



## HS2 Environmental Statement Consultation

Response by London Borough of Hillingdon

<b>1. Executive Summary</b>	<b>9</b>
1.1. Objections and Concerns	9
1.2. Summary of Significant Effects: Route Wide	10
1.3. Summary of Significant Effects: Hillingdon Specific	11
1.4. Summary of Hillingdon’s Suggested Mitigation	13
<b>2. Improper and Unfair Decision Making</b>	<b>17</b>
2.1. Parliament as a Planning Authority	17
2.2. Decision Making Process	17
2.3. Lack of Scrutiny of Assessment	19
2.4. Conclusion	21
<b>3. Economic Merits of HS2 and Alternatives</b>	<b>22</b>
3.1. Background	22
3.2. Optimised Alternative	22
3.3. Alternative Option: Route 4	23
3.4. There will be no Re-balancing of the UK Economy	24
3.5. Capacity of Trains	26
3.6. North of Birmingham	26
3.7. Additional Costs	27
3.8. Conclusion	27
<b>4. Rushed and Inadequate Assessment</b>	<b>28</b>
4.1. Background	28
4.2. Construction Route through Uxbridge Golf Course	28
4.3. Lack of details about West Ruislip Railhead	29
4.4. Public Rights of Way Diversions	31
4.5. Grassland Mitigation	32
4.6. General Understanding of the Construction Routes	33
4.7. Impacts from the Dumping of Soil	34
4.8. Northolt Tunnel and Earthworks Main Compound	36
4.9. Further Implications for Public Resources	37
<b>5. Non Compliance with HS2 Ltd’s Own Design Aims</b>	<b>38</b>
5.1. Design Aims	38
5.2. Conclusion	40
<b>6. Non Compliance with EIA Regulations</b>	<b>41</b>

6.1.	Background	41
6.2.	Schedule 4 Requirements	41
6.3.	Conclusion	44
<b>7.</b>	<b>Environmental Statement Comments</b>	<b>46</b>
7.1.	Approach to Comments	46
7.2.	Hillingdon as Local Authority and Landowner	46
7.3.	Use of Maps	46
<b>8.</b>	<b>HS2 in Hillingdon</b>	<b>48</b>
8.1.	Areas lost to HS2	48
<b>9.</b>	<b>Sustainable Placement of Excavated Material</b>	<b>51</b>
9.1.	Background	51
9.2.	Location of Excavated Material – North of New Years Green Lane	51
9.3.	Location of Excavated Material – West of Breakspear Road South	52
9.4.	Location of Excavated Material – North of Harvil Road	53
9.5.	Appearance	54
9.6.	Conclusion	54
9.7.	London Borough of Hillingdon Proposal	54
<b>10.</b>	<b>Heathrow Spur</b>	<b>55</b>
10.1.	No Business Case	55
<b>11.</b>	<b>Route Wide Effects: Carbon Emissions</b>	<b>57</b>
11.1.	Conclusions from the Final ES	57
11.2.	Problems with the Assessment	57
11.3.	Problems with Assessing Flights	58
11.4.	Conclusion	59
<b>12.</b>	<b>Agriculture</b>	<b>61</b>
12.1.	General Comments	61
12.2.	CFA6	61
12.3.	CFA7	61
12.4.	Conclusion	62
<b>13.</b>	<b>Air Quality</b>	<b>63</b>

13.1.	General Comments	63
13.2.	South Ruislip to Ickenham Community Forum Area 6	64
13.3.	Assessment of Significance	65
13.4.	Colne Valley Community Forum Area 7	67
13.5.	Assessment of Significance	68
13.6.	Operational Effects	69
13.7.	Mitigation	69
<b>14.</b>	<b>Community</b>	<b>70</b>
14.1.	General Comments	70
14.2.	Public Rights of Way	70
14.3.	CFA6	78
14.4.	Assessment of Significance	79
14.5.	CFA7	79
14.6.	Assessment of Significance	82
14.7.	Cumulative Effects CFA6 and 7	82
14.8.	Unassessed Impacts in CFA6 and 7	83
14.9.	Conclusion	83
14.10.	Proposed Mitigation	83
<b>15.</b>	<b>Cultural Heritage</b>	<b>85</b>
15.1.	General comments	85
15.2.	Colne Valley	85
15.3.	Archaeology	87
15.4.	Conclusion	89
15.5.	Mitigation	89
<b>16.</b>	<b>Ecology</b>	<b>91</b>
16.1.	General Comments	91
16.2.	CFA6 and 7	95
16.3.	Species	96
16.4.	HS2 Ltd proposed Mitigation	96
16.5.	Conclusion	97
16.6.	Proposed Mitigation	98
<b>17.</b>	<b>Landscape</b>	<b>99</b>

17.1.	General Comments	99
17.2.	CFA6	103
17.3.	CFA7	105
17.4.	Conclusion	108
17.5.	Proposed Mitigation	108
<b>18.</b>	<b>Land Quality</b>	<b>110</b>
18.1.	General Comments	110
<b>19.</b>	<b>Socio Economic</b>	<b>113</b>
19.1.	General	113
19.2.	Local impacts	114
19.3.	CFA6	117
19.4.	CFA7	117
19.5.	Conclusion	117
19.6.	Proposed Mitigation	118
<b>20.</b>	<b>Sound and Vibration</b>	<b>119</b>
20.1.	General Comments	119
20.2.	Operational assessment (SV-004-006)	121
20.3.	Volume 5 Technical Appendices (SV-001-000)	122
20.4.	CFA6	124
20.5.	CFA7	126
20.6.	Conclusion	129
20.7.	Proposed Mitigation	129
<b>21.</b>	<b>Traffic and Transport</b>	<b>131</b>
21.1.	General Comments	131
21.2.	CFA6	133
21.3.	Significant Effects in CFA6 and 7	139
21.4.	Conclusion	141
21.5.	Mitigation	141
<b>22.</b>	<b>Water Resources</b>	<b>142</b>

22.1.	General	142
22.2.	CFA6	145
22.3.	Colne Valley CFA7	148
22.4.	Conclusion	149
22.5.	Mitigation	149
<b>23.</b>	<b>Additional Topics</b>	<b>151</b>
23.1.	Electromagnetic Interference	151
23.2.	Waste	151
<b>24.</b>	<b>Conclusion</b>	<b>152</b>
24.1.	Objection in Principle	152
24.2.	Decision Making	152
24.3.	Quality of the ES	152
24.4.	Proposed Mitigation	153
<b>25.</b>	<b>London Borough of Hillingdon Landowner Response</b>	<b>155</b>
25.1.	Introduction	155
25.2.	Petitioning	156
25.3.	Fairness of Decision Making	156
<b>26.</b>	<b>General Observations</b>	<b>157</b>
26.1.	Introduction	157
26.2.	Quality of roads	157
26.3.	Flood Risk Management	157
26.4.	Severance of agricultural land	158
26.5.	Footpaths and diversions	158
26.6.	Residual Noise Impacts on Hillingdon land	159
26.7.	Alternative recreational offerings	161
<b>27.</b>	<b>Ruislip Golf Course and Club House</b>	<b>162</b>
27.1.	Background	162
27.2.	Impacts of HS2	162
<b>28.</b>	<b>Park Lodge Farm (including Dews Farm)</b>	<b>168</b>
28.1.	Background	168
28.2.	Impact of HS2	168
<b>29.</b>	<b>Hillingdon Outdoor Activity Centre [HOAC]</b>	<b>175</b>

29.1.	Background	175
29.2.	Impact of HS2	175
<b>30.</b>	<b>Denham Quarry</b>	<b>181</b>
30.1.	Background	181
30.2.	Impact of HS2	182
<b>31.</b>	<b>Uxbridge Golf Course</b>	<b>185</b>
31.1.	Background	185
31.2.	Impact of HS2	185
<b>32.</b>	<b>Other Land Impacted</b>	<b>189</b>
32.1.	Bourne Farm	189
32.2.	Scout Hut, New Pond Hall	190
32.3.	Land to the rear of 93 Bridgwater Road	190
32.4.	New Pond Parade Shops	190
32.5.	Priors Farm	192
32.6.	Dews Lane and Dews Farm Sand Pits	193
32.7.	Additional Concerns	194
<b>33.</b>	<b>Conclusion</b>	<b>195</b>
33.1.	Main Concern	195

*It is the intention that Hillingdon will lodge a petition against the Bill, and this response to the Environmental Statement is without prejudice to anything that may be said in the petition. Hillingdon also fully reserves its right to raise any additional points in relation to the Environmental Statement in the petition and indeed at other stages of the HS2 process as it deems appropriate.*

# **1. Executive Summary**

## **1.1. Objections and Concerns**

- 1.1.1. The London Borough of Hillingdon will not benefit from HS2 in any way. There will be up to 10 years of disruption during construction along with the long term effects of having a high speed rail line run through relatively unspoiled landscape.
- 1.1.2. HS2 Ltd and the Government have never presented a case that all the negative impacts will be outweighed by the benefits. The business case is entirely questionable and this environmental statement (ES) unwittingly presents further evidence that the rhetoric from the Government about balancing the economy or increasing the capacity is also flawed.
- 1.1.3. The questionable business case must be judged against the environmental effects of the scheme which are set out in the ES. The Council considers the assessment submitted to be of a particularly poor standard. There are omissions, misrepresented effects, its presentation is deliberately misleading, and the findings are scattered across a vast array of documents. This is far from reflective of a multi billion pound public project.
- 1.1.4. The ES finds that the scheme will have significant adverse effects as set out below. It provides no clear benefits. In normal planning circumstances, there would be no likelihood that this scheme would be approved based on the poor assessment and environmental conclusions.
- 1.1.5. However, it would appear that the quality of the ES is immaterial to HS2 Ltd and in turn the Government because this scheme will not be processed through normal planning routes. The decision to go through a Hybrid Bill allows HS2 Ltd to present an inadequate assessment and an unacceptable scheme safe in the knowledge there is no independent expert scrutiny from a public inquiry. The decision to amend standing Order 22a requires an independent assessor which is misleading, since all they are required to do is summarise the consultation responses, rather than understand the implications or provide any technical advice.
- 1.1.6. Parliament will debate the scheme with no independent expert analysis of the 50,000 pages of ES, or the responses from interested parties and the public. The whole approach is further undermined by the fact that many senior ministers appear to have made up their mind and lobbied for support for the scheme long before the ES was submitted. For this reason, the Council does

not believe that HS2 will get a fair, impartial and technical hearing which the public deserve.

1.1.7. Finally, aside from the decision making process, the Council is disappointed by the quality of the assessment. It has clearly been rushed through to meet a contrived deadline which has resulted in a poorly evidenced and inappropriately presented assessment. The budget for designing the scheme has already significantly overrun by millions. However, due to the failings of the scheme, the Council will now have to use its own funds to seek improvements to the scheme or to complete the design work for HS2 Ltd through the petitioning stages. For the money outlaid on the design, the Council would have expected an exemplary piece of work that reduces and not increases pressure on its own resources.

## 1.2. Summary of Significant Effects: Route Wide

Topic	Commentary	Effect
Carbon Emissions	<p>The final ES concludes that the residual carbon ranges between 2,140,000 tCO<sub>2</sub>e and 2,620,000 tCO<sub>2</sub>e.</p> <p>HS2 will add to the carbon emissions and will not contribute to the urgent need to tackle climate change.</p>	Significant Effect and Significant failing of objectives
Employment	<p>+14,600 full time 10 year construction jobs (although construction is only planned for 7 years - 11.6.3 of Volume 3)</p> <p>+5,480 additional indirect demand for goods and services through the business supply chain - 11.6.6 of Volume 3.</p> <p>-8375 jobs due to construction (cumulation of CFA reports not presented in the route wide report which is noted in 11.6.7 in Volume 3)</p> <p>-12,700 displaced jobs from developments that can no longer proceed (these are estimated to reduce by 88% due to evidence gathered from the London Olympics) - 11.6.9 Volume 3</p> <p>Wider economic benefits – not assessed</p>	<p>Negligible if it is assumed a lost job in business equates to a 10 year construction job</p> <p>Significant effect otherwise.</p>

Usage of HS2	<p>The ES (tables 6.114 and 6.115 of volume 5 appendix) shows that in the morning peak period there will be 4280 more passengers arriving in London on HS2 than leaving.</p> <p>In the evening peak period there will be 5180 more leaving London.</p> <p>This demonstrates that HS2 will attract more people into London. This helps to dispel the myth that HS2 will rebalance the economy by increasing growth in the north.</p> <p>There is also a question as to how full the trains are. If only 10,450 people are arriving in London in the three hour morning peak and there are 11 trains per hour with 1100 per train this means trains will be 70% empty into London.</p>	Significant failing of the objectives
Impacts north of Birmingham	No information is provided regarding passengers moving north of Birmingham. The ES does not assess impacts at stations in these areas.	Not assessed at all
Cumulative Effects	HS2 Ltd has not adequately grouped together all the significant effects within the CFA reports and presented them in a suitable table. It is not possible to accurately compare the alleged route wide benefits against all the acknowledged significant effects.	Not adequately assessed.

### 1.3. Summary of Significant Effects: Hillingdon Specific

Topic	Commentary	HS2 Ltd conclusion on effect	Proposed Mitigation
Agriculture	Approximately 200 hectares of lost farmland with only 145 restored on completion. An area approximately the combined size of the urban areas of Harefield and South Harefield which have a population of nearly 8000	Significant	None proposed
	Loss of severed land or farm no longer suitable	Unassessed	
Air Quality	Exceedences beyond minimum EU air quality levels in areas affected by construction traffic. This will have an adverse impact on health.	Significant	No details
Community Impacts	The loss of Hillingdon Outdoor Activity Centre, a charity run centre which has 22,000 users from a wide range of areas and backgrounds	Significant	None Proposed
	Adverse noise impacts to communities	Significant	No details
	Disruption of roads and local services from construction	Significant	No details

	traffic		
	Impacts on Ruislip Golf Course and loss of Ruislip Rifle Club	Negative	No details
	Use of the Colne Valley as quiet recreational area is reduced even with noise barriers in place	Significant	No details
	Diversion of public rights of way onto busy roads with no footways endangering lives	Significant	Inadequate
Cultural Heritage	Impact on many cultural heritage features	Significant	No details
	Impacts on archaeology likely to be significant but not assessed	Unassessed	
Ecology	Impacts on SSSI	Significant*	Not Adequate**
	Impacts on several smaller nature conservation sites	Significant*	Not Adequate**
	Total loss of over 150 hectares of natural habitat	Significant*	Not Adequate**
	European Protected Species lost, disturbed or displaced	Significant*	Not Adequate**
	Non European Protected Species not adequately considered	Unassessed	
<p><i>*HS2 Ltd considers the ecological impacts are not significant because they can be mitigated by new planting which will take 20 years to even begin to offer compensation.</i></p> <p><i>**Mitigation proposed amounts to random locations (mainly existing farmland) for the planting of new woodland and grassland (including on existing grassland). There appears to be a basic belief that losing mature woodland in the Colne Valley (including ancient woodland) can be mitigated by random planting on farmland without consideration to the existing value of the areas lost, the length of time the new planting will establish or the continuity or connectivity of ecology sites.</i></p>			
Landscape Impacts	Viaduct through the Colne Valley	Significant	No details*
	<i>*Previous commitments to a single span viaduct through the Colne Valley have not materialised in the ES.</i>		
	Changes to landscape from placement of excavated material	Unassessed	
	Plantation of new woodland in open countryside	Unassessed	

	Realignment of Pylons	Unassessed	
Land Quality	Placement of excavated material onto area of contaminated land. This could increase the risk to groundwater that serves an area being considered to serve a new abstraction point	Unassessed	
Socio-economic s	Congestion impacts on local businesses inadequately assessed.	Negative potentially significant	No details
Sound and Vibration	Significant noise increases to over 200 properties	Significant	No details
	Impacts in the Colne Valley	Unassessed	
Traffic	Increase in congestion and potentially impractical construction traffic routes	Significant	No details
Water Resources	Increased risk of surface water flooding	Unassessed	

#### 1.4. Summary of Hillingdon's Suggested Mitigation

1.4.1. The Council is reluctant to set out mitigation measures purely because it considers there is no case for the scheme at all. However, it is important to protect the residents of the Borough because the scheme could get approval due to the lack of a proper technical assessment made by the decision maker. To that end, the Council has considered the need for mitigation.

##### *Approach*

1.4.2. There are significant effects in the Borough, covering every environmental topic, and there are no clear benefits to be found. At best HS2 has set out mitigation that reduces some of the effects. However, the Council does not believe these go any where near far enough. Firstly they are largely based on incomplete assessments or unspecified details, and secondly they are far from visionary.

1.4.3. HS2 Ltd has isolated the topic areas into contrived Community Forum Areas to ease the assessment process. This would be perfectly acceptable if HS2 Ltd then considered the joint effects across the topics and across the CFAs. This has not been done.

- 1.4.4. The result is an uninspiring, hastily developed minimalist approach to mitigation. There does not appear to be any sort of vision for the mitigation; there is no coordinated effort to integrate the measures for placement of excavated material, ecological mitigation, flood risk management or the socio-economic and community impacts. The ES presents a disparate set of mitigation measures that could be so much more with proper consideration.
- 1.4.5. The Council has set out its detailed mitigation measures in each of the comments on the topic areas. In summary the mitigation is graded as follows:

*Primary Mitigation*

- 1.4.6. The extent of the significant effects outlined in the section above clearly support the need for further tunnelling from West Ruislip to west of the Colne Valley. A tunnel extension would virtually remove all the significant effects.
- 1.4.7. HS2 Ltd acknowledges that a thorough assessment of a tunnel extension has not been carried out. The decision was taken at the outset of the project and has not been reconsidered even though the environmental impacts in Hillingdon are far greater than envisaged. No costing or detailed engineering work has been done to rule out the tunnel extension. In effect, HS2 Ltd is suggesting that virtually any cost to the environment is preferable to the assumed cost of a tunnel.
- 1.4.8. This is an irresponsible approach and the Council believes the evidence in the ES more than supports the need for a tunnel extension.

*Secondary Mitigation*

- 1.4.9. If a proper assessment of a tunnel reveals that it is unfeasible from an engineering perspective (which is unlikely given the Channel can be tunnelled) or for cost reasons (which need to be open and transparent and open to challenge) then the Council would reluctantly accept the findings. In this instance the following is a summary of the mitigation measures proposed:

*Vision for Hillingdon*

- 1.4.10. HS2 Ltd should develop a vision for the area that integrates all the mitigation of the environmental topic areas. In particular, the vast ecological mitigation and placement of excavated material provide a unique opportunity to deliver something lasting and positive for the borough. The Barnes Wetland Centre was formed on old flooded gravel pits and now is a unique facility in a relatively urban area. Material from Crossrail is being used to create a RSPB nature

reserve in Essex. These visionary uses of land and surplus material have beneficial community and socio economic impacts. Ultimately, the Council is seeking some lasting benefit to come from HS2.

#### *Colne Valley Viaduct Design*

- 1.4.11. The Council requires the Colne Valley viaduct to be an exemplar in design. The viaduct used in the assessment is bland, uninspiring and not reflective of a 'state of the art' high speed railway line. The final design must have significant input from local communities and must be reflective of the heritage and landscape of the area. It must have an adequate and appropriate budget for its design and construction. The Council is seeking commitments from HS2 Ltd and Parliament that the subsequent high quality design is not subjected to budget cuts.

#### *Noise Impacts*

- 1.4.12. The noise impacts are as significant as first feared despite HS2 Ltd's use of 'sound booths' in roadshows that suggested bird song is louder than a 250mph train. Approximately 250 properties are subjected to adverse noise impacts even with noise barriers in place. No details of measures to improve these properties have been provided. The ES provides no comfort to residents as to how these impacts will be reduced.

#### *Traffic*

- 1.4.13. The Council does not believe that HS2 Ltd fully understand the implications of their construction traffic arrangements. In some instances it will not be practically possible to use the routes suggested let alone accommodate the extent of congestion HS2 Ltd acknowledge will take place. The Council is seeking for HS2 Ltd to carry out a full review of the construction traffic arrangements and from HS2 Ltd. In addition, the Council is also requesting HS2 Ltd to review the suggested public rights of way diversions. These diversions suggest HS2 Ltd has not visited or understood the areas. The proposed diversions suggest the use of roads that are without footpaths or adequate verges, and which HS2 Ltd will use for hundreds of HGV movements. In other words, they represent a severe threat to human life and the Council would have no choice but to encourage pedestrians not to follow the proposed diversions.

# Part 1

## Main Objections and Concerns

## **2. Improper and Unfair Decision Making**

### **2.1. Parliament as a Planning Authority**

2.1.1. The inability of the public to participate effectively was one of two grounds of appeal which the 51M Group referred to the Supreme Court. It was strongly argued that ineffective public participation made the Hybrid Bill process incompatible with the EIA Directive. Furthermore, many of the points mentioned in the following paragraphs were put before the Court and lent weight to the contention that the Government is likely to breach fundamental principles of European Law if it does not amend the procedures it is proposing to adopt. The Supreme Court is yet to issue its judgment and it is therefore extremely disappointing that the Government has decided to publish and issue the Hybrid Bill and accompanying Environmental Statement ahead of the judgment.

2.1.2. Notwithstanding the above, the following sections are entirely relevant regardless of the Supreme Court Decision. Parliament is effectively taking the responsibility of a Planning Authority and must be mindful of the normal processes it requires planning bodies to follow. It demonstrates that Parliament is not operating in accordance with the procedures enshrined in UK planning law, or in a fair, open and independent manner that is expected of planning decision makers across the Country.

### **2.2. Decision Making Process**

2.2.1. The Council is fundamentally concerned that the Government has decided to pursue HS2 through a Hybrid Bill. This process falls outside the normal forums for planning decisions and is therefore not governed by the same strict rules Parliament has set for other planning decision makers.

2.2.2. Local Authorities, Planning Inspectorates and the Secretary of State are required by law to approach determination of a new development with a fair and open mind. There must be no pre-determination and importantly, these decision makers must be able to be influenced by members of the public through adequate and meaningful consultation. The requirement of fairness has sat at the heart of a fair and just planning system for decades.

2.2.3. Decision making must be fair and open to be lawful in all planning situations, regardless of the type or scale of development. It is this consistency of approach that ensures the UK planning system is fair and democratic and open to independent scrutiny. However, for HS2, the largest infrastructure project for

generations, the decision making has been removed from this robust and well governed structure. Instead, decision making will be placed within Parliament that has limited experience of operating as a planning decision maker and is not governed by the same rules it has set for others.

### *Pre-determination*

- 2.2.4. In the case of HS2 and the Hybrid Bill, Parliament appears to be outside of the normal requirements for fair and open decision making. Not only is the applicant sitting on the equivalent of the planning committee, but there has been a huge quantity of views already aired about the importance of HS2 ahead of a vote at the second reading. For example, the Chancellor has openly admitted to being passionate about HS2, whilst the Prime Minister has been quoted as saying:

*If we don't go for things like high-speed rail we'll see an overheating economy in the South East and London rather than what I want to see, which is a balanced recovery where every part of our country can join in.*

*We do have to think of the bigger picture of how do we make sure that as the economy recovers that this time we don't leave the West Midlands, the north-west, the north-east of our country behind. (Daily Telegraph, 13 Dec 2013)*

- 2.2.5. These are just two examples of senior Politicians providing their backing to HS2 ahead of a vote. Similar statements of support and opposition have come from all corners of those voting at the second reading.
- 2.2.6. Local Authorities are entitled to vote on their own planning applications. However they are required by law not to approach decision making with a close mind. If any member of a planning committee were to make similar statements of support or opposition ahead of a vote at a planning committee there would be a strong likelihood that a subsequent challenge to decision would succeed.
- 2.2.7. It is disappointing that the Government has opted to determine HS2 through a Hybrid Bill and outside the fairness of normal planning decision making. There have been clear statements that demonstrate pre-determination and it is evident that Parliament is unused to operating as a planning decision maker.

### *Lobbying*

- 2.2.8. It is also unlawful for members of Planning Committees at Local Authorities to lobby for or against a planning proposal. This further cements fairness within the planning decision and provides a sense of equality for all.

- 2.2.9. Again, the Hybrid Bill approach allows the Government to operate outside this normal level of fairness. The Government has lobbied hard to ensure the merits of HS2 are known. Task groups and lobbying firms have been set up at the taxpayer's expense to raise support long before the Environmental Statement was deposited.
- 2.2.10. Not only is this contrary to the lawful requirements set for Local Authorities and the Secretary of State, it implies that the Government made up their minds on the project long before environmental effects were properly considered. No planning decision making process would be valid if the applicant, sitting on the voting committee, were to use public money to lobby support for a scheme. This lobbying removes fair and independent scrutiny, and gives weight to allegations of pre-determination.

#### *Whipping*

- 2.2.11. Similarly, Local Authorities are not allowed to whip committee members to vote in a certain way on a development proposal. This allows each member of the committee to approach decision making with an open mind and to make up their own minds. There is an inherent fairness to a vote where the outcome has not been orchestrated.
- 2.2.12. The Second Reading on HS2 will be subject to a three line whip. This means that the majority of the decision makers will be unable to approach the decision freely. Any independence that remains after the lobbying is likely to dissipate once MPs have been whipped into making a decision.

#### *Clear and Effective Participation*

- 2.2.13. All these aberrations of normal process result in a consultation on an Environmental Statement that cannot be seen to have any merit. Effective public participation means allowing the public to have the ability to influence decision makers. The Government's resolution to take the decision making away from constitutional governed mechanisms of normal planning forums has alienated the public in participating effectively.

### **2.3. Lack of Scrutiny of Assessment**

- 2.3.1. The Council is also heavily concerned about the ability of Parliament to consider the Environmental Statement, given the 50,000 pages of consultation material, the thousands of consultation responses likely to be submitted and the sheer technical details of HS2.

### *Independent Assessor*

- 2.3.2. In general, Planning Committees are supported by a myriad of independent technical experts to ensure decisions on planning applications are not based on guesswork or solely linked to high level principles.
- 2.3.3. The technical experts, in combination with a case officer, allow for a range of material planning considerations to be properly considered. It also presents the public with an outlet to have their comments heard and understood prior to a committee voting.
- 2.3.4. For HS2 there is no such role. Changes to the standing orders were introduced during the Appeal Court proceedings in June 2013. Standing Order 27A was quickly updated to introduce an 'independent assessor' to the decision making process. On the face of it, this satisfied one of the concerns of the court that there would be inadequate scrutiny.
- 2.3.5. However, since then, more information on the independent assessor has been released:
- The independent assessor will prepare a report summarising the issues raised by the comments made on the ES*
- 2.3.6. The term assessor is misleading. There will be no replica of the normal planning processes, no proper independent scrutiny of the environmental statement, and Parliament will only have a summary of people's responses.
- 2.3.7. This is wholly inadequate. It will mean that Parliament will be left to debate matters of principle without understanding any of the detailed impacts. The public's concerns will be unfairly treated and technical matters ignored. It is likely to solely focus on the economics as outlined by the Prime Minister, and the consultation on the ES will have been meaningless in informing the debate.

### *Lack of Public Inquiry*

- 2.3.8. There will be a distinct lack of scrutiny of HS2 as Parliament will focus the debate on wider strategic issues without being informed by a proper understanding of the detailed impacts.
- 2.3.9. If the Government were so confident the scheme is positive at a strategic and detailed level, then there would be no issue with taking HS2 through a public inquiry. However, the decision to remove it from such scrutiny means that the Government can ignore the complicated detailed matters that may impact upon the principle of the scheme and place undue weight on an exaggerated

business case. This unique decision making process can then be controlled through a three line whip and outside of normal UK planning practices.

- 2.3.10. The Council is rightly concerned about the bypassing of normal rules and procedures for such a controversial scheme that is only being taken forward on the back of an unsubstantiated business case built on hope.

#### *Lack of Independent Scrutiny*

- 2.3.11. Another area of concern relates to the lack of scrutiny from the three major environmental regulators. Historically, the Environment Agency, Natural England and English Heritage have always provided independent scrutiny of Governmental schemes and acted in the best interests of the relevant parts of the environment they consider. However, under the existing government, these independent bodies are no longer allowed to form negative opinions of policy or schemes put forward by the Government. It is noticeable that none of these bodies objected to the scheme at the draft ES stage, despite significant environmental effects related to flood risk, water resources, sites of special scientific interest and many listed buildings.
- 2.3.12. This further undermines the scrutiny this ES will get or the ability for the environment to be adequately protected.

## **2.4. Conclusion**

- 2.4.1. HS2 is highly controversial project. It will have a huge impact across the Country, will affect the lives a significant portion of the population and will result in a fundamental change to the landscape.
- 2.4.2. The majority of planning projects divide opinion, but none more so than HS2. It is for this reason that HS2 should, above any other project, be open to a fully independent, fair and transparent decision making process. Instead, the decision making on HS2 has been removed from a well established planning system supported by a legal framework which demands fairness. HS2 is subject to a decision making process where voting MPs have demonstrated pre-determination, lobbied for a positive decision and will be obliged by their party to vote in a particular manner.
- 2.4.3. The decision making on HS2 cannot be seen to be fair and shows little respect of the impacts on the environment and to the public.

### **3. Economic Merits of HS2 and Alternatives**

#### **3.1. Background**

- 3.1.1. HS2 Ltd and the Government have consistently altered the objectives for HS2 as the project has developed before finally determining that 'balancing the economy' and improving capacity were the principle aims. This means that high speed is no longer a necessity as the Prime Minister outlined in a speech to the CBI on 4 November 2013:

*One of the problems we have with HS2 is that the early argument a lot of it was about speed. I make no apology for that – it is important to get from A to B quickly. Is there a businessman here who likes to take the slow train who likes to go more slowly – of course not. Everyone wants to get places quickly. But the real argument about HS2 isn't speed it is capacity. The line is full – we need a new line and building HS2 will not just make it faster and more capacity to get from London to Birmingham, or London to Leeds or London to Manchester, it will have enormous knock on benefits for other destinations.*

- 3.1.2. Many of the original alternative options to HS2 were ruled out because of matters related to speed and cost. The Council is therefore surprised that as speed is no longer paramount and the cost of the preferred option has climbed significantly, that there has been no review of the original options which include slower yet cheaper alternatives.

#### **3.2. Optimised Alternative**

- 3.2.1. The Council is part of the 51M group of Local Authorities who has challenged the merits of the scheme from the outset. As part of this challenge, 51M has consistently presented a case that improving existing services across the whole of the UK benefits a greater number of people, spreads the geographical scope of the benefits, costs considerably less and can be achieved in a shorter space of time. The package of measures put forward is collectively known as the Optimised Alternative.
- 3.2.2. The Council fully supports the Optimised Alternative over the proposed scheme and believes this to be a far superior method of improving rail travel across the Country. 51M has included extensive work on the Optimised Alternative in their response which the Council endorses and supports. The Council does not feel it necessary to present the Optimised Alternative case within this response but it should be acknowledged that the response by Bucks County Council

regarding the Optimised Alternative does have the Council's full support and forms part of the Council's case for seeking a review of the preferred option.

### **3.3. Alternative Option: Route 4**

3.3.1. The alternative Route 4 Option provides the clearest example of why a review of the routes was necessary. Route 4 was initially ruled out as being too expensive largely as a result of significantly more tunnelling than the preferred option and also that it would be difficult to connect to Heathrow. Volume 5 of the ES states:

*Route 4 would provide the shortest section through the Chilterns, but its alignment would have potentially greater impacts in relation to biodiversity, vibration and community integrity than Route 3. It would be slightly shorter than Route 2.5 and slightly longer than Route 3, with commensurate implications for journey times. The route would have required much more tunnelling than Route 3 as then envisaged and would be considerably more expensive.*

3.3.2. It concluded:

*The reduced impact on the Chilterns AONB was considered to be insufficient to outweigh the tunnelling costs. It would have resulted in fewer adverse impacts for landscape and townscape, cultural heritage, water resources, flooding, construction and operational noise, but greater impacts relating to biodiversity and community severance.*

3.3.3. Since it was ruled out in 2010, the cost of the preferred option has risen above that estimated for Route 4, the length of tunnelling has increased beyond Route 4 and the Heathrow connection has been put on hold. Volume 5 recognises that:

*Route 4 entailed 28km of tunnel between Euston and Kings Langley. Route 3 as then envisaged included 17.8km of tunnel from Euston to Amersham though the Proposed Scheme, which is on the Route 3 alignment, now includes 34.6km of tunnel through London and the Chilterns.*

3.3.4. Since it was originally ruled out in 2010, the credentials of Route 4 have dramatically increased in comparison to the preferred option. There is less tunnelling and a lot less environmental effects. Yet despite this for some unknown reason, it has not been reassessed.

3.3.5. There is no logical reason for not reviewing the alternatives as the objectives and details of the preferred option have changed dramatically. It seems likely

that if a review were undertaken now, the more costly and environmentally unfriendly preferred option would be dismissed. It is accepted that optioneering must cease at some point in the design of a scheme, but there has been a distinct lack of rationality when planning for HS2 which is demonstrated by the changing objectives and rising costs. It would be remiss of HS2 Ltd and the Government to vainly pursue an option that no longer represents the best value for money or the least impact on the environment.

### **3.4. There will be no Re-balancing of the UK Economy**

- 3.4.1. HS2 will allow greater links between the capital and other northern cities, which it is claimed will assist in rebalancing the UK economy. This claim is made despite running contrary to expert analysis and evidence from the continent that shows high speed rail redirects economic growth to regional centres at the expense of sub regions. No clear evidence has ever been provided regarding exactly how many people are likely to be using the trains and therefore how the scheme will rebalance the economy.
- 3.4.2. For example, in a response to a recent freedom of information request (July 2013, FOI13-683) the Council were informed that HS2 does not hold any information on how many passengers there would be on HS2 trains from London to Manchester or London to Liverpool.
- 3.4.3. This means to date no information has been provided about the likely usage of the HS2 trains, i.e. how many passengers will get on at London and off at Manchester. There has been no evidence presented by the supporters of HS2 to demonstrate that HS2 would promote travel from south to north.
- 3.4.4. However, the ES does need to assess the impacts of passenger dispersal around the destination stations. This information, although presented for other reasons, does provide an insight into what journeys are expected and when. The table below shows extracts from tables 6.114 and 6.115 of the Volume 5 appendix. This information is provided in the main Community Forum Area Volumes.
- 3.4.5. The above table shows that London is the primary destination in the morning peak and the point of departure in the evening peak. It demonstrates that HS2 will be a significant piece of infrastructure for people getting to London during the working day as opposed to reaching other parts of the Country.

Passenger Dispersal at London Stations for HS2				
	AM Peak Period 0700-1000		PM Peak Period 1600 - 1900	
	Leaving London	Arriving in London	Leaving London	Arriving in London
HS2 Trains Euston	8340	10450	12530	8050
HS2 Trains Old Oak Common	3530	5700	4210	3510
Total	11870	16150	16740	11560
Total passenger changes for Euston Only including existing networks (NB: some passengers have switched to HS2 journeys from existing Network rail journeys)				
Euston without HS2 (total) - 2026	11990	29440	29850	12360
Euston with HS2 (total) – 2026	13390	36290	37420	14610
Total Increase at Euston due HS2	1400	6850	7570	2250
Total new HS2 Passengers at Euston	8250		9820	
<i>Data taken from Tables 6.114 and 6.115 from Volume 5 Appendix Transport Assessment TR-001-000</i>				

3.4.6. No data has previously been provided to support the business case for HS2 or the theory that it will rebalance the economy. However, the data presented in the ES to support the transport assessment does allow an insight into the passenger usage. It presents a clear reason as to why HS2 Ltd has been unwilling to provide passenger data to support the business case (as demonstrated by the response to FOI request 13-683). HS2 will not generate additional traffic away from London to the regions or sub-regions, but as feared, it will absorb growth. The data confined to the appendices in Volume 5 shows that of the 8250 new users of HS2 in Euston in 2026 just 16% will be doing so to leave London in the morning. This does not support the theory that HS2 will transform the geography of the UK economy.

### **3.5. Capacity of Trains**

- 3.5.1. Another concern regarding this data relates to the relatively light use of the new high speed trains. The ES states:

*Trains are expected to be 400m long during peak hours and a mix of 200m and 400m long trains at other times. Up to 550 passengers will be accommodated on each 200m long high speed train (i.e. up to 1,100 passengers for each two-unit train). (Para 4.3.4, Volume 1)*

- 3.5.2. HS2 will run 11 trains per hour from day one in 2026 which means at peak times there will be 12,100 seats available. Table 6.114 from Volume 5 TR-001-000 shows just 8,340 passengers using HS2 to depart from London in the whole of the three hour morning peak period (0700-1000). 36,300 seats will be available in this period which means the trains will be over 75% empty.

### **3.6. North of Birmingham**

- 3.6.1. Another serious concern is that there is no information at all on passenger numbers north of Birmingham. Volume 4 assesses off route effects north of Birmingham, such as the need for new depots, but does not include data on passenger dispersal numbers. HS2 trains will travel on the classic network north of Birmingham to Leeds and Manchester amongst other destinations. Previous specifications show that 4 trains will carry on the classic network to Leeds and the same number to Manchester.
- 3.6.2. Two unit trains will be used in the peak hours which provide 1100 seats. Up to 4400 people could be arriving in Leeds with a further 4400 arriving in Manchester in the peak morning hour. The same amount of passengers could be leaving these cities. This is a large amount of people within stations already under pressure, but particularly on the local road and transport networks many of which are congested.
- 3.6.3. The ES provides no information on the usage of HS2 in these areas, let alone the impacts of the passengers will have on existing local facilities and networks. These can only be considered likely significant environmental effects which should be fully assessed in the ES.

#### *Design Speeds*

- 3.6.4. The design philosophy for Phase 2 is different from Phase 1. Speed is no longer the main purpose and Government has stated that the drivers behind HS2 are now capacity and connectivity. The change in emphasis is very evident with the Leeds arm of the Y, where only 38% of the route has a design

speed of 400kph compared with over 75% for Phase 1. The problems are compounded by the fact the reduction in speeds on Phase 1 are as a result of increased tunnelling where trains cannot safely run at high speed. In contrast, there is virtually no tunnelling on the Leeds arm which means design speeds are reduced solely as a result of a more meandering route.

- 3.6.5. The change in design principles of the route are bad enough but the whole purpose of the scheme is brought into question when the expensive high speed trains will not be able to run at their optimum speeds the majority of the time.

### **3.7. Additional Costs**

- 3.7.1. The Council is also not certain about what the £20bn budget for Phase 1 (£50bn for both phases) actually entails. The scheme will result in additional pressures on Local Authorities to manage the residual impacts but there appears to be little acknowledgement of that. The ES makes no allowances for the additional costs placed on Local Authorities.

- 3.7.2. The impact in Hillingdon alone will significant impact on Council resources, either through finding alternative recreational places, managing new woodland and grassland, working with agricultural tenants to best manage the farmland left as well having to respond to parking and transport issues raised through construction.

- 3.7.3. The £20bn budget has been presented solely for HS2 Ltd's design and build costs. The Council is concerned the final bill to the public purse will be much higher.

### **3.8. Conclusion**

- 3.8.1. The Council is significantly worried about the extent of the environmental effects in the borough. There will be extensive destruction of the natural environment, years of construction traffic and compounds, significant levels of noise from the trains, and a fundamental change to the landscape and use of land in the borough. To date, the Government and HS2 Ltd has presented a case that these adverse impacts are in effect 'collateral' damage to facilitate a wider benefit for the UK.
- 3.8.2. Unfortunately, the rhetoric behind the positives is not matched by details in the environmental assessment. Parliament should be particularly concerned that the alleged benefits of the scheme do not translate into the assessment.

## **4. Rushed and Inadequate Assessment**

### **4.1. Background**

- 4.1.1. The proposed scheme has cost considerable sums of public money to get to this stage. The exceptional cost to the public purse has been coupled with rhetoric about this project being about delivering a state of the art rail network. However:

*According to figures from the Department for Transport (DfT), the total spend by HS2 Ltd on the civil and structural engineering design services contracts was £10.6m above the £58.7m estimated worth of the contracts. (<http://www.building.co.uk/story.aspx?storyCode=5063220>)*

- 4.1.2. Given the extreme overspend of public money and the project aims, the Council would have expected this ES to be of an exemplary standard. Unfortunately this is far from the case. It is widely regarded that HS2 Ltd has rushed through the environmental statement without properly completing work or the assessment. Below is clear evidence of the poor quality of the assessment that does not reflect the millions spent on delivering it.

### **4.2. Construction Route through Uxbridge Golf Course**

- 4.2.1. HS2 Ltd has proposed a new construction route running to the eastern border of the Uxbridge Golf Course. The Council is surprised to see that this is to be a newly created construction route given one already exists less than 30metres to the east.
- 4.2.2. The following map highlights the obvious lack of investigative works by HS2 Ltd. The Council does not believe it necessary to destroy vegetation and hinder an existing right of way. It seems eminently possible that the existing access route can be used where possible without needing to create a new one. However, what this shows is that HS2 Ltd was oblivious to the existing situation as they designed the scheme.



### 4.3. Lack of details about West Ruislip Railhead

4.3.1. The ES states that that there will be a conveyor system taking excavated material from the West Ruislip tunnel portal to the temporary railhead in Ickenham (CFA6 2.3.43). The railhead is situated within CFA7 which attempts to clarify the operation of this facility:

*railheads will connect with the existing railway network for the delivery of materials for the construction of the rail systems, further details are provided in Section 2.3.34; (Para 2.3.14 CFA7)*

Section 2.3.34 does not refer to railheads and simply states:

*No watercourse realignments will be required.*

4.3.2. The ES does not actually contain any information about this railhead. It is evident that HS2 Ltd finally accepted that the construction routes around Ruislip were so problematic that they would have to find alternatives to using road to move material and machinery around. The solution appears to be quickly put

together to ease concerns about construction traffic without actually providing any information.

4.3.3. The Council asked for more details about the railhead system when they met HS2 in early December 2013. HS2 Ltd officers advised that the railhead system would be akin to the facility used by Crossrail at Royal Oak. The image below shows this temporary railhead in operation.



4.3.4. The Royal Oak railhead is a sizeable operation. It seems entirely inappropriate to allude to a similar facility being used to service the West Ruislip tunnel portal

but provide no information. This ES states the railhead will operate 24 hours a day and presumably will be in operation for much of the timetable of construction yet there are no more details.

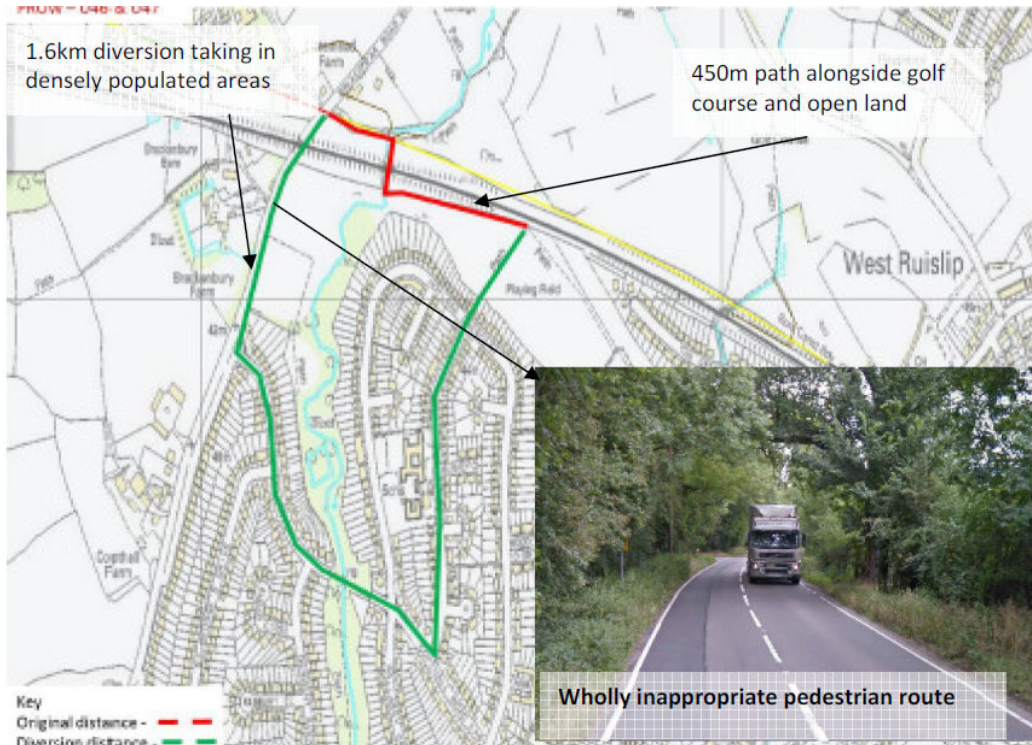
- 4.3.5. The extract below shows the photomontage (LV-01-180) of the West Ruislip tunnel works taken from CFA6 Map Book. Nowhere in this image is there a conveyor system transporting material away from the tunnel portal. There are no photomontages at all for the construction compound or railhead outlined in CFA7.



