2.6.11)

It is apparent from the above that tunnelling represents an improvement from an environmental perspective.

In addition we note that *the Community Area Forum Report, Colne Valley, no 7*, refers to a tunnel under the Colne Valley.

“HS2 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”. (para 2.6.17)

6. The document goes on to state that HS2 Ltd decided early in the project that tunnelling was not appropriate and an option for tunnelling has not been revisited in detail as part of the work since the announcement of the scheme in January 2012.

7. We wish to reiterate our formal request for HS2 Ltd to consider a route refinement of a tunnel extension from London continuing through the Colne Valley. We believe this

represents the best option and should be further evaluated by HS2 Ltd in terms of the benefits it would bring.

8. Such a proposal would remove noise impacts from residents near the tunnel portal in West Ruislip and from the proposed viaduct. It would remove the need for the demolition of a number of properties within the borough and also preserve the regional resource that HOAC provides.

9. With the publication of the draft Environmental Statement, there is slightly more information now available on where construction sites will be and where the accompanying construction routes are proposed. Even from the limited information available in the draft Environmental Statement documentation it is apparent that the consequence of not tunnelling under the Colne Valley will cause considerable hardship in the short term and long lasting damage (as set out in paras 6 and 7 in our response to Question 4 above), which could be avoided if the proposed 3,840 m long viaduct were to be replaced by 5,780m of additional tunnelling. Otherwise in Hillingdon, we have the tunnel portal just 2,210m away from the viaduct and the area in between will become a massive construction site within a densely populated area with no easy access to the A40 or motorway network. We therefore request that HS2 Ltd now take the opportunity to extend the tunnel from London through to the western side of the Colne Valley.

We do hope that our comments will be fully taken into account.

Yours faithfully



Jales Tippell
Head of Planning Policy, Transportation and Community Engagement