- 4.3.6. The Council is therefore right to question what the railhead is, what it does, what it looks like and where it will go. The reliance on the railhead is vital to reducing impacts in the Borough which should have prompted a considerable amount of credible knowledge of it. Instead, HS2 Ltd has provided no detail.

#### **4.4. Public Rights of Way Diversions**

- 4.4.1. The Council has provided a detailed commentary of the rights of way diversions that HS2 Ltd has mapped. Below is an image of one of the routes to illustrate the point that HS2 Ltd had not properly assessed the diversions prior to proposing them. The extract provides further evidence that HS2 Ltd has satisfied the need to provide diversions but not undertaken an appropriate level of work to determine whether they are actually practical.



4.4.2. The detailed assessment of the rights of way diversions also highlights a number of inconsistencies and contradictions. In some instances, rights of way are stated as being diverted for 3 months in one document but 4 years in another. The lengths of diversions are also contradicted in places.

#### 4.5. Grassland Mitigation

4.5.1. HS2 Ltd's proposed locations for grassland habitat creations have also caused some puzzlement. The map below shows an area of South Ruislip proposed for grassland habitat creation.



4.5.2. Below is an aerial photograph of the same site. This area of land is already grassland habitat. The Council questions why HS2 Ltd has selected an area of grassland for the planting of grassland mitigation. Again, it suggests HS2 Ltd may not have given an appropriate level of consideration to the lines they were drawing on maps.



#### 4.6. General Understanding of the Construction Routes

4.6.1. The Council has detailed its concerns with the construction traffic routes in the specific transport section elsewhere in this report. However it is worth reiterating in this section that it does not appear HS2 Ltd are aware of the impracticalities of using the roads proposed for such a vast amount of construction traffic. In many instances, HS2 HGVs will simply be unable to complete journeys without significant levels of disruption and inefficiencies.

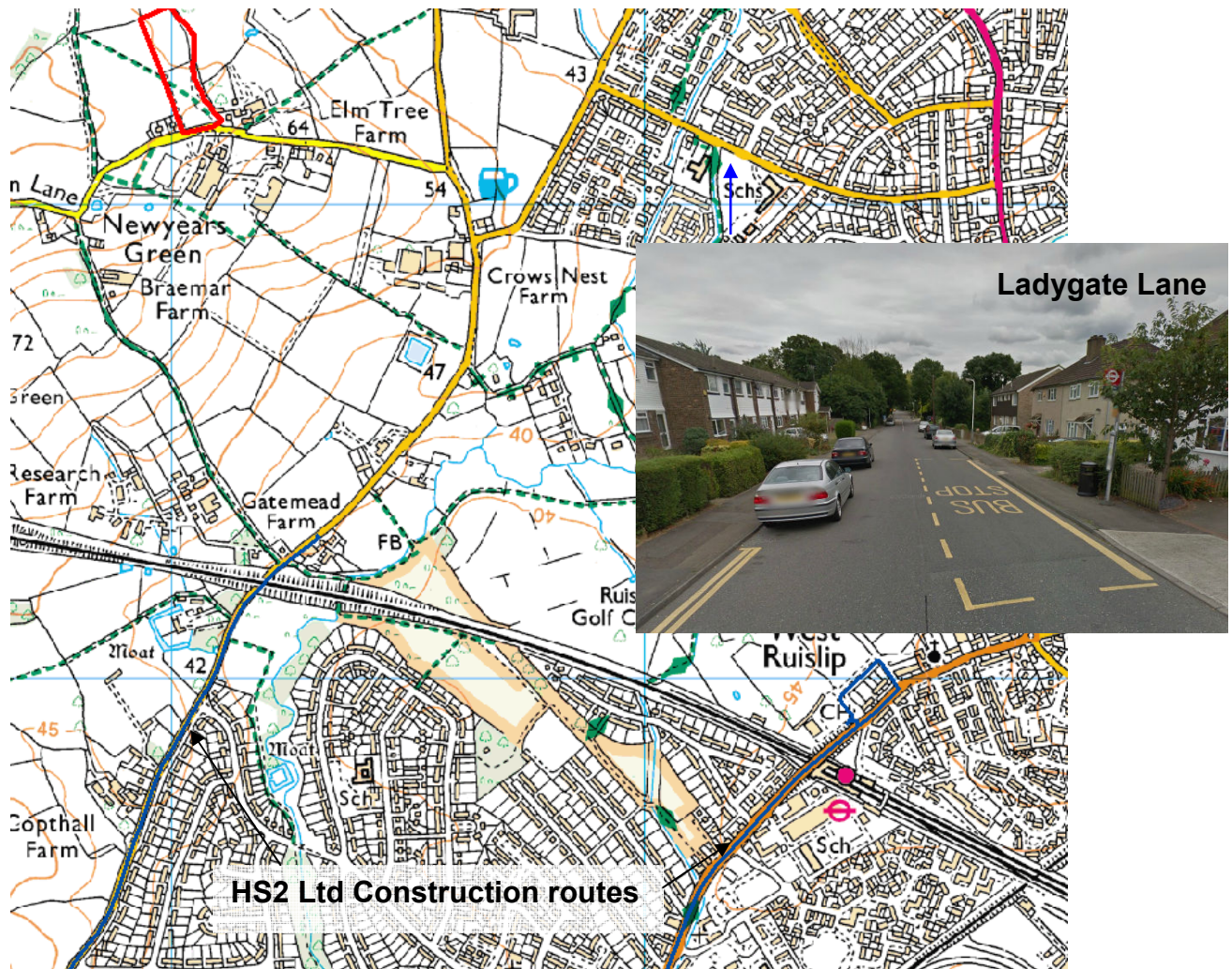
4.6.2. In addition to this, there are also uncertainties about what roads will actually be used. Paragraph 12.4.21 of CFA6 states:

*Construction of the Proposed Scheme is forecast to result in increases in daily traffic flow (HGV or all traffic) causing a significant increase in traffic related severance in the following locations in scenarios CW1 and CW2:*

- Ladygate Lane – major adverse effect (HGV)

4.6.3. The map extract below shows the construction routes (marked in blue) of HS2 Ltd. Ladygate Gate does not appear to be impacted. The draft ES did show construction movement along Ladygate Lane but this seems to no longer be the case based on the maps. Unfortunately this is contradicted by the supporting text. The introduction of the West Ruislip railhead and conveyor

system has been offered as a reason for reducing the traffic impacts outlined in the draft ES. However, given the confusion and lack of time to fully design railhead, the ES is left with a confusing situation of presenting different scenarios. Ultimately, the Council is not sure what the situation will be in the Ruislip area.



#### 4.7. Impacts from the Dumping of Soil

- 4.7.1. This response includes a separate commentary on the locations for dumping excavated material. Again, it is worth reiterating the principle of the concerns in this section to demonstrate the Council's belief that these were a 'last minute' consideration.
- 4.7.2. The areas for dumping excavated material were not shown in the draft ES, not included in the land safeguarded at the end of 2013 and have only recently been detailed in the ES. There was no prior indication that there would be a need for dumping excavated material in the Borough.

4.7.3. This alone demonstrates a lack of planning. However, the locations for the soil dumping reveal a sense of urgency within HS2 Ltd to find sites regardless of what the current land use is. The aerial image below shows the dumping of excavated material on top of the West London Composting site. This is a highly valuable waste management site that integral to the management of waste across west London:

*Established in 2004 to help increase the amount of organic waste recycled in the UK, West London Composting (WLC) is the largest in-vessel facility of its kind in Europe today for bulk composting.*

*Licensed by the Environment Agency and Department of Environment Food and Rural Affairs (Defra) to process 50,000 tonnes of organic waste each year, at WLC we utilise the very latest techniques and equipment for manufacturing a variety of soil conditioners for agricultural and commercial uses. (<http://www.wlcompost.co.uk/>)*



4.7.4. The decision to select this site for dumping of material is wholly inappropriate and flawed. There is no logical reason for selecting this site at all.

4.7.5. The Council understands HS2 Ltd has discussed the dumping of material with the landowner and has reached an informal agreement to change their plans. No formal plans have yet been drawn up and the decision to select this land has caused annoyance, uncertainty and wasted resources for the landowner and HS2 Ltd's public money. A simple check of the land would have avoided these problems but shows that HS2 Ltd's rush to complete the ES has resulted in basic errors.

#### **4.8. Northolt Tunnel and Earthworks Main Compound**

4.8.1. The ES makes several references to the Northolt Tunnel and Earthworks Main Compound. Contrary to the description this is nowhere near Northolt. Instead it is situated in Ickenham in between Harvil Road and Breakspear Road South. Paragraph 2.3.41 of CFA6 states that this compound will:

- *be operational for approximately ten years. It will provide support for construction of bridgeworks, earthworks and retaining structures. The railhead will then be established and it will support the construction of the Northolt tunnel and installation of the railway;*
- *manage all civil engineering works in the South Ruislip to Ickenham area and provide logistics support for the Northolt tunnel (for approximately five years);*
- *contain a temporary factory for producing pre-cast concrete tunnel lining segments for the Northolt tunnel;*
- *include a temporary railhead for the removal of surplus excavated material and delivery of railway installations materials, with temporary connections to the Chiltern Main Line;*
- *be used for the management of sustainable placement areas;*
- *support up to 200 workers each day throughout the civil engineering works period, increasing to approximately 460 workers during peak periods and support approximately 170 workers each day on average throughout the railway installations works period;*
- *not provide overnight worker accommodation;*
- *be accessed via the A40 Western Avenue, the B467 Swakeleys Road and then Harvil Road or Breakspear Road South.*

4.8.2. The ES fails to go into much detail about this compound. Between CFA6 and 7 there is only one reference to the factory, and that is within the list set out

above. There are no further details, no discussion of noise impacts, no mention in the socio economic section about employment opportunities, and no description of what it would look like or how it would be accessed. It is as if it was suddenly considered at the last minute.

- 4.8.3. There is no acknowledgement of how 200 workers (460 at peak times) will get to the compound site each day and there is a sweeping statement that traffic will be reduced through the use of alternative forms of transportation even though there are limited bus stops available in the area and no other connections.
- 4.8.4. As stated elsewhere there are virtually no details of the railhead. Yet once again this section alludes to its presence.
- 4.8.5. It is still not clear why a construction project that is supposed to last 7 years, will require a tunnel and earthworks compound for 10 years.

#### **4.9. Further Implications for Public Resources**

- 4.9.1. All the examples above come from just one (and a small section of another) of the CFA reports. There are 25 others. It is hugely worrying to think that so little time and conscientious thought has gone into the ES. HS2 Ltd has clearly been put under huge pressure to reach a deadline regardless to what standard the assessment had reached.
- 4.9.2. The worst aspect of this though is that it has created significant uncertainty and left residents and the Local Authority with not really understanding what the HS2 scheme is. Furthermore, it will now require the Council to demonstrate the failings either to HS2 Ltd or in front of the Select Committee via a petition. It is not appropriate for the Council or residents to use its own resources to rectify the errors of HS2 Ltd and their multi million pound publicly funded ES.
- 4.9.3. Suffice to say the Council is extremely disappointed at the standard of assessment presented.

## 5. Non Compliance with HS2 Ltd’s Own Design Aims

### 5.1. Design Aims

5.1.1. Section 1.5 of Volume 1 of the ES sets out the design aims that governed the development of HS2. Below is a table of the design aims with a commentary on the impacts in Hillingdon.

Priority One	Reduce greenhouse gas emissions and combat climate change	
<p><b>Design Aim 1:</b> managing energy - The project shall consider the energy efficiency of the operation of trains and rail infrastructure, as well as the energy requirements of construction and materials, as a means of establishing low-energy priorities within the Proposed Scheme as a whole.</p>	<p>The scheme does not reduce carbon emissions and increases the amount of Greenhouse Gasses. There are a number of poorly evidenced assumptions and omissions which suggest the scheme would be worse than presented.</p>	<p><b>Failed</b></p>
<p><b>Design Aim 2:</b> managing flood risk - The project shall aim to avoid any increase in flood risk, by maintaining overall flood storage capacity (through, in order of priority, option selection that avoids floodplains, infrastructure design and flood compensation) and minimising disruption of flood flows.</p>	<p>The scheme does not adequately assess surface water run-off or the impacts from sustainable placement of soil. These could have significant impacts on flood risk but were not covered by the limited scope of the assessment.</p>	<p><b>Failed</b></p>
Priority Two	Protect natural and cultural resources and enhance the environment	
<p><b>Design Aim 3:</b> protecting natural resources - The project shall seek to avoid direct or indirect harm to valued landscape, water and ecological resources, to mitigate adverse impacts and to enhance such resources where practicable. Measures to achieve this would be commensurate with the sensitivity of the resources and the level of their protection.</p>	<p>The ES describes the effects in Hillingdon as being significant with regards to landscape, water and ecology. The line of route affects nationally and regionally designated sites, significantly affects a landscape of high importance and results in the diversion of water and impacts adversely on water quality. Avoidance is the best form of mitigation but there has been no evidence that this was attempted in this location. A tunnel would have avoided all these adverse impacts but has never been properly considered.</p>	<p><b>Failed</b></p>

	<p><b>Design Aim 4:</b> protecting cultural resources - The project shall seek to avoid direct or indirect harm to valued historic cultural resources, to mitigate adverse impacts, and to enhance such resources where practicable. Measures to achieve this would be commensurate with the sensitivity of the resources and their level of protection.</p>	<p>There has been no attempt to bypass areas of historical importance. The ES concludes there will be significant cultural heritage effects and proposes no mitigation.</p> <p><b>Failed</b></p>
<p><b>Priority Three</b></p>	<p><b>Create sustainable communities</b></p>	
	<p><b>Design Aim 5:</b> controlling noise and vibration – Where reasonably practicable, the operation of the Proposed Scheme shall result in no significant adverse noise and vibration impacts (by reference to relevant guidance and precedence) to residents and other sensitive receptors near the route or proposed stations. Measures to mitigate potential impacts would be introduced, but where such impacts are unavoidable and cannot be appropriately mitigated, the project shall define circumstances under which residential properties shall be eligible for sound insulation.</p>	<p>The noise from HS2 is considered to have a significant adverse effect on a number of properties in Ickenham and across the Colne Valley. The only mitigation proposed amounts to a 5m noise barrier although despite this ‘wall’ there will still be adverse effects felt at hundreds of properties. No further mitigation is proposed in the ES and there is no information as to who will be eligible for sound insulation.</p> <p><b>Failed</b></p>
	<p><b>Design Aim 6:</b> minimising property demolition - The project would seek to avoid or, where this is not practicable, to minimise impacts due to the demolition of properties and, in particular, to minimise residential land required and demolition.</p>	<p>There are a number of properties to be demolished in Hillingdon. There is also a lot of farm land lost that renders residential farm properties unviable.</p> <p>In particular, the Hillingdon Outdoor Activity Centre (HOAC) will be lost with as yet no mitigation or replacement.</p> <p>It is difficult to see how HS2 Ltd has attempted to avoid or mitigate the impacts.</p> <p><b>Failed</b></p>
	<p><b>Design Aim 7:</b> protecting communities - The project would seek to maintain the health and amenity of residential communities potentially affected by the Proposed Scheme. This would include, where practicable, maintenance of access to services (such as health facilities, schools and places of worship) and shops, and maintenance of environmental conditions such that significant adverse effects on health and amenity are mitigated.</p>	<p>In general the inclusion of a tunnel through Ruislip helps reduce impacts. However, there are still a number of significant adverse effects that will affect communities. The loss of rights of way, the impact on landscape, the loss of HOAC, problems from construction traffic, the loss of farmland and increased noise impacts ensure that the scheme fails to protect communities.</p> <p><b>Failed</b></p>

	<p><b>Design Aim 8:</b> safety - the project design would seek to ensure that the travelling public and general public are not subject to increased risk of death or injury as a result of the operation of services associated with the Proposed Scheme.</p>	<p>HS2 Ltd has failed even on a relatively straight forward design aim such as this. The public rights of way diversion are fundamentally dangerous and would increase the risk of death if they were to be used. It is highly questionable as to whether HS2 Ltd was aware of the location of diversions when proposing them.</p>
<b>Failed</b>		
<p><b>Priority Four</b></p>	<p><b>Achieve sustainable consumption and production</b></p>	
	<p><b>Design Aim 9:</b> optimising the land resource - The project would seek, where practicable, to use land with planning designations appropriate to development for high speed rail and its infrastructure. The project would seek to maintain and enhance land use, provided this does not compromise other sustainability aims.</p>	<p>Unlike High Speed 1 which follows existing transport corridors, HS2 ploughs straight through the Colne Valley. An area entirely inappropriate for infrastructure due to landscape value, ecology, water resources, tranquillity and recreational open space. The project fails to protect let alone enhance the area.</p>
<b>Failed</b>		

## 5.2. Conclusion

- 5.2.1. It is difficult to see how the design aims influence the scheme within Hillingdon. There are a huge amount of significant environmental effects that are acknowledged within the ES. In the first instance this shows that the priority form of mitigation i.e. avoid the problem, has not been engaged. In some instances, significant likely impacts remain un-assessed and those significant effects known are not accompanied by proposed mitigation.
- 5.2.2. A decision to proceed with this scheme on the basis of the ES gives further evidence that the environment is given little weight and that the scheme has been designed with little respect to local impacts.

## **6. Non Compliance with EIA Regulations**

### **6.1. Background**

- 6.1.1. The Council is part of a consortium of local authorities [the 51M group] who have brought legal challenges against the Government on a number of grounds. As discussed in Part 1, an appeal was recently heard in the Supreme Court on two specific European Law grounds.
- 6.1.2. One of the grounds is that the Government failed to carry out a Strategic Environmental Assessment prior to issuing its decision to proceed with HS2 in January 2012.
- 6.1.3. The second ground relates to the relationship between Hybrid Bills and the Environmental Impact Assessment regulation, focussing on the likelihood of there being non compliance with the EIA Directive. The decision of the Supreme Court is still awaited but even if it goes against the 51M group, this will not in any way detract from the need for Parliament to ensure that there is full compliance with the requirements of the EIA Directive.
- 6.1.4. The following sections analyse the compliance of the ES with the EIA Regulations. They demonstrate that the ES does fail to comply with the EIA regulations regardless of previous court case outcomes or the impending decision of the Supreme Court which only considered the likelihood of compliance.
- 6.1.5. The Council therefore believes that a decision to proceed with HS2 based on this ES would be unlawful.

### **6.2. Schedule 4 Requirements**

- 6.2.1. Schedule 4 of the EIA Regulations set out the minimum standards for compliance. Set out below are the sections within Schedule 4 that the Council believes the ES does not comply with.

#### *Schedule 4, Part 1(1a)*

*Description of the development, including in particular (a) a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;*

- 6.2.2. The CFA Map books include maps that show vast areas of 'Land Potentially Required for Construction'. However this is misleading as it is possible to

determine that some of this land is definitely required for construction by cross-referencing with other maps. However, in some instances, the term 'potential' is likely to be more accurate. The impact of these areas that are 'potentially required' has not been adequately assessed. The ES needs to be more certain about what land is and is not required for the scheme. The ES cannot be said to describe or assess the 'whole development'.

*Schedule 4, Part 1(2)*

*2. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects.*

- 6.2.3. Volume 5: Alternatives Report replicates the reasons for dismissing alternative options (including routes) from 2010. The selection of the preferred option was made prior to knowledge of the environmental effects of this scheme. Most of the options ruled out have only had a fleeting acknowledgement of their environmental effects, and there is no clear methodology for understanding why the preferred option was selected.
- 6.2.4. The main concern relates to the lack of review of the options as the scheme has progressed. The objectives for the preferred scheme have consistently changed, the benefits downgraded, and there has been a significant increase in tunnelling resulting in higher costs. In other words, alternatives were ruled out in favour of preferred option that has fundamentally changed.
- 6.2.5. It is therefore clear that the alternative options were ruled out prior to understanding the environmental effects of the preferred scheme. It is also evident that even as it transpired the environmental effects of the preferred scheme were far greater than expected, there was no desire to seek an alternative scheme that had far less environmental impacts.

*Schedule 4, Part 1(3)*

*A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.*

- 6.2.6. The ES broadly acknowledges the significant aspects of the environment to be affected by the scheme. However, importantly it omits any assessment of those affected north of Birmingham from the operation of High Speed trains. HS2 trains will use the dedicated high speed network until Birmingham at which

point 8 trains per hour in Phase 1 will branch off on to the classic line. There could be thousands of people travelling north to Leeds and Manchester resulting in significant pressures on these City Centres including increasing impacts on air quality and the problems from transport movements in and around the stations. The ES also fails to consider the wider impacts on the population from disrupted classic line services.

- 6.2.7. The ES fails to describe all the aspects of the Environment to be affected by the development.

*Schedule 4, Part 1(4)*

*A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and longterm, permanent and temporary, positive and negative effects of the development, resulting from:*

*(a) the existence of the development;*

*(b) the use of natural resources;*

*(c) the emission of pollutants, the creation of nuisances and the elimination of waste,*

*and the description by the applicant or appellant of the forecasting methods used to assess the effects on the environment.*

- 6.2.8. The primary compliance failure with this requirement relates to the lack of cumulative assessment with the wider Phase 2 scheme. The ES needs to consider all relevant committed developments within the cumulative assessment and therefore Phase 2 should fall within this scope of the cumulative assessment.
- 6.2.9. The ES requires a description of the likely significant effects however Volume 3, Chapter 16 only provides a list of the impacts. There is no assessment of these impacts on the environment, and in turn no conclusion on significant effects.
- 6.2.10. The lack of assessment with Phase 2 is particularly problematic because the business case has not been adequately decoupled. This means the environmental effects of Phase 1 will be measured against the benefits of Phase 1 and 2.

*Schedule 4, Part 1(5)*

*A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.*

- 6.2.11. The ES acknowledges a number of significant environmental effects but in some cases offers no proposals to mitigate these. For example:
- The ES acknowledges the loss of the Hillingdon Outdoor Activity as a significant effect but provides no mitigation.
  - The ES acknowledges that there will be significant effects from noise but eludes to mitigation being developed some time in the future.
  - The ES concludes that there will be significant effects relating to cultural heritage but provides no mitigation at all, nor does it suggest future proposals to lessen the impacts.
  - The viaduct across the Colne Valley is recognised to have a significant adverse effect on the landscape, but the ES provides no designs or commitments to design standards.
  - One location for the placement of excavated soil covers an existing composting site which will be heavily compromised. Another is located on an extremely sensitive area that is known to be highly contaminated. The use of this area could jeopardise attempts to decontaminate the site and to reopen a new water abstraction point.
- 6.2.12. These are just some of the examples of significant effects which the ES acknowledges but makes no allowances for. The ES therefore, cannot be said to describe the measures that will offset the significant environmental effects.

**6.3. Conclusion**

- 6.3.1. The Council considers that the ES does not adequately comply with all aspects of the EIA Regulations. A decision to proceed with HS2 at the second reading stage would be unlawful as it is based on a non-compliant environmental statement.

## Part 2

# Assessment of Significant Environmental Effects

## **7. Environmental Statement Comments**

### **7.1. Approach to Comments**

- 7.1.1. The Council is fundamentally opposed to HS2. The whole case for HS2 is based on a theoretical performance of the scheme which is not reflected in the ES. There are far superior alternatives that would aid more people, have fewer environmental impacts and cost far less. However, it is recognised that if Parliament were to proceed with the scheme then the London Borough of Hillingdon will be severely impacted and this cannot be ignored.
- 7.1.2. Hillingdon's response to the relevant Reports will highlight the significant effects and the deficiencies of the assessment, but more importantly, will set out suggestions for an improved scheme should it ever reach a stage of construction. Any comments advising on the design of the final scheme should not be read as Hillingdon's acceptance of the project.

### **7.2. Hillingdon as Local Authority and Landowner**

- 7.2.1. The Council will be providing two responses to the consultation, one as a local authority in the area and a second response as a landowner. The Council's own land will be directly impacted by the scheme. These impacts require separation from the wider issues regarding the impacts across the borough. The landowner response will be included within Part 3 of this response.

### **7.3. Use of Maps**

- 7.3.1. HS2 Ltd took the peculiar decision to orientate the maps inconsistently and to use different scales for the maps presented. This resulted in maps running over multiple pages, and in many cases parcels of land covered by the same annotation are separated. This makes the ES difficult to follow.
- 7.3.2. The Council requested electronic versions of the GIS files as it would allow them to rescale plans and re-orientate them to the more commonly used north and to make it far easier to cross reference with existing mapping resources and constraint maps. HS2 advised that these would be made available but they failed to provide them until late January.
- 7.3.3. There is no reason as to why these files could not be provided early on in the process. They would have made the consultation far more accessible and would have allowed maps to be properly visualised and circulated to others. As it is, the Council has had to literally tape together the maps in the manner of a

jigsaw to understand the wider context and match parcels of land separated by different pages in the ES.

- 7.3.4. The maps used in these comments will therefore be a mix of direct extracts from the final ES and those reproduced by the Council using outlines plotted by officers on its own mapping systems and then where possible HS2 Ltd maps that have been used to replace its own versions.
- 7.3.5. The Council is highly disappointed in HS2 Ltd's decision not to assist the Local Authority and others in engaging with this consultation which has resulted in abortive work and created undue stress.

## 8. HS2 in Hillingdon

### 8.1. Areas lost to HS2

8.1.1. The map on the previous page shows considerable harm and destruction to a vast area in Hillingdon. There are large areas directly lost to construction impacts, but also the subsequent loss of farmland through mitigation and for the placement of excavated material. The following highlights the extent of loss:

- The cumulation of the impacts results in 192.8 hectares of farmland lost, with less than 50 being restored this equates to the combined size of the urban areas of Harefield and South Harefield which have a population of nearly 8000

#### *CFA6*

- 20 hectares of diverse habitat including woodland
- 60ha of open grassland
- 3.km of hedgerows lost
- 10 ponds lost which includes unaccounted for populations of great crested newts
- 1ha of complex and diverse habitat along the River Pinn
- The loss of an open watercourse on the Ickenham Stream

#### *CFA7*

- 19ha (14%) of the Mid Colne Valley SSSi including 1ha of ancient woodland
- 5.4ha of open water (6% of which is within the SSSi)
- 2.9ha of running water (50% of the River Colne in the SSSi)
- 10ha of Woodland (33% of the total woodland area of the SSSi)
- 25ha of terrestrial habitat including 18ha of broadleaved woodland in the Mid Colne Valley nature conservation (outside of SSSi) which includes:
  - 10ha of supporting habitat including woodland
  - 170m of River Colne will be 'modified'

#### *CFA6 and 7 combined*

- Approximately 150ha of diverse ecological rich habitat will be lost. An area the combined size of Harefield and South Harefield.

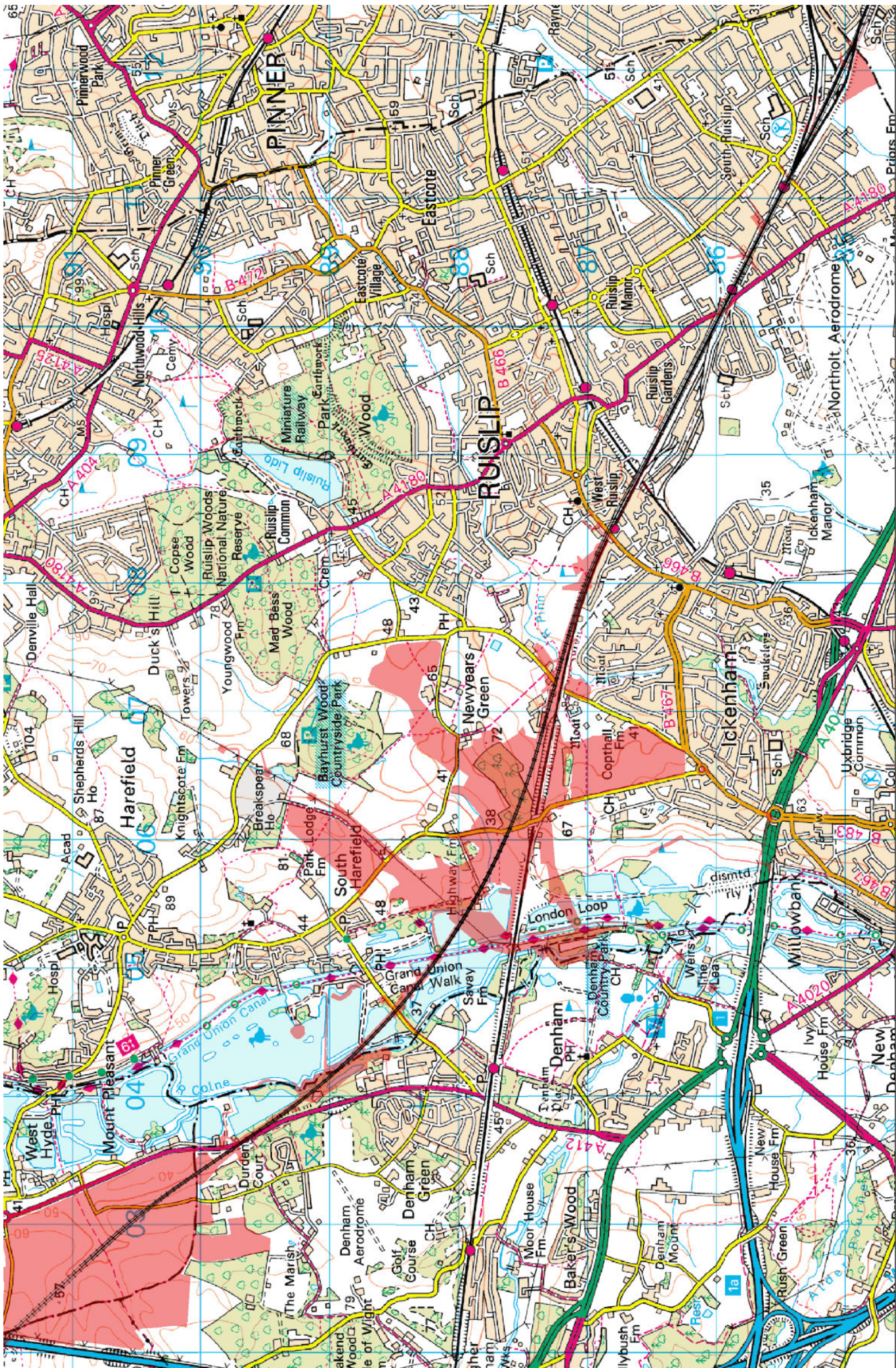


Legend

HS2 Route

Construction Boundary

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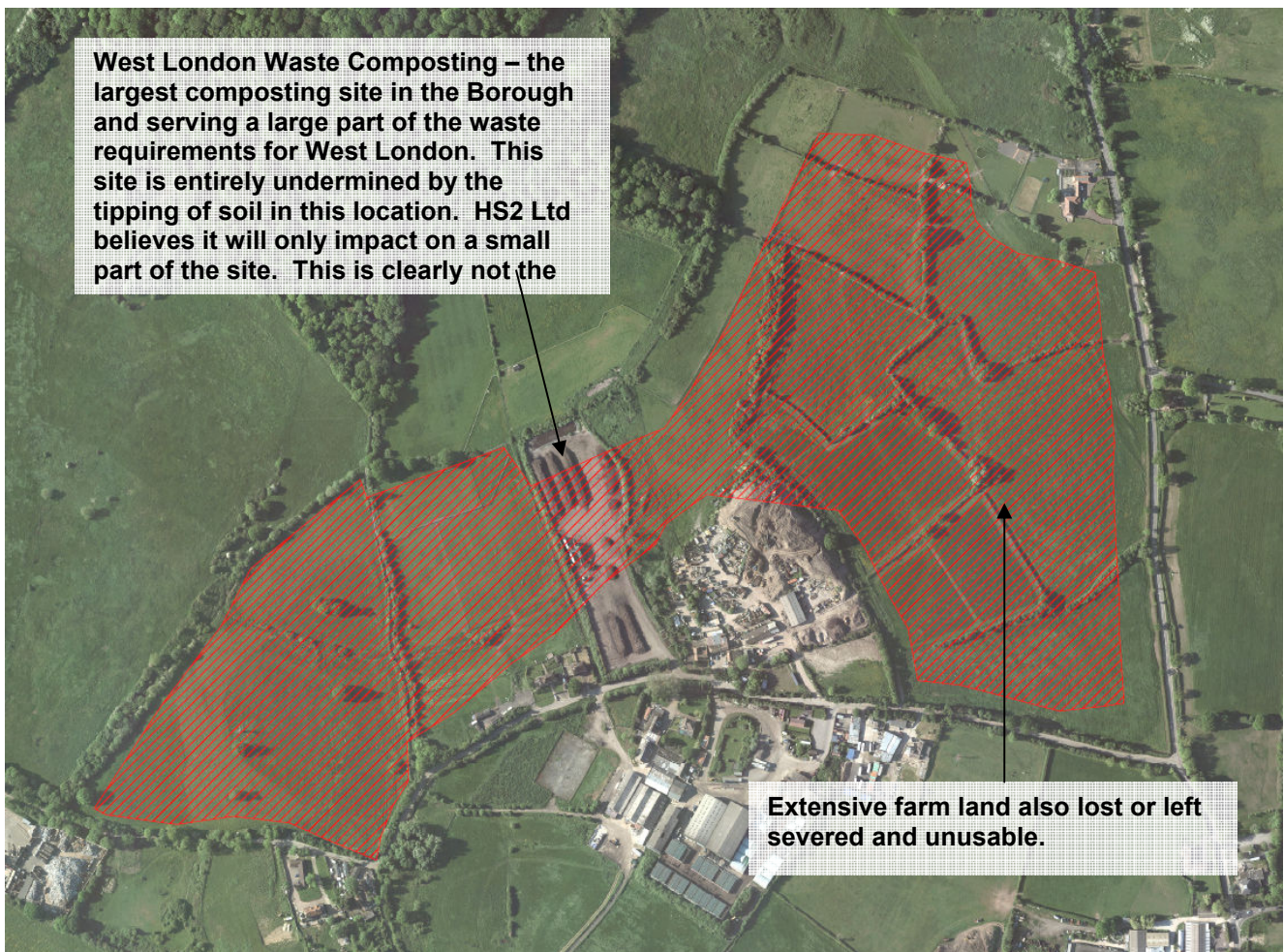
Legend  
 ——— HS2 Route  
 ■ Construction Boundary

## 9. Sustainable Placement of Excavated Material

### 9.1. Background

9.1.1. HS2 Ltd has identified three locations for the 'sustainable placement of excavated material' in order to facilitate the construction of a tunnel in west London. There is no clear evidence as to how these three areas have been selected. Sustainability is a combination of social, economic and environmental impacts. Therefore the selection of 'sustainable' locations must in some way be supported by evidence as to how the combination of the impacts has been assessed. No information has been provided and as a consequence the Council considers that HS2 Ltd has misused the term 'sustainable' and therefore misrepresented the placement of excavated material.

### 9.2. Location of Excavated Material – North of New Years Green Lane



9.2.1. The map above shows the extent of harm created by the New Years Green Lane Excavated Material dump. Clearly this proposal is in a location that incorporates the largest composting site in the borough, serving the waste

needs for a significant area of London, is far from sustainable. It also demonstrates that very little consideration has gone into the identification for the dumping of excavated material.

9.2.2. The decision to place material in this location will render the composting site inoperable requiring the West London Waste Authority to reconsider its entire composting strategy. Hillingdon Council would have to find alternative sites for composting its own material, which is unacceptable.

9.2.3. The Council is also concerned that this site has never been considered prior to the publication of the final ES. It was not acknowledged in the draft ES and the safeguarding directions make no reference to it. This location was clearly ill thought through and included at the last minute and has not been properly assessed.

### 9.3. Location of Excavated Material – West of Breakspear Road South



9.3.1. The map above again shows extensive areas for locating excavated material in the Breakspear Road South area. This site comprises a significant portion of agricultural land and is in close proximity to a number of residential developments. Again, the decision to use this for dumping tunnel spoil was taken at the last minute and it is not on safeguarded land.

#### 9.4. Location of Excavated Material – North of Harvil Road



- 9.4.1. This location for excavated material at Harvil Road is entirely inappropriate based on the assessment set out so far. The material will be deposited on a site with significant contamination problems over sensitive groundwater. The issues are further complicated by the Environment Agency's desire to reopen a water abstraction point to the east of the site. The Council believes the dumping of material on this site could undermine the already highly sensitive pathway from contamination to groundwater. This issue is set out in more detail in the Land Quality section below.
- 9.4.2. In addition, the land south of Harvil Road chosen for dumping excavated material severs the available farm land. It also has ecological impacts through the loss of a number of historic hedgerows and finally, Harvil Road is highly sensitive to additional road movements, due to its restricted width and the local topography, which appears not to have been considered.

## **9.5. Appearance**

- 9.5.1. Paragraph 9.5.51 of CFA6 acknowledges that the final height of dumping sites for excavated material will be 3m high. That is a significant change to the landscape that should not be accepted based solely on a featureless map. There should have been consideration given to the existing and proposed contours and whether or not these locations were truly 'sustainable'. This clearly has not been done.

## **9.6. Conclusion**

- 9.6.1. It is evident that the locations for dumping excavated material have been a last minute design consideration for HS2 Ltd and ill thought through. These sites were not included in the safeguarding areas published at the end of 2013 and nor did they appear in the draft ES. In particular the sites at New Years Green Lane and Harvil Road are entirely inappropriate based on the assessment work carried out and the remaining site is highly questionable.

## **9.7. London Borough of Hillingdon Proposal**

- 9.7.1. The Council has significant overriding objections to the scheme, which in part results from the lack of environmental consideration as demonstrated by the inclusion of these sites for the dumping of excavated material. Notwithstanding this, if the scheme were to proceed the Council would request that the principles from Crossrail is followed regarding the placement of excavated material. Crossrail acknowledged they had excess material but instead of randomly placing it on areas picked out from aerial mapping as HS2 Ltd has done, they opted for a more visionary approach:

*The final destinations for the excavated material in Essex and Kent have been specifically chosen to ensure that the vast majority is transported by either rail or river thereby limiting the impact on the road network.*  
[\(<http://www.crossrail.co.uk/news/articles/crossrail-will-move-five-million-tonnes-earth-via-river>\)](http://www.crossrail.co.uk/news/articles/crossrail-will-move-five-million-tonnes-earth-via-river)

- 9.7.2. HS2 Ltd's approaches to dumping excavated material share none of the innovative or aspirational objectives of Crossrail. The same ethos of reducing road traffic has not been applied to HS2 and the proposed outcomes from the dumping of spoil are entirely negative. HS2 Ltd must rethink their ideas for dumping spoil and must formulate a greater plan and vision that avoids an operational large scale composting facility on valued land. It must also properly compensate for the loss of useable farm land, address the adverse impacts on roads, the loss of open ecological habitat and the harmful changes to the landscape.

## 10. Heathrow Spur

### 10.1. No Business Case

10.1.1. The judicial review into the decision to proceed with HS2 heard that the business case for the Heathrow link was very poor, with a business cost ratio of considerably less than 1:1 (the court heard it could be as low as 0.3). Beyond that, the merits or justification were never adequately presented. The DNS (para 4.25) stated:

*Some consultation responses questioned the strength of the economic case for providing a direct link to Heathrow. The Government considers that its strong strategic case makes a direct Heathrow link the right approach to take, providing a properly integrated connection between the country's major hub airport and HS2. The economic case of a project is only a single component in a much broader decision making process [emphasis added]*

10.1.2. There is still inadequate information justifying the Heathrow link. A Heathrow Spur would add to the devastation of HS2 in Hillingdon. The use of this spur provides no clear rationale and the generic timetable set out shows just one train per hour going to Leeds and one to Manchester. Although a spur is planned to connect to the London side HS2 network, there are **no** trains planned for this link. The following summarise the negative aspects of a link to Heathrow:

- Limited trains will use the Heathrow to north link and no trains programmed to use the London link
- Business cost ration of less than 1:1
- Significant adverse transport effects to deliver yet another part of HS2 in Hillingdon
- Significant adverse effects from construction and doubts about whether it could be achieved
- Significant adverse effects from noise
- Significant adverse effects on air quality
- Significant adverse effects on ecology
- Significant flood risk effects
- Significant effects on public rights of way
- Loss of public facilities and businesses
- Significant adverse landscape effects

- The building of a Heathrow spur after the construction of Phase 1 is complete will extend the construction impacts across Hillingdon to nearly 20 years.

10.1.3. There appears to be a belief that a Heathrow Spur is a good idea, but it still cannot be proven and the ES includes reference to it as if it is likely to come forward in the future. The Council believes the Government is being irresponsible by not presenting their full vision for the Heathrow Spur. Instead HS2 Ltd appears to be planning for it surreptitiously whilst making no consideration of the environmental impacts.

10.1.4. There is absolutely no justification for a Heathrow spur, but including reference to it, although 'on hold' shows little respect for the environment or those who are being blighted.

## **11. Route Wide Effects: Carbon Emissions**

### **11.1. Conclusions from the Final ES**

11.1.1. The Final ES concludes that HS2 will increase the amount of greenhouse gas emissions and will therefore not contribute to a low carbon transport network.

11.1.2. Paragraph 5.7.2 of Volume 3 of the final ES states:

*The Proposed Scheme's operational emissions are anticipated to result in between -2,970,000 tCO<sub>2</sub>e and -3,160,000 tCO<sub>2</sub>e over the 60 year operational assessment period, once modal shift, carbon mitigation from tree planting and freight benefits from released capacity on the classic network is taken into account.*

11.1.3. However, this part of the conclusion only relates to the operational emissions. When the construction impacts are factored in, the conclusion changes dramatically:

*The construction carbon footprint is estimated to be between 5,300,000 tCO<sub>2</sub>e and 6,460,000 tCO<sub>2</sub>e<sup>81</sup>. This is mostly a result of the construction of tunnels, earthworks, bridges, viaducts and underpasses, of which many of these elements have been included in order to mitigate other significant environmental noise and visual amenity. (5.7.4 Volume 3 Route Wide Effects)*

11.1.4. The final ES concludes that the residual carbon ranges between 2,140,000 tCO<sub>2</sub>e and 2,620,000 tCO<sub>2</sub>e. In other words, HS2 will significantly add to the carbon emissions and will not contribute to the urgent need to tackle climate change.

### **11.2. Problems with the Assessment**

11.2.1. The final ES is still fundamentally flawed, in respect of assessing carbon emissions, despite acknowledging that HS2 will result in a net increase in emissions:

- The report does not adequately set out any of the detailed inputs that went into the modelling. For example it sets out the biggest reductions in modal shift, but there is no information on who, what, where and when there will be a switch to HS2. There is no information on the assumptions.
- There is no information on increased journeys as a result of HS2. For example, there is a huge park and ride network proposed as part of the

Birmingham Interchange yet no reference is made to the amount of additional journeys that will be likely to this facility.

- There is no information on what freight routes will benefit, how many lorries will be removed from the roads, and where these freight benefits will be realised.
- There is no clear acknowledgement of the likely emissions factors in 22 years time when HS2 starts to have operational improvements. It is highly likely that by then motor vehicles have a much reduced carbon footprint and therefore the benefits are being hugely overstated. HS2 will however still require grid electricity which will continue to be reliant on fossil fuels when opening.
- There is no acknowledgement that the emissions from construction will be well established prior to any improvements generated from the operation of the scheme.
- There is no acknowledgement of what impacts reduced classic lines services in rural areas will have. This is likely to result in increased car journeys.
- The conclusion that there is a 'slight improvement' in emissions within the 120 year life span is not backed up by any evidence or full interrogation of the assumptions for competing modes of transport.
- This rate of decarbonisation of the National Grid is open to extensive debate particularly given the aspirations around energy derived from fracking.

11.2.2. In general, the assessment is based entirely on theories and is not supported by a detailed assessment. The Council raised this as a concern within its response to the draft ES but this does not appear to have been considered.

11.2.3. In addition, the Council also suggested that the scheme should be assessed in accordance with the strategic objectives for HS2. One of the key aims for the Government was to present a low carbon transport scheme that positively contributed to a reduction in carbon emissions. Anything short of a significant reduction in emissions should be considered a failure.

11.2.4. As it is, the scheme is an unmitigated failure in attempting to reduce carbon emissions. The same results are likely from Phase 2 meaning the cumulative impacts are only likely to get much worse.

### **11.3. Problems with Assessing Flights**

11.3.1. The original assessment in the 2011 Appraisal of Sustainability concluded that the scheme could have anything from a slight reduction to a significant increase in emissions. The significance of the increase depended on the extent to which

freed up domestic flights (as a result of passengers switching to HS2) would be transferred to long haul flights. HS2 Ltd no longer feels it necessary to consider this matter:

*This GHG assessment has not included the emissions from additional long-haul flights associated with possible released capacity for three reasons:*

*the reallocation of slots is a commercial matter, primarily for the airlines. Factors that might influence the future use of slots could include passenger demand, airport capacity issues, agreements with airport operators and other local commercial considerations at the time;*

*due to capacity shortages, short-haul and particularly domestic flights are gradually being eroded from London Heathrow, with some relocating to other airports in the south-east. This is increasing the slots available for long-haul flights, regardless of the presence of the Proposed Scheme. The impact of the Proposed Scheme may be limited to simply speeding up what is already happening; and*

*if a small number of domestic flights are liberated at Heathrow (in the context of its total number) and substituted by long-haul flights, it is more likely to slightly increase Heathrow's relative market share of long-haul flights compared to other airports, including competitor European hub airports. Therefore, there is unlikely to be any significant overall change in total European long-haul flights or emissions due to the Proposed Scheme.*

11.3.2. In effect, HS2 does not believe it necessary to assess the impacts on long haul flights, because a) it is unlikely HS2 will have much bearing on domestic flights, and b) it would happen anyway.

11.3.3. These same principles are not applied to other parts of the assessment. For example, it is likely that the number of car journeys would have reduced regardless of HS2 as the price of fuel increases. Yet HS2 Ltd has amended their methodology when considering topics that would help present the scheme more beneficially.

#### **11.4. Conclusion**

11.4.1. It is worrying that the largest transport project for decades will increase carbon emissions. This goes against all the aims and objectives of the Government and the DfT.

11.4.2. As for the assessment, the Council believes this to be entirely flawed, poorly evidenced, full of improbable assumptions and misleading conclusions. The Council does not see how this basic assessment is anyway appropriate to the scale and nature of the scheme.

## **12. Agriculture**

### **12.1. General Comments**

- 12.1.1. CFA reports 6 and 7 reveal a significant loss of agriculture within Hillingdon. CFA6 shows that there will be 110.6 hectares of agricultural land lost to the construction of HS2 with just 5.9 hectares returned on completion. 104.7 hectares will therefore be lost permanently. CFA7 shows that there will be a further 82.8 hectares of designated agricultural land lost due to construction with 42.5 hectares restored and a permanent loss of 40.3 hectares. The total area permanently lost is 145 hectares.
- 12.1.2. The consideration of impacts to agriculture rests primarily with the major agricultural bodies such as the National Farmers Union. The Council will also be making representation as a landowner regarding its own land being lost to the scheme. However, it is evident from the assessment that there will be a significant reduction in available agricultural land.

### **12.2. CFA6**

- 12.2.1. The CFA6 report acknowledges that 9 agricultural holdings from 11 impacted will have an adverse effect. It describes this as significant. It also acknowledges that 10 properties will be significantly affected due to the loss of the holdings they support.
- 12.2.2. No information is provided about what will happen to these buildings or those who currently use them. The ES states:
- HS2 Ltd will continue to negotiate with landowners to reach a mutually beneficial solution. (3.4.29 CFA6)*
- 12.2.3. The ES merely describes the affects of the scheme. It does not provide a commentary on what the loss of 104.7 hectares of agricultural land does to the area, nor does it present any solutions for the continued viability of the holdings and properties it will significantly effect.

### **12.3. CFA7**

- 12.3.1. This CFA report acknowledges the significant effects on one large agricultural holding. Park Lodge Farm will reduce in size by over 80 hectares of which 40 will be restored on completion of construction works.

- 12.3.2. The ES makes a limited assessment of the likely effects from the loss of the area. There is no detailed assessment or clear understanding of how the holding operates presently or will do after the scheme is completed and with a considerable amount of land lost.
- 12.3.3. The ES also suggests that some of the holding impacted is currently contaminated land and therefore not viable for agriculture. It suggests on restoration of this land, the holding may grow which would be a positive.
- 12.3.4. No information is provided about restoration or decontamination of this area to support HS2 Ltd's theories that there will be a net gain. The Council would expect the decontamination of this land to be a bare minimum requirement to compensate for the loss of the Park Lodge Holding.

#### **12.4. Conclusion**

- 12.4.1. The ES does not actually assess the loss of 145 hectares of agricultural land. Instead it merely describes the loss and assigns a weighting to satisfy the EIA Regulations.
- 12.4.2. HS2 Ltd has made no attempt to avoid the significant impacts and having acknowledged them, the ES provides no mitigation to overcome the problems. Instead it relies on solutions that may be found in the future. In other words, the assessment has not yet been completed because HS2 Ltd has no solutions to the significant effects.
- 12.4.3. The area impacted has historically been used for agriculture. HS2 Ltd will remove these historical uses with little regard for the consequences.

## **13. Air Quality**

### **13.1. General Comments**

- 13.1.1. The presence of the Hillingdon AQMA and reference to borough monitoring have been included. There are no automatic, and only limited passive, monitoring devices in the areas in Hillingdon where the main impacts are indicated to occur. The one passive monitoring device is at Warren Road, Ickenham which is not referred to in the report. No additional monitoring has been undertaken by HS2 Ltd to verify the existing background levels. The local air quality modelling carried out by Hillingdon, as part of its local air quality management duties, shows exceedences of the European Union legislation limit values around the main roads of the borough such as the A40 and the residential roads accessing this such as Swakeleys Road.
- 13.1.2. The main receptors of potential air quality impact are defined as those close to construction activity and alongside roads where traffic flows will change as a consequence of construction activity.

#### *Construction Dust Impacts*

- 13.1.3. The methodology for assessment is the Institute of Air Quality Management guidance which is accepted as a suitable approach. The magnitude of the dust impacts in all circumstances i.e. demolition, earthworks, construction and track out, are all identified as negligible impacts. This conclusion is based upon the inclusion of generic mitigation measures set out in the draft Code of Construction Practice (CoCP) and supplemented by Local Environmental Management Plans (LEMP) where appropriate.

#### *Construction Traffic Impacts*

- 13.1.4. The air quality methodology undertaken is accepted as a suitable process for the assessment. The DMRB methodology has been used as a screening tool for the chosen receptors and a congested situation has been built into the assessment to identify areas where queuing traffic might give rise to higher concentrations and require further assessment. A further assessment using ADMS Roads, an atmospheric dispersion model, has been undertaken where average road speeds were identified as 50% of the speed limit. In these situations queue speeds and queue lengths were accounted for in the modelling assessment process. In the absence of information on the

occurrence of queuing, a worse case assumption has been used that queuing occurred between 7am and 7pm.

- 13.1.5. However, there are inherent uncertainties in the modelling and the final results should be treated with caution. Model verification has not been possible within the impacted area itself due to the lack of monitoring sites and the modelling results have used the Defra background maps to predict the future 2017 concentrations which are optimistic in regards to predicted drops in future years. Concentrations of nitrogen dioxide in Hillingdon, along with other London boroughs, have not been declining as expected, especially in areas close to main roads. This is due to expected improvements in road vehicle technology not delivering the actual reductions assumed. A more rigorous approach would have been to include a sensitivity test assuming no reduction in concentrations in future years i.e. 2017. Without this sensitivity test the results should be viewed as potentially optimistic. The assumption of the numbers of HGVs and the actual routes taken is crucial to the outcome of the air quality assessment. Any uncertainty in regards to this input will impact on the accuracy of the results.

## **13.2. South Ruislip to Ickenham Community Forum Area 6**

### *Dust Impacts*

- 13.2.1. Dust generating activities are identified as occurring at the major construction sites for the Northolt tunnel and the South Ruislip Vent Shaft. In addition the TBM drive site, the construction of the railhead at West Ruislip, the Breakspear Road South/River Pinn bridge works and the embankment and cuttings works are all potential dust emitting activities.
- 13.2.2. The conclusion is that generic mitigation measures identified in the CoCP along with use of LEMPS is expected to reduce any construction dust impacts to be negligible.

### *Construction Traffic Impacts*

- 13.2.3. Construction activity is identified as affecting local air quality where construction vehicles impact on the traffic levels generated on local roads near residential areas.
- 13.2.4. The construction traffic is associated with earthworks (including West Ruislip embankment works) and the West Ruislip tunnel portal. Vehicle movements associated with these works will travel via Harvil Road and Swakeleys Road to/from the A40.

- 13.2.5. The conclusion in the report is that the NO<sub>2</sub> impacts will give rise to temporary significant effects at properties close to the B467 Swakeley Road, between Harvil Road and the A40 roundabout, and west of the A40 roundabout. The peak effects are stated as being expected to last one year.
- 13.2.6. Following the construction of the temporary railhead in 2018, air quality effects associated with construction traffic are stated as typically reducing as the majority of excavated material will be transported via the rail network instead of local roads.

### **13.3. Assessment of Significance**

#### *Construction Dust*

- 13.3.1. It is not possible to support the ES conclusion with the regard to construction dust. The conclusion that the impacts will be negligible depends entirely on the robustness of, and the implementation and enforcement of, the final code of construction practice, the Local Environmental Management Plan to be drawn up with the local authority and, in terms of track-out, the accuracy of the assumptions associated with HGV movements. There is insufficient information provided in the ES to allow any meaningful discussion on this issue at this stage. In regards to the construction of, and then the operation of, the railhead, this is not clear in the documentation and there is insufficient information on the routes to the sustainable placement areas (dumping sites).

#### *Construction Traffic*

- 13.3.2. The conclusion that the scheme will give rise to significant effects which are substantially adverse is accepted. The detailed modelling results indicate a substantial worsening of exceedences of the EU limit value for annual mean nitrogen dioxide.
- 13.3.3. There are substantial adverse effects at receptors in the following areas:
- Swakeleys Road, between A40 and Breakspear Road;
  - Warren Road near junction with Swakeleys Road;
  - Roker Park Avenue, close to junction with Swakeleys Road;
  - Shorediche Close, at facade closest to Swakeleys Road.
- 13.3.4. There are moderate adverse effects at receptors in the following areas:
- Woodhall Close, two properties with rear facades close to A40;
  - Park Road, closest to junction with A40.

- 13.3.5. To clarify, these receptors are already predicted to be above the EU limit value as set to protect human health and the proposed scheme worsens this situation.
- 13.3.6. As a specific example, a receptor on a road such as Warren Road, near to Swakeleys Road and the A40 junction, is predicted to suffer an uplift in concentrations of 10.5ug/m<sup>3</sup>.
- 13.3.7. There are no mitigation measures suggested in the report to address this issue or give any reassurance that the effects will be “temporary” as described. There is no detail behind the statement that the peak effects are expected to last one year. Whilst the assessment looks at worst case, it is important to understand the ongoing impacts and the time scales involved. This is especially critical in areas which are already in exceedance of European legislation.
- 13.3.8. The inclusion of a rail head in the proposed scheme is stated as reducing the air quality impacts as the majority of excavated material will be moved by rail as opposed to road. There is no further detail as to when this will be fully operational and how many road movements will be reduced and on which roads. The document refers to an air quality assessment of the rail head. It states:
- There will be additional train movements at the rail head to move 1.7 million cubic metres of material from London. This is equivalent to 16 trains movements a day for 18 months or 12 train movements a day for two years.*
- There are no residential buildings within 30m of the railway tracks at the rail head and therefore any impacts with the rail head will be negligible.*
- 13.3.9. This is not an air quality assessment it is a statement of facts. There has been no attempt made to demonstrate how this will impact on air quality levels arising from the construction activity e.g. how many construction lorries will be removed from the roads, which roads will be affected, how long the rail head will operate for.

#### *Operational effects*

- 13.3.10. No impacts on air quality are identified as arising from the operation of the proposed scheme. The operation of the vent shaft and the operation of the trains are not anticipated to be sources of local air quality emissions.

### *Mitigation*

- 13.3.11. There must be an effective monitoring regime put in place now across the potentially impacted areas at the worst case receptor locations. This must cover the receptors likely to be impacted from the construction dust impacts and those that will be impacted by the road traffic activity. Due to the lack of any current monitoring in the area this must be established as soon as possible to obtain an accurate baseline. This will form the baseline from which measures put in place via the code of construction practice and the LEMPs are monitored in regard to effectiveness.
- 13.3.12. The most effective mitigation would be to avoid the use of construction routes which impact on residential areas. In the absence of this, the vehicles used on the construction routes must, where possible, be low emission vehicles.

## **13.4. Colne Valley Community Forum Area 7**

### *Dust Impacts*

- 13.4.1. Dust generating activities are identified as occurring as a consequence of construction activity. Notable receptors in close proximity to these areas in Hillingdon are identified as residential properties at Dew's Farm Cottages and Weybeards Cottages. It should be noted that demolitions are identified as being required at Dew's Farm Cottages.
- 13.4.2. No reference has been made in regard to the sustainable placement areas (dumping sites) in relation to emissions of dust.
- 13.4.3. The conclusion is that mitigation measures identified in the CoCP along with the use of LEMPS is expected to reduce any construction dust impacts to be negligible.

### *Construction Traffic Impacts*

- 13.4.4. Construction activity is identified as affecting local air quality where construction traffic impacts on the traffic levels generated on local roads near residential areas, or by changes to traffic flows from temporary road diversions or realignment of roads.
- 13.4.5. Of the roads included in the air quality assessment, substantial adverse impacts have been identified at residential receptors on Swakeleys Road between Harvil Road and the A40. This overlaps with the Community Forum Area 6 where these roads have also been identified as construction routes.

- 13.4.6. These effects are identified as of limited duration and limited to within a few metres of the roadside

### **13.5. Assessment of Significance**

#### *Construction Dust*

- 13.5.1. It is not possible to support the ES conclusion with the regard to construction dust. The conclusion that the impacts will be negligible depends entirely on the robustness of, and the implementation and enforcement of, the final code of construction practice, the Local Environmental Management Plan to be drawn up with the local authority and, in terms of track-out, the accuracy of the assumptions for HGV movements. There is insufficient information provided in the ES to allow any meaningful discussion on this issue at this stage.

#### *Construction Traffic*

- 13.5.2. The conclusion that the scheme will give rise to significant effects which are substantially adverse is supported. The detailed modelling results indicate a substantial worsening of exceedences of the EU limit value for annual mean nitrogen dioxide. This occurs at several receptors along Swakeleys Road between Harvil Road and the A40.
- 13.5.3. To clarify, apart from Harvil Road which despite having an identified receptor point appears to have been omitted from the modelling assessment, these receptors are already predicted to be above the EU limit value as set to protect human health and the proposed scheme worsens this situation.
- 13.5.4. As a specific example, a receptor on a road such as Swakeleys Road close to the junction with Harvil Road, is predicted to suffer an uplift in concentrations of 7.8ug/m<sup>3</sup>.
- 13.5.5. There is no explanation in the text as to why any receptor in Harvil Road has not been subjected to any of the air quality modelling assessment stages. There are residential receptors at the first part of Harvil Road with the junction with Swakeleys Road, and this is an omission especially if this is an identified construction traffic route.
- 13.5.6. There are no mitigation measures suggested in the report to address this issue or give any reassurance that the effects will be “of limited duration and limited to within a few metres of the roadside”. No dispersion modelling with contour plots has been provided to allow for any spatial assessment of this aspect. Whilst the assessment looks at worse case, it is important to understand the

ongoing impacts and the time scales involved. This is especially critical in areas which are already in exceedence of European legislation.

### **13.6. Operational Effects**

- 13.6.1. No impacts on air quality are identified as arising from the operation of the proposed scheme. There is no reference to road realignments or any potential impacts this may have on existing residential receptors.

### **13.7. Mitigation**

- 13.7.1. The impacts on air quality support the need for a tunnel. Worsening air quality in areas already suffering is not acceptable. These impacts reduce the quality of life and increase health impacts.
- 13.7.2. However, if a tunnel were unfeasible once properly investigated, the measures outlined below are mandatory.
- 13.7.3. There must be an effective monitoring regime put in place now across the potentially impacted areas at the worse case receptor locations. This must cover the receptors likely to be impacted from the construction dust impacts and those that will be impacted by the road traffic activity. Due to the lack of any current monitoring in the area this must be established as soon as possible to obtain an accurate baseline. This will form the baseline from which measures put in place via the code of construction practice and the LEMPs are monitored in regard to effectiveness.
- 13.7.4. The most effective mitigation would be to use construction routes that avoid impacts on residential areas. In the absence of this, HS2 Ltd must develop an Air Quality Action Plan specific to this area. This should include measures to avoid increasing traffic in peak hours, the use of low emission vehicles, appropriate driver training and to develop other exemplary and innovative approaches consistent with a multi billion pound public scheme.

## **14. Community**

### **14.1. General Comments**

14.1.1. It is acknowledged and supported that the inclusion of a tunnel from Northolt to west Ruislip will reduce a number of community impacts from the scheme. It is also acknowledged that there will always be residual impacts on communities, largely through disruption from construction associated with new building projects.

14.1.2. However, the Council is disappointed and concerned about the extent of the assessment on community impacts for this ES. There are a number of community impacts that have been ignored, understated or misrepresented in the ES.

#### *Reliance on the Code of Construction Practice*

14.1.3. The assessment relies solely on the draft Code of Construction Practice to reduce the significant effects outlined in the ES. Unfortunately, the draft COCP is only a generic document. Many of the significant effects outlined in the ES require bespoke solutions. The reliance on the draft COCP means that HS2 Ltd are deferring responsibility to properly mitigate effects until a date in time when they are the primary body responsible. The ES therefore provides no comfort at this stage as to how residents will be protected from significant effects. Instead, residents are effectively asked to 'trust' HS2 Ltd that a solution will be found some time in the future.

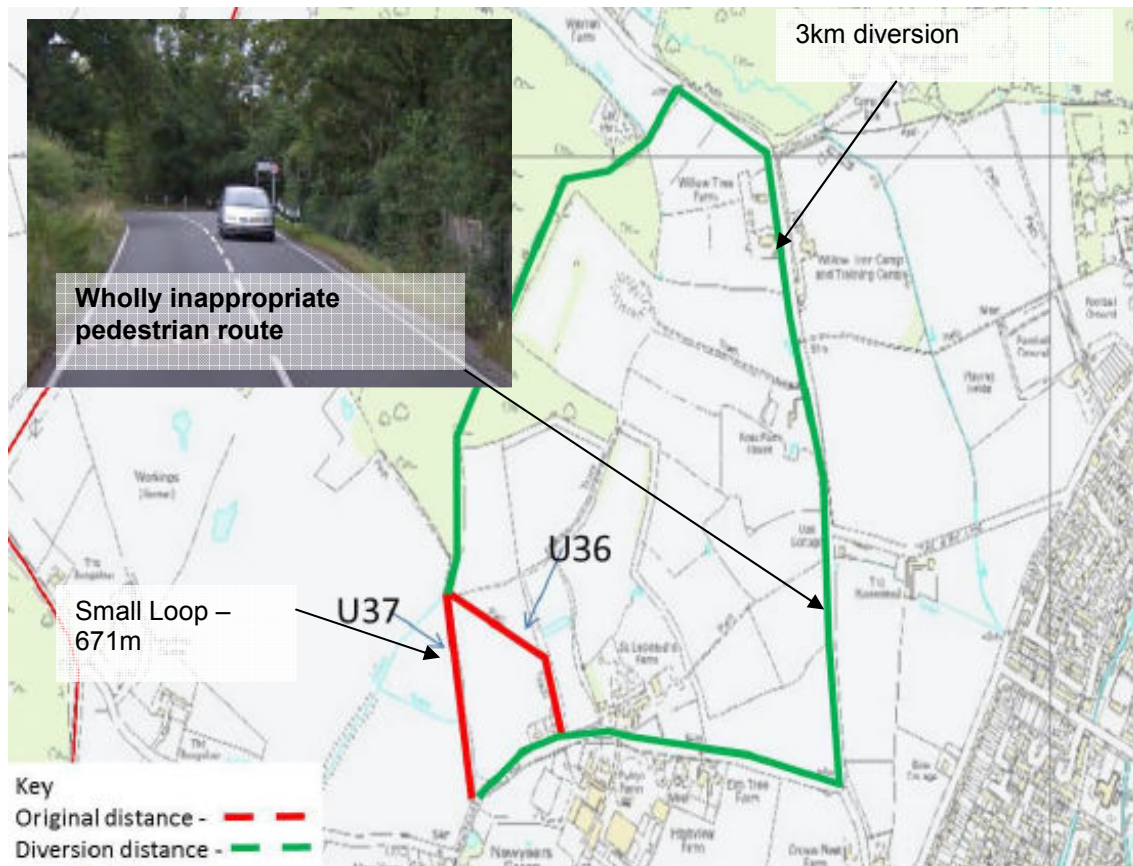
#### *No Impact to Existing Services*

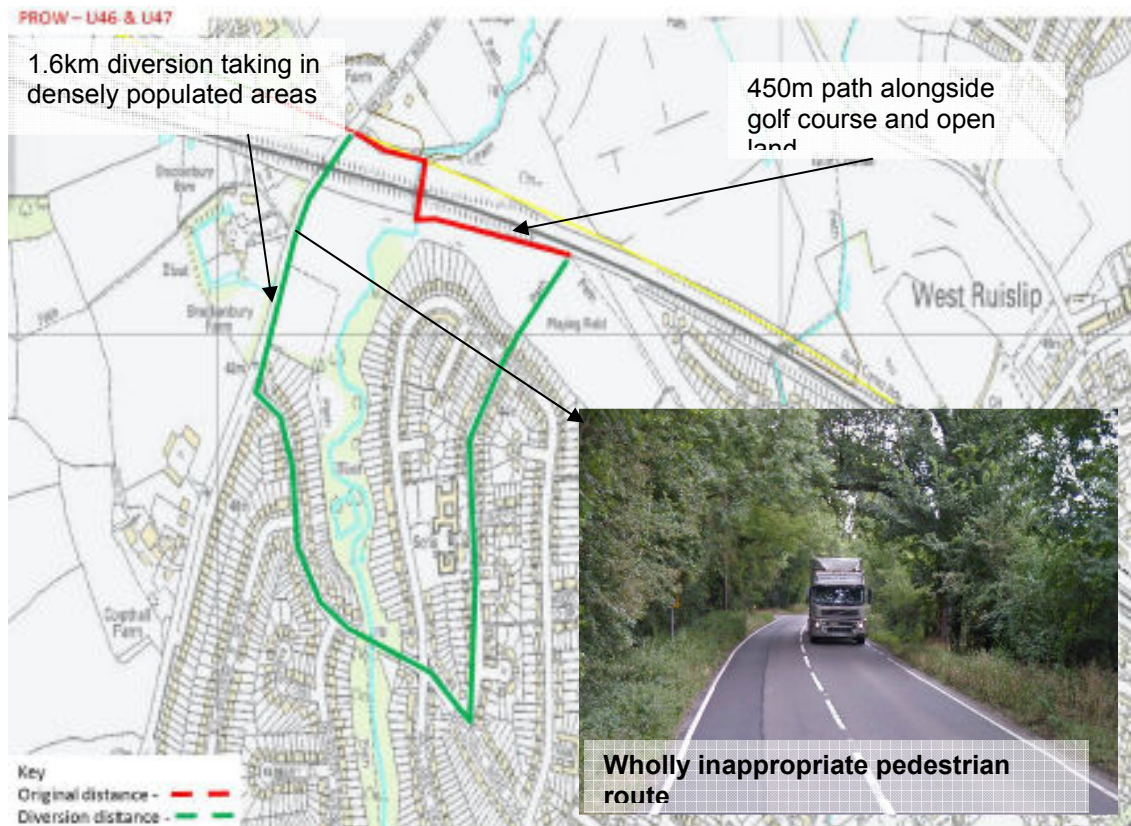
14.1.4. HS2 Ltd has stated consistently that there will be no disruption to existing rail or underground services. HS2 has the potential to impact on both the Chiltern Railway network and the London Underground (Central Line). To some extent, the Council has to trust HS2 Ltd that there will be no disruption to the relevant services due to the lack of assessment to scrutinise. However, given the reliability of other parts of the assessment in the ES, the Council would seek an undertaking from Parliament that no services will be disrupted by HS2.

### **14.2. Public Rights of Way**

14.2.1. The report (5.4.19) refers to the impacts on rights of way but suggests there will be minimal community disruption due to the inclusion of diversions.

- 14.2.2. Firstly there are a number of PROW diversions that will be enforced in CFA reports 6 and 7. These PROWs currently take users into open countryside and away from urban life. They are highly valued. Secondly, the diversions are fundamentally dangerous and the Council would have no choice but to urge residents not to use them as they pose a serious threat to life.
- 14.2.3. The maps below clearly reveal HS2 Ltd has never been to the area and do not understand the implications of the proposals. These maps are just two examples from CFA6. There are other examples for CFA7 outlined in the next section but maps have not been provided by HS2 Ltd.
- 14.2.4. The second of these maps show not only a 1.6km diversion, but also that this diversion takes in a road that is fundamentally unsuitable for pedestrians; a road that HS2 Ltd will use for extensive vehicular traffic including HGVs.
- 14.2.5. HS2 Ltd cannot suggest that the diversions reduce the impacts on community facilities to negligible. In effect the diversions are unusable in most instances resulting in a complete lack of facilities. Based on the ES presented there will be significant disruption to PROWs without any usable alternative.





### Rights of Way Diversions

14.2.6. The table below sets out the extent of rights of way diversion as a result of HS2.

Public Right of Way	Additional Route	Duration
Public Footpath U81	Hillingdon Trail	4 years
Public Footpath U46		4 years
Public Footpath U45	Celandine Route	4 years
Public Footpath U43		4 years
Public Footpath U51		4 years
Public Bridleway U42	Grand Union Canal Circular Walk	5 years
Public Footpath U36		6 years
Public Footpath U37	Permissive Bridleway & Grand Union Canal Circular Walk	6 years
Public Footpath U38		6 years
Public Footpath U49	Grand Union Canal Circular Walk	6 years
Public Footpath U30		7 years
Public Footpath U31		7 years
Public Footpath U32		7 years
Public Footpath U75	GUC / Grand Union Canal Circular Walk, Colne Valley Trail, London Loop, permissive bridleway	3 years-6 months
Public Footpath U34	Grand Union Canal Circular Walk, permissive bridleway	4 years
Public Footpath U81	Hillingdon Trail	Permanent

Public Footpath U46		Permanent
Public Footpath U45	Celandine Route	Permanent
Public Bridleway U42	Grand Union Canal Circular Walk	Permanent
Public Footpath U34	Grand Union Canal Circular Walk, permissive bridleway	Permanent
Public Footpath R146 – continuation of U81	Hillingdon trail	Not assessed
Public Footpath U47 – continuation of U45 & U46	Celandine Route	Not assessed
Public Footpath U84 - continuation of U51		Not assessed
U50 – continuation of U49 via Harvil Road	Grand Union Canal Circular Walk	Not assessed

*Public Footpath U81 & R146*

14.2.7. From north side of The Greenway via R146 in Ruislip golf course to Clack Lane, Ruislip. Diversion route via The Greenway, Ickenham Road, Hill Lane and Clack Lane.

14.2.8. The proposed diversion route is considered acceptable.

*Public Footpath U46 & U45 & U47*

14.2.9. From the east side of Breakspear Road South connecting with footpath U45. Diversion route Hoylake Crescent, Bushey Road, Copthall Road East and Breakspear Road South.

14.2.10. This proposed diversion route not considered acceptable for a number of reasons. In reality this also includes diversion of footpaths U45 and U47, though no mention of U45 is made in the ES. This section of footpath forms the hub of connectivity between north and south and west to east towards the Grand Union Canal, Denham Country Park, Ruislip Woods National Nature Reserve, Newyears Green and the countryside beyond, Ruislip golf course and the Celandine Route. The time and length of the diversion can be considered very high but the proposed route along Breakspear Road South cannot be considered acceptable on health and safety grounds. As set out earlier in this section Breakspear Road South contains no footways and is a very busy commuter route. With the temporary closure of U81 to the east and the proposed closure of U43 to the north it is vital that connectivity remains intact, the routes of U45 and U47 should therefore be accommodated during the construction period via the bank side of the River Pinn or by staged management or by providing a temporary tunnel.

### *Public Footpath U43*

- 14.2.11. From the east side of Breakspear Road South connecting with footpaths U44 & U45. Diversion route Breakspear Road South, Tile Kiln Lane and Clack Lane via R183 & R144.
- 14.2.12. A diversion of this route is not suitable due to its isolated start point on Breakspear Road South, the lack of direct connectivity to an adjoining PRow and considering Breakspear Road South cannot be considered acceptable on health and safety grounds. In addition, information offered is conflicting with section 2.3.37 of the CFA 6 states that the footpath would be diverted for 3 months while the volume 5 appendix states 4 years.

### *Public Footpath U51 & U84*

- 14.2.13. From east side of Breakspear Road South to Copthall Road West. Diversion route Breakspear Road South and Copthall Road West.
- 14.2.14. With the proposed temporary closure of U46 to the north this footpath maintains a vital link to U45 and U47 via the Celandine Route and U49 to the west that carries the Grand Union Canal Circular Walk and links into Buckinghamshire and the Grand Union Canal. The diversion route is not considered acceptable on health and safety grounds as Breakspear Road South contains no footways and is a very busy commuter route. U51 should therefore be accommodated by routing the footpath around the edge of the meadow area protected from operations by appropriate fencing. Information offered is conflicting as CFA 6 makes no mention of this footpath.

### *Public Bridleway U42*

- 14.2.15. From west side of Breakspear Road South connecting to Newyears Green Lane. Diversion route Newyears Green Lane and footpath U41.
- 14.2.16. Though the temporary loss of bridleway provisions will be a significant loss the proposed diversion route is considered acceptable considering connectivity to U37.

### *Public Footpaths U36 & U37*

- 14.2.17. From the north side of Newyears Green Lane connecting to the footpath U86. Diversion route Newyears Green Lane, Breakspear Road South, Breakspear Road North and footpath U86

14.2.18. This proposed diversion route is not considered acceptable for a number of reasons. Footpath U37 or U36 provide connectivity between Bayhurst Wood and Harefield, U37 also carries permissive bridleway rights which forms part of a wider off road network for equestrian use into Bayhurst Wood and beyond. It also carries the Grand Union Canal Circular Walk. The length of the diversion can be considered extremely long, but the proposed route along Breakspear Road North, Breakspear Road South and Newyears Green Lane cannot be considered acceptable on health and safety grounds. None of these roads carry footways and all are very busy commuter routes. U36 could be diverted onto U37 or vice versa with the route diverted around the field edge with appropriate fenced during operations. U37 is a hedged lane and as such can be managed by using alternative entrance points.

*Public Footpaths U38*

14.2.19. From north side of Newyears Green Lane connecting with Breakspear Road South. Diversion Route of Newyears Green Lane and Breakspear Road South.

14.2.20. This proposed diversion route is not considered acceptable as on health and safety grounds. The roads on to which the diversion carried pedestrians have no footways and both are very busy commuter routes. U38 should therefore be accommodated by routing the footpath around the edge of the meadow area protected from operations by appropriate fencing.

*Public Footpath U49*

14.2.21. From east side of Harvil Road to Breakspear Road South.

14.2.22. Diversion route footpath east of Uxbridge Golf Course, The Drive, Highfield Drive, Harvil Road and Breakspear Road south.

14.2.23. This proposed diversion route not considered acceptable. The proposed route along The Drive, Highfield Drive and Breakspear Road South cannot be considered acceptable on health and safety grounds, these roads carry no footways, the diversion is also considered extremely long. U49 should therefore be accommodated by routing the footpath around the edge of the meadow area protected from operations by appropriate fencing.

*Public Footpath U30*

14.2.24. Diversion route will run north along Harvil Road to footpath U29 before following U29 to its junction with U30. The footpath will be temporarily closed from Harvil Road to footpath U29.

14.2.25. The proposed diversion route is considered acceptable.

*Public Footpaths U31*

14.2.26. The diversion route will follow Harvil Road to the north before turning north east along U29 to path U31. Routes eastwards from here will follow the diversion of U31 below. The footpath will be temporarily closed from Harvil Road to footpath U31.

14.2.27. The diversion route will be along an unnamed footpath northwards before running eastwards along an unnamed footpath on a farm track towards Bayhurst Wood. It will then turn south towards U35 along another unnamed footpath. The footpath will be temporarily closed from a point approximately 100m east of Park Lodge Farm to the junction with footpaths U35 and U32.

*Public Footpaths U32*

14.2.28. The diversion route will be along an unnamed footpath on a farm track east towards Bayhurst Wood before turning south towards U35 along another unnamed footpath. The footpath will be temporarily closed from a point approximately 100m east of Park Lodge Farm to the junction with footpaths U35 and U31

14.2.29. The Proposed diversion routes for U31 and U32 follow the same route and provide connectivity and therefore can be considered acceptable. It is not clear, but it is understood that this section forms part of the Hillingdon Trail which borders the edge of a meadow and does not run along a defined farm track as described. This can be mitigated by providing appropriate fencing to protect the users from operations.

*Public Footpath U81*

14.2.30. Footpath U81 from the north side of The Greenway to footpath R146 in Ruislip Golf Course – 140m diversion (minor adverse affect)

14.2.31. This permanent diversion is not considered acceptable. The current footpath carries the Hillingdon Trail and passes underneath the Chiltern Line via a tunnel. The preferred diversion option would be to continue the footpath on the existing line of the route via a tunnel construction. The proximity to the west Ruislip portal should not be considered an obstruction to this method. The Council has to consider the Equality Act 2010 and the least restrictive option in considering public footpath orders, the creation of a footbridge structure would not adhere to the least restrictive option and could lead to this route and section

of the Hillingdon Trail not being available to less able members of the community.

#### *Public Footpaths U45 & U46*

- 14.2.32. Footpath U46 from the east side of Breakspear Road South connecting with footpath U45 and U47-25m diversion (not significant)
- 14.2.33. The permanent diversions of U45 and U46 are considered acceptable but should be considered with the proposed diversion of Bridleway U42. The two routes should effectively join on either side of Breakspear Road South to maintain connectivity and avoid walking along the road to find alternative links. The River Pinn bridge construction should also take into consideration the recorded width of 3-4 m on footpath U47.

#### *Public Bridleway U42*

- 14.2.34. Bridleway U42 from west side of Breakspear Road South connecting to Newyears Green Lane-145m diversion (minor adverse affect)
- 14.2.35. This permanent diversion is not considered acceptable due to diversion route not connecting to either public footpaths U46 and U43. This forces users onto Breakspear Road South. It is not obvious from the mapping why the new route would have to divert so far north from its existing route. The bridleway could be diverted to the north of Gatemead Farm to connect with the proposed diversion of U46. This proposal would be considered acceptable if network continuity can be provided. No precise details have been given and there is a length difference of 106m to 145m from the information provided in CFA 6 and the proposed scheme description.
- 14.2.36. Description of identified Public Rights of Way temporary diversions - Community Forum Area 7 – Colne Valley and Volume 5 appendix Transport Assessment

#### *Public Footpath U75*

- 14.2.37. Footpath U75-colne Valley Trail (footpath,bridleway,cycleway)Diversion route-temporary offline diversion of the tow path on the west side of the canal across PRow U50 to the existing tracks/pathways U35 on the east side, London Loop Trail & Moorhall Road.
- 14.2.38. This diversion is not considered acceptable. No details have been given and the information provided above indicates a diversion to the east of the Grand Union Canal via footpath U50 and onto Harvil Road which holds heavy traffic

and carries no footway. No map has been provided in the volume 5 and the CFA 6 Map Book offers no insight.

- 14.2.39. A temporary diversion of U75 to the west of the Grand Union Canal would offer a much more realistic approach.

#### *Public Footpath U34*

- 14.2.40. A temporary alternative route for footpath U34, to the east for a period of approximately 3 years and 9 months adding a negligible distance.
- 14.2.41. This route is not considered acceptable. No clear information is given in the CFA 7 or volume 5 appendixes. The CFA map book appears to show the diversion along a site access road which for safety reasons would not be acceptable. A preferred route would be to follow the Newyears Green Bourne; this would keep the route closer to its existing line and offer better views to the user.

#### *Public Footpath U34*

- 14.2.42. Reinstated on permanent diversion route following completion of Colne Valley viaduct works.
- 14.2.43. The preferred route for a permanent diversion would be to follow the Newyears Green Bourne. This would keep the route closer to its existing line and offer better views to the user.

#### *Further mitigation measures*

- 14.2.44. The creation of a Public Right of Way from opposite the tip of the proposed diversion of footpath U34, Harvil Road, following the northern edge of Copthall cutting to connect to Bridleway U42, this would greatly enhance the connectivity of the network north of the Chiltern Line on Harvil Road.

### **14.3. CFA6**

#### *Residential Properties*

- 14.3.1. Paragraph 5.4.6 acknowledges that approximately 30 properties on the northern side of the Greenway are expected to experience significant combined noise and visual effects during construction. A further 50 properties on Harvil Road (from the junction with Highfield Road, north to Harvil Farm) and on Breakspear Road South (from the junction with Swakeleys Road north to

Copthall Farm) will also suffer. These findings do correspond with the assessment from the Noise chapter.

- 14.3.2. There is no proposed mitigation for these properties or specific measures. There is not even a reference to the draft COCP.

#### *Community Infrastructure*

- 14.3.3. HS2 Ltd acknowledges that there will be significant disruption to Ruislip Golf Course. Attempts have been made by the Council to formally engage with HS2 Ltd prior to the submission of the ES to discuss the Golf Course. HS2 Ltd has been unwilling or unable to provide the level of information required to do this and effectively wanted to discuss solutions without presenting the impacts.
- 14.3.4. No further land has been safeguarded and it is difficult to see what additional land could be used to make up for the loss of the three holes. A potential solution has yet to be presented, if one exists, and the lack of professional engagement from HS2 Ltd has prevented discussions. Subsequent impacts on other landowners have therefore not been considered in the ES or through any other consultation.
- 14.3.5. The ES also identifies significant impacts at the Blenheim Care Centre (5.4.10) and the Church of Jesus Christ Latter Day Saints on Ickenham Road (5.4.11). The ES does not set out any methods for reducing these effects to enable the facilities to be able to continue to operate.

#### **14.4. Assessment of Significance**

- 14.4.1. The ES makes a number of ill informed conclusions which results in misrepresentation of the effects.
- 14.4.2. There is reliance on as yet unknown mitigation measures to alleviate problems identified at three community facilities and 80 residential properties. There is nothing in the ES to provide comfort to the residents that their communities have and will be protected.

#### **14.5. CFA7**

- 14.5.1. The principle community concerns outlined within CFA7 relate the loss of the Hillingdon Outdoor Activity Centre (HOAC), loss of value of the Colne Valley, and several public rights of way diversions.

## HOAC

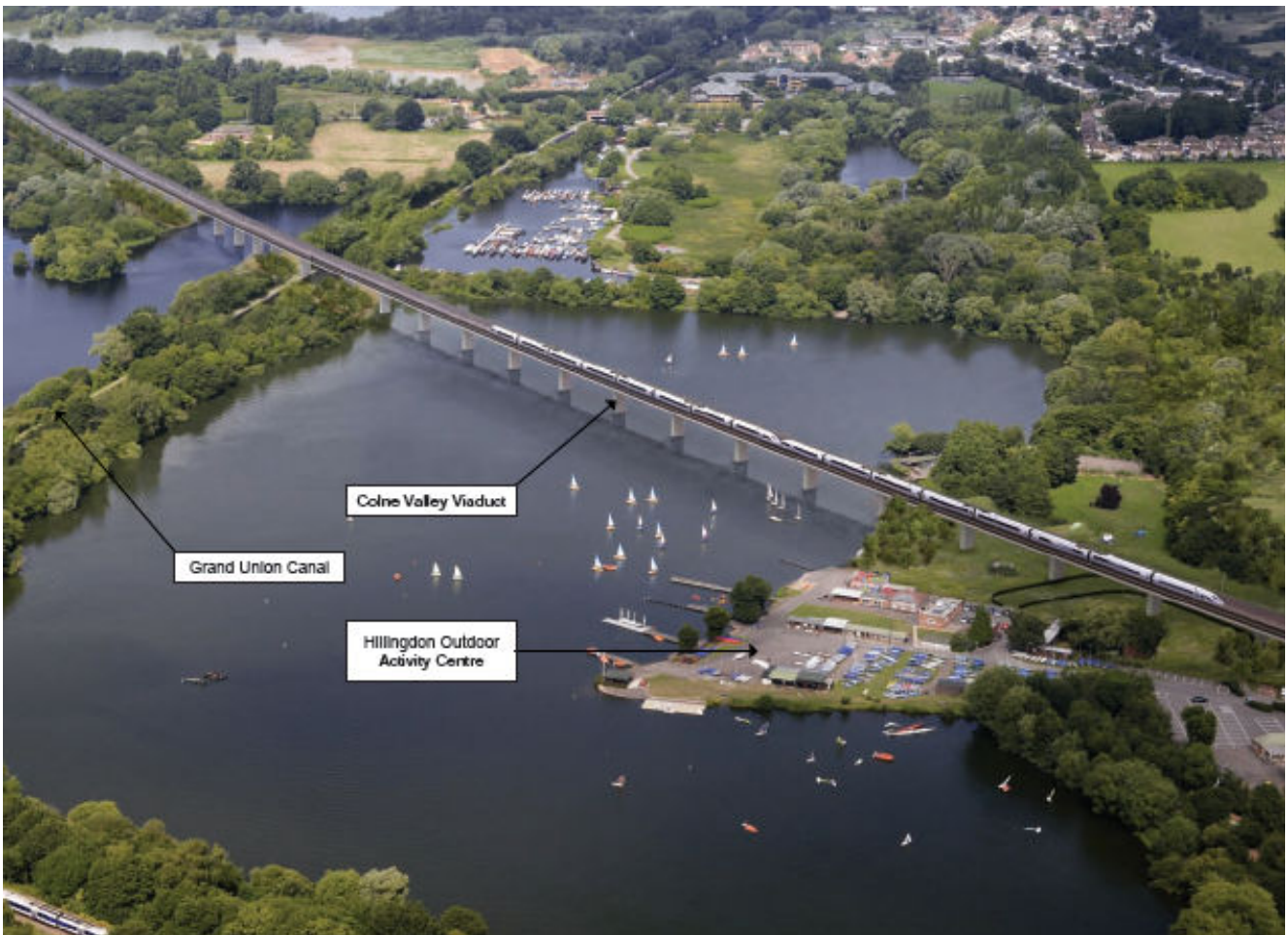
14.5.2. HOAC is an essential community facility for more than just Hillingdon. It serves a much wider catchment. Isolating HOAC as a facility within CFA7 alone misrepresents its function and demonstrates the limitations of the approach to the assessment. HOAC is a unique resource serving the whole of west London:

- HOAC is a registered outdoor and environmental educational charity which serves Hillingdon and the whole of the West London community and focuses on disadvantaged and disabled youth.
- The centre is operated as a unique partnership arrangement between the charity and the London Borough of Hillingdon who support and sponsor the centre.
- Over 22,000 young people from a wide range of economic and ethnic backgrounds come to the centre from many localities, but especially West London, as there is nothing else comparable.
- It is also a valuable leisure resource for people of all ages.
- The centre is located in the green belt of Hillingdon just inside the M25 and often provides young people with their first 'country' experience which is enhanced when they make use of the campsite.

14.5.3. HOAC has grown gradually over many years. The Council and the tenants of HOAC have consistently made it clear that it cannot envisage a scenario where it closes for a matter of years and then reopen. It is surprising that the ES still does not make this acknowledgement. HS2 Ltd is not in a position to determine the viability of HOAC upon closure for two years. Paragraph 5.5.4 of CFA7 states:

*In the event that it does prove possible for HOAC to continue to operate during construction as a result of on-going discussions or alternatively, HOAC is re-established on its existing location after construction then there will be an impact during the operation of the Proposed Scheme. This will include changes to the areas used for their on-site activities and storage and restrictions on the use of the lake, affecting water-based activities as a result of the Colne Valley viaduct.*

14.5.4. CFA7 presents an image showing HOAC and HS2 operating concurrently. The Council and HOAC have made it plainly clear that this scenario cannot happen. HS2 Ltd's presentation of HOAC and the viaduct ignores all advice given by the site owners and the Council.



14.5.5. The Council maintains that HOAC cannot function whilst construction takes place, and once closed, will be all but impossible to return to the same location:

- The significant break in business would result in the loss of the community and business base, and also the valuable staff experience that currently exists.
- It would clearly be impossible for the centre to operate while construction took place. It would not be possible for the Council to secure a new tenant until there was clarity about when the construction would finish.
- The Council would need to make an assessment of the facility post completion to understand the restrictions placed on it by a high speed line running overhead. The facility could only go to market once appropriate assessments have been carried out.
- It is likely that the facility would be heavily compromised by the viaduct, shading and noise of up to 36 trains per hour.

14.5.6. The ES makes no assessment of the effects if the facility was lost permanently. No meaningful progress has been made in finding an alternative site. HS2 Ltd has been unable to disclose their methodology for finding a new site,

compensation for the loss of HOAC or how the community will be recompensed.

### *Colne Valley Impacts*

- 14.5.7. The ES acknowledges in the summary that the impacts on Colne Valley are important, but this is not reflected in the supporting text. There is no reference to the impacts in the Colne Valley from construction and it only refers to the operational impacts in respect of HOAC.
- 14.5.8. In reality the construction of the viaduct will completely change the amenity value of the Colne Valley for several years, if not actually in perpetuity. HS2's acknowledgement that HOAC would be harmed by visual and noise impacts from the operation of HS2 extends to the whole of the Colne Valley.
- 14.5.9. The assessment is insufficient in its consideration of the Colne Valley. It fails to even describe the effects let alone present solutions or compensation.

### **14.6. Assessment of Significance**

- 14.6.1. The ES concludes that there will be significant effects in the Colne Valley but then does not outline what HS2 Ltd will do about them. The whole assessment is far from adequate and is not reflective of the value of the Colne Valley.

### **14.7. Cumulative Effects CFA6 and 7**

- 14.7.1. The decision to split up the CFAs and treat them in isolation allows HS2 Ltd to decouple the inherently linked community facilities of CFAs 6, 7 and 8. The best example of this is the treatment of HOAC. This is a hugely important facility for the communities in CFA6 and beyond yet it gets no mention.
- 14.7.2. The outcome of the scheme will be that a golf course is restricted or potentially closed, an outdoor activity centre is lost, a rifle club is relocated or lost entirely and one of the most pleasant and open areas of west London is completely transformed for the worse.
- 14.7.3. The cumulative PROW diversions are also a concern. Many of the areas enjoyed by residents will now be inaccessible with diversions taking pedestrian through densely populated urban areas and in some instances, on to roads that can best be described as lethal.

## **14.8. Unassessed Impacts in CFA6 and 7**

- 14.8.1. There are a number of impacts outlined in other topic areas that have not been properly assessed in respect of their impacts on local communities
- The noise section reveals that there will be significant operational noise impacts on the Greenway, whilst the community CFA chapter only describes construction issues.
  - There will be a 5m high noise barrier along the railway fundamentally changing the landscape for the Greenway yet this is not assessed.
  - It is acknowledged that air quality will worsen dramatically in certain parts of CFA6 which will impact on health and wellbeing of communities.
  - The extent of traffic and construction throughout CFA reports 6 and 7 is given little consideration within the community chapters.
  - The noise and landscape impacts in the Colne Valley have been entirely omitted from the community section.

## **14.9. Conclusion**

- 14.9.1. The ES is incomplete in its assessment of the community impacts. In some instances significant effects have been ignored entirely, and where significant effects have been acknowledged there is still no mitigation proposed.
- 14.9.2. The reliance on the draft COCP and a generic list of measures provides no comfort to communities that their impacts have been taken seriously.
- 14.9.3. The poor quality of the ES means that many of these issues will have to be dealt with through the petitioning stage at further expense to the public purse.

## **14.10. Proposed Mitigation**

- 14.10.1. The scheme will result in significant community effects in CFA6 and 7. This once again supports the conclusion that the only suitable alternative is to continue the tunnel from West Ruislip to west of the Colne Valley.
- 14.10.2. If the tunnel is found to be unfeasible after a proper assessment has been completed, the following mitigation measures are necessary:
- An undertaking from Parliament that the construction and operation of HS2 will not disrupt the timetables of other rail services, particularly the Chiltern Railway and the London Underground (Central Line)
  - To undertake a more robust appraisal of the community impacts with cross references to other topic areas.

- To fully understand the community impacts from construction and operational noise in the Colne Valley and present a workable solution that does not diminish enjoyment in the area.
- Provide details of the specific measures to reduce the significant effects identified. These should be location specific and not generic i.e. how will impacts on Blenheim Care Centre and the Church of Jesus Christ Latter Day Saints on Ickenham Road be rectified.
- To find a suitable solution for HOAC that retains the existing staff and continues to support the 22,000 users without a break.
- To find a suitable solution for Ruislip Golf Course that enables it to continue to operate as a viable business.
- To present a suitable solution for the Rifle Club.
- To devise and implement a vision that sees a significant community output from the ecological mitigation works and the placement of excavated material.

## **15. Cultural Heritage**

### **15.1. General comments**

- 15.1.1. The Council has been inundated with unnecessary information, and a lack of relevant and detailed information in those areas that really matter i.e. adjacent to the viaduct and those areas earmarked for work related operations that lie close to heritage assets.
- 15.1.2. The baseline historical reports are interesting, but quite general for the Borough. Much of the important specific detailing is missing though. For example there is a lack of detailed information on the height and design of the viaduct and its approaches, including acoustic screens, catenary, embankments, etc... This makes commenting on its visual impact very difficult, particularly as it is impossible to know how much of the existing tree screening, or new screening will be in place. This is particularly important in considering views from the adjacent conservation areas. The submission of a more detailed plan would have helped undertake a proper assessment.
- 15.1.3. It is not clear what works are proposed within each of the red lined areas, noted as land required during construction, so it not possible to fully understand their potential impact (visual and damage to features) on local heritage assets. This is important for archaeology, listed buildings and their settings, and also for locally listed (non designated) buildings. The latter are not marked on the maps so it is difficult to see where there might be potential areas of conflict.

### **15.2. Colne Valley**

- 15.2.1. The Council is concerned that the assessment diminishes the role of the heritage assets due to their relationship with manmade gravel pits. Whilst the gravel pits may not be the original setting for these features, they were in existence at designation and they make an unusual and positive contribution to their current setting. For example it is not considered that HOAC detracts from the setting of Dews Farm, which still has a rural setting; the Grand Union Canal (Wide Water Lock conservation area) is lined with mature trees and is enhanced by the areas of open water adjacent and the Harefield Village CA benefits from the long open views of the water filled gravel pits to the west.
- 15.2.2. The Council agrees that the impact of the works on Dews Farm and associated archaeological remains will be "major adverse", but does not agree that the impact on the adjacent Widewater Lock and Harefield Village conservation areas will be neutral. It is unclear how the impact on these conservation areas

has been assessed and given the lack of information available on the viaduct, it is not possible to make an informed comment on this matter and it would be entirely unreasonable to predetermine impacts as neutral.

- 15.2.3. The description of the Breakspear House Dovecote is out of date (ref CVA064), as the setting has been considerably enhanced by recent works.
- 15.2.4. The Locally Listed Buildings within the area, other than Dews Farm, have not been assessed.
- 15.2.5. Harefield Place and associated lodge (CVA005) are both grade II listed and are located off The Drive in Ickenham. A reference for the former is not noted on the maps, but is included as CV058 in the assessment. The house is close to an area noted as being potentially required for the construction period, and which could negatively impact on its setting; this is not considered in the assessment. The history of the house now called Harefield Place is noted in the background report, but is referenced wrongly as CV054 and 55 (Church Gardens).
- 15.2.6. Map CH-01-022-L2 shows Denham Place in the position of 254 Swakeleys Road and is therefore wrong.
- 15.2.7. The Council needs to know more about the construction works and access required for the proposed works to pylons adjacent to the listed Bourne Farm Barn.
- 15.2.8. The sunken boats in the Widewater Lock Conservation Area should also be noted as non designated heritage assets.

#### *Ruislip*

- 15.2.9. Further information is required on the relocation of Harvil Road adjacent to Highway Farm, which includes a number of listed buildings. The listed farm house is already located very close to the road. Bringing the road closer to this structure would have a seriously detrimental impact on its setting.
- 15.2.10. The boundary of the Ruislip Village conservation area is incorrect; this does not show the recent extension to the south.
- 15.2.11. The large placement of excavated material to the south of Bayhurst Woods Country Park has the potential to negatively impact on a number of historic structures, such as RUI006 (Highway Farm House), RUI1064 (St Leonards Farm and Barn) and RUI1065 (Crows Nest Farm). Further information on the nature and extent of these works needs to be submitted to assess their impact

on the setting of the assets. A similar situation exists regarding the compounds close to Brackenbury Farm, RU1002, which includes listed buildings and a Scheduled Ancient Monument and also regarding the compound running parallel with Harvil Road, Ickenham. This would not only impact on the setting of Copthall Farm, which includes a listed farmhouse, but would also potentially remove archaeology associated with its past.

- 15.2.12. Locally Listed structures are not included on the maps but most have been included in the assessment. South Ruislip Station, ref RUI033, is Locally Listed.
- 15.2.13. RAF West Ruislip RUI011 is included as a heritage asset despite the site having been totally cleared and partially redeveloped; as such it can no longer be considered a heritage asset.
- 15.2.14. At RAF Northolt RUI010, the guard room has been demolished, and the hangar is listed as Grade 2 not 1 and the officers mess is listed Grade 2, but not shown on the map. Other listed buildings have not been indicated on the map, but are discussed in the Gazetteer.
- 15.2.15. The listed structures at Ruislip Manor Sports Ground, Grosvenor Vale, are not recorded on the maps or Gazetteer.
- 15.2.16. RU1007, properties at 1-2 The Green, Ickenham, are Locally Listed rather than statutory listed.
- 15.2.17. The Ruislip Gazetteer does not include descriptions for entries RUL1067 to 80.
- 15.2.18. The former underground munitions factory at Ruislip Gardens Depot is not recorded or discussed.

### **15.3. Archaeology**

- 15.3.1. English Heritage provides archaeology advice to the Council through statutory legislation. The Council does not retain in house expertise and therefore seeks advice on development matters from English Heritage. The following comments provide the Council with the assessment of the impacts from HS2 and should not be read as an English Heritage response:

#### *CFA6*

- 15.3.2. This area will experience extensive construction impacts relating to compounds and spoil dumps as well as the route itself. The Colne Valley is a known area of archaeological potential focussed on prehistory but with significant later sites,

including scheduled medieval moats. There are several known sites within the affected area including a Romano British settlement, north of New Years Green Farm where a major adverse impact is identified.

- 15.3.3. The ES also identifies a major adverse impact on Brackenbury Moat Scheduled Ancient Monument (SAM) from construction and spoil disposal in its setting and also a moderate adverse impact on Pynchester medieval moated SAM.

#### *CFA6 Conclusion*

- 15.3.4. The Hillingdon part of CF6 has significant potential for archaeological interest. Field evaluation would normally be expected for a major development in such a location but there has in fact only been very limited geophysical survey and no trial trench. The evidence indicates that there is currently insufficient information to make an informed judgment on whether archaeological effects would be significant and to define appropriate mitigation. It is not clear whether there is flexibility to preserve significant remains in-situ if they are discovered after development consent is granted.
- 15.3.5. With respect to the temporary adverse effect on the setting of Brackenbury Moat associated with the proposed rail head and construction site, English Heritage has advised HS2 that they should include further detail on both noise and vibration affects and identify appropriate mitigation. The changes to the surrounding landscape would permanently alter the monument's historic landscape setting.

#### *CFA7*

- 15.3.6. The Colne Valley is a known area of archaeological interest focussed on prehistory including sites of national importance recognised by Hillingdon Council as a Proposed Archaeological Priority Zone in the Local Plan. There are also significant later sites, although the flooded gravel pits have no remaining archaeological interest. HS2 will require extensive land take for construction and spoil dumps on previously undeveloped land with significant archaeological potential for discovery of as yet unrecognised heritage assets. The main known site within the affected area is Mesolithic activity at Dews Farm (CVA021) which is considered by HS2 of moderate value with a major adverse effect identified. However, if in-situ Upper Palaeolithic/Mesolithic occupation is present then this site could be of national importance and therefore of high value. Dews Farm itself (CVA022) is noted as having 14-18th century origins so could potentially be of more than the moderate value assigned by HS2.

### *CFA7 Conclusion*

- 15.3.7. The Hillingdon part of CF7 has significant potential for archaeological interest. Field evaluation would normally be expected for a major development in such a location but very little has in fact taken place. The evidence indicates that there is currently insufficient information to make an informed judgment on whether archaeological effects would be significant and to define appropriate mitigation. It is not clear whether there is flexibility to preserve significant remains in-situ if discovered after development consent is granted.

### **15.4. Conclusion**

- 15.4.1. There is a distinct lack of sufficient information on the new development and its associated works to properly consider their impact on the heritage of the Borough.
- 15.4.2. Each of the works areas needs to be assessed in some detail, and all of the adjacent heritage structures features and structures should be fully assessed. It should also be noted that existing listed descriptions do not include all the features of importance within the curtilage of a listed building. Each site, therefore, needs to be visited, surveyed, researched and then assessed. So far all that is presented is a purely paper exercise relying in some cases on outdated information.
- 15.4.3. A more detailed assessment of the Colne Valley area is necessary in terms the impact of the viaduct on the setting of the adjacent conservation areas. If we accept the loss of Dews Farm, which was not deemed to be listable by English Heritage (it was considered to be largely 19th century in date and heavily altered), then we would at the very least need to ensure it is recorded to the appropriate level, detailed reports deposited with relevant bodies and any items of interest salvaged.
- 15.4.4. With regards to archaeology, it is in the best interests of HS2 Ltd to undertake a proper assessment. Once construction works commence, any notable finds could cause delays, require redesigns and increase the cost of the project. These could be avoided now if HS2 Ltd were to carry out a proper assessment.

### **15.5. Mitigation**

- 15.5.1. HS2 Ltd acknowledges that there will be significant cultural heritage effects even though the Council and English Heritage advice suggests the assessment is entirely lacking in detail. It is therefore not possible for HS2 Ltd to fully reach conclusions.

- 15.5.2. However, the assessment that the impacts will be significantly negative supports the need for the extension of a tunnel from West Ruislip to the western part of the Colne Valley.
- 15.5.3. If a tunnel is deemed unfeasible following a proper assessment, the following mitigation is necessary prior to the finalisation of the route:
- An appropriate archaeological assessment should be undertaken in consultation with the suitable advisors. The route should be redesigned accordingly.
  - Further details on the works in the construction compounds should be provided and a scheme for minimising impacts on heritage assets should be undertaken.
  - Full design details of the viaduct need to be developed with heritage assets in mind.

## **16. Ecology**

### **16.1. General Comments**

#### *Objections*

- 16.1.1. CFAs 6 and 7 demonstrate a significant loss of flora and fauna, including many protected species. HS2 Ltd's has concluded that in broad terms, the proposed mitigation will ensure the favourable conservation status of wildlife in the area. However, there is a distinct lack of respect for the loss of flora and fauna, and the subsequent timeframe for mitigation measures to be established.
- 16.1.2. HS2 Ltd has made no attempt to avoid the ecological effects in this area and seemingly accepted the destruction of habitats as inevitable. Providing mitigation that will take decades to establish is not considered sufficient mitigation.

#### *Lack of Assessments*

- 16.1.3. HS2 Ltd accepted within the ES that they have not been able to assess all areas to be impacted by the scheme. This is due to not having permissions or being unable to access land, which surprisingly includes Network Rail land in one instance.
- 16.1.4. Land ownership and permissions were always going to be a controversial matter. However, the purpose of voting through the HS2 Preparation Bill was to facilitate HS2 Ltd's ability to access land. It is therefore strange that the ES was completed without the adequate surveys and assessments prior to the voting on the Preparation Bill. It demonstrates that there was a sense of urgency in producing the ES to the detriment of a proper assessment.

#### *Inadequate Presentation of Information*

- 16.1.5. HS2 Ltd has not presented the impacts on ecology adequately. There is a clear attempt to focus on mitigation, whilst understating and not presenting clearly the loss.
- 16.1.6. The principles that led the design of HS1 was to ensure the new route followed existing routes where possible minimising the environmental harm. HS2 adopts that principle for only the first 15miles. The route emerges above ground in West Ruislip and then travels on a new line that does not follow an existing

route. This causes a significant level of destruction to well established and highly diverse habitats.

- 16.1.7. The map below provides a context for HS2 in what is evidently an open, rural and diverse area.



- 16.1.8. Beyond the route, the level of construction disruption and the placement of excavated material will give rise to the loss of further highly important ecological features. However this has not been clearly shown by HS2 Ltd. The focus for HS2 is on presenting the mitigation for the loss and attempting to persuade readers that the 'after' situation in 2041 makes up for the loss of many hectares of natural open land, woodland and diverse grassland. HS2 Ltd has not clearly delineated on a plan the extent of loss. This became evident after the Council was asked to attend a meeting with HS2 Ltd to discuss mitigation. In response, the Council requested information on the extent of loss in the area to understand what the mitigation proposals related to. Unfortunately, due to the operating practices of HS2 Ltd this had to be requested through a freedom of information request. HS2 Ltd responded as follows:

*You have requested a map showing the natural areas (including woodland, vegetation, and grassland) that will be lost around the Colne Valley. We do not have this mapping and so I am unable to provide it to you. There will be additional mapping produced for the Environmental*

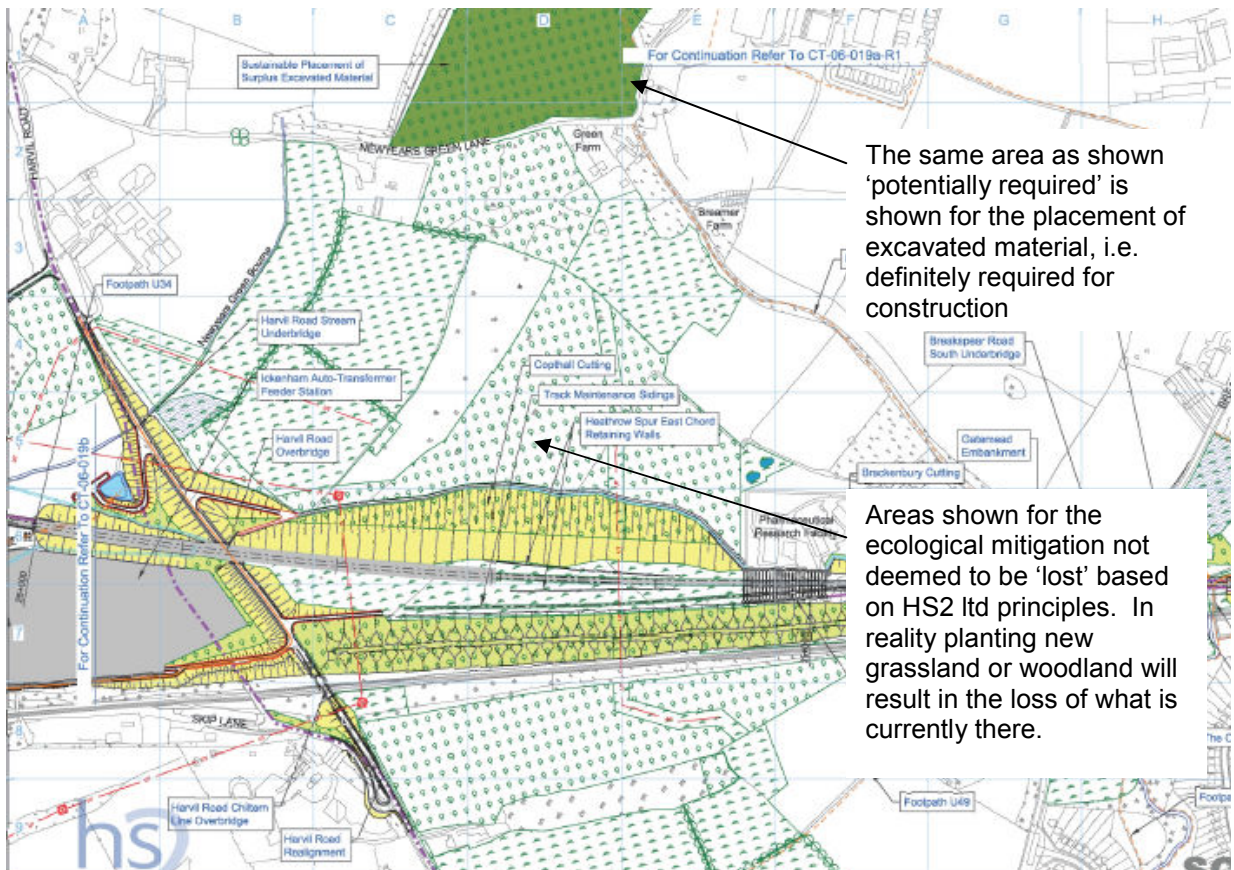
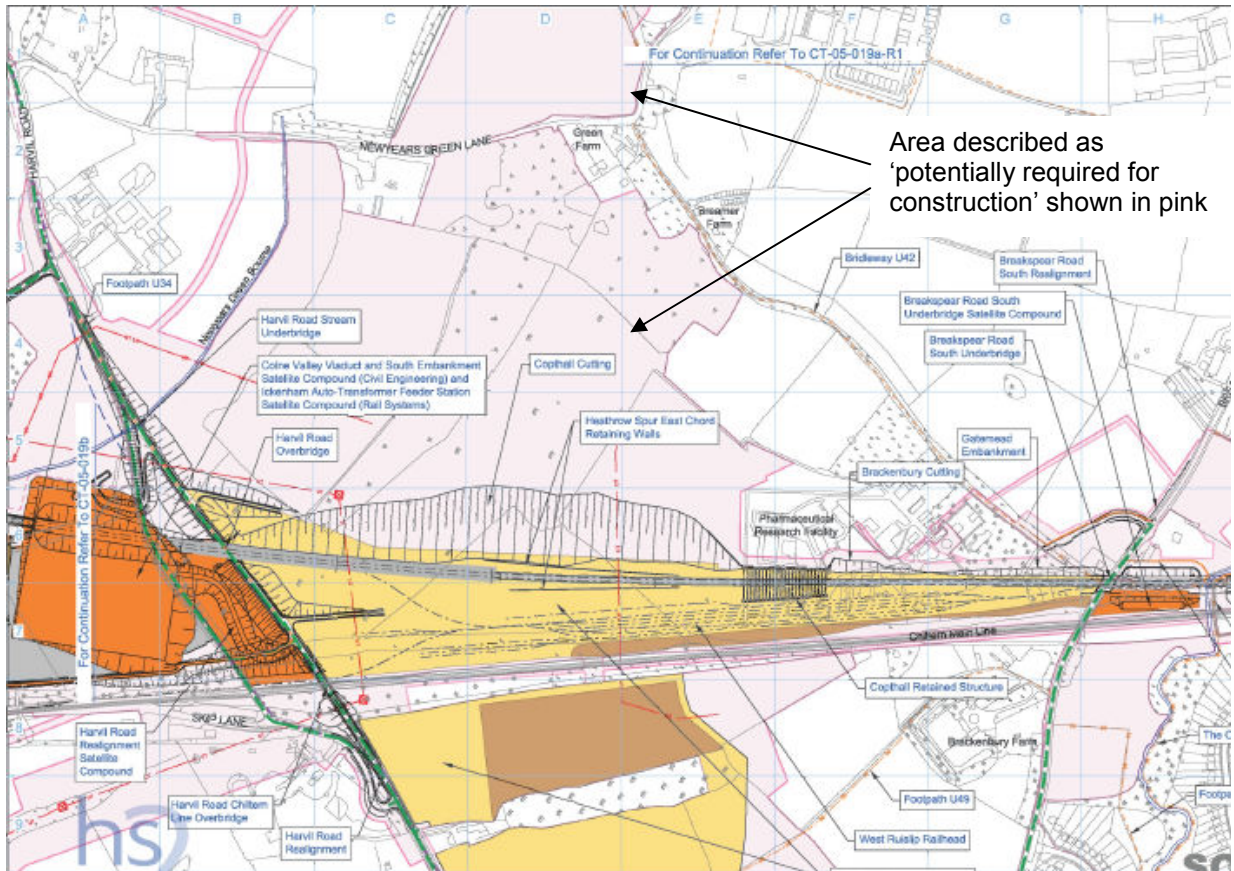
*Statement to be submitted as part of the Hybrid Bill but these are not available at this time. (FOI13-724, 6 September 2013)*

- 16.1.9. On receipt of the ES, the Council was keen to determine the extent of loss through more than the descriptive text contained within the draft ES. This would provide a clear understanding of what is expected to be lost in mapping form, and to allow a more informed discussion on what should replace it. However, the final ES still does not contain the requested mapping. HS2 Ltd has provided clarification on this:

*The Environmental Statement clearly identifies the areas of loss according to habitat type and provides an assessment of the likely significant effects on ecology. This is what is required under the relevant Environmental Impact Assessment Regulations. Separate mapping showing individual areas of loss is not specifically required by the Regulations and has not been provided. The assumption as explained in Volume 1 (section 8.5.12) of the ES is that all habitats and features within the land required for the construction of the Proposed Scheme will be lost. (e-mail Peter Fry to Ian Thynne 13 December 2013)*

- 16.1.10. HS2 Ltd has purposely not provided a level of information that would allow a clear understanding of what is being lost and where. Instead it is expecting consultees to piece together the various maps, cross reference these with the descriptive text and then determine for themselves what is expected to be lost. This is a classic example of a developer not willing to present the negative impacts of the scheme.
- 16.1.11. HS2 Ltd has further hindered the assessment process by not providing the GIS data files to allow local authorities to plot the relevant information on a more manageable and interactive mapping system.
- 16.1.12. A final complaint with this approach is that HS2 Ltd has stated that anything identified as being 'within the land required for the construction of the proposed scheme will be lost'. The range of maps presented show land required for construction, and also land that is 'potentially required for construction'.
- 16.1.13. The maps highlight the difficulty the Council has in determining the exact loss of ecology. HS2 Ltd only acknowledges the loss of ecology in areas required for construction. The maps below show there will be extensive loss in areas also designated as land potentially required for construction. The use of the word 'potentially' is misplaced because it is clear that some of these are definitely required for construction. For example, the areas for dumping excavated material are on land 'potentially required for construction' which is clearly a significant contradiction. Ultimately, this means there is clear ecology loss in

areas outside that suggested in Peter Fry's e-mail which makes the decision not to map the ecology loss as more misleading and unhelpful.



16.1.14. As a consequence, the Council does not consider the ecological assessment in the ES is sufficient to allow proper engagement and demonstrates a disregard for the negative impacts of the scheme.

## **16.2. CFA6 and 7**

16.2.1. In general, the approach to the assessments is difficult to accept without undertaking further studies to confirm the findings. The presentation of the data is not entirely helpful and it is difficult to determine what was surveyed, where and when. This further undermines the ability of the Council to scrutinise the scheme. However, based on the assessment, HS2 Ltd has confirmed the grave concerns that there will be a serious loss to flora and fauna, as follows:

### *CFA6*

- 2.2ha of Ruslip Golf Course and Old Priory Meadows nature conservation site
- 3.5ha of Brackenbury nature conservation site (72% of the site) with the loss devaluing the remainder of the site
- 5.5ha of Newyears Green Conservation Site
- 6ha of semi natural broadleaved woodland at Ruislip Golf Course, Newyears Green Covert and Copthall Covert
- 35ha of grassland at Copthall Covert
- 25ha of grassland at Bayhurst Wood
- 3.km of hedgerows lost
- 10 ponds lost which includes unaccounted for populations of great crested newts
- 1ha of complex and diverse habitat along the River Pinn
- The loss of an open watercourse on the Ickenham Stream
- 2ha of habitats within existing railway land. Habitat that is normally considered diverse and free from human interference

### *CFA7*

- 19ha (14%) of the Mid Colne Valley SSSI
- 5.4ha of open water (6% of which is within the SSSI)
- 2.9ha of running water (50% of the River Colne in the SSSI)
- 10ha of Woodland (33% of the total woodland area of the SSSI)
- 0.75ha of swamp vegetation

- The loss of habitat in the SSSI will result in loss of breeding bird habitat, suitable nesting sites, and an overall reduction in bird numbers including red listed species. Breeding birds using woodland would also be disturbed.
- 25ha of terrestrial habitat including 18ha of broadleaved woodland in the Mid Colne Valley nature conservation (outside of SSSI) which includes:
  - 2.9ha of Tilehouse Gravel Pits
  - 0.9ha of the River Colne to be realigned
  - 4.2ha of woodland in the Fray's Valley
  - 1ha of ancient woodland
  - 170m of River Colne will be 'modified'
  - Other smaller parcels of habitats
- The list does not include the habitats located on areas for ecological mitigation which will remove the existing value of the site.

### **16.3. Species**

- 16.3.1. The report focuses solely on European protected species and does not evaluate the likely loss of other species protected or otherwise. The report is therefore lacking appropriate details to quantify the impacts on wildlife.

### **16.4. HS2 Ltd proposed Mitigation**

- 16.4.1. The report acknowledges that the impacts on ecology will be significant although the Council considers this is a conservative assessment. It is not possible to adequately validate the assessment due to the inadequate presentation of the material. To reduce the effects HS2 Ltd has presented a series of mitigation options which have been mapped. These maps show that a variety of areas, mostly used for agriculture, will be use for the planting of woodland and grassland resulting in a further loss of agricultural land. There will be a number of balancing ponds and other types of habitat scattered through CFA6 and 7.
- 16.4.2. The mitigation does not appear to be well developed and presents only an indicative plan. Far more details need to be developed to understand whether this habitat will be effective, is in the best location and considers other aims and visions such as those set through London's Blue Ribbon Network.

- 16.4.3. HS2 Ltd appear that they have only satisfied the need to find land for mitigation measures, and not made a concerted effort to find the most suitable land or come up with any coherent vision for the measures.
- 16.4.4. The mitigation plans need far greater work before they can be said to provide any sort of compensation for the scheme. In particular, there needs to be an understanding of the soils and drainage to ensure mitigation can establish. If the mitigation is implemented the Council needs to be confident that HS2 Ltd has considered the long term management and maintenance including the appropriate funding. Much of the land is Council owned and used for agriculture. Replacing this with extensive woodland and grassland places more pressure on the Council to manage it. HS2 Ltd and the Government would need to provide the local authority with an ongoing Trust Fund for its long term management.
- 16.4.5. Furthermore, the mitigation for the Colne Valley needs to be far more extensive than proposed. HS2 Ltd has simply highlighted parcels of land for planting woodland in an attempt to rectify the problems created in the Colne Valley. As stated in the Landscape section, this should only be considered once the landscape impacts of this additional planting have been properly considered.
- 16.4.6. Furthermore, the Council recommends that HS2 Ltd considers a Colne Valley mitigation fund to be managed by the relevant Councils and the Colne Valley Partnership, a non-profit making charity who aims to ensure the protection and enhancement of the Colne Valley. This, alongside the better planting of new woodland and grassland would provide a much more suitable and considered response to the destruction of the flora and fauna in the Colne Valley.

## **16.5. Conclusion**

- 16.5.1. HS2 Ltd relies on mitigation to offset the significance of the destruction of approximately 150ha of valuable areas with diverse ecology. There is a distinct lack of quality in the assessment to fully appreciate the value of the area. The assessment makes no qualification of what this area does for non-European protected species or the range of small mammals, birds, insects, reptiles and amphibians that use the area.
- 16.5.2. It is clear to see that such a wide impact on ecological areas will have a devastating effect. The proposed mitigation, albeit including extensive areas of woodland and grassland, cannot in any way make up for the immediate loss and destruction of habitats or the death of so many animals.
- 16.5.3. HS2 Ltd determines that the mitigation will ensure the effects of the scheme are not significant. That is simply an appalling conclusion to make.

16.5.4. This assessment has shown the value of the Colne Valley and what it offers from an ecological perspective. HS2 Ltd openly admits there has never been a genuine attempt to find a solution to avoid the destruction of large parts of west London's natural environment. They admit the option of a tunnel was never adequately assessed and was not reviewed even once the devastating impacts of the scheme were known.

## **16.6. Proposed Mitigation**

16.6.1. The impacts on ecology alone warrant a review of the use of a tunnel in west London.

16.6.2. If, once reviewed properly and in light of all the environmental information, a tunnel is not possible then HS2 Ltd needs to develop a far more comprehensive approach to mitigation. HS2 Ltd needs to accept that the construction impacts will result in a long period of decline in species and biodiverse areas in the Borough. This will only really start to pick up again 20 years into the maturation of the new planting. The approach to mitigation should reflect this and set out measures to support the intervening period. Mitigation measures should include:

- Funding to the Council and the Colne Valley Partnership to improve the Colne Valley – this should provide for the long term security to ensure the Colne Valley is adequately protected and enhanced. Importantly, the funds should cover the short term decline in the Colne Valley resulting from the construction and mitigate for the permanent loss and operational impacts. The funds should allow works across the whole of the Colne Valley.
- Funding should also be given to the Local Authority to improve existing parks, woodlands and habitat areas to manage wildlife improvements due to the destruction and lengthy maturation of HS2 Ltd's proposed mitigation.
- HS2 Ltd should work with the Council and other environmental bodies to develop a more meaningful and coordinated approach to where and how the ecological mitigation will go. This should be linked to the placement of excavated material to ensure new sites can be created that best befits the area.
- All river diversions, creations of ponds, balancing lagoons and other water features should be adequately landscaped.
- All finalised mitigation measures should be accompanied by clear and well funded management schedules.

## 17. Landscape

### 17.1. General Comments

17.1.1. The decision to pursue an entirely new transport line as opposed to following an existing one will fundamentally alter the landscape of west London. The assessment of this change in CFAs 6 and 7 does not adequately assess this change or present it.

17.1.2. In particular, the photomontages used by HS2 Ltd are solely aimed at misrepresenting the impact of the scheme. The image below is taken LV-01-227 and shows the scheme in 2041, 15 years after completion. It should be noted that HS2 is barely visible in this image.



17.1.3. The image below shows another attempt at presenting the scheme post completion. The high speed line can be just about made out in the right of the image.

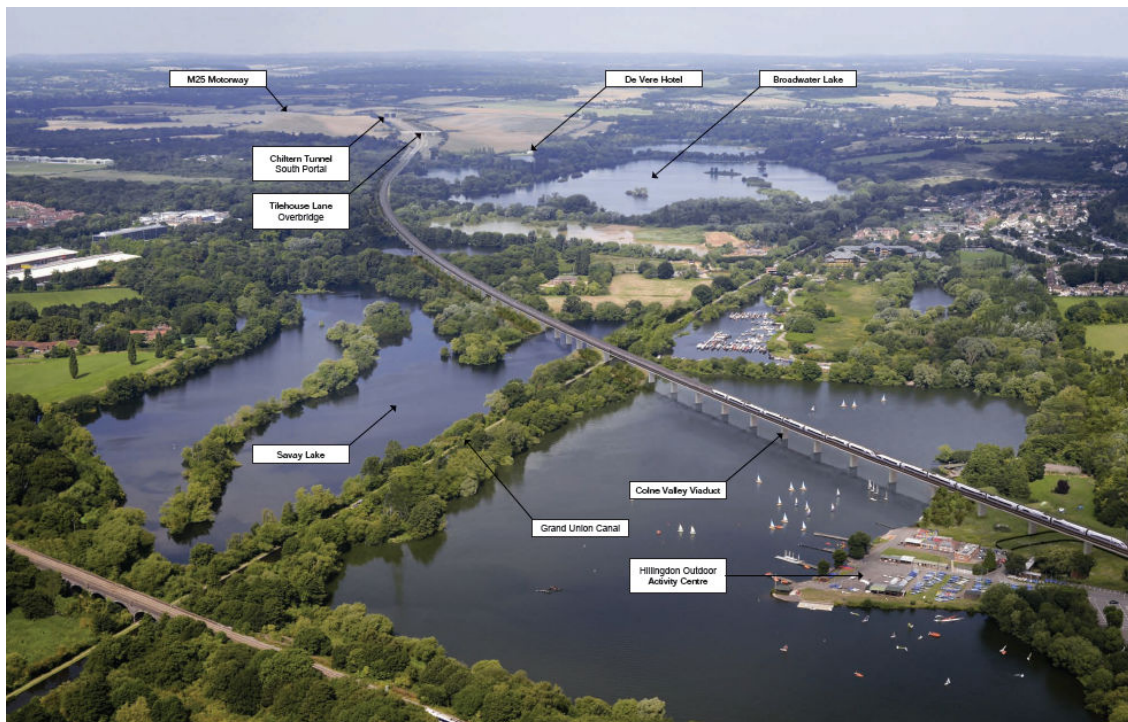


- 17.1.4. The following image shows a more distinct image of HS2. However, it uses muted tones and a clear attempt to blend HS2 into the background. The decision to take the photograph from behind a bush is also questionable.



- 17.1.5. While these photomontages may be technically accurate, it fails to reflect the likely perception of these heavy engineered structures in this location. The close spacing, bulk and number of piers supporting the viaduct has a detrimental impact on the reservoir and has precisely the impact on the lake which should be avoided.

- 17.1.6. There are several images of the before and after scheme that shows very minimal impact of HS2. Below is the only image that portrays the stark reality of this major piece of infrastructure. It can clearly be seen that such a vast structure will have a huge impact in the Colne Valley in particular. Developing photomontages from carefully selected locations, and then presenting the finished scheme in a muted way misrepresents the reality of what the scheme will do.



*Mitigation: New Woodland Planting*

- 17.1.7. Both CFA6 and 7 will see further irreversible changes on completion of the scheme through hard infrastructure, the removal of mature and ancient woodland and the fundamental changes to the Colne Valley. These impacts have been given some consideration within the ES. However, what have not been adequately assessed is the changes that will occur from the extensive planting of new woodland and the placement of excavated material.
- 17.1.8. The images below show the existing landscape contains open countryside which is dominated by agriculture use. This well established landscape compliments urban areas of Ickenham and West Ruislip as well as the heavily wooded Colne Valley. This provides a diverse and gradual change to the landscape for the whole of west London.
- 17.1.9. HS2 Ltd wants to plant excessive amounts of trees in seemingly random areas with little regard for the Countryside. There is an assumption that since woodland is not a man made structure then it should naturally fit into the existing landscape. This is blatantly not accurate. The images below show a fundamental change to the open countryside.

Current baseline (2013)



Operation Year 15 (2041) - Summer verifiable photomontage



- 17.1.10. The change from the additional planting and loss of agriculture has not been adequately assessed, particularly in relation to Hillingdon's Landscape

Character Assessment. The Council considers that these changes will have a significant effect.

#### *Inadequate Methodology*

- 17.1.11. The assessment makes no reference to Hillingdon's Landscape Character Assessment or which guidelines have been used to aid the assessment. To some extent this is unsurprising, given the results of the ES are not aimed at influencing the design of the scheme but merely to describe the effects.

#### *Haul Roads*

- 17.1.12. The proposed scheme includes haul roads in both CFA6 and 7. These purpose built 'roads' are designed to connect up spoil dumping sites with the main construction compounds. The landscape is not just sensitive to fixed structures or construction compounds, but to excessive vehicular movements through the countryside on purpose built roads.
- 17.1.13. HS2 Ltd has given no weight to this or other ancillary operations that have an adverse impact in the landscape.

#### *Operational Structures*

- 17.1.14. There are a number of new structures within CFA6 and 7 including electricity feeder stations and a head house near Ruislip tunnel. The design of these buildings needs to compensate for their landscape impacts. The assessment makes no reference to finished design and it is expected that the final details are fully developed in consultation with the Local Authority and relevant communities.
- 17.1.15. All new structures should aim to achieve the highest standards of design. Given the loss of ecology as a result of the scheme, green walls and roofs, as well as other boundary landscaping should be included.

#### *Significant Effects*

- 17.1.16. A schedule of 'not significant effects' is provided in Volume 5 which describes the temporary effects on the landscape character areas. Section 2 describes the permanent effects on the landscape character areas arising during operation years 1, 15 and 60. Predictably, most of landscape impacts will be adverse to a greater or lesser extent during construction, with many of the adverse effects diminishing throughout the operational life of the railway, as the

mitigation measures become more effective. In the worst case (CFA7) the Colne River Valley is predicted to retain a 'moderate adverse' in operation until year 60. Elsewhere the impact associated with the Colne Valley and west of the borough is described as most significant in year 1 and is assessed to reduce to 'minor adverse' in years 15 and 60.

## **17.2. CFA6**

### *General*

- 17.2.1. The ES acknowledges that significant effects will remain in some parts of the local landscape due to the essential infrastructure, engineered landforms and overhead line equipment.
- 17.2.2. Temporary impacts will also be associated with the construction works although the length of these impacts is down played.
- 17.2.3. Once operational, the tunnel portal and ventilation shafts at South Ruislip will continue to affect views within the local area.
- 17.2.4. The visual effect of the project is to be mitigated by planting, the details of which are not known at present. It is therefore not possible for the Council to comment on the likely effectiveness of any mitigation proposals. It is inappropriate for HS2 Ltd to rely on mitigation measures they have not detailed.
- 17.2.5. The Council broadly accepts the findings of HS2 as presented in the ES starting at 9.4.19 of CFA6. The assessment shows that there will be significant changes in the landscape with a range of views affected. However, the Council strongly disagrees with the summary presented:
- These effects will be temporary and reversible in nature lasting only for the duration of the construction works. Any residual effects will generally arise from the widespread presence of construction activity and construction plant within the landscape and viewed from surrounding residential receptors, users of PRow and main roads within the study area.*
- 17.2.6. The images taken from the CFA6 Map book ES reveal a more realistic summary of the likely landscape impacts.

Current baseline (2013)



Peak construction phase - Winter verifiable photomontage



Current baseline (2013)



Peak construction phase - Winter verifiable photomontage



17.2.7. Much of the construction work in this area will last the full length of construction, i.e. 7+ years. At present, the areas west of the Ruislip tunnel portal have

relatively unspoiled views over countryside. This scheme will change that. The landscape in this area will fundamentally change during construction which is entirely understated in the assessment.

#### *Operational Impacts – Noise Barrier*

- 17.2.8. The Sound and Vibration chapter acknowledges that a 5m noise barrier is required to the southern section of the existing Chiltern Railway line to protect properties on the Greenway. The landscape impact of a 5m screen directly in front of a densely populated urban area has not been considered in the photomontages but is described in the text:

*The noise fence barriers, located between the Chiltern Main Line and the Proposed Scheme, at approximately 40m away from the nearest properties will create a new linear element in the view from properties on the western end of The Greenway. (9.5.31 CFA6)*

- 17.2.9. A permanent 5m noise barrier will change the outlook from these properties yet the assessment has not provided an adequate representation of what this may look like.

### **17.3. CFA7**

#### *Colne Valley Viaduct*

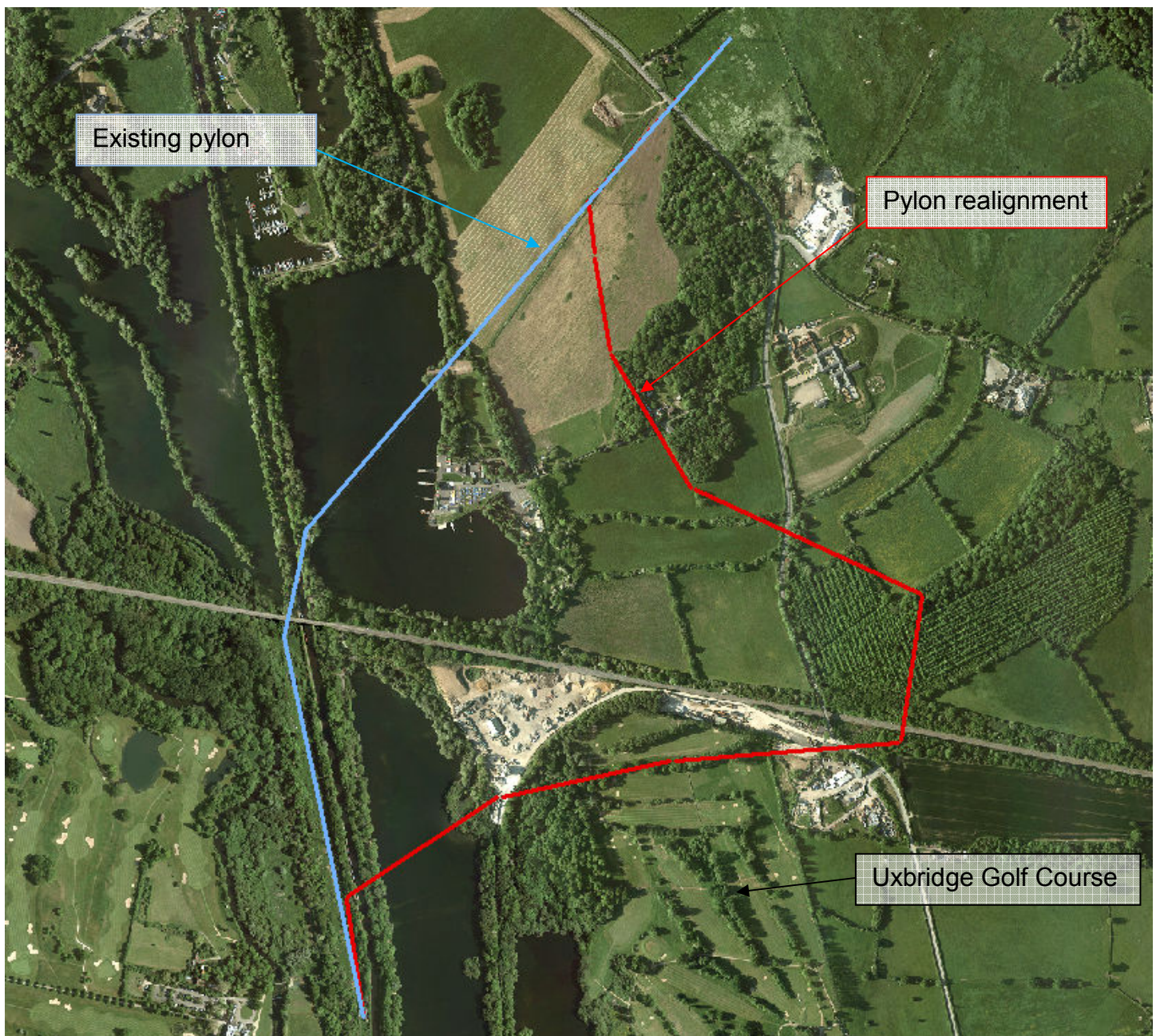
- 17.3.1. The most harmful visual impact of the rail link in the Colne Valley is due to a proposed viaduct. This is deemed a significant effect by HS2 Ltd and will have a lasting negative impact on west London. The Council maintains that these impacts can be removed through the use of a tunnel; however, as proposed this viaduct needs much more considered design.
- 17.3.2. HS2 Ltd acknowledges that this viaduct has yet to be designed. The Council understands from Natural England that they had been informed that HS2 Ltd would use a single span structure across the Colne Valley to reduce the impacts on wildlife and the SSSI.
- 17.3.3. The Council would support the decision for a single span viaduct if it was deemed a tunnel would be unfeasible. The Council considers this an opportunity for a world class design which could become a visitor attraction to the Colne Valley.
- 17.3.4. If the scheme is approved, the Hybrid Bill must commit the designers of the viaduct to a design that reflects the landscape and heritage of the area. The

viaduct should not become a victim of cost cutting and Parliament should make an undertaking to this affect.

### *New Pylons*

17.3.5. HS2 Ltd intends to reroute an existing pylon network as shown on the image below. The pylon crosses Uxbridge Golf Course as well as the Colne Valley having taken a new convoluted route from its existing path. Paragraph 9.4.7 of CFA7 states:

*The Colne Valley will be improved by a large section of overhead power line and pylons being removed.*



- 17.3.6. Part of the Colne Valley may be improved by the realignment, but another area will be greatly impacted. The final ES makes no assessment of the permanent impact of the pylons or provides any photomontages. The convoluted realignment will result in a permanent adverse impact in the area.

#### *General Matters*

- 17.3.7. Permanently visible railway infrastructure within Hillingdon will be most conspicuous from the visually sensitive Colne Valley. The rail line will exit the tunnel via a portal to the east of Harvil Road. The rail line will emerge via a series of cuttings and embankments, passing an auto-transformer feeder station, and crossing the Colne Valley on a viaduct over the former gravel pits / reservoirs, before entering a tunnel under the Chiltern Hills.
- 17.3.8. The construction work will necessitate an extensive land-take to accommodate temporary works compounds and permanent structures. This will be exacerbated by the need for temporary stockpiles of tunnel waste and topsoil - as well as the permanent deposition of clean spoil and topsoil, planned to reduce the volumes of spoil/soil to be carted further afield.
- 17.3.9. Approximately 1ha of ancient woodland will be lost in the Mid Colne Valley, together with other detrimental effects on local trees and biodiversity.
- 17.3.10. The deposition of (potentially vast) volumes of spoil and topsoil will require careful design and handling to ensure that the local landform does not become an alien feature in the landscape
- 17.3.11. The volume of spoil and soil to be accommodated will be significant and will alter the topography. There is limited information on what the changes will look like, the depth of fill, and the finished contouring. The deeper the fill, the smaller the area of land take required - but the greater the affect on local topography, views and drainage. Conversely, a shallower depth of fill implies a less dramatic effect on local topography but requires a greater area of land take and additional disturbance to the existing ecology (flora and fauna.) (Vol.2 CFA6 Report refers to the balancing of cut and fill and the 'sustainable placement of inert surplus excavated material')
- 17.3.12. The 'cut' volumes of spoil and topsoil have been estimated. Details of the handling, storage and placement will be required, in accordance with current standards / good practice (Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, 2009, pub. DEFRAWRAP).
- 17.3.13. The resultant earthworks should be carefully designed and contoured to blend seamlessly with the local topography, avoiding steep-sided engineered slopes.

17.3.14. Where possible, re-contouring of land should be used to assist with the screening of compounds and other built infrastructure. The ground modelling associated with the tunnel portal and approaches to the viaduct abutments should be sensitively contoured to ensure that both the tunnel portal and viaduct approach are integrated comfortably within the existing landscape.

#### **17.4. Conclusion**

17.4.1. There is little certainty as to the outcome of the project in terms of design quality, detailing or effectiveness of the proposed mitigation measures.

17.4.2. The significant effect on the landscape supports the need for a tunnel through west London. The majority of the significant effects cannot be removed or avoided based on the proposed scheme and at best can be marginally reduced overtime with the maturing of proposed planting.

17.4.3. However, this does not compensate for several years of construction impacts, the loss of countryside views for hundreds of people and the intervening 15years from completion whilst mitigation measures become established.

17.4.4. The Colne Valley is entirely changed as a result of a viaduct, the design of which remains unknown. No firm commitments to the design criteria have been set out by HS2 Ltd and no design briefs made available. The Council must be assured through the Hybrid Bill process that there is a commitment to a high quality design for the viaduct.

17.4.5. The Council also requires that comprehensive landscape proposals should be supported by detailed long-term management and maintenance plans. These should include financial provisions to secure the future maintenance of all affected land.

#### **17.5. Proposed Mitigation**

17.5.1. The significant adverse landscape impacts support the need for increased tunnelling from West Ruislip to west of the Colne Valley. This will remove all the negative visual impacts in West London.

17.5.2. If a proper assessment reveals the tunnel to be unfeasible the following mitigation measures are necessary:

- HS2 Ltd and Parliament must commit to a high quality, 'award winning' design for the Colne Valley viaduct, with an elegant long span structure with as few piers as possible interrupting the water bodies. The basic viaduct presented in the photomontages does not befit a high quality scheme. Commitment should be made to include the public regarding

the design and the final design should be selected by a panel of appropriately selected individuals that includes representatives of the area.

- HS2 Ltd should clearly respond to the failings of its Landscape Assessment and provide photomontages that show more details on the construction sites including the conveyor system from the West Ruislip tunnel portal; the appearance and impacts of noise barriers; the impacts of the placement of excavated materials and the long term impacts of all the ecological mitigation.

## 18. Land Quality

### 18.1. General Comments

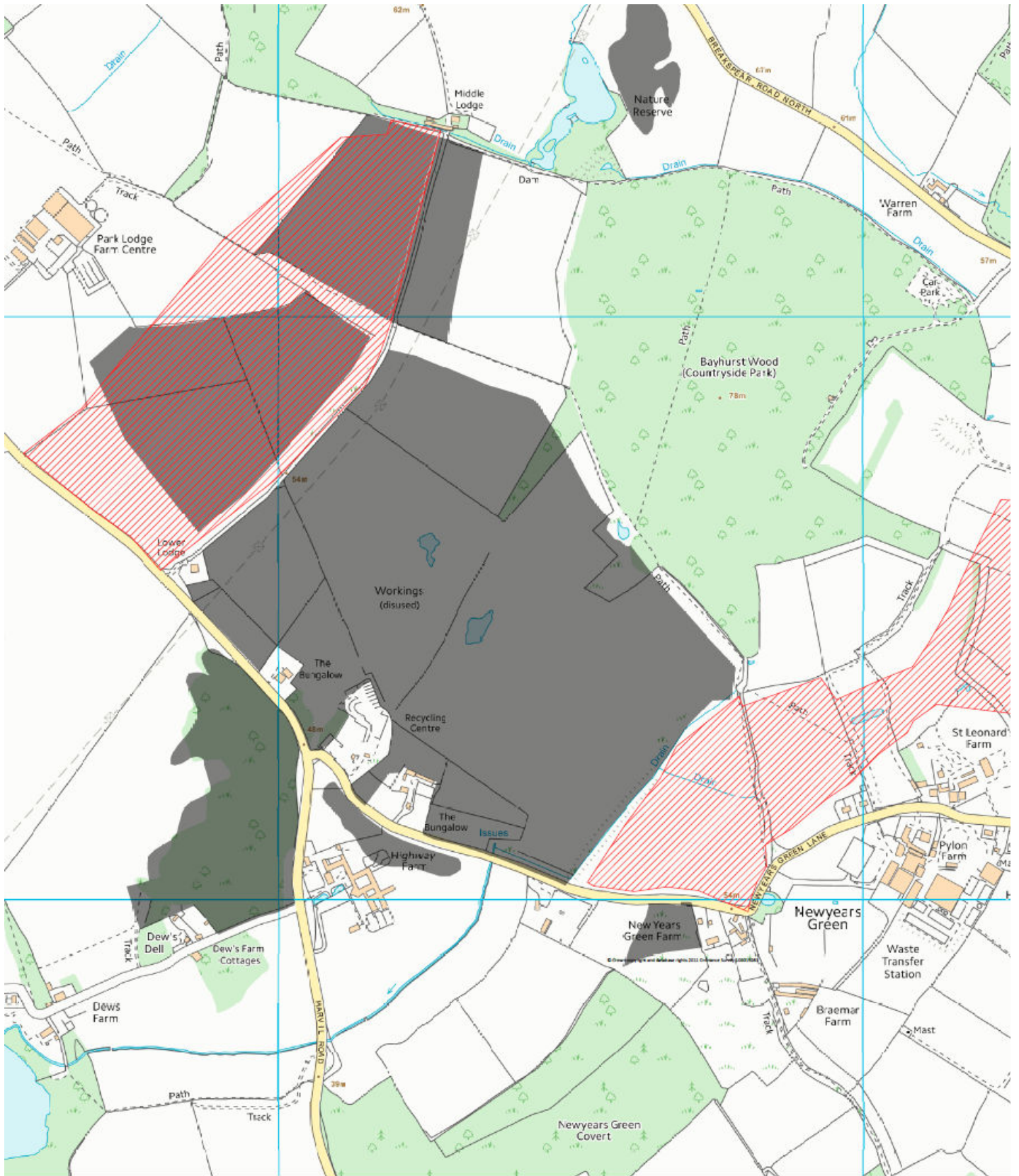
- 18.1.1. The Council accepts that the impacts on Land Quality are not yet fully known due to the lack of intrusive investigations. It is assumed that there will be rigorous processes in place to test and evaluate excavated material to ensure that it will be transported to suitable receptor sites.
- 18.1.2. The Council is concerned that HS2 Ltd cannot determine the effects of managing contaminated soils but accepts that adequate processes will be in place.
- 18.1.3. The Council needs to be consulted on any detailed contamination studies and in relation to the management of contaminated material.

#### *Movement of Soil for Planting*

- 18.1.4. The ES does not provide details on the soil quality of areas for ecological mitigation. This is particularly important where new woodland is required. It is possible that some areas selected for ecological mitigation may not be suitable for woodland and the importation of improved soil may be required. This needs to be fully assessed prior to any works commencing although it accepted it is unlikely to be a significant effect at this stage.
- 18.1.5. CFA6
- 18.1.6. The main area of concern regarding CFA6 relates to the location of an area for the placement of excavated material. The ES assesses the 'during construction' effects as having a:

*Potential impact on human health on-site from inhalation of gases (moderate to high risk) Impact from leaching of contaminants from soil to groundwater and vertical and lateral migration in groundwater in Principal Aquifer (high to very high risk)*

- 18.1.7. It describes the post construction effect as not significant, but the risk as 'high to very high'. The ES makes no reference to the deposition of excavated material in the area of this landfill site.



**Legend**

- Landfill Sites
- Locations of Placement of Excavated Material

- 18.1.8. The Council and the Environment Agency has been working closely to find a solution to the contamination problems for the Newyears Green Lane landfill site. Of particular concern is the effect the site is having on groundwater, in an area that the Environment Agency wants to reopen a water abstraction point.
- 18.1.9. The Council is concerned that dumping excessive material in this area could change the groundwater flow. It is likely to fundamentally change the pathway from the contaminated leachate to the groundwater. This could ultimately increase the risk of contaminating the groundwater and hinder attempts to reopen a much need water abstraction point.
- 18.1.10. The decision to dump excavated material on this site has not been though through. The Council was not able to comment on this aspect in the draft ES simply because these spoil dumping sites only materialised in the final ES.
- 18.1.11. The Council recommends two options:
- 1 Find an alternative site for the dumping of excavated material
  - 2 Carry out a full land investigation, prepare a remediation plan and undertake the works prior to the dumping of excavated material.

## 19. Socio Economic

### 19.1. General

#### *Route Wide Effects*

- 19.1.1. The individual CFAs direct readers to the Route Wide Socio-economic assessment in Volume 3. This shows that there will be 146,000 permanent full time construction years which HS2 Ltd equates to 14,600 full time jobs for 10 years although this implies construction will be ongoing after opening.
- 19.1.2. The assessment does not factor in the peaks in construction and it does not acknowledge that there will be associated spikes in employment. In reality there are likely to be intensive periods of employment for example in Hillingdon there will be a 2 year construction of the Colne Valley viaduct running concurrently with the 8-10 year construction of the tunnel. Towards the end of the project there is likely to be a lot less construction jobs as works such as the viaduct are finished. Simply suggesting that the 7 year construction timetable will generate 14,600 fulltime jobs for 10 years is misleading.

#### *Deliberately Misleading Assessment*

- 19.1.3. Whilst the Route Wide Assessment is keen to present the total number of construction jobs available, it refers to the individual CFAs for readers to understand the jobs lost:

*The construction phase will result in the displacement of some existing businesses through land required for the construction of the Proposed Scheme. These effects have been assessed and reported within the relevant Volume 2, CFA reports, Section 10. (11.6.7)*

- 19.1.4. The decision not to give the total numbers from the CFAs is a blatant attempt to present the positives in a larger cumulated number that can be easily sourced whilst negatives are dispersed through 26 different documents making it difficult for readers to make the link. The assessment is deliberately misleading and manipulative of the truth.

#### *Developments Lost to HS2*

- 19.1.5. Although the total amount of jobs lost to construction is not provided, Volume 3 (paragraph 11.6.9) reveals that 12,700 jobs will be lost that are attributable to developments that will no longer be able to proceed.

- 19.1.6. However, HS2 Ltd present the case that 88% of these jobs will be relocated elsewhere based on evidence linked to the displacement of businesses affected by the London Olympics in 2012.
- 19.1.7. This seems far fetched and lacks any real interrogation of the impacts of HS2.
- 19.1.8. In reality the figures show a considerable number of jobs lost through the direct loss of businesses during construction plus the loss of 12,700 jobs that would have come forward in new development. The creation of a questionable 14,600 construction jobs at best provides only part compensation. The construction of HS2 cannot be said to result in a significant socio-economic benefit.

#### *Reliance on 'Hope' of Creating Jobs*

- 19.1.9. Volume 3 also suggests that there will be a total of 2200 operational jobs created from London to Birmingham. Paragraph 11.7.6 states:

*It is estimated that 830 jobs will be created route-wide through indirect effects as a result of the operational phase. Route-wide, the indirect employment impact will be a moderate beneficial effect and is therefore considered to be significant.*

- 19.1.10. The outcome of the assessment is that there are limited direct employment benefits from HS2. This means decision makers will be relying solely on the hope of wider economic benefits not included within the assessment.

## **19.2. Local impacts**

### *Employment from Construction*

- 19.2.1. The Council does not consider the Socio-economic assessment to be of any value in assessing the impacts of the development. The scheme seems to rely on construction related jobs as a potential benefit, but it is acknowledged that these are likely to go to contractors with HS2 Ltd having limited control on where jobs will come from.
- 19.2.2. It is noted that HS2 Ltd is likely to use a lot of Crossrail workforce since the type of construction is very similar. The accessibility of 'new' jobs to local residents is entirely questionable and not adequately defined.

### *Employment from Operation*

- 19.2.3. HS2 Ltd has concluded that the socio-economic impacts could be beneficial.

*Operational employment will be created at locations along the route including stations, train crew facilities and infrastructure/maintenance depots which could be accessed by residents within the area, particularly given its proximity to Old Oak Common and Euston.*

- 19.2.4. Old Oak Common is situated approximately 10miles from the CFA6. To suggest that this will be of benefit to this area because there will be a HS2 station at Old Oak Common is stretching the positives of the scheme.
- 19.2.5. The ES refers readers of the CFAs to the wider socio-economic assessment in Volume 3. Table 8 in this assessment shows that there will be potentially 100 jobs directly related to the operation of HS2 at Old Oak Common and 500 at Euston. There is no information on associated employment derived from the presence of HS2.
- 19.2.6. The map below shows the area around Old Oak Common that covers Hillingdon as far as Ruislip. It shows that any potential employment opportunities, if available to Ruislip, are available to an exceptionally large part of London.
- 19.2.7. With only 100 jobs directly available in this area, and an unspecified number of related servicing jobs, HS2 Ltd has not made a case that the Borough will receive any credible socio-economic impacts from the scheme.



into account the impacts to businesses from congestion which is deemed to be a significant effect, particularly around Ruislip.

### **19.3. CFA6**

19.3.1. The CFA Report confirms that there will be a direct loss of 10 jobs although it is not clear where these are, and the report does not direct readers to the mapped locations or a supporting appendix.

19.3.2. In reality job losses are likely to be higher due to :

- Impacts to Ruislip Golf Course have not yet been established so assessment on jobs is not possible.
- The impacts on the West London Composting site have not been properly understood.
- The impacts to farmland around the West London Composting site has not been factored in.
- The loss of the Rifle Club has not been adequately evaluated.
- The effects from increased congestion have not been considered.

### **19.4. CFA7**

19.4.1. Similar to CFA6 the ES reports that there will be a loss of 10 jobs within CFA7. Again this is hard to accept. There is no clear evidence of where these jobs are and furthermore it does not seem to consider:

- The loss of HOAC that employs in excess of 10 people
- The substantial loss of farmland and the severance of usable land
- The loss of farm buildings and outbuildings.

### **19.5. Conclusion**

19.5.1. The Council accepts that HS2 will not have the same effect in the Borough as other areas in terms of lost employment. However, the Council would have preferred to have seen a much more considered assessment that accurately reflects the scheme.

19.5.2. HS2 Ltd has not yet found solutions to a number of businesses that contribute to jobs in the area. As a consequence the socio-economic assessment cannot yet be determined. For example, HS2 Ltd acknowledges that there are no solutions for the loss to HOAC or the Rifle Club, and that the Ruislip Golf Course impacts are still unresolved.

19.5.3. With regards to the route wide impacts, HS2 Ltd has provided no credible evidence about the benefits of the scheme.

## **19.6. Proposed Mitigation**

19.6.1. On its own the socio-economic impacts do not support the need for a new tunnel, however they add to the growing concern that the Council gets no benefits from the scheme and alongside huge adverse environmental effects, it will have negative socio-economic impacts.

- HS2 Ltd must speed up its quest for a solution to the loss of HOAC, Rifle Club and the impacts on Ruislip Golf Course. It should also consider the socio-economic impacts of the disruption to the Colne Valley. Once this work is complete, HS2 Ltd should identify socio-economic improvements which address other issues such as ecological mitigation and spoil placement sites. For example, the Barnes Wetland centre was created on previously used land and now includes a visitor centre and employs a healthy number of staff. HS2 Ltd could be equally visionary if this scheme is to go ahead.

## 20. Sound and Vibration

### 20.1. General Comments

- 20.1.1. The threat of excessive noise from HS2 has been one of the key themes of community forums and workshops. To date, HS2 Ltd has attempted to allay fears that there will be excessive noise and understated all impacts. In the original community engagement forums a 'sound booth' was available for people to understand the noise of HS2. The public was generally quite surprised that birds singing were noisier than high speed trains.
- 20.1.2. No evidence has ever been presented by HS2 Ltd to adequately support their theory that HS2 will be virtually quiet compared with ambient noise levels. The draft ES was severely lacking in detail and provided only a small level of detail.
- 20.1.3. This fuller ES provides more details. It shows that despite extensive noise barriers being in place that nearly 250 properties will experience high increases in noise levels. Noise levels in the Colne Valley have not been adequately presented but will experience impacts of upwards of 25dB during construction.

#### *Methodology*

- 20.1.4. The key to determining noise impacts stems from the methodology chosen. Unhelpfully, HS2 Ltd has placed details of the methodology in Volume 5: Appendix CT-001-000/1, Volume 5: Appendix CT-001-000/2 and offers further information in Volume 5: Appendix SV-001-000. The methodology is not presented in the individual noise chapters in CFA reports.

#### *Night Time Noise Levels*

- 20.1.5. The Council's response to the draft ES and Scoping and Methodology Report questioned the use of the night time noise metrics. The Council still cannot understand why HS2 Ltd is insisting on assessing significant noise effects at night time in contrast to recognised EU guidance as detailed below.
- 20.1.6. The World Health Organisation guidelines state:

*Considering the scientific evidence on the thresholds of night noise exposure indicated by  $L_{night, outside}$  as defined in the Environmental Noise Directive (2002/49/EC), an  $L_{night, outside}$  of 40 dB should be the target of the night noise guideline (NNG) to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly.  $L_{night, outside}$  value of 55 dB is recommended as an interim*

*target for the countries where the NNG cannot be achieved in the short term for various reasons, and where policy-makers choose to adopt a stepwise approach.*

- 20.1.7. HS2 Ltd should be applying the highest standards available. Instead, for no logical reason other than to misrepresent the noise effects, HS2 Ltd are insisting on using the interim target, i.e. the minimum standard. The Council maintains that the 40dB level should be the assessment point for the impacts of night time noise for HS2. At the very least a 50dB target or a stepped approach from 55dB should be used to assess significance.

#### *Maximum Noise Levels*

- 20.1.8. The Council cannot find reference to a maximum noise (Lmax) assessment. The focus on averages allows the intermittent periods of respite when no train is passing to bring the average down for train movements. This is further troubled by the fact that the train service runs differently during the day as opposed to in peak hours. Therefore not only is the average noise level reduced by the relative quiet periods of when no train is passing, but it is further reduced by the less noise intensive off peak operations. In the draft ES the noise report states:

*The lowest daytime sound level contour shown on the maps is 50dB. For HS2's envisaged operation this is equivalent to a night-time sound level of 40db. In general below these levels adverse effects are not expected. In assessing the risk of sleep disturbance, the maximum noise level for each train pass by has also been calculated and considered in this initial assessment.*

- 20.1.9. The Council cannot understand why the information referred to was not disclosed and is not immediately obvious in the myriad of noise documents with the final ES. HS2 Ltd was well aware that there are considerable concerns about noise, therefore, to present only averages which distorts the true impacts and also withhold maximum levels is highly frustrating. It does nothing to support HS2 Ltd's assertions that noise impacts will be minimal.

#### *Baseline*

- 20.1.10. 36 baseline sound level measurements were undertaken. The monitoring locations appear to be representative for both operational and construction noise. However the long, medium and short term locations have should have been identified on the maps SV-03-009 and SV-04-009 as these are not defined on the maps. This suggests in some locations LAeq,16 hr and LAeq,8

hr may have been derived from just 30 minutes of measurement and may not be representative.

- 20.1.11. Section 3.2.1 of SV002-006 makes reference to key sound indicators in terms of LAeq,16hr weekday daytime, LAeq,8hr weekday night time for operational sound but no indicators for weekend daytime and night time have been provided. It is unclear as to whether this is meant to mean that HS2 trains will not be operating during weekends.
- 20.1.12. In Table 1, some of the data has been derived from DEFRA noise maps which are in Lden and Lnight. There is no direct correlation between LAeq and Lden/night. This lacks clarity and does not allow for a proper assessment of the findings.

## **20.2. Operational assessment (SV-004-006)**

- 20.2.1. In terms of operational noise, as the route will be in tunnel the impact is likely to occur as the route surfaces at West Ruislip portal and then goes onto a viaduct. A cutting is proposed immediately after the tunnel portal. Details of the cutting together with the required mitigation are missing from the report.
- 20.2.2. Table 3 shows the operational airborne sound level, noise/vibration impacts and effects. A total of 55 minor impacts (change of 3 to 5dB) in sound level compared to the baseline and a total of 140 moderate impacts (change of 5 to 10dB) on residential properties have been identified. The impacts are also represented on maps SV-01-009 and SV-02-009. Map SV-01-009 provides the information as sound contour maps. The assessment also includes phase 2 services (paragraph 11.4.2 of CFA6). It is not clear whether each impact represents an individual property. This should be clarified and the individual properties identified.
- 20.2.3. The Council does not agree with the above classification of magnitude of change as no details have been provided on the basis of the change in sound levels. The draft 2002 IOA/IEMA guidelines for noise impact assessment suggests a change of 3-4.9 dB as being of moderate impact and a change of 5-9.9 dB as a substantial impact. In view of this there will be 140 impacts which will have substantial impacts.
- 20.2.4. It is not clear whether these impacts will occur with or without the noise barriers in place but it is assumed they will occur with barriers in place. The ES refers to additional measures to reduce noise, but these have not been set out. The ES therefore relies on future unspecified mitigation to overcome the significant effects. This is inappropriate.

## 20.3. Volume 5 Technical Appendices (SV-001-000)

### *Groundborne Noise*

- 20.3.1. Page 11, section 1.4.21 provides criteria for groundborne noise for construction and operational noise. A significant adverse effect will result where ground borne noise will be greater than 45dB LA<sub>max</sub>. Crossrail and HS1 adopted a design criterion of 40dB LA<sub>max</sub> for groundborne noise in residential properties.

### *Inappropriate Noise Criteria*

- 20.3.2. Section 1.5.12, page 20 sets out that significant adverse noise effects occur where “noise level from construction activities that is greater than the following criteria for any period exceeding one month have been identified”- This suggests residents will have to suffer excessive construction noise for more than a month before it becomes significantly adverse. The emerging national planning policy guidance suggests significant adverse effects should be avoided. Setting criteria that state that effects can only be considered significant if they continue for more than one month does not follow the aims and vision of the national policy.

### *Inconsistent Noise Metric*

- 20.3.3. The noise assessment introduces more inconsistencies by using the 12 hour LA<sub>eq</sub> to assess daytime construction noise. However, the draft COCP uses the more appropriate metric for core daytime working hours of LA<sub>eq</sub>,10hr.

### *Inappropriate Construction Sound Methodology*

- 20.3.4. Table 5, page 21 provides the impact criteria for construction sound only. A significant observed adverse effect occurs where each of the threshold levels are exceeded. This table has been taken from table E.3.2 of BS5228-1:2009.
- 20.3.5. BS5228 states if the ambient noise level exceeds the threshold values in the table then a significant effect is deemed to occur if the total LA<sub>eq</sub> noise level for the period increases by more than 3dB due to construction activity. This is applicable to all categories A, B and C. However, according to note 5 below the table it appears that where this scenario occurs for HS2 construction, it is only applicable for category C.

### *Sleep Disturbance*

- 20.3.6. LAFmax criteria are also suggested for operational train noise at night paragraph (1.5.27). Two levels are suggested based on number of train movements, 85 dB for train pass bys of 20 or less and 80dB for more than 20 pass-bys. These are façade levels which would result in internal level of 70 and 65dB assuming windows open as suggested in para 1.5.25. These levels are significantly higher than levels recommended in BS8233 and World Health Organisation (WHO) i.e. 45dB LAFmax. The WHO document “Guidelines for Community Noise” recommends that noise levels outside bedrooms should not exceed 60dB LAFmax so that people may sleep at night with windows open. We are concerned that passing HS2 trains could cause sleep disturbance to residents in the night period.

### *Insufficient Details*

- 20.3.7. According to para 1.2.30, tunnel portals are to be designed to avoid any significant airborne noise effects but details of proposed measures have not been provided.

### *Inadequate Approach to Mitigation*

- 20.3.8. The noise insulation and temporary re-housing policy thresholds are to be found in table 1. Insulation or temporary re-housing will only be provided if the thresholds in table 1 are exceeded at a façade of a property for at least 10 days out of any period of 15 consecutive days or 40 days in any 6 month period. So in order to qualify for insulation a resident will have to suffer for a minimum of 10 days. If someone is predicted to exceed the thresholds for only 9 days, they will not qualify. The policy does not extend to night time works, and it appears works such as tunnelling and ancillary activities at night are excluded from this policy.
- 20.3.9. There is no information on what insulation package is on offer and how it will work in practice. HS2 Ltd relies heavily on this to reduce the identified effects.
- 20.3.10. The criteria in table 1 have been taken from table E.2 of BS5228-1:2009. BS5228 also uses another criterion for qualifying for noise insulation, that is:
- Where the total noise (pre-construction ambient noise plus construction noise) is 5dB above the existing airborne noise level for the corresponding times of day, whichever is higher.*
- 20.3.11. This approach means that areas with low ambient noise levels will benefit from noise insulation. The qualification is therefore based on the increase in noise

levels and is therefore directly related to the scheme and not other variables. This criterion is being used for Crossrail.

- 20.3.12. It is also recommended that the noise insulation policy considers contiguous facades i.e. façades which adjoins the eligible façades under the Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996 but do not qualify under the regulations i.e. a property which just faces away from the works. There is power available under Regulation 6 of the above to provide this, which states as follows:

*Where the responsible authority is required by regulation 4 or empowered by regulation 5 to carry out, or make a grant in respect of the cost of carrying out, insulation work in or to an eligible building, it may also carry out, or make a grant in respect of the cost of carrying out, insulation work in or to an eligible building in respect of which no duty under regulation 4 or power under regulation 5 has arisen, if the facades of both buildings are contiguous or form part of a series of contiguous facades.*

- 20.3.13. This will ensure fairness in the policy.

## **20.4. CFA6**

### *Construction Effects*

- 20.4.1. Approximately 45 dwellings on the Greenway will experience significant construction noise during daytime and 30 dwellings in the evening from construction of the tunnel portal. A further 10 dwellings on Breakspear Road South will experience significant construction noise during daytime from construction of Breakspear Road South underbridge, River Pinn underbridge and West Ruislip retained embankment. Mitigation measures will include noise insulation as per the policy above. These are not yet set out.

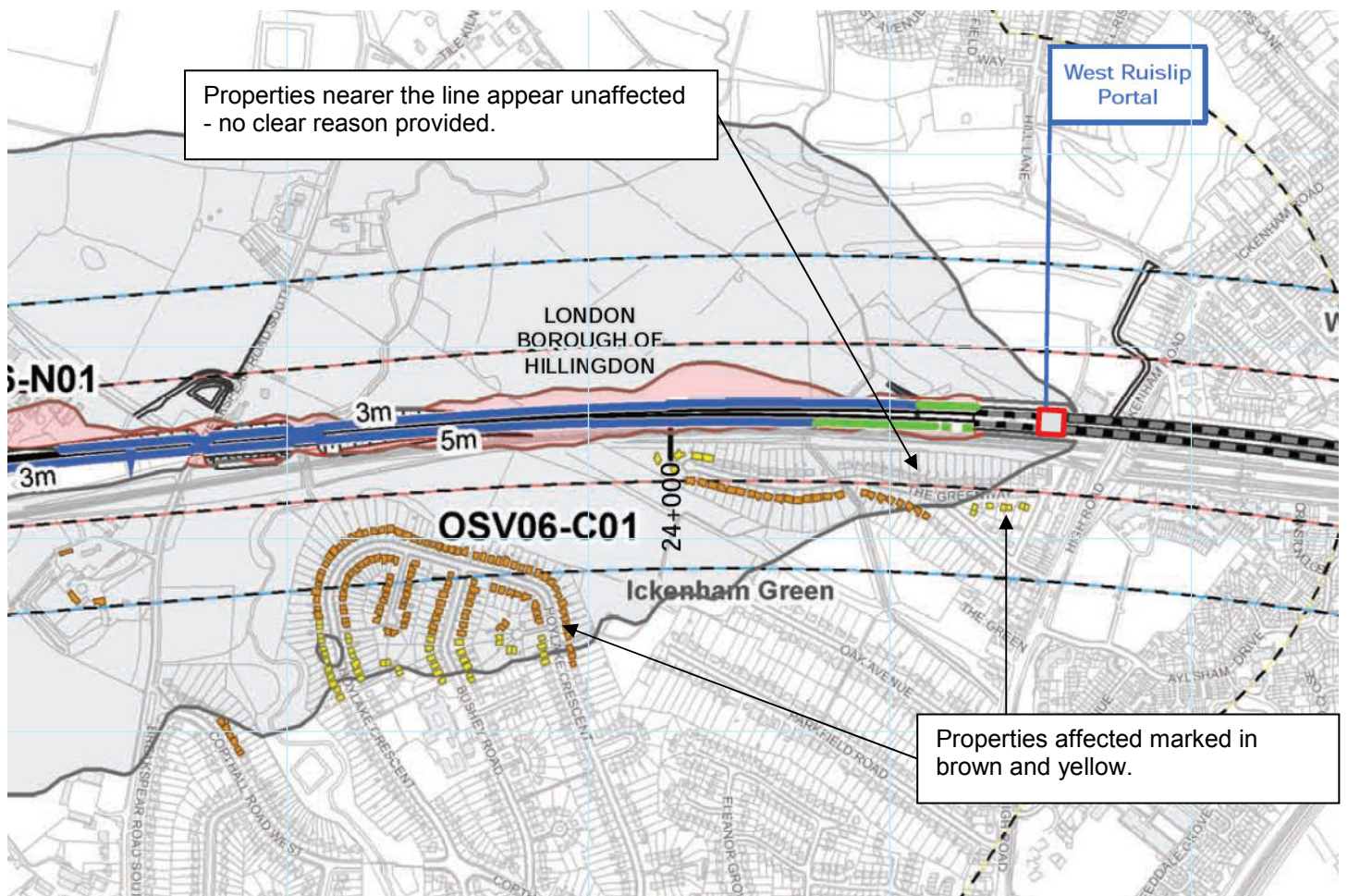
### *Construction Impacts of Conveyor*

- 20.4.2. Construction impacts will occur from 24 hour tunnelling and ancillary activities around West Ruislip portal. This will include operation of a conveyor for spoil removal. The conveyor route has been indicated on map CT-05-018 but no information is provided on the height of the conveyor.
- 20.4.3. The Council does not believe HS2 Ltd can reach conclusions on construction noise when the details of the conveyor have not been provided or assessed. This will be a 24hour operation which is likely to create extensive noise. No details on land levels, heights or operational specification are made. It is

assumed that once again HS2 Ltd is relying on the generic mitigation measures in the draft COCP.

### Operational Effects

20.4.4. The ES confirms that 200 properties will experience adverse effects from HS2 and this is with extensive noise barriers in place. These are located at the Greenway, Hoylake Crescent, Pynchester Close, Bushey Road and Cophall Road West. The following extract of SV-05-009 from the CFA6 Map book shows the properties affected. HS2 Ltd describes these effects as significant.



20.4.5. The ES confirms that HS2 Ltd:

*Will continue to seek reasonably practicable measures to further reduce or avoid these significant effects. In doing so HS2 Ltd will continue to engage with stakeholders to fully understand the receptor, its use and the benefit of the measures.*

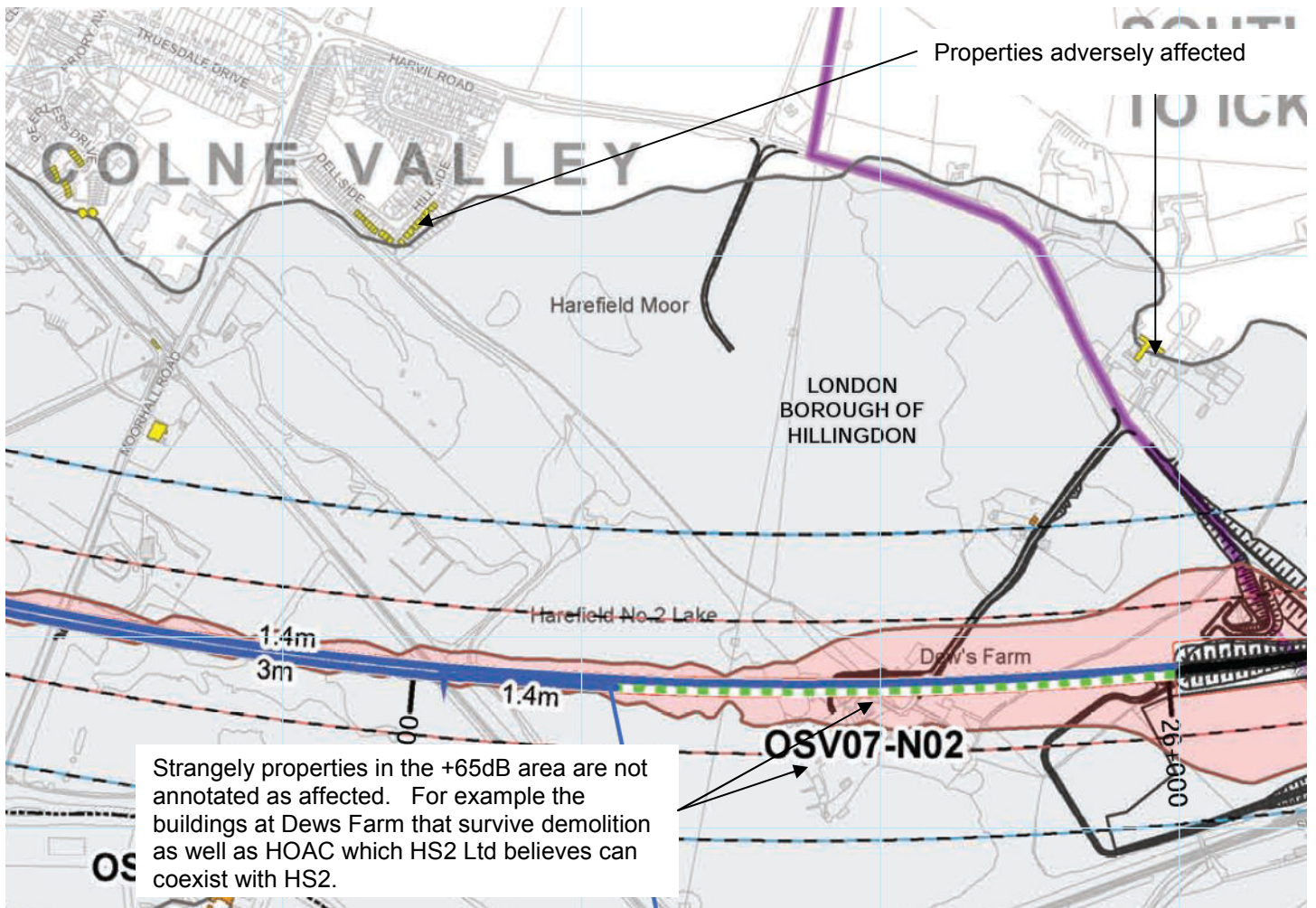
20.4.6. This means that the ES presents a situation where significant adverse effects have not yet been fully designed out.

### *Noise from Stationary Systems*

- 20.4.7. Annex E of Volume 5 Technical Appendices and section 14 of SMR provides details/criteria to control noise produced by stationary plants such as ventilation shafts.
- 20.4.8. A ventilation shaft is proposed at South Ruislip between Long Drive and Bridgwater Road. The ventilation shaft is bordered to the north, east and west by a mix of industrial, commercial and residential uses.
- 20.4.9. Paragraph 1.3.7 of annex E states fixed installations will be designed, constructed, operated and maintained to ensure that the rating level minus the background level is not more than -5dB determined in accordance with BS4142:1997 This would ensure that significant adverse effects on health and quality of life would be avoided and is consistent with paragraph 123 of the National Planning Policy Framework.
- 20.4.10. The above design criterion is suitable for mitigating medium to high frequency noise from fans. However, BS4142 is not suitable for assessing low frequency noise (LFN). LFN can be a problem from ventilation fans and there is no design criteria stipulated in the above documents for assessing the same. Further assessment is needed to adequately inform the effects of the scheme.

### **20.5. CFA7**

- 20.5.1. HS2 will run on a viaduct through the Colne Valley. HS2 Ltd has only assessed significant adverse effects where there is an increase in noise level for certain receptors such as residential units, but for other land uses significance is only triggered if noise levels go above 65dB in the day and 55dB in the evening.
- 20.5.2. In CFA7 this means that approximately 15 dwellings in the vicinity of Savay Lane, Denham Green, closest to the proposed route, are considered to have significant adverse effects. The nearby external amenity space that is available to residents will also be adversely affected. These are shown on the extract below of map SV-05-010 from CFA7 Map Book.

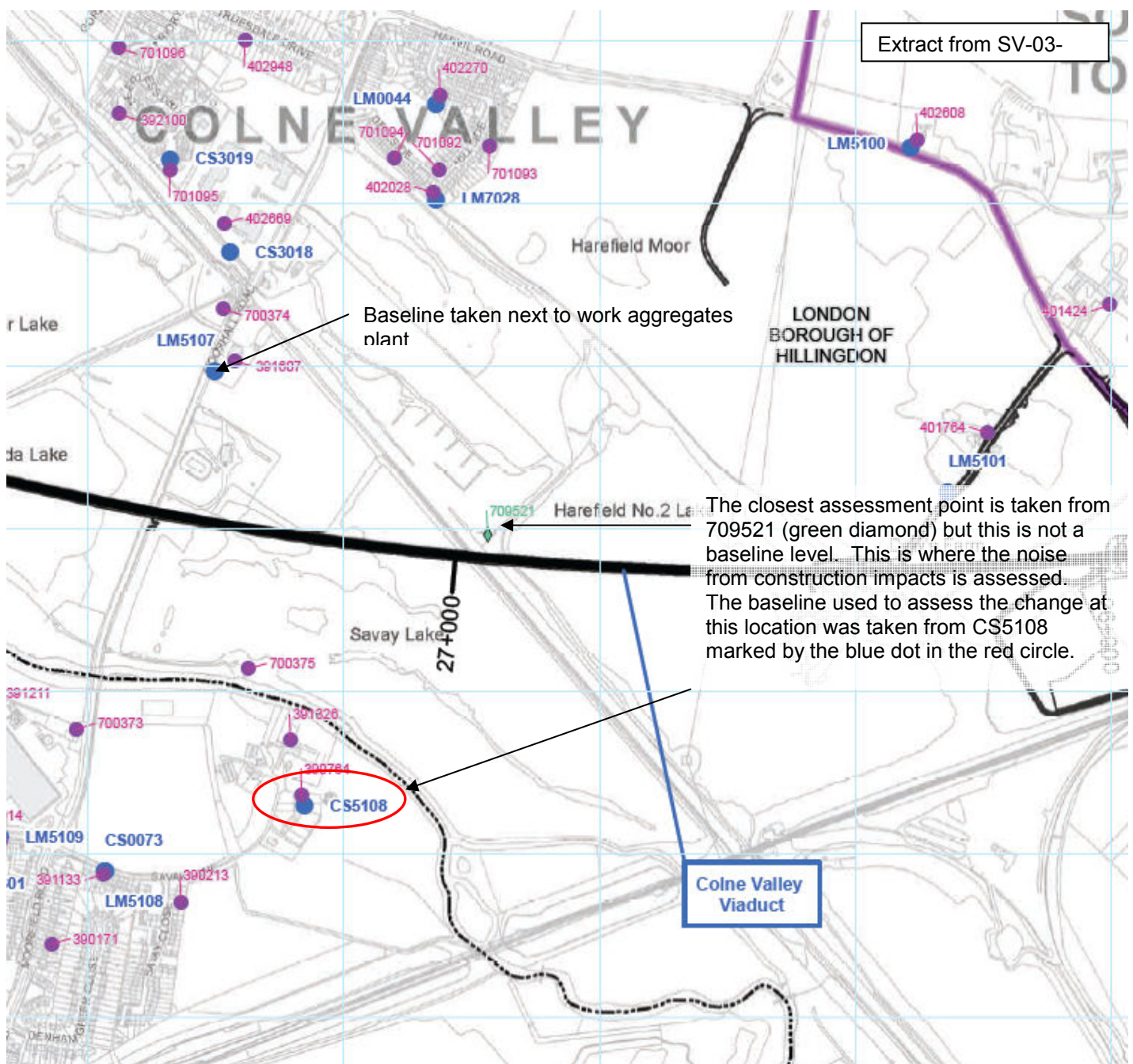


- 20.5.3. However, of concern is the treatment of the Colne Valley itself. There was no baseline noise level for the Colne Valley in the relatively unexposed areas. The map extract below from SV-03-010 shows the location of where baseline measurements were taken.
- 20.5.4. The map shows the location of a point used to assess the noise from construction impacts, not the operational noise of trains. The baseline for this assessment is actually taken from south of Savay Lake. It is unclear why a baseline level was not taken at this location particularly as the Council raised significant concerns about the noise level in the Colne Valley.
- 20.5.5. Table 1 of SV-002-007 shows a daytime noise level of 45.3dB laeq 16hr and a nighttime noise level of 38.7 laeq 8hr for receptor 709521 (Jetties, Harefield). In reality the noise at this specific location here would be much lower given it is in the heart of the valley away from residential receptors or working aggregates sites. Although HS2 Ltd has not provided the details of the assessment, it is possible to extrapolate the data. At this point HS2 Ltd has assessed the construction noise level as 71 – 81dB, an increase of approximately 30dB. It

must be expected that much of the Colne Valley will see this level of noise throughout the day during construction of the viaduct.

20.5.6. The assessment is unclear as to what the operational impacts would be in the heart of the valley, but given the extremely close proximity of an area deemed to be greater than 65dB it seems entirely logical to conclude that there would be impacts of upwards of 55dB in this location and through large parts of the Colne Valley.

20.5.7. This is an excessive change to the present relative tranquillity in the Colne Valley which goes largely unassessed in the ES. HS2 Ltd has focussed on properties and not adequately assessed impacts in the Colne Valley.



## **20.6. Conclusion**

- 20.6.1. The noise assessment is based on an inadequate assessment of significance. The Council does not agree that a 3dB increase is only a minor change. The Council considers a 1dB increase to be more appropriate for moderate to significant change, with a 3dB increase, which is a doubling of effect, definitely a significant change.
- 20.6.2. The ES is unhelpfully presented with a number of different reports in various volumes, there are contradictory statements, and information is missing.
- 20.6.3. The Council is disappointed by HS2 Ltd's reliance on low standards opting for the bare minimum instead of aiming to achieve exemplary levels as originally stated. The decision to meet only the bare minimum World Health Organisation standards for night time noise levels is entirely unacceptable for the most prestigious and costly transport scheme for generations.
- 20.6.4. Nonetheless the ES does report that nearly 250 properties across Hillingdon will experience significant noise effects due to sizeable changes in noise exposure levels. This appears to be based on a situation after the noise barriers are in place.
- 20.6.5. The ES relies on as yet unspecified mitigation to reduce these impacts. However, assuming this is some form of noise insulation scheme then this will only benefit the insides of properties. Gardens and amenity space will be permanently harmed which impacts on the quality of life.
- 20.6.6. The Colne Valley is given very little attention. The National Planning Policy Framework requires development to respect the tranquillity of rural and semi rural areas. HS2 Ltd has opted not to take baseline noise levels in the relatively tranquil parts of the Valley which distorts the assessment. However, it is possible to extrapolate some information to provide some form assessment in lieu of anything provided by HS2. This shows noise increases of 25dB+ through construction, and once operational, increases of over 10dB could be expected. HS2 Ltd only assesses increases in relation to properties.
- 20.6.7. The significant noise effects on nearly 250 properties and huge levels throughout the Colne Valley based on a highly conservative methodology demonstrates HS2 will not be anywhere near as quiet as first set out.

## **20.7. Proposed Mitigation**

- 20.7.1. The noise impacts are much greater than originally presented and result in significant effects and disturbance to people and quality of life. This supports

the need for an extension of the tunnel from West Ruislip to the west of the Colne Valley. At the very least an extension should be made beyond the Greenways.

20.7.2. However, if after a proper assessment the tunnel extension is not feasible the following mitigation measures are necessary:

- Full details of noise from construction including details of the conveyor system. Appropriate mitigation to reduce impacts should be set out.
- Full details of the sound insulation and property improvements to reduce the noise down to acceptable levels.
- A proper assessment of the noise impacts in the Colne Valley complete with appropriate baseline monitoring. A subsequent reassessment that focuses on not just properties but also on the Colne Valley Park itself needs to be undertaken and adequate mitigation measures presented.

## 21. Traffic and Transport

### 21.1. General Comments

- 21.1.1. Environmental Statements should not be based on generic approaches to assessments. They should be far more relative to the local impacts they are assessing for example inner London does not have the same timeframe for peak morning hours as outer London. HS2 Ltd appears to have treated the impacts in each area of the scheme in the same way.
- 21.1.2. HS2 has based their highways modelling on an assumed peak morning period of 08:00-09:00 and an evening peak of 17:00-18:00:
- 21.1.3. The HS2 report [CFA6 paragraphs 12.2.3 and 12.3.2), includes an assumption that the appropriate definition of peak hours in the area of the study are as above. In practice, morning peak flows in particular will tend to start earlier than 08:00 as much of the commuter traffic passing through the area is headed further afield. As regular road users in the area know, their journeys are very vulnerable to minor congestion along the route, which tends to mean that journeys start earlier in the day.
- 21.1.4. The traffic flows across the proposed line of HS2 tend to be higher southwards in the morning and northwards in the evening. Traffic heading towards West Ruislip uses Long Lane which becomes High Road, Ickenham and then Ickenham High Road and this long route, with few viable parallel alternatives, is extremely susceptible to congestion at any point along it. HS2 recognise this in the ES [para 12.3.3]. The imposition of a new site compound access point at Hill Lane will add considerably to this and this will most likely lead to a considerable increase in the duration of the evening peaks.
- 21.1.5. HS2 Ltd acknowledges that peak periods will become extended due to construction traffic. This further undermines the use of rigid morning and evening peak periods.
- 21.1.6. The Council is hugely concerned with the use of the evening and morning peak periods assessed. The reason for this concern becomes more apparent as HS2 Ltd states:

*'core operating hours will be 08:00-18:00 on weekdays and 08:00-13:00 on Saturdays...site staff and workers will [therefore] generally arrive before the morning peak hour and depart after the evening peak hour ((paragraph 12.4.5 see also draft CoCP, section 15).*

- 21.1.7. This means that the construction workforce will add to traffic congestion at both ends of the working day, outside the periods HS2 Ltd has assessed as sensitive but inside the timeframe of normal congestion within the Borough.

#### *Railhead*

- 21.1.8. The draft ES showed a vast array of routes to be used through Ruislip for construction purposes. However, these are no longer shown in the maps for the final ES. This is largely understood to be down to the use of a rail head which will service the West Ruislip tunnel portal. A conveyor will transport material from the tunnel portal to an area of Harvil Road to the west, where it will be sorted and removed by rail.
- 21.1.9. In theory, this seems to be a sensible approach. However, it appears HS2 Ltd has run out of time in developing the details as set out in section 4 of this report. As a consequence, the text in the ES refers to a number of roads being used as outlined in the draft ES, but the maps appear to be based on the use of a railhead.
- 21.1.10. No firm details of the railhead have been provided. The photomontages in the landscape section clearly show no conveyor system in operation. If this scheme were to proceed, the Council requires an undertaking from Parliament that the railhead will be in use.

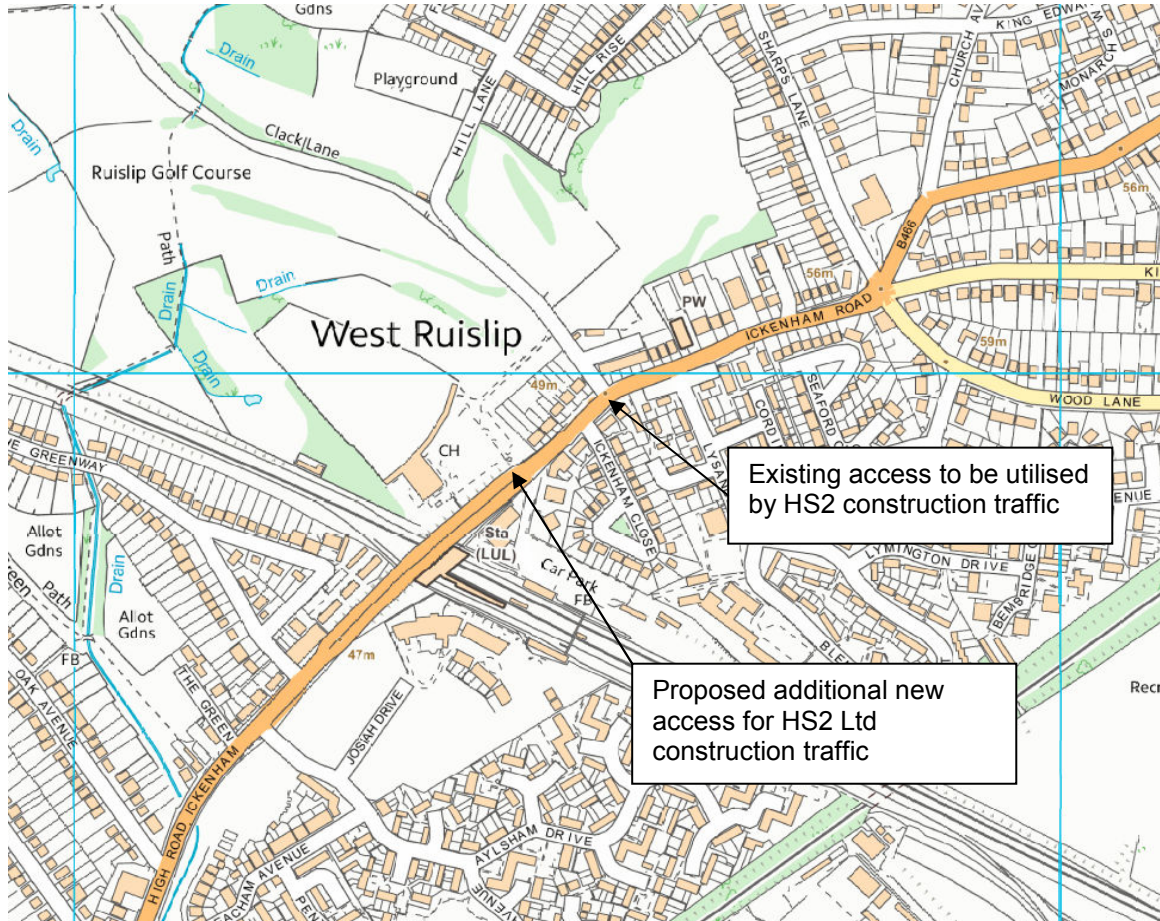
#### *Modelling*

- 21.1.11. The Council does not consider the use of the WELHAM modelling to be appropriate in Hillingdon. It is an inappropriate tool for this type of work. This modelling fails to represent existing junctions and does not reflect the actual problems on the network. The Council considers it is more appropriate to use software like LIINSIG rather than WELHAM output.
- 21.1.12. The problem with the WELHAM modelling is that it does not take into account existing congestion at key junctions for example at Long Lane, Ickenham High Road, and Swakeleys Road. It only uses TFL data and takes no account of local data collected by the Council. As a consequence the baseline for measuring vehicle increases is considered to be far too low.

## 21.2. CFA6

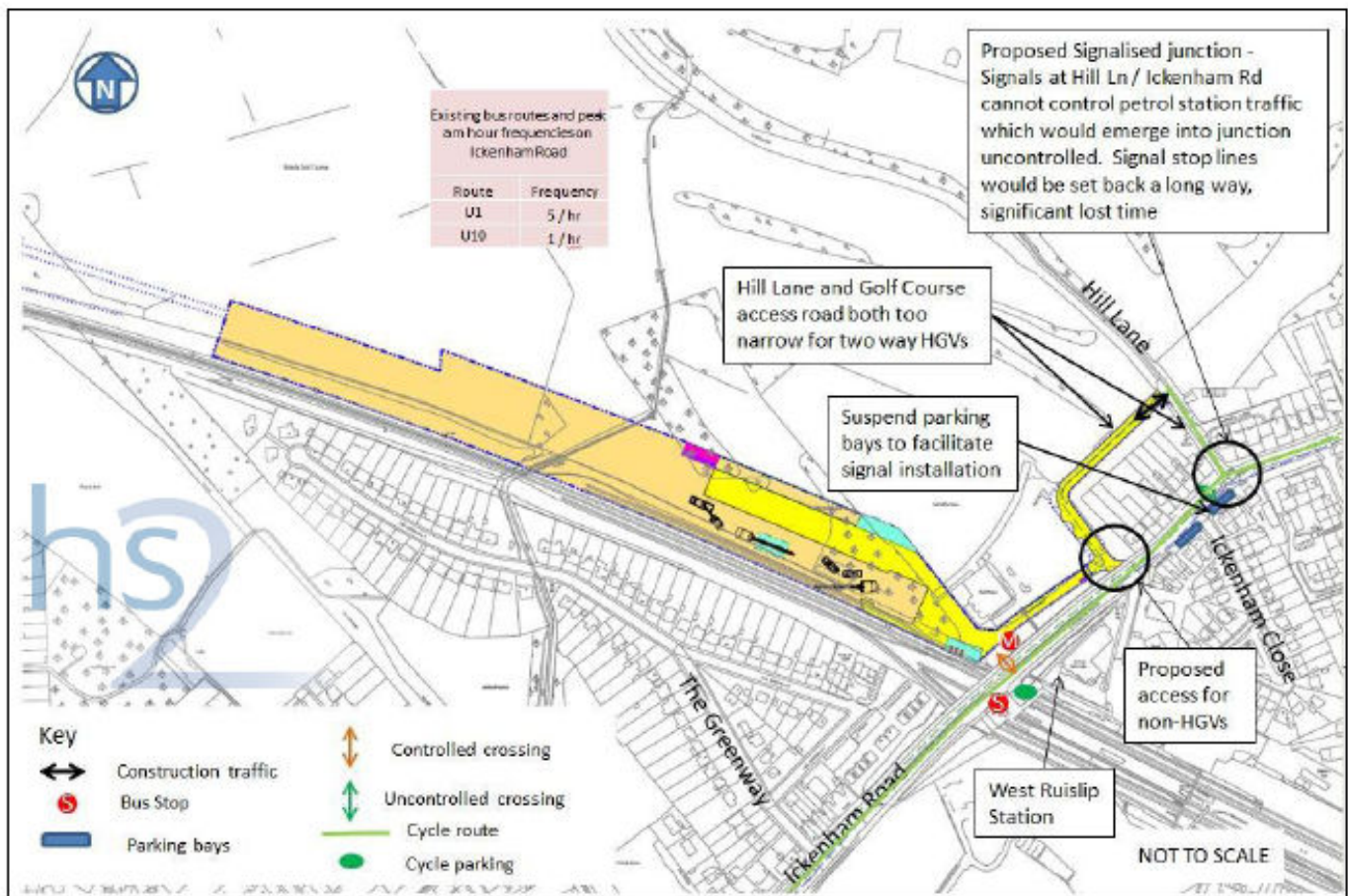
### *Hill Lane access*

- 21.2.1. The statement notes correctly that there are few significant road safety accident clusters, but a key concern is that the creation of a new access point at Hill Lane, to the north of the proposed West Ruislip tunnel portal, will potentially create a new accident hot spot.



- 21.2.2. Whilst overall numbers of accidents may be low, a significant cluster were within close proximity of Hill Lane (see HS2 Vol 5 Appendix Transport Assessment TR-001-000 Figure 5-57 – shown below)

Figure 6-216: West Ruislip Tunnel Portal site and local access and egress



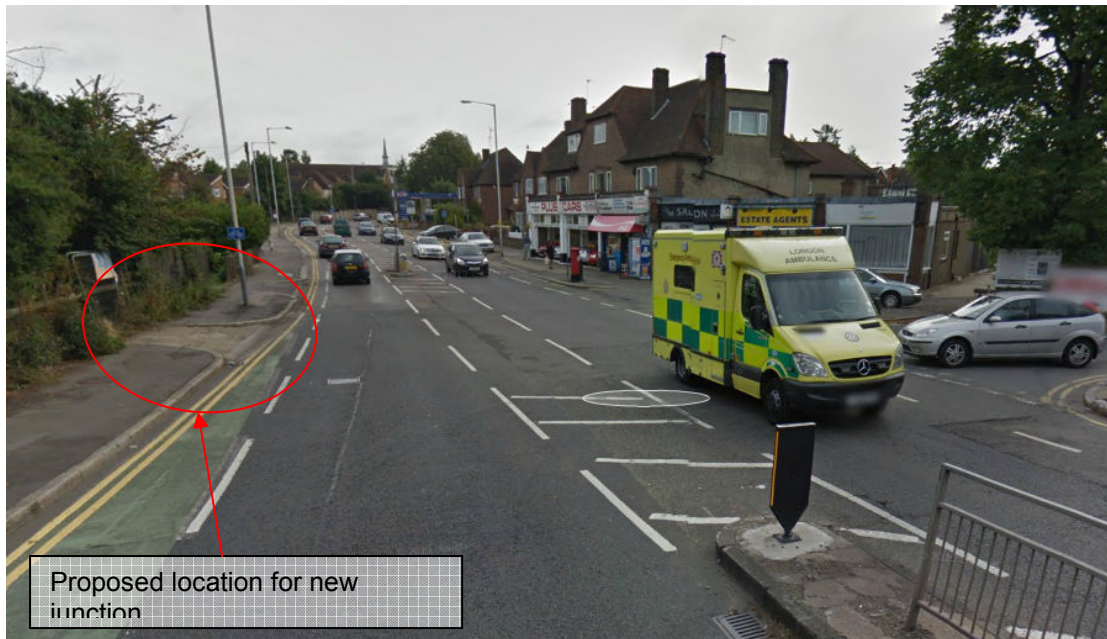
21.2.3. In the Council’s response to the draft ES, the need for a careful redesign of this modest access road, which at present serves a small housing development, Ruislip Golf Course and a cycle route, was highlighted. The Council suggested the link would require a traffic signal control but this would be on a route already subjected to a significant number of sets of traffic signals.

21.2.4. In the final ES, the problems with this access appear to have been acknowledged [paras 12.3.12 and 6.9.60 referred to below] but the Council is concerned that HS2 Ltd has not set out a solution to the problem

21.2.5. The Volume 5 Appendix ‘Transport Assessment – TR-001-000 London Assessment CFA6’ also has a section covering the Hill Lane access (section 6.9.60) with a drawing (figure 6-216 – see below) which shows the layout proposed.

21.2.6. There is little commentary on this other than an explanation in paragraph 6.9.60 of the route to be taken by construction traffic to and from the site (it links to the A40 via the B467 Swakeleys Road and B466 High Road Ickenham/ Ickenham Road, suggesting further major impacts on the congested junction of these two roads). However the plan includes reference to the proposed signalisation of

the Hill Lane junction but provides no further details as to what this will do to traffic in the area. The proposed new junction can be seen below alongside the existing road layout.



21.2.7. Of particular concern are HS2 Ltd's acknowledgements of the existing problems in the area and their restrictions on what they can control near the Hill Lane access. Especially notable are the statements 'cannot control petrol station traffic which would emerge into junction uncontrolled'.



21.2.8. It is not clear how this could be safely arranged. Secondly, there is a note to say 'signal stop lines would be set back a long way, significant lost time.' This is again something that the Council highlighted as a key concern.

- 21.2.9. Adding signal controls to what will become a very busy junction will also add significantly to traffic congestion in the morning and evening peaks along the B466 which already has a series of signal sets, some of which arose through the redevelopment of the former RAF West Ruislip site. If signal controls are unavoidable it may be prudent to consider linking them through a UTC/Scoot system.
- 21.2.10. Also shown in figure 6-216 is a second access proposed from Ickenham Road. This is described as 'proposed access for non HGVs'. This would involve opening up an old long-disused gateway off Ickenham Road shown on the image below.



- 21.2.11. A key concern here would be road safety as this gateway would open on to a section of Ickenham Road just north of the existing road bridge over the Chiltern Line with a considerable risk of collisions with traffic coming over the bridge itself as well as traffic coming in and out of the main Chiltern Line car park at West Ruislip Station, which is directly opposite.

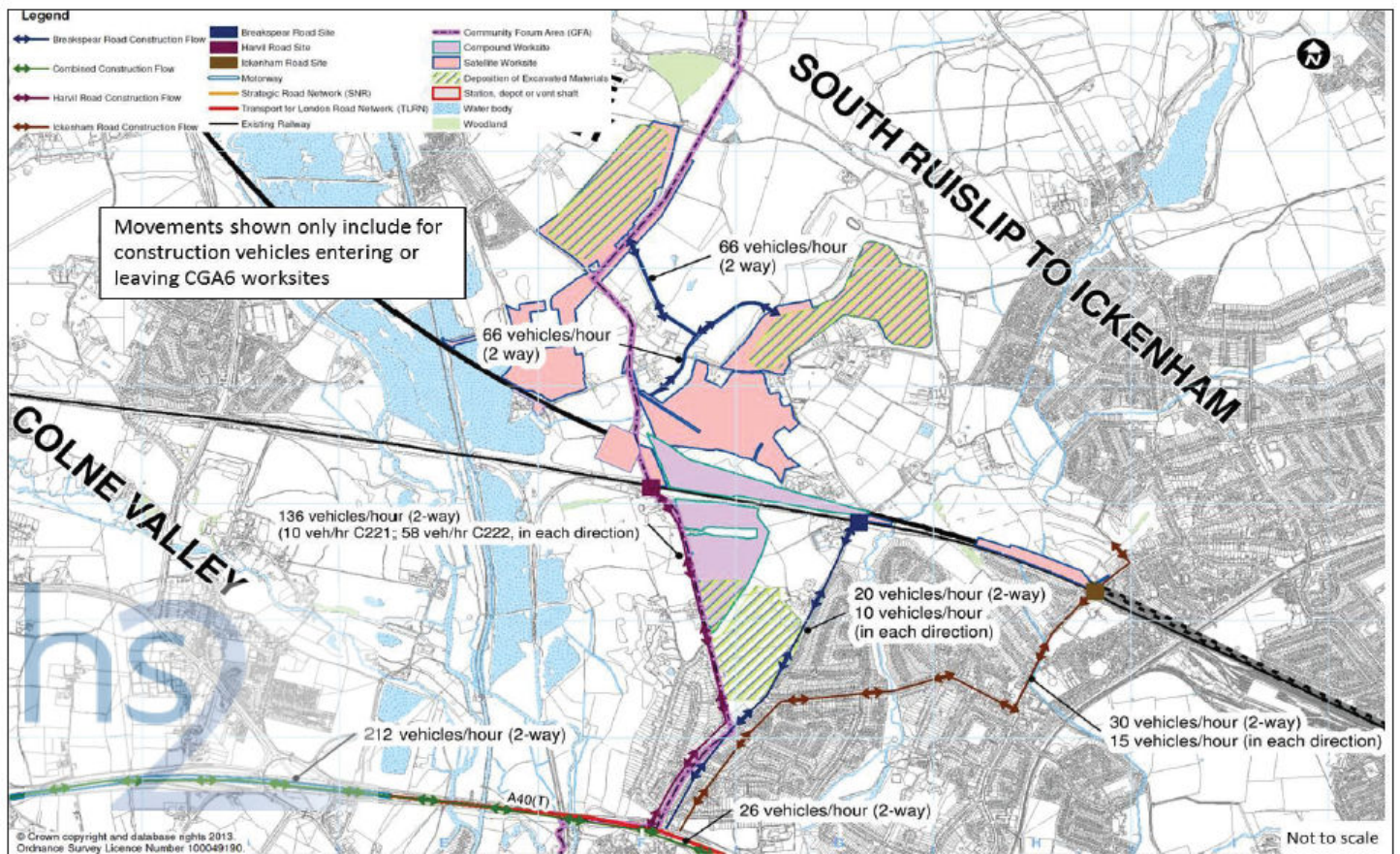
#### *Traffic Routeing*

- 21.2.12. Proposed HGV construction traffic routeing is referred to in paragraph 12.4.1 and shown on plan TR-03-009 in Volume 5, Map Book, Traffic and Transport. It is apparent that while HS2 have acknowledged some of the higher traffic impacts (for example, extending the route shown in Swakeleys Road as far as the A40 Western Avenue) other critical aspects such as Ladygate Lane, High Street Ruislip and New Years Green Lane, appear to have been ignored.

21.2.13. The HS2 Draft Code of Construction Practice also contains a section 14 on 'Traffic and Transport'. Section 14.2 describes 'measures to reduce potential transport impacts during construction' and paragraph 14.2.2 suggests that 'generic measures will be discussed with the appropriate authorities and may include measures to ensure that the maintenance and condition of public roads, cycleways and PRow do not deteriorate due to the construction traffic, including monitoring arrangements with local highway authorities'. This is considered important not least because the weight and numbers of HGV movements will be considerably greater than at present and there appears to have been no obvious assessment work by HS2 Ltd of the practical aspects such as the current state of roads and whether they will withstand the sheer increase in the amount of HGV movement.

21.2.14. HS2 also refer to 'construction lorry routes and HGV movements' in paragraph 6.9.64 of Volume 5 Appendix TR-001-000 London Assessment (CFA6) which includes the following map:

Figure 6-218: CFA6 Hs2 HGV route loadings (vehicles)



21.2.15. This diagram appears to indicate that there will be no construction traffic passing through Ruislip High Street and Bury Street. However, the main CFA6 report states:

*The main local roads affected by the Proposed Scheme are Harvil Road and Breakspear Road South which both lead to the A40 via B467*

*Swakeleys Road, High Road Ickenham, Ickenham Road, High Street, Breakspear Road and Ladygate Lane. Traffic counts and model data suggests that Ickenham Road is the busiest of these roads, followed by Breakspear Road South, Harvil Road and Victoria Road. The majority of the highway network in the area is adjacent to residential areas, with the exception of Breakspear Road South and Harvil Road which are semi-rural in nature. (Paragraph 12.3.5)*

- 21.2.16. Ladygate Lane, which is a residential road passing Whiteheath School and with junctions at either end with Bury Street and Breakspear Road, is often congested in the morning and evening school peak periods with parents and guardians picking up or dropping off young school children. The assessment indicates the scheme will result in significant severance on Ladygate Lane which clearly implies it will be used for construction vehicles. The confusion as to whether construction vehicles will be directed past this sensitive area is obviously a concern.
- 21.2.17. It is also assumed 'High Street' in the above extract refers to the A4180 High Street in Ruislip. This is a busy retail centre with less than optimum road width which necessitates peak hours waiting restrictions on opposite sides of the road in order to allow free flow of buses and HGVs at these busy periods. It is already at capacity and cannot safely deal with an increase in HGVs.

#### *Traffic Disruption*

- 21.2.18. An indication of the predicted duration of traffic disruption is given in Table 20 of CFA6. This shows maximum duration of disruption of up to ten years at Harvil Road, although the maximum intensity is shown as lasting one year.
- 21.2.19. It is unclear as to why there will be 10 years of construction when the start date is in 2017. Furthermore, there is no indication as to how HS2 Ltd has categorised the 9 years that will not suffer from 'busy vehicle movements'.

Table 20: Typical vehicle trip generation for construction compounds in this area

Compound type	Location	Access to/from compound	Indicative start / set up date	Estimated duration of use (years)	Estimated duration with busy vehicle movements (years)	Typical daily number of combined two way trips	
						Cars/ LGVs	HGVs
Main compound and facilities	South Ruislip vent shaft	Victoria Road	2018	6 years	2 years	10-20	90-100
Main compound and facilities	Northolt tunnel and earthworks (including Gatemead embankment works)	Harvil Road	2017	10 years	1 year	102 - 136	1,020-1,360
Satellite compound and facilities	Breakspear Road (including West Ruislip embankment works)	Breakspear Road South	2017	18 months	6 months	15-20	150-200
Satellite compound and facilities	Harvil Road realignment	Harvil Road	2017	5 years	1 year	8-10	75-100
Satellite compound and facilities	West Ruislip portal	Ickenham Road / Hill Lane	2017	7 years	1 year 6 months	22-30	225-300

### *General Observations*

21.2.20. There are many references throughout all the documents to ‘Breakspear Road’ when what is actually meant is either ‘Breakspear Road South’ or ‘Breakspear Road North’. This is a concern as not only does it suggest a lack of certainty by the HS2 team, it also adds a degree of potential confusion for residents who know that these are three distinct routes.

21.2.21. Breakspear Road South runs from Ickenham in the direction of Harefield as far as the junction with Fine Bush Lane. From that point northwards, it becomes Breakspear Road North. Breakspear Road, however, is a separate road that runs between its junctions with Breakspear Road South and with Ducks Hill Road.

### **21.3. Significant Effects in CFA6 and 7**

21.3.1. The following lists the significant effects of both CFAs relevant to Hillingdon:

21.3.2. Construction of the Proposed Scheme is forecast to result in changes in daily traffic flows due to works and construction vehicles accessing worksites and also temporary road closures and diversions. These changes in traffic flows

will lead to significant increases in delays to vehicle users and congestion at the following junctions

- B467 Swakeleys Road/Harvil Road
- B467 Swakeleys Road/Woodstock Drive
- Swakeleys Roundabout (A40 junction)
- Harvil Road with Woodstock Drive (minor adverse effect);
- B467 Swakeleys Road with Harvil Road (moderate adverse effect);  
and
- A40 Western Avenue with B467 Swakeleys Road (moderate adverse effect).

21.3.3. Construction of the Proposed Scheme is forecast to result in increases in daily traffic flow (HGV or all traffic) causing a significant increase in traffic related severance due to the increase in HGV movements in the following locations:

- B467 Swakeleys Road – major adverse effect (HGV);
- Ickenham Road – major adverse effect (HGV);
- Breakspear Road South – major adverse effect (HGV);
- Harvil Road – major adverse effect (HGV);
- Swakeleys Drive/Woodstock Drive – moderate adverse effect (all traffic);
- Swakeleys Roundabout (A40 junction) – major adverse effect (HGV);
- Ladygate Lane – major adverse effect (HGV);
- A40 eastbound off-slip to Swakeleys Roundabout – major adverse effect (HGV); and
- A40 westbound on-slip from Swakeleys Roundabout – major adverse effect (HGV).
- Denham Green Lane (moderate adverse effect) – an increase in HGV flow as well as all traffic flow; Slip road on to A40 westbound from Swakeleys roundabout (major adverse effect) due to an increase in HGV flow;
- Slip road from A40 eastbound to Swakeleys roundabout (major adverse effect) due to an increase in HGV flow;
- Swakeleys Road, between A40 and Harvil Road (major adverse effect) due to an increase in HGV flow; and
- Harvil Road, south of Moorhall Road (major adverse effect).

## **21.4. Conclusion**

- 21.4.1. The Council agrees with HS2 Ltd that there will be extensive impacts on the Council's road network. However, the Council believes that HS2 Ltd has not quite determined the full extent of the problems.
- 21.4.2. The principle problems stem from problems related to the types of modelling used and the misunderstanding of when the peak hours are in Hillingdon. There is still a lack of understanding of the roads being used which suggests HS2 Ltd has never driven the routes they intend to send hundreds of lorries down. The assessment also includes contradictions about what roads will be used which makes it unclear to the Council and residents as to what is affected and where.
- 21.4.3. In general though, HS2 Ltd hides behind generic solutions outlined in the draft Code of Construction Practice. This means they are able to determine that significant effects will occur but simply suggest this will be resolved at some time in the future using as yet undetermined mitigation measures.
- 21.4.4. This is entirely unacceptable.

## **21.5. Mitigation**

- 21.5.1. The significant effects on congestion and likely (but unassessed) impacts on businesses and quality of life support the need for a tunnel from West Ruislip to west of the Colne Valley,
- 21.5.2. If however, a proper assessment reveals a tunnel extension is not feasible, the following mitigation is necessary:
- Commitment from Parliament that HS2 Ltd will complete the work on the West Ruislip railhead and review the ES and the relevant transport assessments. Clear details must be provided to the Council to demonstrate how the railhead and conveyor system will work, the noise implications, the landscape impacts and the practicalities of moving material away by rail.
  - HS2 Ltd need to reconsider the transport routes around West Ruislip and Ickenham. It is advised that HS2 Ltd carry out a test run of the proposed routes using a HGV as would be expected during construction. The route of the lorry should be filmed and discussed between Council and HS2 Ltd. This should help inform a new approach to construction traffic routes.
  - Under no circumstances can the public footpath diversions be carried out as planned. These must be reassessed and alternative measures that do not put people's lives at risk put in place.

## **22. Water Resources**

### **22.1. General**

#### *Lack of Assessment*

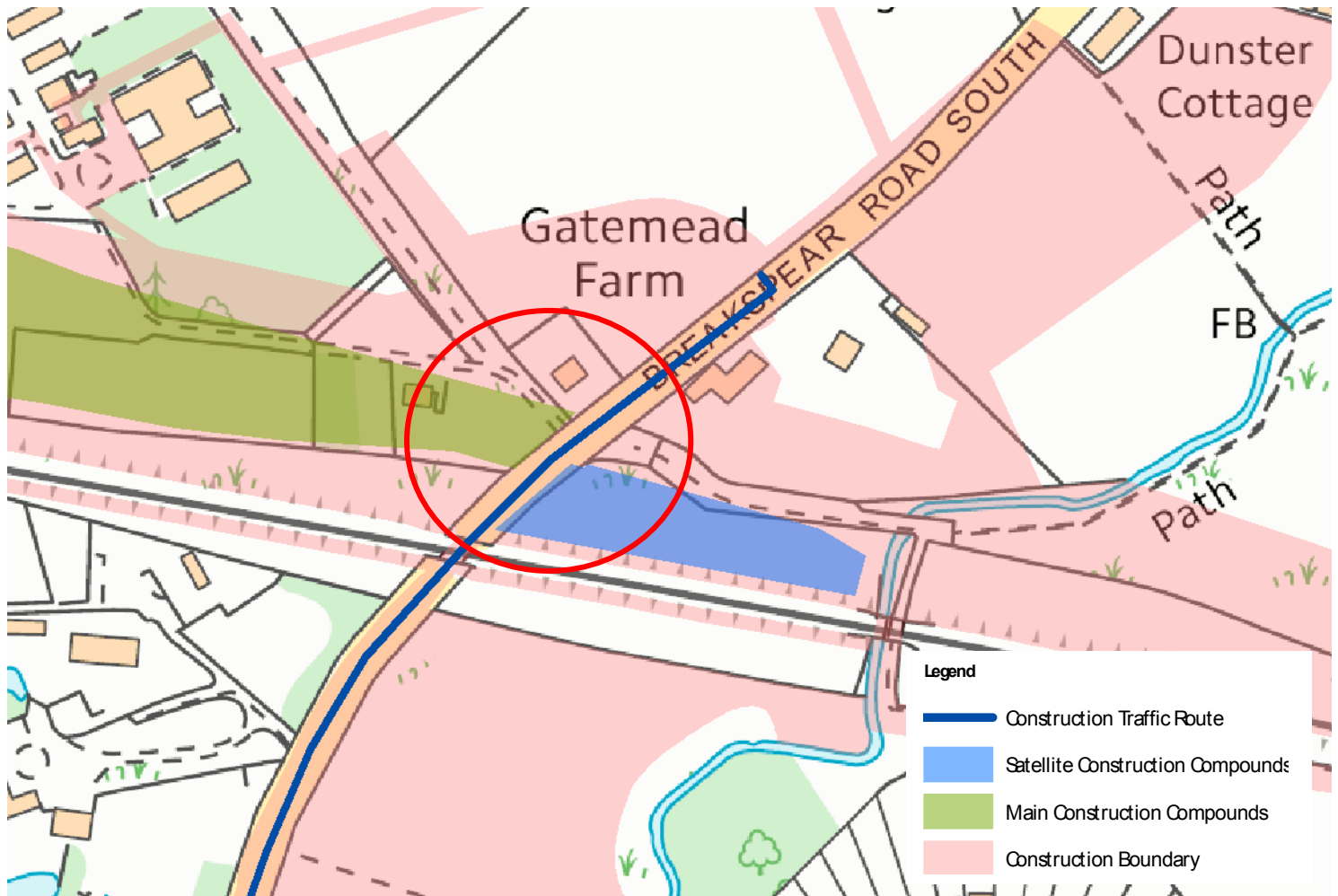
- 22.1.1. Paragraphs 13.4.36 and 13.4.37 of CFA6 and section 13.4.31 of CFA7 acknowledge there are significant threats to groundwater and potentially public water supplies. However, there have been limited attempts to quantify the risks or qualify the type of threat. Instead there is a reliance on determining the risks at a late date when HS2 Ltd has had an opportunity to agree an approach with the Environment Agency and Affinity Water.
- 22.1.2. The Council is concerned that Parliament is being asked to determine the principle of the scheme when there is very little information about how harmful it could be. The Council is therefore seeking an undertaking that the water supply of residents is not impacted at any time by the HS2 project.

#### *Surface Water*

- 22.1.3. HS2 Ltd does not appear to have assessed all aspects of the scheme and has not used the best available evidence to fully assess the impacts and determine appropriate mitigation. The Environment Agency has updated its surface water plan and the London Borough of Hillingdon's Surface Water Management Plan has also been adopted.
- 22.1.4. The areas outside the main construction sites for supporting works such as the deposition of spoil can also have an impact on the flood risk particularly regarding surface water impacts. These have not been taken into account.
- 22.1.5. Local flood risk receptors need to include not just residential or commercial buildings but also Highway infrastructure, and other land such as farmland. Changes in drainage regime can also impact severely on the type of ecology in that area and the use of any infrastructure.
- 22.1.6. It is possible the HS2 proposal may create additional problems from surface water flooding and changes to drainage regimes, but as this has not been assessed it is not possible to confirm.

### *Breakspear Road South*

22.1.7. HS2 intends to use part of Breakspear Road South as a primary route for construction vehicles and as the entrance to construction compounds on either side of the road as shown in the map below.



22.1.8. The area circled is known to flood regularly and badly as result of a poor surface water drainage regime in the area.

22.1.9. HS2 Ltd's decision to select this area for significant works is flawed. Any earthworks are likely to increase in the risk of flooding and any traffic movements could be fundamentally hampered by flooding events.

22.1.10. The photo on the opposite page shows Breakspear Road South to be flooded in January 2014. The photo provides evidence that HS2 Ltd has given little weight to practicalities when locating major construction infrastructure. If the scheme were to proceed, HS2 Ltd would have to contribute to a flooding solution prior to any other works commencing.



### *Blue Ribbon Network*

- 22.1.11. Changes to rivers and watercourse should follow the principles set out in the Blue Ribbon Network plans and should help achieve the aims and objectives of the Water Framework Directive.
- 22.1.12. It appears that the assessment has been undertaken entirely in isolation of other plans, programmes or visions. The Council would prefer to see a much greater vision regarding the watercourses and drainage arrangements.

### *Use of Culverts*

- 22.1.13. Some of the proposed drainage systems include culverting of existing open watercourses. Culverts are opposed by the Local Authority and the Environment Agency as they increase flood risk, increase maintenance requirements, and reduced ecological diversity. Culverts represent an outdated and unsustainable way of thinking. HS2 Ltd should be aiming for much higher design finishes and must seek far more favourable alternatives to culverts.

## 22.2. CFA6

### *Ickenham Stream*

- 22.2.1. The proposed drainage changes impacting on the Ickenham Stream need to be far more visionary. HS2 Ltd has approached their proposals in isolation with no consideration for seeking improvements away from their proposals. The works to the Stream and other watercourses in the area have the potential to improve the management of flood risk. Exploring options to enhance the existing drainage and increasing capacity in the watercourse should be a priority. In addition, sinuosity should be introduced where possible to slow flow and create access points if this drain is to be within Council ownership for future maintenance.
- 22.2.2. Landscaping of the new watercourse routes should promote wildlife and ecology benefits.

### *River Pinn*

- 22.2.3. There is a large loss of River Pinn fluvial floodplain as a result of the embankments required for the route. The impacts will be felt at Breakspear Road South on Council owned land.
- 22.2.4. The loss of floodplain storage will exacerbate the flooding on Breakspear Road South, which is a main access point for the north of the Borough. It is also an area HS2 Ltd intends to use for a lot of its vehicular traffic.
- 22.2.5. Further problems are created because the compensation only appears to be related to fluvial floodplain and there is no consideration of the impact of the embankment on the Surface water flooding on Breakspear Road South. Currently water is stored alongside the Chiltern lines embankment within an ordinary watercourse, through the construction of a higher headwall prior to discharge on to the road. The lack of consideration of surface water flooding could result in significant effects.
- 22.2.6. Where floodplain compensation is proposed, the footpath across this area will also be at a lower level causing issues of access over a larger portion of the route for residents as the low lying land is often saturated during winter.
- 22.2.7. The existing footbridge over the Ickenham Stream is an obstruction to river flows and should be replaced to provide more space for water.

### *New Years Green Bourne*

- 22.2.8. The floodplain compensation off Harvil Road does not appear to be a sustainable solution. The New Years Green Bourne is a narrow channel that already hampers flood risk management by constricting discharges from above New Years Green Lane. Expanding the width or size of any crossing of Harvil Road will also increase the flood risk downstream by speeding the rate at which it will reach the lakes.
- 22.2.9. The temporary compound also appears to be within the floodplain.

### *New Years Green Lane*

- 22.2.10. New Years Green Lane should be included in the list of local receptors, as this would be affected by the proposed spoil deposits. There is a network of ditches across the area which currently over top and back up which causes flooding to New Years Green Lane. Raising of ground levels across these areas will increase the water flowing along New Years Green Lane which is likely to increase flood risk. This would have to be assessed further to determine the suitability of the measures and there will be a need to have discussion with the Council to determine the profiling of this land. Replacement of the ordinary watercourse crossings would need to be undertaken to be able to deal with the likely increase in flows.

### *Other Ordinary Watercourses.*

- 22.2.11. There are large numbers of Ordinary Water Courses not referenced. An access track is proposed through Uxbridge Golf Course which would require the crossing of a number of ordinary watercourse; these would have to be assessed structurally for vehicles.
- 22.2.12. There are a number of locations for spoil, again there are ordinary watercourses on these sites. Profiling and the suitability of these sites will have to be managed carefully so they do not increase flood risk.
- 22.2.13. Open ditches should be utilised to convey flow from the Copthall Cutting. Ditches are only provided downstream of the basin west of Harvil Road.

### *Surface Water Flooding*

- 22.2.14. Station Approach in South Ruislip is required for construction of the Ruislip vent shaft. This road suffers from regular surface water flooding. West End Road also suffers flooding issues. These are routes that HS2 Ltd is likely to use on a regular basis but are omitted from the assessment.

- 22.2.15. Works in South Ruislip have the potential to improve existing flood management situations. HS2 Ltd does not appear to have adequately considered improvements, for example the proposed mitigation for the South Ruislip Vent shaft does not appear sufficient; any surface water should be controlled to high national standards and to help reduce flood risk in the surrounding area by overprovision of storage or contribute to the wider management of flood risk. HS2 Ltd has only considered the scheme and not a wider area.
- 22.2.16. Drainage ditches along the Chiltern Rail embankment currently run into the River Pinn, the one immediately to the west of the Pinn is in open channel and should be retained as the drainage from the road discharges to this. Any opportunities to expand the length of open channel up to the road as a result of the embankment works should be explored.
- 22.2.17. Map CT- 06-019a shows the diversion of an ordinary watercourse alongside the Chiltern Main Line to the north of the new cutting. There does not appear to be a replacement for the Chiltern Main line. This ordinary watercourse receives a large amount of water from a wide catchment and is not currently sized appropriately to deal with that; the proposed balancing pond must be sized adequately to deal with excess water and prevent flooding on Breakspear Road. This low lying area is often already saturated.
- 22.2.18. There is a statement that landscape mitigation earthworks will separate surface water catchments. This is not an unacceptable situation unless it is properly assessed. For example, Network Rail has stated there is no current railway drainage system on the Chiltern Mainline through the cutting which the Council considers to have a contributory factor to the flooding issues in the surrounding areas. Any further separation of surface water catchments could lead to similar barriers increase the risk of flooding elsewhere.
- 22.2.19. There is a proposed sustainable drainage basin on Council owned land for the proposed scheme. Clarification is needed on the long term ownership of this area, and the Council would not want to be responsible for maintenance of railway drainage infrastructure.

#### *Groundwater*

- 22.2.20. There is an increased potential for groundwater flooding in the permeable superficial deposits at Ruislip Gardens.
- 22.2.21. The Council is aware from borehole monitoring undertaken by developments that there are a number of perched watercourses through the clay which affects properties in the area, and this could affect the rail head site.

### *Drainage Systems*

- 22.2.22. The Council's surface water management plan (SWMP) has not been referred to in the understanding of the drainage systems. Locations of historic flood events are mapped in the SWMP.
- 22.2.23. Existing drainage systems have limited capacity and additional pressure will contribute to flooding problems. HS2 Ltd appears to be working to minimum industry standards and have only considered drainage to a very low standard. HS2 Ltd must consider improving the drainage performance of the scheme and improving the situation in a wider area.

### **22.3. Colne Valley CFA7**

#### *Uxbridge Golf Course Access*

- 22.3.1. HS2 Ltd has proposed an access track along Uxbridge Golf Course possibly to facilitate the realignment of the overhead pylons. This track is proposed on land that is low lying, adjacent to a floodplain and regularly saturated. Any construction of a new access track to allow access for movement of vehicles should be designed in response to these existing flooding and drainage problems but could also provide a long term dry access with a link to the surrounding network of PROW.

#### *New Years Green Bourne*

- 22.3.2. Land required for pylons along the New Years Green Bourne lies within its floodplain, and will need to be taken into account in any work in these areas.
- 22.3.3. A haul road is proposed across the New Years Green Bourne where it is in culvert. A clear assessment of its structural integrity would need to be undertaken using CCTV survey and appropriate structural support must be provided where necessary.
- 22.3.4. The Viaduct piers result in a diversion of the New Years Green Bourne. This diversion appears to increase the length of a watercourse which is already very flat at this location and currently causes backing up along its length resulting in flooding issues to a number of landowners.
- 22.3.5. Two locations of Floodplain compensation shown on CT-06-019b are not considered to be the most suitable locations. One is compensation for the impact of locating the National Grid Feeder Station and the other from the impact on the New Years Green Bourne Floodplain. Both sites fall on Council owned Land. The FRA states that any slight afflux has an impact a long way

upstream because of the slight gradient. Therefore compensation would be better alongside the New Years Green Bourne, rather than the other side of Dews farm.

22.3.6. Ickenham National Grid feeder station is of concern to Hillingdon because it is at flood risk. The proposed solution of raising ground levels 1m above the floodplain is an extreme mitigation measures. HS2 Ltd should reconsider this in favour of more credible methods for managing flood risk.

22.3.7. The proposed location of the balancing pond is on Council owned land and is in an area already saturated as a low lying area.

#### *River Colne*

22.3.8. There is little detail of the use and design of the Jetty in Flood Zone 2 and further information would be required.

22.3.9. Diversion of the River Colne is dependent on design. Far greater detail is required to ensure there is no increased responsibility on the Environment Agency or Lead Local Flood Authorities in managing fluvial and pluvial flood risk.

### **22.4. Conclusion**

22.4.1. It is evident that HS2 Ltd has focussed solely on their needs when managing flood risk for the development. There appears to be a limited vision to improve the wider flood risk situation.

22.4.2. Of particular concern is the lack of consideration of surface water flooding. It is likely that HS2 Ltd worked with the Environment Agency on fluvial flooding matters, but neglected to consider more complex surface water issues. This is evidenced by the choice of locations for balancing ponds in already saturated areas, the disturbance to already highly constricted drainage regimes, and severing of surface water catchment areas. All of these measures have not been properly assessed.

22.4.3. The Council considers the cumulative impacts of all the likely changes to the surface water regime to be poorly assessed and therefore a 'likely significant effect'.

### **22.5. Mitigation**

22.5.1. The water resources impacts do not directly support the need for a tunnel but they the ancillary works for the scheme remain unassessed in relation to

surface water flooding. This could ultimately reveal significant effects which do support the extension of a tunnel.

22.5.2. However, if a tunnel extension is deemed unfeasible following a proper assessment then the following mitigation is necessary:

- HS2 Ltd must undertake a full surface water flood risk appraisal. This will need to influence and support final decisions on changes to land levels and the modification to watercourses. For example the impact of the inclusion of flood compensation near Breakspear Road South is likely to increase flooding on the road. Greater consideration of the impact of the scheme on surface water drainage and management is required.
- A review of the drainage and modification of watercourses should be carried out with an aim to provide more positive outcomes. This should be done in consultation with the Lead Local Flood Authority, i.e. the Council.
- There should be no new culverts, but if these are deemed unavoidable, HS2 Ltd should look to open up other watercourse to avoid a net increase in culverting and the problems they bring. This could include opening up culverts on New Years Green Lane.
- Works to the River Pinn should not be isolated to consider just the scheme and instead should seek to provide improvements to people and property. Recent flood events in January 2014 have revealed that properties could benefit from River Pinn flood enhancement works which should be delivered by the HS2 project since it intends to divert and modify the Pinn.
- The creation of balancing ponds, wetland areas and other water features should be designed jointly with measures to deliver ecological enhancements and with the placement of excavated material.

## **23. Additional Topics**

### **23.1. Electromagnetic Interference**

- 23.1.1. In its response to the draft ES the Council requested that HS2 Ltd seek independent verification of its assessment of Electromagnetic Interference. The Council is not aware of a statutory body that covers such topics, which means HS2 Ltd's assessment is the only source for understanding the impacts.
- 23.1.2. For such an important scheme the Council would request that HS2 Ltd seek a second opinion on their assessment for professional verification.

### **23.2. Waste**

- 23.2.1. The Council is concerned that HS2 Ltd does not have a clear understanding of how or where to manage any waste arisings. In reality, this is likely to come from excavated material that is contaminated. The Council appreciates it is difficult to fully determine the extent of contamination at this stage, but arrangements must be in place should unexpected material be discovered.
- 23.2.2. The quantities of material involved are so large than any unexpected need to dispose of contaminated material will put pressure on existing waste management facilities.

## **24. Conclusion**

### **24.1. Objection in Principle**

- 24.1.1. The Council is opposed to HS2. The business case demonstrates a poor return for taxpayers and none of the alleged benefits have been supported by facts. In contrast the ES provides detailed information on passenger usage that shows one of the main aims, rebalancing the economy, to be entirely unsubstantiated and is likely to make matters worse.
- 24.1.2. The ES provides a greater understanding of the huge environmental effects which have consistently been understated by HS2 Ltd. The business case would have to be considerable with clear unarguable evidence that countless numbers would see the benefits to warrant such effects. As it is alleged benefits are completely questionable and in no way make up for the awful environmental performance of the scheme.
- 24.1.3. The findings of the ES reaffirm the Council's opinion that HS2 as presented would be an unmitigated failure.

### **24.2. Decision Making**

- 24.2.1. The Council is concerned that despite these failings HS2 will not get a fair and impartial hearing. The Government as the promoter of the scheme, has removed decision making from normal experienced planning bodies that are governed by strict rules and removed it from formal public scrutiny. Instead it has placed it in the hands of Parliament where the Government can control a large percentage of the voting MPs.
- 24.2.2. The Government has approached HS2 entirely in contradiction to the rules and regulations Parliament has set for other planning bodies. The Council believes this allows the Government to present an entirely inappropriate scheme free from independent scrutiny.

### **24.3. Quality of the ES**

- 24.3.1. The ES itself has been poorly presented, is deliberately misleading and understates the environment effects. The Council does not believe it complies with the bare minimum standards, or the EIA Regulations. It appears to have been rushed and is not befitting the nature and scale of the scheme it is assessing.

#### **24.4. Proposed Mitigation**

- 24.4.1. Although the Council is opposed to the scheme, it recognises that Parliament could still vote in favour. In this scenario, the Council does not believe the mitigation presented by HS2 Ltd is adequate. It has been poorly devised and lacks any sort of environmental vision.
  
- 24.4.2. In the unfortunate event the scheme were to proceed, the Council has set out a series of proposals that should allow the London Borough of Hillingdon to get at least partial compensation for the considerable damage done to the borough.

## Part 3

# The London Borough of Hillingdon Landowner Response

## **25. London Borough of Hillingdon Landowner Response**

### **25.1. Introduction**

- 25.1.1. This part of the London Borough of Hillingdon's ["Hillingdon"] response to the Environmental Statement ["ES"] Consultation relates to land which it owns. It is to be read in conjunction with Hillingdon's more detailed response which has been made in its capacity as an environmental authority.
- 25.1.2. There will be some degree of overlap between the two sets of responses but it is not the intention that all the points contained in the main response are to be repeated. In particular, it should be noted that this response does not contain headings of the various environmental topics which appear in the main response. The purpose of this is to avoid unnecessary duplication and to stress that full reliance will be placed on everything that has been said in the main response. This response will instead be set out under the more general headings of General Observations, CFA6 [South Ruislip to Ickenham] and CFA7 [Colne Valley], with sub-headings as appropriate.
- 25.1.3. Hillingdon will gain absolutely nothing from HS2 and indeed, as will be demonstrated in this response, a number of significant adverse effects to land in its ownership will occur as a result of the implementation of the HS2 scheme. Hillingdon therefore categorically does not support the HS2 scheme and is of the firm view that it should not proceed under any circumstances.
- 25.1.4. This response will start by outlining a number of general observations before focusing on the following specific pieces of land which will be considered in individual sections:
- Ruislip Golf Course and Clubhouse;
  - Park Lodge Farm [which includes Dews Farm];
  - Hillingdon Outdoor Activity Centre [HOAC];
  - Denham Quarry;
  - Uxbridge Golf Course.
- 25.1.5. In addition, the Council will provide a commentary on a number of smaller parcels of land that will be affected by HS2. These will be captured in one separate section.

## **25.2. Petitioning**

- 25.2.1. It is apparent that the ES is particularly weak in terms of the amount of information and detail it has provided in relation to land owned by Hillingdon. There is also conflicting information which only serves to add confusion. This has made it difficult for Hillingdon to formulate a more robust and coherent response to the issues which have been highlighted in the ES.
- 25.2.2. For this and other reasons, Hillingdon wishes to make it clear that it will lodge a petition against the Hybrid Bill, and this response to the ES is without prejudice to anything that may be said in the petition. Hillingdon also fully reserves its right to raise any additional points in relation to the ES in the petition and indeed at other stages of the HS2 process as it deems appropriate.

## **25.3. Fairness of Decision Making**

- 25.3.1. Hillingdon notes that Parliamentary Standing Orders were amended in June 2013 and a new House of Commons Private Business Standing Order 224A was introduced. This requires the Minister responsible for the Bill to publish all the comments made in response to the ES consultation and to send them to an "independent assessor". The role of the assessor is to simply summarise the comments which have been made. This summary will be made available to MPs together with the ES at the second reading stage of the Bill. Standing Order 224A does not require the assessor to reach any conclusion in relation to the comments made or to conduct any evaluation of the ES. This is a significantly flawed process and does not instil any confidence that the process being adopted by Parliament is fair and legitimate.

## **26. General Observations**

### **26.1. Introduction**

26.1.1. The Council has identified a number of conflicts between the proposed development and land in its ownership. These will be dealt on case by case basis and linked to the commentary set out in the ES. However, the Council also has a number of general observations that relate to more than one parcel of land, or reflect more strategic matters.

### **26.2. Quality of roads**

26.2.1. The construction of HS2 will place considerable pressure on the road surfaces within the borough. It is accepted that traffic impacts from new developments inherently place pressure on roads, although the scale of HS2 Ltd's traffic generation is fundamentally different to any other developments within the Borough. The usual practice is for developers to compensate and mitigate the impact of a development by way of monies secured through Section 106 Agreements.

26.2.2. To date, HS2 Ltd has not presented any proposals to compensate Hillingdon for the pressure of having to maintain and potentially repair damaged or worn roads. Hillingdon would therefore suggest that HS2 Ltd need to provide a survey of the quality of the roads that it intends to use, and then formulate a monitoring and reporting regime to assess the impacts of construction traffic on adopted highway roads. HS2 Ltd should then agree to be responsible for funding any noticeable deterioration or defects that require repair work on the relevant highways.

26.2.3. Alternatively, HS2 Ltd should agree a funding package to assist Hillingdon in managing its adopted highways which will come under pressure from HS2 construction traffic.

### **26.3. Flood Risk Management**

26.3.1. As indicated in Hillingdon's main response, the ES has not adequately addressed surface water flooding. Large amounts of soil will be deposited on areas of Hillingdon owned land some of which are consistently saturated. The depositing of spoil on other sites could also have a negative drainage impact on land owned by Hillingdon.

- 26.3.2. Hillingdon is not willing to accept a situation where its land will contribute to an increased risk in flooding due to works undertaken by HS2 Ltd. Once construction works finish the responsibility for flood risk on and from land will rest solely with landowner.
- 26.3.3. Prior to returning the land to Hillingdon's control and following construction of the works, HS2 Ltd should undertake a full flood risk assessment and surface water drainage strategy in order to ensure that HS2 Ltd is not handing back land that will increase flood risk on site or around the surrounding area.
- 26.3.4. In addition to this, Hillingdon is also concerned that there is no maintenance or management proposals for flood compensation areas or balancing ponds. These are required in order to offset the increase in flood risk as a result of the HS2 construction works. Once implemented, there will be an ongoing pressure placed upon Hillingdon as landowner to ensure the long term effectiveness of these flood risk assets which will require a range of resources.
- 26.3.5. To date, HS2 Ltd has put forward no maintenance plans or suggested compensatory measures to ensure Hillingdon have adequate resources to manage these important flood assets. Hillingdon will not accept the land back from HS2 Ltd until adequate safeguards for managing flood risk management assets are put in place.

#### **26.4. Severance of agricultural land**

- 26.4.1. Hillingdon has large areas of land (which are discussed further below) that have various interests in them (i.e. licences and tenancies). Hillingdon are of the view that HS2 Ltd have failed to adequately consider the implications of severance when deciding the most suitable land to use during the construction works and operational phases. In light of this omission, HS2 Ltd has inadvertently ruled out the safe and effective management of land that it does not require.
- 26.4.2. HS2 Ltd should reconsider the location of the sustainable placements and the ecological measures that it has proposed in order to minimise the disruption to useable agricultural land. Any residual impacts that occur through the severance of land not used by HS2 Ltd should then have appropriate mitigation and compensatory measures put in place in order to reduce the impact.

#### **26.5. Footpaths and diversions**

- 26.5.1. Hillingdon's main ES response makes it clear that HS2 Ltd have failed to adopt a rational approach to suggested footpath diversions. It appears that HS2 Ltd

has simply formulated diversions on OS base maps without affording proper consideration to the practical route of the diversion.

26.5.2. Some of the diversions are located on Hillingdon adopted highways. Hillingdon is very concerned with this and is not willing to take on responsibility for the management of the diversion when they are potentially dangerous and could result in loss or harm to life.

26.5.3. Hillingdon urge HS2 Ltd to undertake a complete review of the proposed footpath diversions and consider the practicality of the routes and the ongoing implications for those who will need to maintain and manage them going forward.

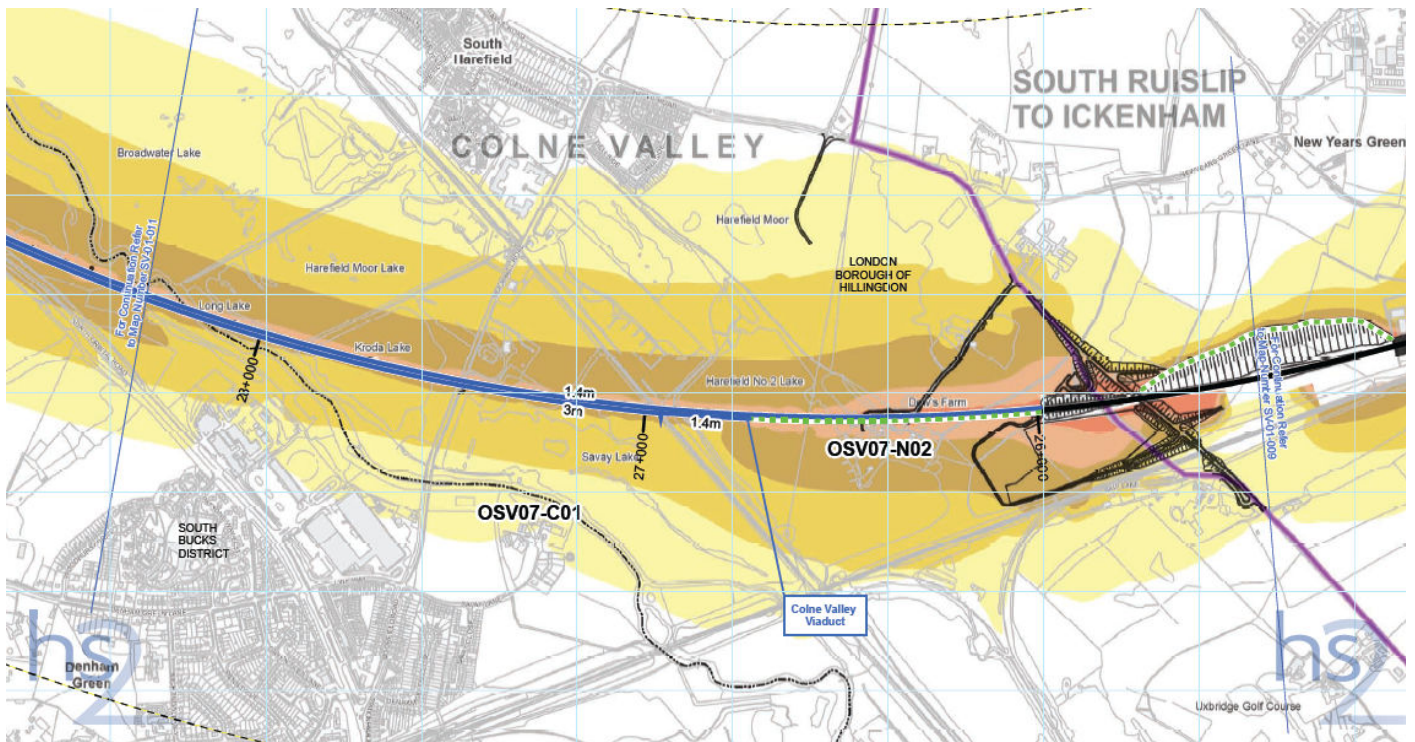
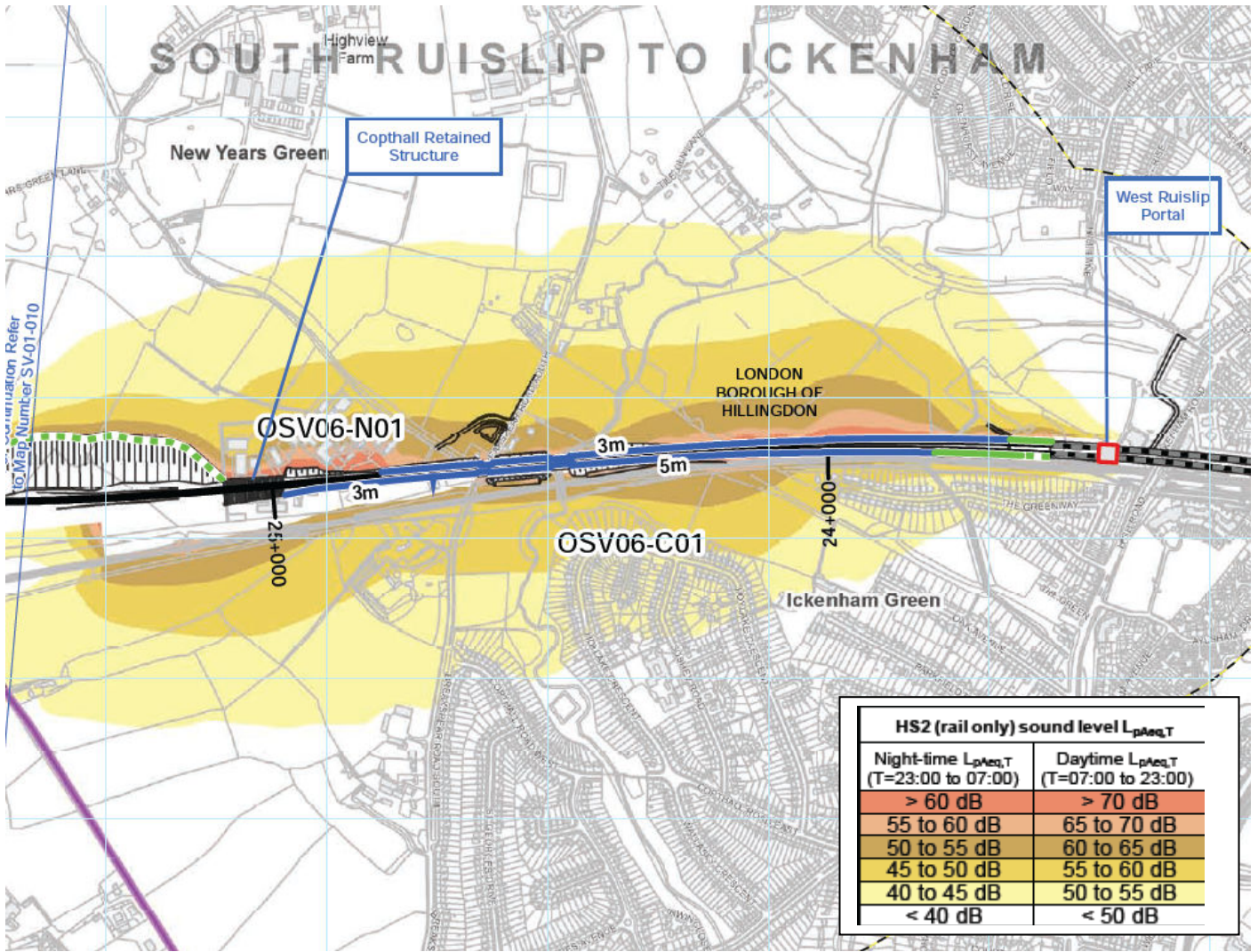
## **26.6. Residual Noise Impacts on Hillingdon land**

26.6.1. Within the main response, Hillingdon have raised concerns regarding the approach that HS2 Ltd has adopted to assess the impacts of noise. However, as landowner there are separate considerations regarding the functionality of the land impacted by noise.

26.6.2. The first plan below illustrates that noise levels of greater than 65db Laeq (0700-2300) affect the southern part of the golf course (land within the red contour). The grey noise contour illustrates noise levels of 50-65 db. Notwithstanding these inappropriate noise contours, it reveals that a relatively quiet golf course will begin to suffer from noise levels that are similar to Heathrow Airport. Hillingdon is of the view that this is entirely unacceptable

26.6.3. Again, the second of the plans below illustrates that the majority of the HOAC site and Dews Farm will experience noise levels of over 65db. The remainder of the Colne Valley will get excessive noise between 50 and 65db. Even at the lower end of this spectrum, 50db represents a significant increase. At the upper end, the area will begin to suffer from noise levels that are similar to Heathrow Airport. Regardless of the challenges that the HOAC site faces, (these are discussed further below), any uses that continue on this site will need to be able to absorb exposure to noise levels in excess of 65db.

26.6.4. In light of this, Hillingdon are of the view that the only suitable mitigation option that would remove the noise impacts on these parcels of land is to tunnel under the Colne Valley. Without this, there will be considerable areas of land blighted on a permanent basis.



## **26.7. Alternative recreational offerings**

- 26.7.1. As discussed further below, HS2 will adversely impact upon Hillingdon owned land that is currently used for recreational purposes. This includes HOAC, Ruislip and Uxbridge Golf Courses, open space off Bridgewater Lane, open space off Priors Farm Lane, a significant amount of well used public rights of way and Colne Valley. This loss of land will clearly reduce the amount of open and recreational spaces within the borough and Hillingdon will therefore need to look at alternative sites in order to offer compensatory recreational areas.
- 26.7.2. In light of this, HS2 Ltd should present Hillingdon with an adequate compensation package for the residents of Hillingdon in order to mitigate for the loss of recreational facilities and open space areas.

## **27. Ruislip Golf Course and Club House**

### **27.1. Background**

- 27.1.1. The golf course and club house consist of 38.18 hectares of land and are situated to the west of the B466 Ickenham Road and north of the railway line. The golf course has eighteen holes and has been open since 1922. Hillingdon is the freehold owner of the course. It had leased it to Mack Trading [Hillingdon] Limited but this lease has terminated and Hillingdon has been responsible for running the course itself since 2010.
- 27.1.2. The golf course has limited changes in topography and is enclosed by structural planting on all sides which contributes to the high tranquillity. The course comprises well-maintained fairways, in good condition, bordered by tree and shrub planting. The existing Chiltern Line runs along its southern edge. The area is valued at a regional level as a result of its location within the green belt. Therefore, this area has high sensitivity to change.

### **27.2. Impacts of HS2**

- 27.2.1. The ES says that the construction of the tunnel portal at West Ruislip will require the temporary use of part of Ruislip Golf Course. The proposed scheme will require part of the land that currently forms three of the eighteen holes, an outbuilding and a small part of the driving range. There is no requirement for land that will affect the club house. It is alleged in the ES that the members of the golf course have identified three holes that can be repeated to maintain an eighteen hole course during construction. A course incorporating repeated holes will not function as a competition course.
- 27.2.2. The golf course is open to the public and is therefore accessible to local residents. The temporary loss of land from the golf course is a significant adverse effect.
- 27.2.3. Construction activity at the West Ruislip portal main compound is not predicted to create in-combination effects on those playing golf on the course. The club house is predicted to experience significant construction noise and visual effects. There are also predicted to be significant increases in HGV movements along Ickenham Road, which is the road by which the golf course is accessed.
- 27.2.4. These effects are predicted to affect users of the club house, which also functions as a pub/restaurant and hosts occasional community events. Overall, the combination of these effects, which are expected to coincide for up to nine

months, will have a significant adverse effect on the amenity of the users of the club house.

- 27.2.5. The ES also makes it clear that the construction of the tunnel portal at West Ruislip will permanently require land currently used by the golf course. The proposed scheme will permanently require two of the eighteen holes. This means that the golf course will not be able to function as an eighteen-hole competition course.
- 27.2.6. The palliative measures available in the temporary situation will not be valid and therefore the permanent loss of two holes at the golf course will amount to a significant adverse effect.
- 27.2.7. The construction of the tunnel portal at West Ruislip will also permanently require the use of the land currently occupied by Ruislip Rifle Club which will be permanently lost from the site. There are no local alternative facilities of a similar nature. Although Hillingdon no longer owns the land on which the Rifle Club is located, (it sold it to the Trustees of the Ruislip Rifle Club in February 1996), nevertheless there will be a permanent loss of a valuable community facility and therefore this will once again amount to a significant adverse effect.
- 27.2.8. A number of further significant adverse impacts have been identified in the ES. These include:
- Three ponds in the golf course will be lost, resulting in a permanent adverse effect on the conservation status of this habitat type at this location.
  - Construction of the new railway alignment, a satellite construction compound and a rail siding at the golf course will result in the loss of approximately 2.2ha of the golf course. This loss will result in a permanent adverse effect on site integrity significant at the borough level.
  - Construction work at the golf course will result in the loss of significant semi-natural broadleaved woodland and small areas of plantation. It will result in a permanent adverse effect on the conservation status of the woodland area and the effect will be significant at a borough level.
  - The loss of existing vegetation from the golf course along the northern edge of the railway corridor and from within the golf course itself, coupled with the close proximity of construction activity to sensitive visual receptors, will result in significant visual effects during construction. There will also be a loss of the existing vegetation to the south and west of the club house which will result in discernible

changes to the view through the opening of views towards the railway. Construction activity will be visible in the foreground and middle ground including views of cranes and other plant used to construct the tunnel portal, headhouse and railway tracks from this location.

- There will be a localised reduction in tranquility of the LCA derived from the visual presence and noise of trains in the suburban area adjacent to the golf course.
- Significant noise effects have been identified on the buildings of the golf course during the daytime. Noise levels could rise at times to around 80db over a period of approximately nine months commencing in 2017 during the construction of the West Ruislip portal. These noise effects will result in significant residual temporary effects on the buildings.

27.2.9. The ES says that HS2 Ltd will work with Ruislip Golf Course and Hillingdon to enable the golf course to continue to operate as an eighteen hole golf course throughout the construction phase and to identify a means by which it could operate as an eighteen hole competition course throughout the operational phase of the proposed scheme.

27.2.10. This statement is in direct contradiction to an earlier statement made in the ES which alleges that members of the golf course have identified three holes that can be repeated to maintain an eighteen-hole course during construction. A course incorporating repeated holes will not function as a competition course. The nearest golf course owned by Hillingdon is Haste Hill Golf Course, which is approximately 4km north and this could act as an alternative for competitions. The golf course is owned by Hillingdon and is open to the public and therefore accessible to local residents.

27.2.11. Both Hillingdon and HS2 Ltd acknowledge that there will be significant disruption to the golf course with considerable environmental consequences. Attempts have been made by Hillingdon to formally engage with HS2 Ltd prior to the issuing of the ES for the purpose of discussing the golf course. However, HS2 Ltd has been unwilling or unable to provide the level of information required and it is evident that they wish to discuss solutions without presenting the impacts.

27.2.12. It follows that Hillingdon has little confidence that HS2 Ltd is able to find workable solutions to the various environmental impacts which the golf course will face let alone identify a means by which the course could operate as an eighteen hole competition course throughout the operational phase of the proposed scheme.

- 27.2.13. Why should members of the golf course wish to use Haste Hill instead? Uxbridge Golf Course, which is also owned by Hillingdon, faces its own difficulties as a result of HS2 which are set out in detail later in this response. For these reasons, Uxbridge will also not be suitable to operate as an eighteen hole competition course.
- 27.2.14. A further important consideration is that Ruislip Golf Course has already lost members as a direct result of HS2. Access to the course is gained through Ickenham Road which will suffer from heavy traffic disruption during the course of the construction works. Members will also be put off by the fact that three holes will be lost and the prospect of having to play competitions at an alternative course.
- 27.2.15. There are currently a total of 108 Club Members and 159 season ticket holders. In 2013, Hillingdon received an income of approximately £300k. There is a very real danger that a further significant number of members will leave and the course could be forced to close. If this were to happen, 1 seasonal, 6 full-time and 4 part-time Hillingdon employees would face the prospect of losing their jobs.
- 27.2.16. Furthermore, if the course closed, Hillingdon would lose a very valuable source of income and it is noteworthy that nowhere within the ES is there any suggestion that Hillingdon is likely to be offered compensation for any potential financial losses which it may incur. In any event, even if such compensation were to be offered, the likelihood is that it would be insufficient given the inadequacy of the proposals for compensation set out in the recent Government Property and Compensation consultation.
- 27.2.17. With regard to the club house, it provides a number of valuable community facilities and no solutions have been set out in the ES as to how the impact on the amenity of the users of the club house will be addressed. Once again, there is the potential for the club house to close altogether. This would also result in a number of job losses for those members of staff employed by the leaseholder of the club house.
- 27.2.18. It is regrettable that the Rifle Club will be lost. In addition to the comments made in paragraph 2.10 above, HS2 Ltd will need to work with the National Small-bore Rifle Association which the Rifle Club is a member of. This Association has its own inspection and approval scheme for ranges run by their member clubs. All of this points to the need of HS2 Ltd to speed up its efforts to find a solution to the loss of the Rifle Club.
- 27.2.19. With regard to the further significant adverse impacts which have been identified in the ES, and which are summarised in paragraph 2.11 above,

Hillingdon will fully rely upon those comments made in the main response regarding the inadequacy of the proposed mitigation measures set out in the ES, and its own proposals for mitigation.



**Legend**

- ++++ HS2 Route
- Construction Boundary
- Construction Traffic Route
- Satellite Construction Compounds
- Main Construction Compounds
- Tunnel Portal

**Ruislip Golf Course**

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## **28. Park Lodge Farm (including Dews Farm)**

### **28.1. Background**

28.1.1. Park Lodge Farm and Dews Farm are located within this community forum area and consist of 240 hectares of land. Hillingdon is the freehold owner (save for Dews Farmhouse which is now privately owned). This land currently has a farm business tenancy in place for use as a dairy farm, which commenced in April 2010 for long term management. Hillingdon derives a significant income from the tenancy. In addition to this, a number of licence arrangements are in place concerning Dews Farmhouse, Dews Farm Granary, and Dews Farm Walled Garden which includes a small paddock and Dews Sandpits.

### **28.2. Impact of HS2**

#### *Depositing of Excavated Material*

28.2.1. The ES says that during construction HS2 will use 87.1 hectares (which equates to 36%) of Park Lodge Farm/Dews Farm for the siting of sustainable placements for excavated material. This area will be used to permanently deposit approximately 500,000m<sup>3</sup> of surplus excavated materials from CFA6.

28.2.2. The ES has failed to provide sufficient detail on how the excavated material will be deposited, how it will be managed or what types of material will be appropriate. The ES provides no detail on whether HS2 Ltd plan to provide some form of capping of the deposited soils which raises concerns regarding the porosity of the land. The final contours and materials could have a negative impact on surface water management in an area already sensitive. Finally, the land is known to be in a contaminated state as set out in the Council's main response. the selection of the this site could ultimately increase the risk of contaminating the ground water and hinder attempts to reopen a much needed water abstraction point close to the site.

28.2.3. It is not sufficient for HS2 to simply state in the ES that 'this land should become re-available for agricultural production following appropriate restoration and subject to clarification from the Food Standards Agency'. Instead, HS2 Ltd should have already undertaken detailed site investigations, prepared a management plan to indicate how the excavated material will be treated and prepared and created a remediation plan to demonstrate what measures will be undertaken once the use of the site has ceased. Hillingdon would then be in

a position to comment on whether the remediation measures are satisfactory in order to ensure that there is a net gain arising from the proposed use.

- 28.2.4. If deposits are made on the site without a suitable restoration plan in place, or acknowledgement of the existing state of the land, the final contours may not be suitable for another use without further work being undertaken. This could have an unknown cost implication for Hillingdon. In addition to this, Hillingdon is unable to establish the amount of topsoil to be laid over the three metres of existing subsoil and whether a suitable depth of growing culture will be implemented to ensure that an established form of planting is present to enhance or allow the placements to contrast with the surrounding landscape.

#### *Ickenham Auto-transformer Feeder Station*

- 28.2.5. The ES also says that the Ickenham auto-transformer feeder station will be located on this site with an associated access from Harvil Road. The access road from Harvil Road to Dew's Farm will be used as a construction access road which will introduce higher frequencies of traffic. Dews Farm and associated outbuildings will also be demolished.

#### *Colne Valley Viaduct*

- 28.2.6. A viaduct of approximately 3.4km long (starting approximately 190m west of Harvil Road and which will vary between 11m to 15m above ground/water level) will be constructed across this site. The viaduct will carry HS2 over the Colne Valley passing across this site. The viaduct will have a solid 1.4m high protection barrier adjacent to the track on each side.

#### *Severance*

- 28.2.7. The works to be undertaken on this land will also cause considerable severance to the east of the Park Lodge Farm and south of Harvil Road (Dews Farm). As part of the 87.1 hectares required, HS2 Ltd are requiring a mix of contaminated land and 'virgin' grassland. The 'virgin' grassland used for some of the sustainable placement is central to the farms' current working pattern, generating most of the silage. This will no doubt cause the current farm use to cease. In the unlikely scenario that the farm can continue to operate, Hillingdon has assessed the rent that could be derived from the current tenant once the 'virgin' grassland required by HS2 Ltd is removed and it is clear that the rental income for Hillingdon will significantly decrease to a very low level.

### *Contaminated Land*

- 28.2.8. The ES says that within the 87.1 hectares of land required by HS2 Ltd, 16.5 hectares of it should not be included within the actual loss of land to Hillingdon as it is currently unsuitable for agricultural production due to ground contamination. HS2 Ltd has therefore calculated the actual loss of land to Hillingdon to be 70.6 hectares which is simply unfair.
- 28.2.9. The 16.5 hectares of land has been determined contaminated land and a special site for controlled waters under Part IIA of the Environmental Protection Act 1990. Without remediation this land is not suitable for purposes connected to food production (including cropping and grazing) and therefore the current tenant does not utilise it as a dairy farm or indeed any alternative use. The tenant is therefore in the process of surrendering the existing lease and re-negotiating its terms to remove the contaminated land from the holding. Negotiations will be concluded soon, but in any event before construction commences on this site. Once surrendered, Hillingdon will seek to place a new tenant on this part of the land and derive an income from an alternative suitable use. On this basis, the 16.5 hectares of land should be included in HS2 Ltd's calculation of the total loss on this site and more particularly for compensation purposes.

### *Dews Farm*

- 28.2.10. The ES depicts an area of land within Dews Farm which is going to be used as flood plain. This land is already low lying and predominantly made up of sand. It is difficult for Hillingdon to properly assess the implications of this proposal given the lack of detail provided within the ES, however on the information that is available Hillingdon has strong concerns that unless HS2 propose to create a clay cap, there will be no holding capacity for additional water on this area of land. If such installation is proposed, Hillingdon require assurances that the continued management of this area will fall under the responsibility of HS2 Ltd or National Rail in perpetuity. Without such assurances, Hillingdon is faced with an unknown financial burden and neither the current tenant nor Hillingdon have sufficient resources to undertake the continued maintenance and management works themselves. In the event that HS2 Ltd do pass this responsibility on, a suitable funding arrangement and management plan will need to be agreed and put in place to ensure that the cap continues to operate as envisioned by HS2 Ltd. The Council will be seeking an undertaking from Parliament to this affect.

### *Diversion of Newyears Green Bourne Main River*

- 28.2.11. The ES says that the proposed viaduct will cross the Newyears Green Bourne. This is a main river and accordingly HS2 Ltd considers this watercourse to be a high value receptor. In order to ensure that flow in the river is unobstructed as far as reasonably practicable, the Newyears Green Bourne will be permanently realigned.
- 28.2.12. The ES says that, at present, the detailed design of the realignments and the detailed mitigation measures have not yet been formulated. All that is stated in the ES is that any design mitigation will aim to ensure that the channel is sufficiently sized to avoid a permanent impact on flow. Hillingdon has deep concerns about this approach. In particular, there is currently an unknown impact of this diversion on Denham Quarry and the amount of water emerging from the sustainable placement. This permanent diversion will also have a moderate impact on the long term farming plans for this site as it will sever working fields.

### *Additional Effects*

- 28.2.13. A number of further significant adverse impacts have also been identified in the ES. These include:
- Creation of landscape mitigation planting and a balancing pond within the holding for railway, highway or land drainage will cause further disruption to the farm, as it will not only remove land from the holding, but it will also create a permanent balancing pond that will require continued upkeep and maintenance. The ES does not explain who or how this will be done on a long term basis. If it is anticipated that responsibility for this will fall to either Hillingdon or the tenant a suitable funding/management arrangement will need to be agreed.
  - Buried archaeological remains associated with the Mesolithic activity have been uncovered at Dews Farm. Further to this, Dew's Farm has 14<sup>th</sup> to 18<sup>th</sup> century construction and any buried archaeology that is associated with the probable medieval occupation of the site. Some further value is lent to the building as the birth place of Cecil John Kinross V.C. HS2 Ltd intends to completely remove any remains during construction. On this basis, HS2 Ltd says that this will have a high adverse impact resulting in a major adverse effect.
  - Hillingdon are very concerned that the ES does not contain sufficient information to understand how archaeological remains will be protected during construction. Hillingdon would expect field investigations to be undertaken for a development of this size and in

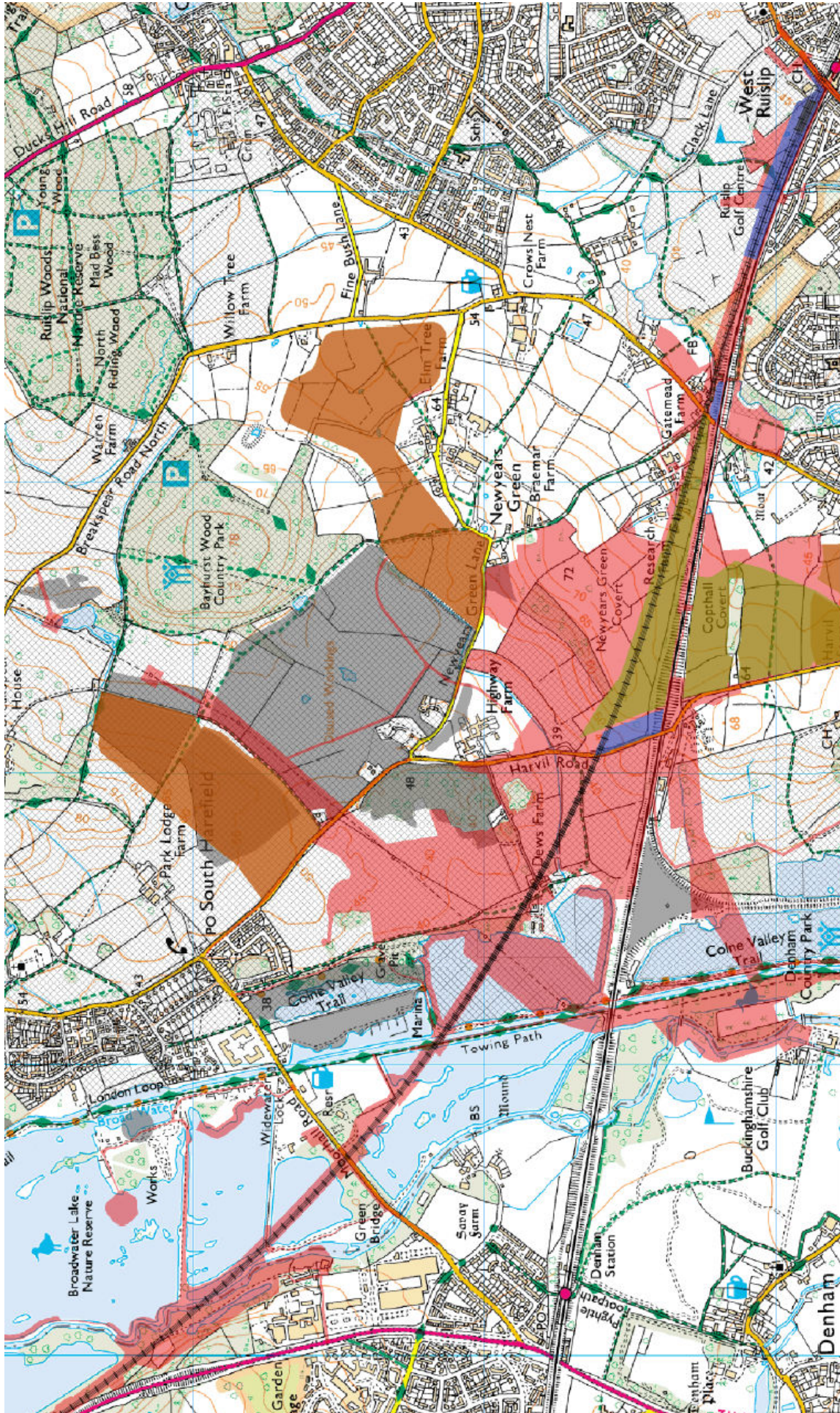
such a location, however to date very little has taken place. It is not clear whether there is flexibility to preserve significant remains in-situ if discovered after development consent is granted.

- As HS2 Ltd was unable to gain access to Dew's Farm they were unable to undertake a general habitat survey. This further undermines the ability of Hillingdon to scrutinise the scheme.
- The permanent realignment of public footpath U34, Harvil Road to Dews Farm, along the proposed access road to the auto transformer feeder station. The realignment will cross the holding which will add further disruption and severance to the farm.
- Noise emanating from trains from moving trains and warning signals and the propensity of operational land to harbour noxious weeds.

28.2.14. The ES says that the *temporary* effects on the holdings during construction will be a major adverse impact due to the proportion of the holding to be removed and the high sensitivity of the site. The ES is clear that the *permanent* construction effects on holdings will have a major/moderate adverse impact due to the proportion of land to be removed (43.8 ha). No mitigation measures are offered by HS2 Ltd to mitigate the operational effects of the proposed scheme on the agricultural land.

28.2.15. Although financial compensation will be offered by HS2 Ltd, they are hoping that this will be used to reduce the overall adverse effects by purchasing replacement land. Even if such compensation were to be offered, the likelihood is that it would be insufficient given the inadequacy of the proposals for compensation set out in the recent Government Property and Compensation consultation

28.2.16. With regard to the further significant impacts which have been identified in the ES, and which are summarised in 9.16 above, Hillingdon will fully rely upon those comments made in the main response regarding the inadequacy of the proposed mitigation measures set out in the ES, and its own proposals for mitigation.



**Park Lodge Farm (and associated leased land holdings) during HS2 Construction**

- Legend**
-  HS2 Route
  -  Construction Boundary
  -  Satellite Construction Compounds
  -  Land in Council Ownership
  -  Main Construction Compounds
  -  Excavated Materials Dump
  -  landfills



**Park Lodge Farm (and associated leased land holdings)**  
**Post Completion of HS2**

- Legend**
-  Excavated Materials Dump
  -  Attenuation Pond
  -  Ecology Mitigation
  -  HS2 Route
  -  Electricity Substation
  -  Landscape Hedgerow Planting

## **29. Hillingdon Outdoor Activity Centre [HOAC]**

### **29.1. Background**

29.1.1. The Council is the freehold owner of the land on which HOAC operates and has let it to HOAC on a long lease at an agreed annual rent. HOAC has been established since 1969 and has been managed as an educational charity in partnership with Hillingdon since 1992. Hillingdon supports and sponsors HOAC.

29.1.2. HOAC provides water-based and land-based outdoor activities all year round. The water-based activities are provided on a 45 acre lake. Users include local people, education groups, community groups and those with disabilities for whom special facilities are in place. HOAC is embedded within the local community, serving local schools, local people and clubs and providing volunteering opportunities. HOAC also has a role beyond recreation, providing training for new and existing instructors. There are no other centres providing similar services to those provided by HOAC in neighbouring local authority areas. The following is a summary of their operations:

- HOAC is a registered outdoor and environmental educational charity which serves Hillingdon and the whole of the West London community and focuses on disadvantaged and disabled youth.
- The centre is operated as a unique partnership arrangement between the charity and the London Borough of Hillingdon who support and sponsor the centre.
- Over 22,000 young people from a wide range of economic and ethnic backgrounds come to the centre from many localities, but especially West London, as there is nothing comparable.
- It is also a valuable leisure resource for people of all ages.
- The centre is located in the green belt of Hillingdon just inside the M25 and often provides young people with their first 'country' experience which is enhanced when they make use of the campsite.

### **29.2. Impact of HS2**

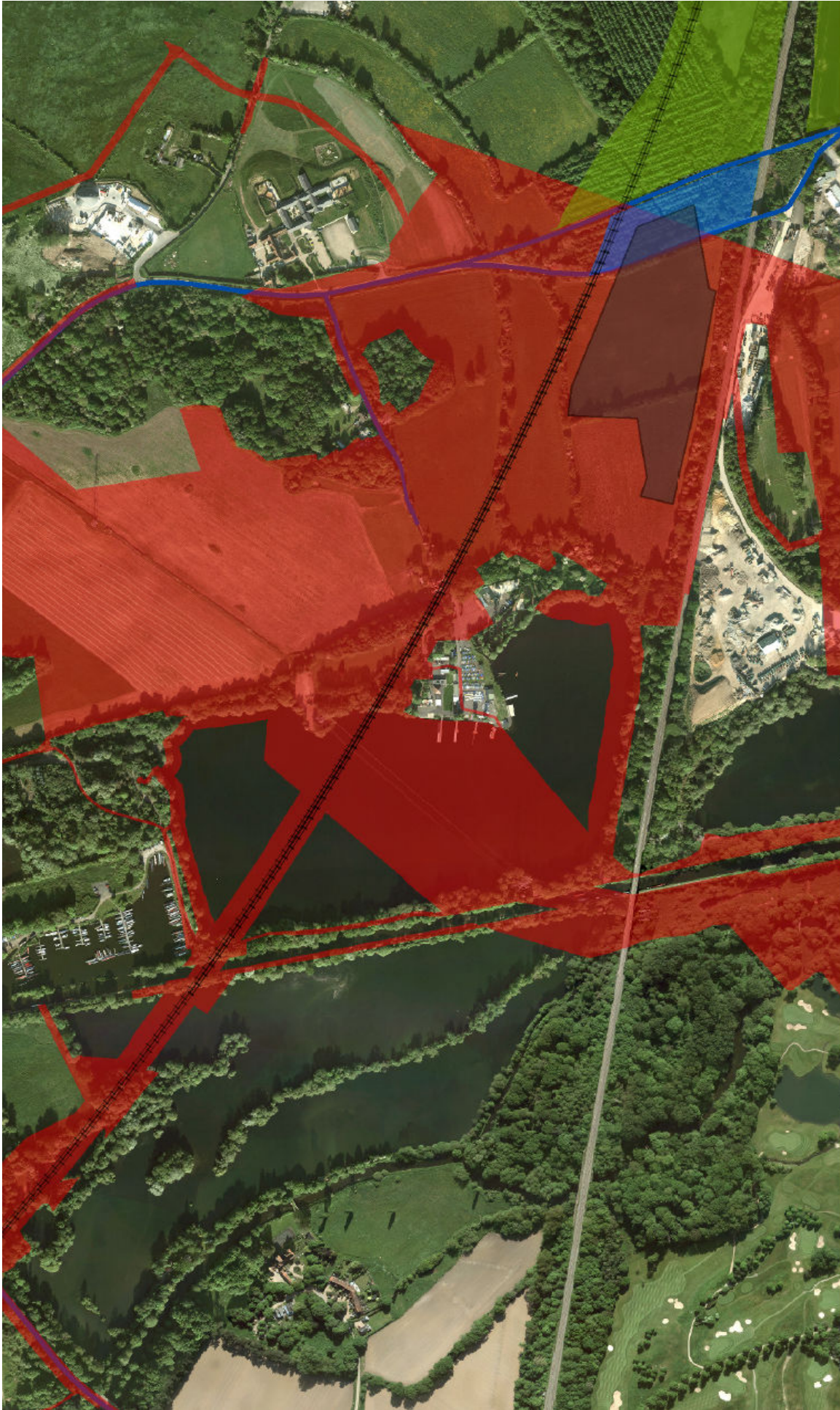
29.2.1. The ES makes it clear that the Colne Valley viaduct will cross the HOAC site. The construction of the viaduct will require the placement of approximately ten piers in the adjoining lake, which means that the construction works will result in all the lake being used by HOAC being closed during the construction period.

- 29.2.2. The location of the viaduct will also result in the demolition of three HOAC buildings which will lie directly beneath the viaduct. The area is currently used for land-based outdoor activities at HOAC. In combination with the viaduct the satellite compound will enclose some of the remaining buildings on two sides, divide the site in two and occupy land across the existing entrance to the site. The location of the satellite construction compound will affect the ability to enter and exit HOAC. Furthermore, the access road from Harvil Road to Dew's Farm will be used as a construction access road introducing higher frequencies of traffic.
- 29.2.3. There will also be major visual and noise effects. For example, a significant noise effect has been identified in relation to HOAC, Dews Lane during the daytime over a period of approximately 8 months between 2018 and 2020 on the building at the centre, due to the construction of the viaduct and Harvil Road overbridge works.
- 29.2.4. Taking together all the factors outlined above, a significant adverse effect will be created.
- 29.2.5. The ES goes on to say that the combination of land required for construction and changes to amenity means that HOAC is unlikely to operate during the five year construction period.
- 29.2.6. It is alleged that the construction impact will be for a temporary duration. However, there is the potential that if HOAC is unable to continue to operate from its existing location during this period, which is likely to be the case, there would be a longer term impact on the operation of HOAC as it is likely that it would take time to re-establish its current level of activity.
- 29.2.7. Aside from the need for land at HOAC to be temporarily required during construction, the proposed scheme will also require land permanently at the site. The size and nature of this land has not been spelt out in the ES.
- 29.2.8. The ES says that if HOAC is re-established on its existing location after construction, then there will be an impact during the operation of the proposed scheme. This will include changes to the areas used for their on-site activities and storage and restrictions on the use of the lake, affecting water-based activities as a result of the Colne Valley viaduct. Unfortunately, no details of these changes are given in the ES.
- 29.2.9. With regard to any proposed mitigation measures, the ES says that HS2 Ltd has, and will continue, to engage with HOAC regarding the impact of the proposed scheme and the options for HOAC during construction. The options could include for example, continuing to explore potential refinements to the

construction approach during detailed design, combined with restrictions on activities during the construction period.

- 29.2.10. The ES also says that HS2 Ltd is aware that it is HOAC's preference to be relocated from their existing location and this is being discussed within the on-going dialogue. HS2 Ltd will continue to work closely with HOAC, and other relevant stakeholders, and remains committed to seeking to agree a solution with HOAC to allow the facility to continue to operate during the construction period.
- 29.2.11. In essence, HS2 Ltd are repeating exactly the same message as with Ruislip Golf Course i.e. that they are committed to finding a solution and there is an ongoing dialogue etc.
- 29.2.12. The reality, however, is very different. The stark truth is that no mitigation measures will be put into place for HOAC. Is HS2 Ltd being serious when suggesting that HOAC will be able to continue to operate as a viable entity during both the construction works and indeed afterwards?
- 29.2.13. HOAC will be put out of business as a direct consequence of the HS2 scheme. It will not be able to reopen once the construction of the viaduct has been completed. It will have lost all its members and other users who will treat HOAC as having closed for good. Even if a proportion of its members and other users were to return, their enjoyment of HOAC would be seriously impaired by the changes made by the construction works. Hillingdon would need to make an assessment of the facility post-completion to understand the restrictions placed on it by a high speed line running overhead.
- 29.2.14. There is absolutely no prospect of the facility operating during the construction period and it is simply disingenuous of HS2 Ltd to suggest otherwise. Neither is there any scope for HOAC to be relocated from its existing location as there is no viable site within Hillingdon where HOAC can be relocated and the ES has not sought to identify any alternative sites in other boroughs.
- 29.2.15. It follows that a very valuable community facility will be lost for good. The facility exists not just for the enjoyment of Hillingdon residents; over 22,000 young people from a wide range of economic and ethnic backgrounds come to HOAC from many localities, particularly West London, as there is nothing comparable.
- 29.2.16. A further significant consideration is that as HOAC will be unable to realise any income from the operation of the facility, all its employees face the prospect of losing their jobs. The ES fails to touch on this issue and the reality is that HS2 Ltd will not be taking any steps to find them alternative employment.

- 29.2.17. Hillingdon, in its capacity as landowner, will also suffer significant detriment as a consequence of the loss of HOAC. The land is located within the safeguarding corridor and it is clear that HS2 Ltd is not seeking to possess the land owned by Hillingdon. Therefore Hillingdon, without prejudice to its contention that the proposals for compensation as set out in the Government's recent Property and Compensation consultation are inadequate, will not be eligible to receive any compensation in spite of the fact that its land will be effectively neutered for five years or more.
- 29.2.18. Further, Hillingdon will be suffering nuisance on its land such as noise over a period of approximately 8 months - see paragraph 6 above. There will also be major visual effects which will undoubtedly cause a diminution in the value of Hillingdon's land. There is nothing within the ES which suggests that Hillingdon will receive any compensation for this.
- 29.2.19. Hillingdon will lose a valuable rental income stream and will not be able to put the land to any effective use during the period of construction work. It will certainly be unable to re-let the land. Hillingdon will also lose the very effective partnership which it has enjoyed with HOAC since 1992. Not a single proposal has been made by either the Government or HS2 Ltd to compensate Hillingdon for these significant losses.



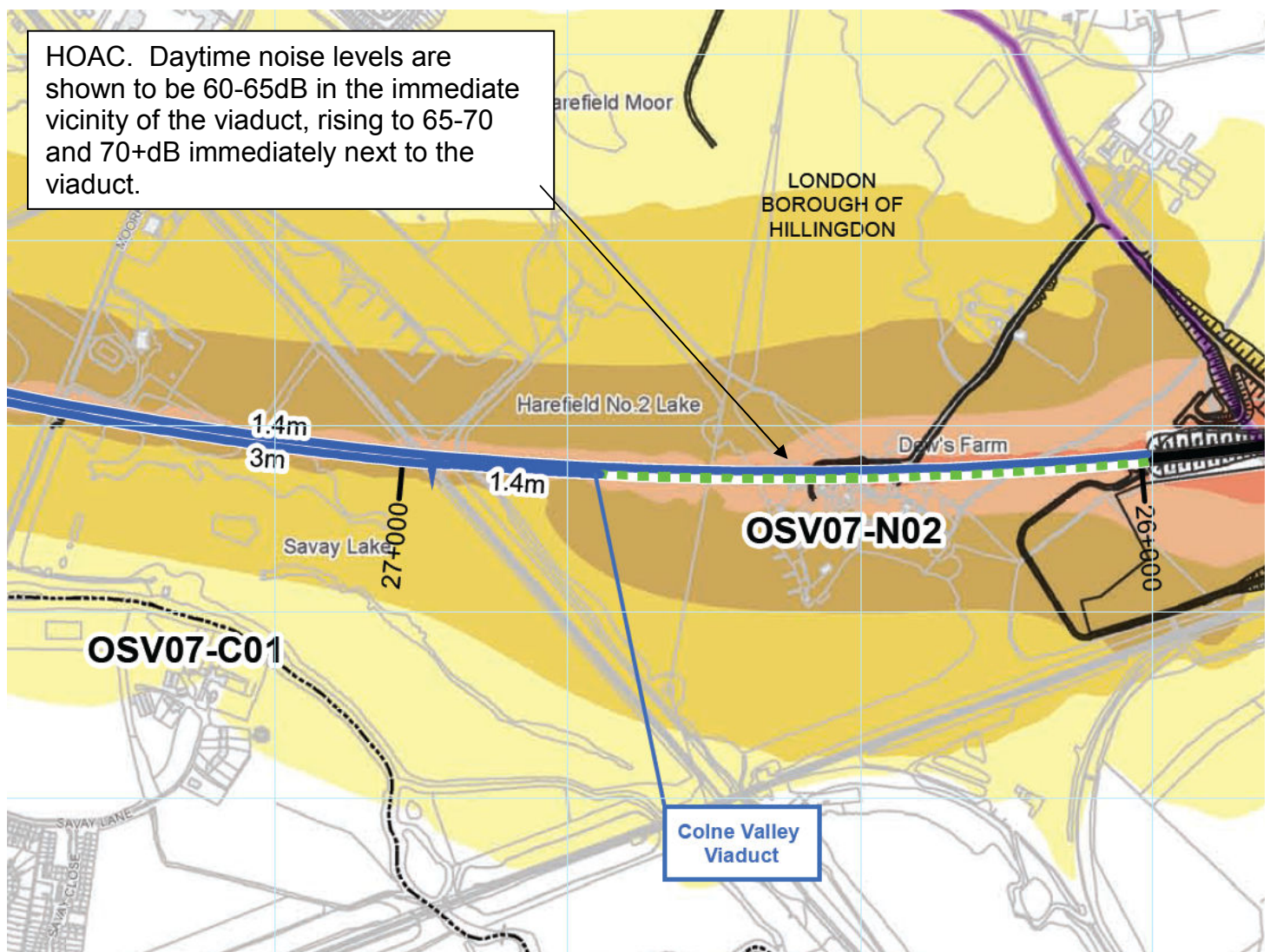
Hillingdon Outdoor Activity Centre  
During Construction

- Legend**
-  HS2 Route
  -  Satellite Construction Compounds
  -  Main Construction Compounds
  -  Electricity Substation
  -  Construction Traffic Route

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### Noise Impacts

- 29.2.20. Even assuming HS2 Ltd suggestion that the continuation of HOAC was even remotely feasible, the permanent juxtaposition of an operational HS2 and HOAC is entirely untenable.
- 29.2.21. The noise impacts alone would turn a relative tranquil recreational area into an area with noise levels akin to Heathrow Airport. The Council would not expect this area to be used for recreational purposes for health and safety reasons alone. Health and safety issues aside, the marketability and attractiveness of an outdoor recreational site that has such high levels of noise would be entirely restricted.



## **30. Denham Quarry**

### **30.1. Background**

30.1.1. Denham Quarry is a former gravel working site, but is now operated as an open space. Hillingdon is the freehold owner of the site and there are various licence arrangements in place. Denham Quarry consists of various parcels of land including, the following:

#### *Harefield Place Fishing Lakes and Lake 1*

30.1.2. This parcel of land consists of 3.6 hectares for Harefield Place and 2.8 hectares for Lake 1. Fishing licences were granted in May 2012 for a period of five years.

#### *Lake 2 (also used by HOAC)*

30.1.3. This parcel of land consists of 20.2 hectares. HOAC has access to Lake 2 and entered into a 25 year lease with Hillingdon in 2003 (details of the impact on HOAC are mentioned elsewhere in the report). In addition to this a fishing licence was granted in May 2012 for a period of five years. This angling club has over 250 members and this site is utilised frequently by them. It is anticipated that all of this site will be required by HS2 Ltd during construction. From an angler's perspective, the piers for the viaduct will go straight through this lake and licensees are very concerned about the welfare of the existing fish. The licensee is keen to move the fish to a holding tank on a suitable fish farm whilst construction is taking place. The licensee has already approached Hillingdon to express concerns about continuing with such a licence when the existing one ends in 2017. The ES does not provide any details on whether this type of disruption will be adequately compensated.

#### *Lake 3*

30.1.4. This parcel of land consists of 18.2 hectares and a fishing licence was granted in May 2012 for a period of five years. It is anticipated that access to the site will be required by HS2 Ltd during construction.

#### *Lake 4*

- 30.1.5. This parcel of land consists of 4.8 hectares and is available to 40 permit holders. It is anticipated that access to the site will be required by HS2 Ltd during construction.

#### *Hillingdon Natural History Society*

- 30.1.6. This parcel of land consists of 0.8 hectares and a licence was granted in May 2012 for a period of five years. It is anticipated that the access to this site will be required by HS2 Ltd during construction.

#### *Frays Farm*

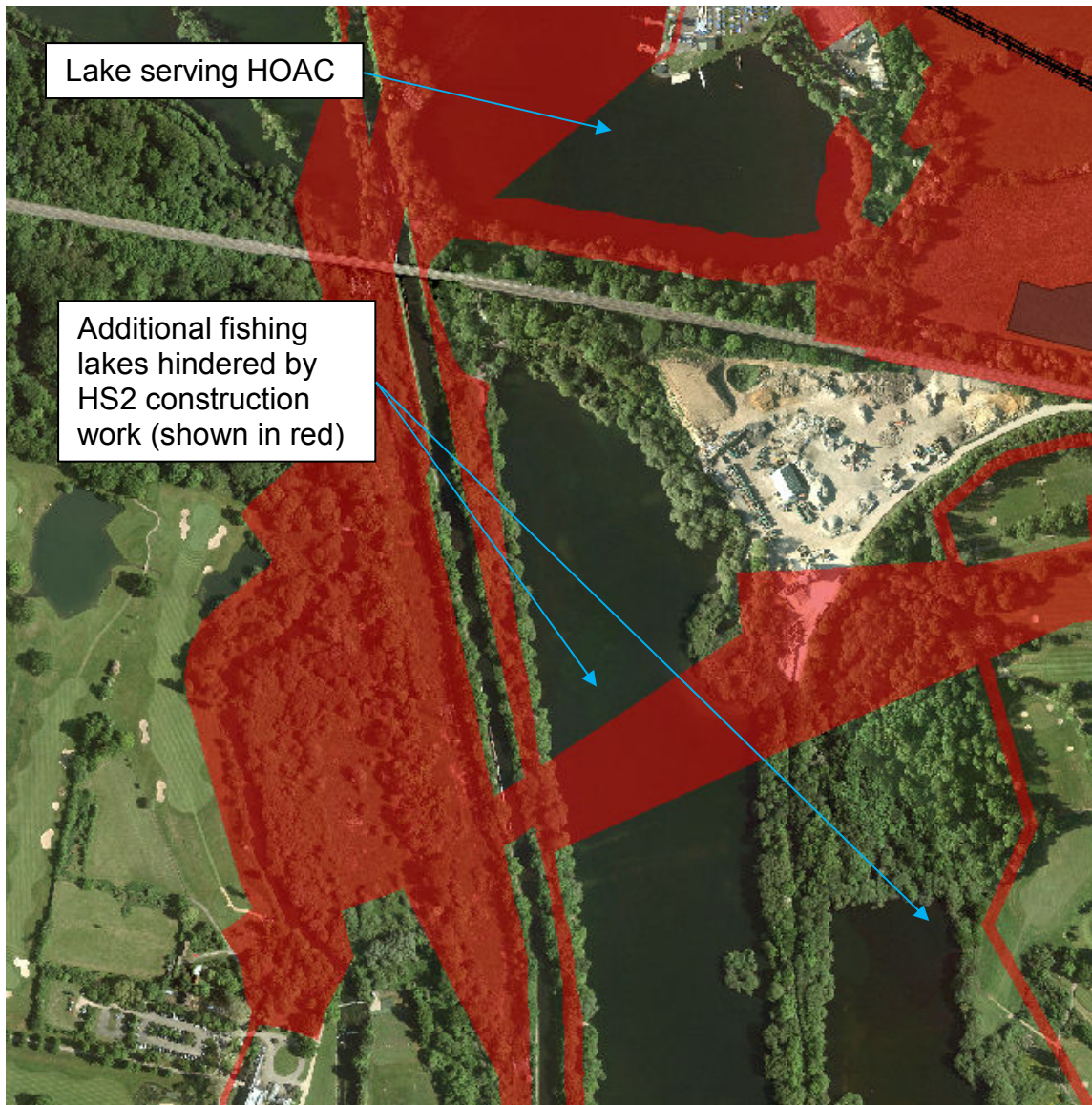
- 30.1.7. This parcel of land consists of 30.6 hectares. The site is adjacent to the realignment of the National Grid overhead power lines. It is designated a SSSI for species-rich grassland, wetland plants and invertebrates. Two farm business tenancies are in place for a period of twenty five years which commenced in October 2001. It is anticipated that access to the site will be required by HS2 Ltd during construction.

### **30.2. Impact of HS2**

- 30.2.1. It is clear that there are a variety of users at Denham Quarry which include angling clubs, permit holders, permitted bridleway users and wildlife enthusiasts. The ES has indicated that HS2 Ltd will require access to these parcels of land for the construction of the viaduct via the single off road track that is currently in place. It is anticipated that the construction will significantly impact the users of all sites within Denham Quarry. The lakes are typically enclosed by vegetation and woodland areas creating a sense of isolation. The area is located within the green belt and contains a number of conservation areas. These factors contribute to make this a regionally valued local character area. On this basis, the ES says that this area has a high sensitivity to change.
- 30.2.2. Whilst the gravel pits may not be the original setting, they make an unusual and positive contribution to the current setting. The Harefield Village Conservation Area benefits from the long open views of the water filled gravel pits. The ES contains insufficient information to ascertain the exact deterioration of the conservation/ heritage value of the land used during the construction period. Hillingdon agree that it will be a major adverse impact on the gravel pits itself, but disagree that the impact on the adjacent conservation area will be neutral. Hillingdon would like further information on how this assessment has been

reached as there is insufficient information on the viaduct within the ES to make an informed comment on this point.

- 30.2.3. The ES says that the single off road track (which forms part of Colne Valley Trail) will be used for both construction vehicles and access to the existing car parks which are often used by angling members who visit the lakes. Hillingdon is very concerned that HS2 Ltd have not provided sufficient information on the mitigation measures that will be used in order to ensure that the existing uses can continue during the construction period (save for HOAC and the use of Lake 2) and that access via the single off road track will remain unrestricted and accessible when construction traffic begin to use it. In addition to this, Hillingdon and the users of the lakes seek assurances from HS2 Ltd that current parking arrangements at the lakes will remain in place throughout the whole period.
- 30.2.4. There are existing drainage issues within the former gravel workings and the surrounding area. The proposed works will further intensify the problem and Hillingdon would like further information on how this has been assessed in order to provide Hillingdon with assurances that HS2 Ltd understands the full impact of the increased use of this access over an already stressed area.



30.2.5. Although the gravel pits (save for Lake 2) will not be directly affected by the construction of the proposed scheme, activity in adjacent areas will noticeably affect the existing tranquillity of this area. Taking this into account, the magnitude of change is considered to be medium. The medium magnitude assessed alongside the high sensitivity of character area will result in a moderate adverse effect.

## **31. Uxbridge Golf Course**

### **31.1. Background**

31.1.1. This piece of land consists of approximately 45 hectares and the freehold owner and occupier of the site is Hillingdon. The permitted use of the site is an 18 hole golf course and there is also an extant planning permission for remodelling works, consisting of re-contouring of the existing land form using imported inert soils, together with extensive landscaping and associated drainage (application no. 4601/APP/2010/1103).

### **31.2. Impact of HS2**

31.2.1. HS2 Ltd will require use of the access track and a large area of land to the north of the site in order to undertake works on existing pylons and to construct new pylons to facilitate the diversion of 275kV overhead cables from their original alignment. HS2 Ltd is proposing to reinstate the land once the construction phase has been completed, however no details have been provided on the expected duration of these works.

31.2.2. The land identified by HS2 Ltd as potentially required for construction of the new pylons, will significantly affect at least three of the eighteen holes of the golf course. Unlike Ruislip Golf Course, HS2 Ltd have not even engaged with Hillingdon or members of the golf course to discuss how this course will continue to operate during the construction period. Hillingdon reiterate that a course incorporating repeated holes will not function as a competition course. Further to this, the northern part of the site will also be severed from that below the land required by HS2 Ltd and will therefore be unusable during the construction period. The golf course is open to the public and is therefore accessible to local residents. The temporary loss of land from the golf course is a significant adverse effect.

31.2.3. The ES also says that a new pylon is going to be permanently constructed to the north of the golf course which will affect at least one of the holes. Despite this there is no mention in the ES as to how this will affect the course operating as an eighteen hole golf course. Unless a suitable solution to this issue can be found, the impact of the new pylon and associated cables will have a significant adverse effect.

31.2.4. A number of further significant adverse impacts have been identified in the ES. These include:

- The potential removal of ponds and ditches in the vicinity of the golf course together with grassland and scrub to facilitate the realignment of the National Grid overhead power lines.
- A compensatory habitat will be required within the National Grid Feeder Station wet grassland area in order to address the possible impacts on the great crested newt population at the golf course. This will include the provision of ponds, terrestrial habitat and hibernation habitat sufficient to maintain the favourable conservation status of the populations affected.
- A compensatory habitat will also be required within the National Grid feeder station wet grassland creation area to address the impacts on possible reptile populations from Harvil Road and Harefield No.2 Lake habitat within the golf course. This will include the provision of rough grassland, open water and habitat features for breeding and hibernating sufficient to maintain the conservation status of the populations affected.
- Vegetation removal within the golf course will open up views of the diversion of overhead power lines in the middle ground (viewpoint 049.3.005). In the northern extent of the view, cranes will be visible across the Chiltern Main Line in the background. There will be the addition of new features that are continuously visible and incongruous with the existing view. The magnitude of this change is considered high.
- Planting will not be established by year 1. The diversion of the overhead power line will therefore give rise to notable changes to the golf course.
- Use of an existing access track for use by construction traffic will increase the potential for flooding on the track itself as there is already an existing issue whereby the ground lies wet and the impact of additional traffic will only exacerbate this problem. The ES does not take this into account and therefore HS2 Ltd will need to allow for the movement of water in this area.

31.2.5. With the above in mind, the ES should detail how HS2 Ltd will work with members of Uxbridge Golf Course and Hillingdon to enable the golf course to continue to operate as an eighteen hole golf course throughout the construction phase and to identify a means by which it could operate as an eighteen hole competition course throughout the operational phase of the proposed scheme with the creation of the new pylon.


31.2.6. The nearest golf course owned by Hillingdon is Ruislip Golf Course, which is approximately 1.4km from Uxbridge Golf Course. However, as detailed

previously in this response, Ruislip is also heavily affected by HS2 and it is therefore impossible for members to use this course as an alternative.

- 31.2.7. The only other golf course that is owned by Hillingdon is Haste Hill Golf Course, which is approximately 4.2km from Uxbridge Golf Course. As stated above, why should members of the golf course wish to use Haste Hill instead?
- 31.2.8. There are currently a total of 63 club members and 18 season ticket holders. In 2013, Hillingdon received an income of approximately £86,527 (January-December 2013). Once members understand the impact that the proposed works will have on the golf course, there is a real danger that a further significant number of members will leave and the course may need to close. If this were to happen, 4 Hillingdon employees would face the prospect of losing their jobs.
- 31.2.9. Furthermore, if the course is closed, Hillingdon would lose a valuable source of income. The ES does not suggest at any point that Hillingdon will be offered compensation for any potential financial losses which it may incur and it also fails to discuss this golf course within the section on community infrastructure.
- 31.2.10. Further to this, Hillingdon will be unable to implement the extant planning permission as detailed above and as such Hillingdon would expect HS2 Ltd to work with Hillingdon to implement the permission following completion of the works. This would ensure that the final contours are suitable for a golf course.
- 31.2.11. With regard to the further significant adverse impacts which have been identified in the ES, and which are summarised in paragraph 9.61 above, Hillingdon will fully rely upon those comments made in the main response regarding the inadequacy of the proposed mitigation measures set out in the ES and its own proposals for mitigation.



**Legend**

 Construction Boundary

**Uxbridge Golf Course During Construction**

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## 32. Other Land Impacted

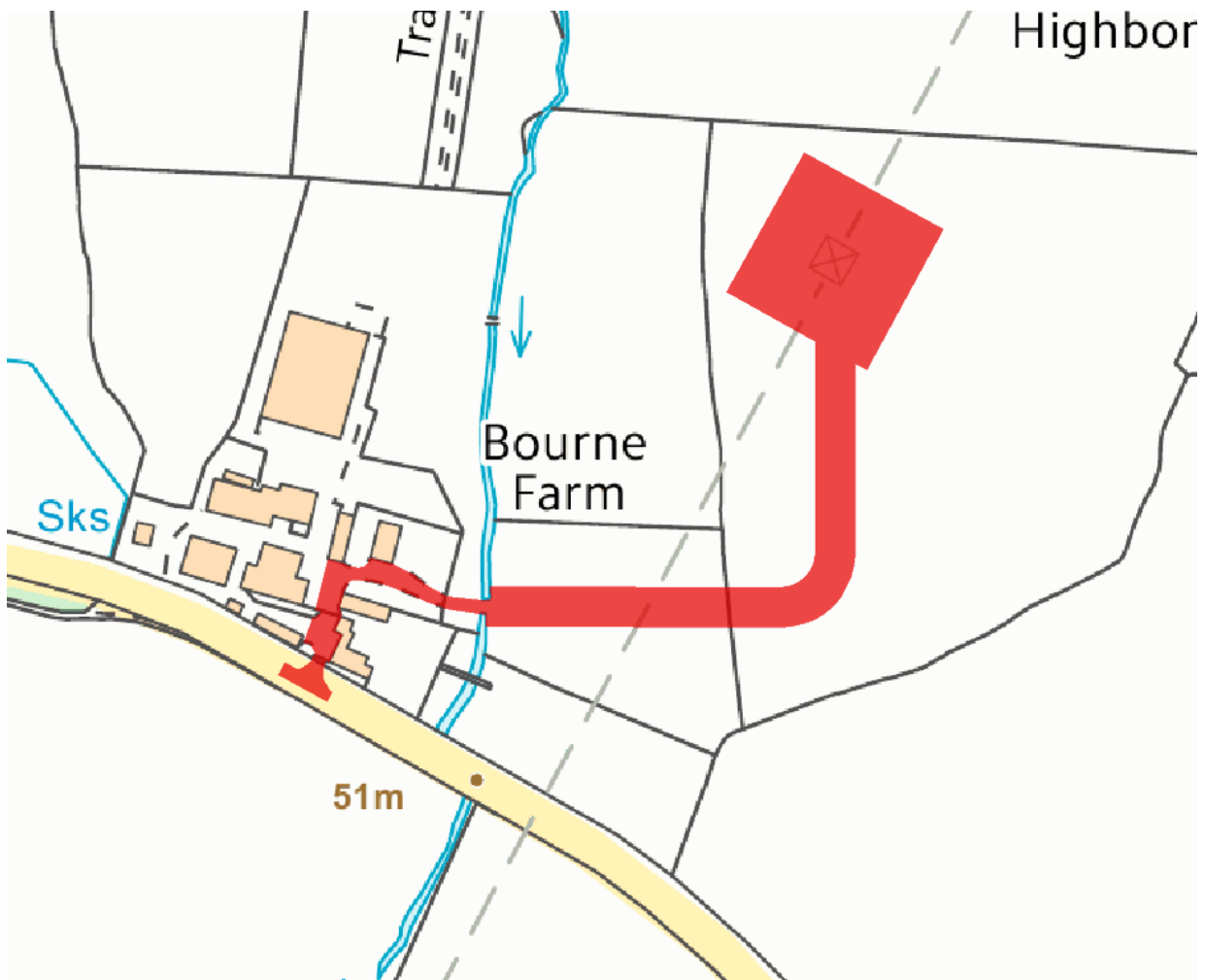
### 32.1. Bourne Farm

#### *Background*

- 32.1.1. Bourne Farm consists of 86.6 hectares of land and the freehold owner of the site is Hillingdon. The land is subject to an agricultural holdings tenancy which was granted in September 1992 and operates year to year. The land generates a significant rental income to Hillingdon.

#### *Impact of HS2*

- 32.1.2. HS2 Ltd will require access to an existing pylon on this land during the realignment of the electricity cables. The access track to be used by HS2 Ltd runs through Bourne Farm. The requirement for access is expected to be for a period of one year and HS2 Ltd intends to reinstate the land back to its former state once access is no longer required.



32.1.3. Bourne Farm Barn is located within the grounds of Bourne Farm and is Grade II listed. The access track which will be used by HS2 Ltd is situated directly next to this barn. HS2 Ltd have not provided any details on how they intend to protect this listed building whilst the access is being used or provide details of an alternative access that could be utilised in order to avoid any potential damage to the listed building.

32.1.4. Save for that mentioned above, Hillingdon is unable to properly assess the impact on this land due to insufficient detail contained within the ES.

## **32.2. Scout Hut, New Pond Hall**

32.2.1. Hillingdon is the freehold owner of this land and it is leased to the 4<sup>th</sup> Ruislip Scouts for a period of 25 years which commenced in January 2002. Rent is payable under the terms of the lease to Hillingdon. HS2 Ltd propose to construct a vent shaft very close to this site on land near to West End Road and therefore the operation of this building is likely to be affected during the construction period.

32.2.2. Although the ES does not indicate that the actual building on this land will be adversely affected, it is unclear whether access to this site will be restricted or prohibited during construction. It is also unclear whether mitigation measures are being proposed by HS2 Ltd in relation to noise, dust and traffic movements. Hillingdon wish to encourage the existing use to continue on this site and therefore it is essential that appropriate measures are offered in order to cause as little disruption as possible to the users of the building.

## **32.3. Land to the rear of 93 Bridgwater Road**

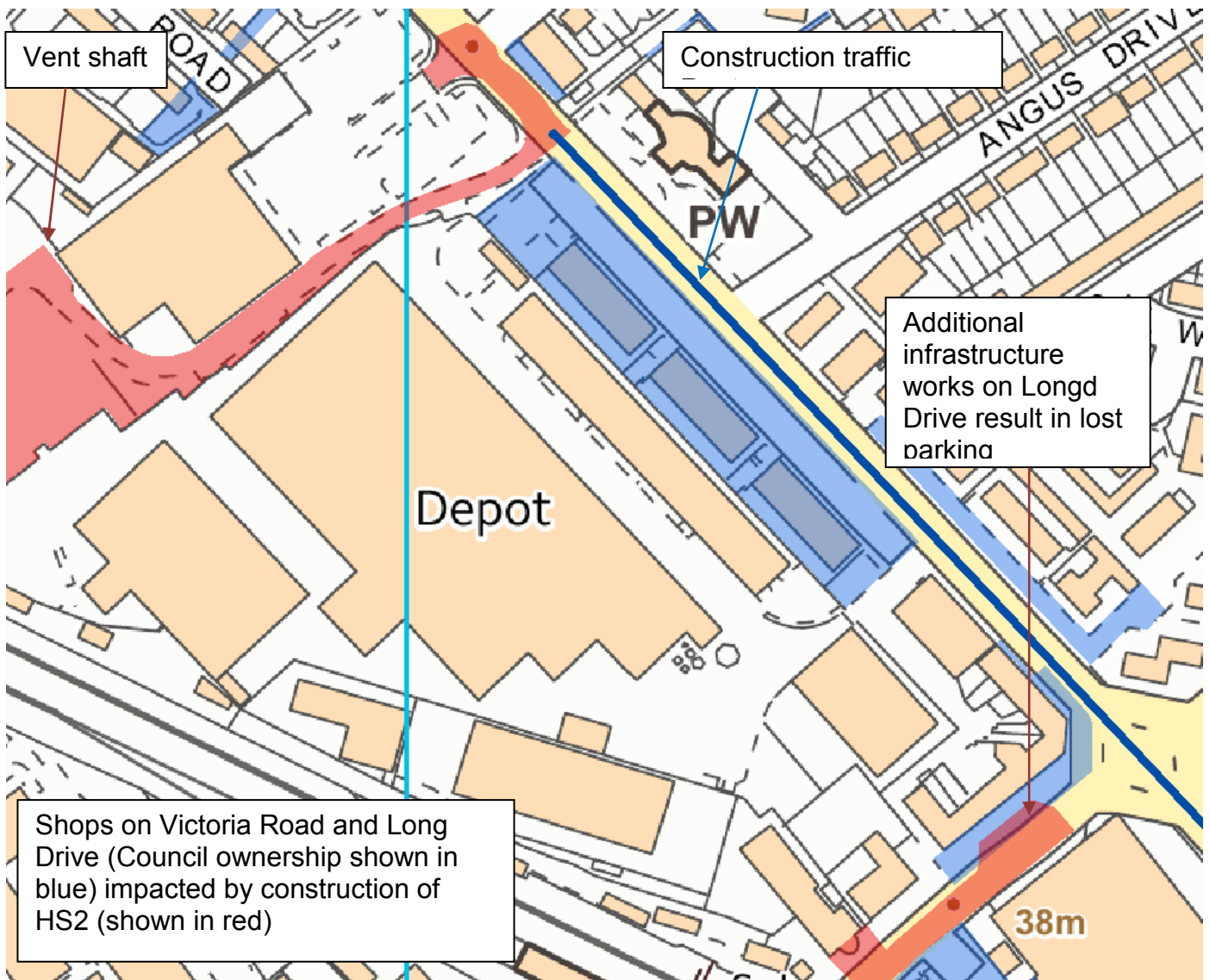
32.3.1. Hillingdon is the freehold owner of this land. The land is subject to a lease and a tenant has occupied the building since 2007. Although there is a distinct lack of detail contained within the ES, it appears that the access to the rear of 93 Bridgwater Road will be impacted during construction. It is not clear why such access is required and if the access to the front of the site will be affected, with the exception of increased construction traffic. Without this level of detail, it is impossible for Hillingdon to properly assess the impact on this property and will need to make a contingency plan to rehouse the occupant in the event that the impact is moderate/high.

## **32.4. New Pond Parade Shops**

32.4.1. Hillingdon is the freehold owner of this parade of shops. Fourteen of the units are subject to lease arrangements and derive a significant income to Hillingdon.

32.4.2. HS2 Ltd requires an extent of cutting and roadway for the construction of a vent shaft and operation of the scheme. This will have an impact on the access and parking arrangements at the site and may decrease the viability of the shopping parade.

32.4.3. As the ES has a distinct lack of detail in respect of this land it is difficult to establish the exact impact and potential implications on the shops and the community.



32.4.4. The book of reference shows that No. 68 (Hillingdon) will result in the loss of parking due to unspecified works to Hillingdon owned land along Long Lane.

32.4.5. Hillingdon is particularly concerned with this loss, particularly given that the ES itself acknowledges that:

*"Parking demand surveys suggest that weekday morning peak demand in the South Ruislip area during 09:00-10:00 is over capacity on Victoria Road. Demand for parking at West Ruislip over the same period*

*remained within capacity except for The Greenway which was over-capacity".*

- 32.4.6. The loss of parking on Long Drive will further increase the pressure on parking in this area and on parking management. Whilst the construction works to the site appear to be minimal, the subsequent effects on Hillingdon activities and responsibilities have not been considered by HS2 Ltd.

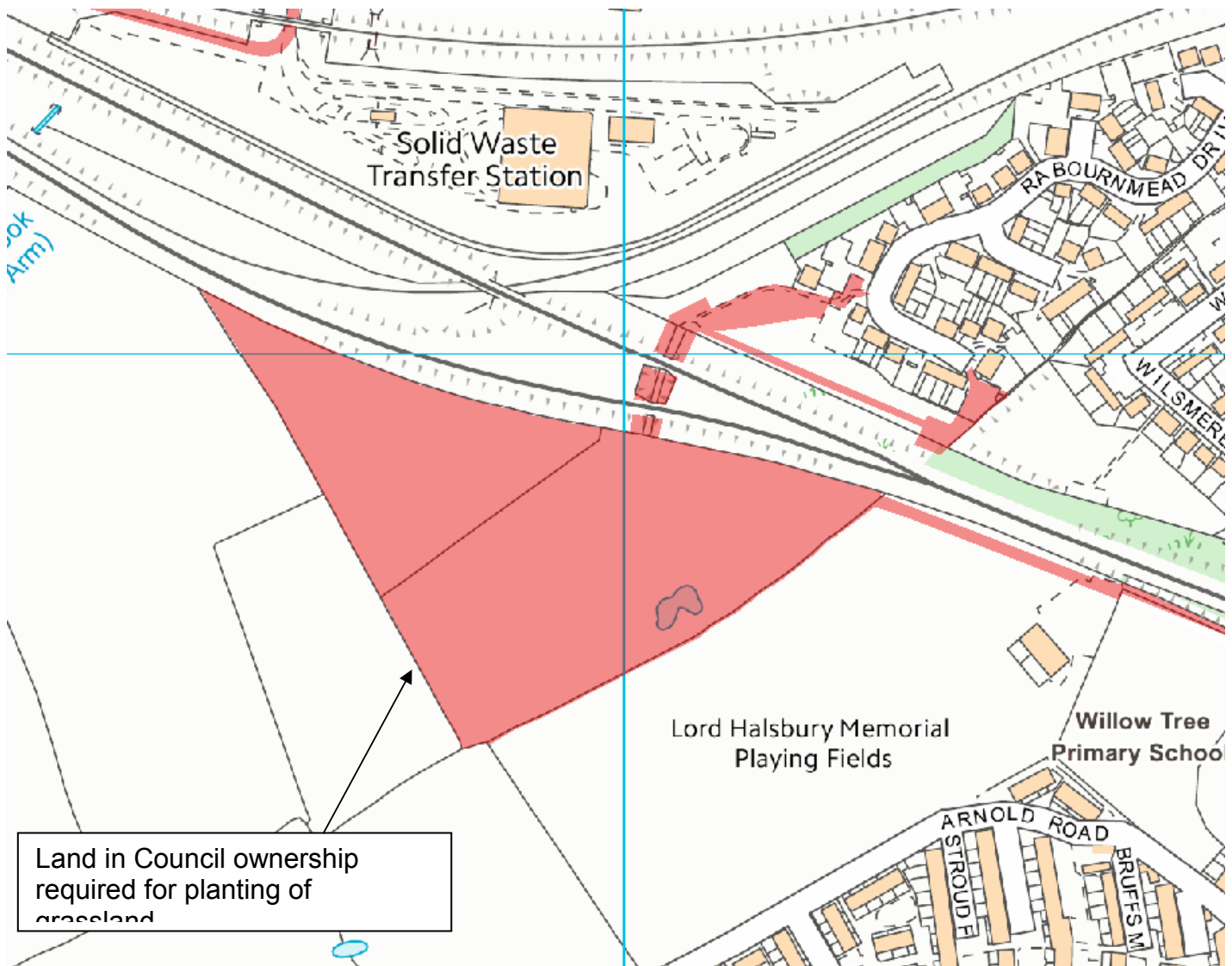
## **32.5. Priors Farm**

### *Background*

- 32.5.1. Priors Farm consists of 28.9 hectares of land. Hillingdon is the freehold owner of this land which is currently subject to an agricultural holdings tenancy that began in December 1982. The tenancy operates from year to year and generates an income to Hillingdon.

### *Impact of HS2*

- 32.5.2. It is the intention of HS2 to use 5.1 hectares (which equates to 21%) of Priors Farm during construction for the purposes of planting of grassland. The ES makes it clear that due to the percentage of land required during construction and the amount of noise and dust to be generated, the construction effects on this land will have a high impact on the productivity of the holding.
- 32.5.3. HS2 Ltd claim that the mitigation measures proposed within the ES will ensure that the effects of the works on this site will be negligible. At present, HS2 Ltd do not intend to acquire any of this land (including buildings or other farm infrastructure) following the completion of the works and it is hoped that the land will be restored to pasture land.
- 32.5.4. Save for the above, Hillingdon do not have any further details on the potential impact that the proposed works will have on this land and therefore cannot properly assess whether this will render the farm inoperable.
- 32.5.5. Although financial compensation may be offered by HS2 Ltd, the likelihood is that it would be insufficient given the inadequacy of the proposals for compensation set out in the recent Government Property and Compensation consultation.



## 32.6. Dews Lane and Dews Farm Sand Pits

### *Background*

- 32.6.1. Along Dews Lane Hillingdon is the freehold owner of two parcels of land. Dews Lane will be used as an access route for construction traffic heading to the National Grid feeder station and to install other associated works (flood plain storage area/woodland creation/planting). Both parcels of land are subject to licence arrangements and will be impacted by HS2 Ltd.

### *Dews Farm Sand Pits East*

- 32.6.2. This site consists of 1 hectare of land and is licensed on a yearly basis. The site is subject to a licence fee and generates an income to Hillingdon.

### *Dews Farm Sand Pits West*

- 32.6.3. This site consists of 4.2 hectares of land and is licensed to two operators on a yearly basis. One operator uses the land for controlled motor cycle access and this is the only site within the Borough that can sustain this type of use. This site is subject to a licence fee and generates an income to Hillingdon.

### *Impact of HS2*

- 32.6.4. Users of both sites are provided with access to an existing Council owned car park which is situated close by. The ES indicates that this car park will be required by HS2 Ltd during the construction period and that access to both sites will be restricted. It is the intention of HS2 Ltd to restore and repair this car park and return it to Hillingdon once it is no longer required by them, however this will still make it very difficult for users of both sites to park safely and securely during the construction period. This may deter people from visiting the site at all or create problems with parking on the road. If the situation becomes untenable the licence holders may terminate and look elsewhere for alternative sites. There is no mention in the ES to suggest that compensation for any potential financial losses will be offered to Hillingdon or the individual licensee's.

## **32.7. Additional Concerns**

- 32.7.1. In paragraph 2.27 above, Hillingdon has emphasised that it has fundamental concerns that the ES has shown that large areas of land which sit outside of the safeguarding corridor are now being claimed as part of the HS2 scheme. An example of such a site which falls within CFA6 is at Copthall Farm, west of Breakspear Road South.
- 32.7.2. Two further examples of sites which fall within CFA7 are firstly, the one approximately 18 hectares (45 acres) north of New Year's Green Lane around St Leonards Farm and secondly, the site approximately 23 hectares (57 acres) north of Harvil Road at Park Lodge Farm.
- 32.7.3. Hillingdon reiterates that this is new information which it has not previously seen and it is apparent that there has been no proper environmental assessment of what will amount to a very significant blight over an extensive area of land for many individuals who live in Hillingdon.

### **33. Conclusion**

#### **33.1. Main Concern**

- 33.1.1. The ES presents a number of very significant difficulties for Hillingdon in its capacity as a landowner. HS2 will have a devastating impact on its land and on those individuals/bodies who are Hillingdon's tenants. In those instances where consultation has taken place, it has been wholly inadequate and Hillingdon is very concerned that there are no compensation proposals in the ES at all and even where they do appear, they are so poor that they do not even begin to address the very real losses that Hillingdon itself its tenants and its residents will suffer.