campaigning
by the
Railway Development
Society Limited

Network Development Committee

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Dear Sirs,

HS2 CONSULTATION - DRAFT SCOPE AND METHODOLOGY FOR THE HS2 ENVIRONMENTAL IMPACT ASSESSMENT

Firstly, our comments on the draft document are made in the context of our opposition to the route selected for the first stage of HS2 by the DfT, partly, though not entirely for environmental reasons. I also refer to your letter of 21 May in response to ours of 9 May. We will avoid comment on issues such as soil, water courses, drainage, wild-life impacts, spoil removal, air quality, etc., but leave these issues for other organisations with greater expertise in these particular areas.

3. Reporting of alternatives - and 6. Climate

We believe that the project so far has been conceived, regrettably, with at best, understated concern for the environment, so it is difficult to select specific individual points for criticism. Perhaps the most outstanding concern for us is that the project had been described as "carbon neutral" in the original documentation. At a time when the UK is striving to meet its targets for overall carbon reduction of some 80% by 2050, "carbon neutral" is a somewhat poor assessment, lacking the ambition or benefits that the project should be seeking. A high-speed railway should surely be aiming to accomplish the following:

(a) Sufficiently attractive journey opportunities to persuade many motorists to switch to high speed rail services:
(b) Additional capacity created on the classic railway routes, relieved of longer distance services, in order to operate additional or more frequent shorter distance services, also attracting motorists to use the railway instead;
(c) Additional capacity created also for substantially increased volumes of rail-borne freight, removing many heavy trucks from the roads;
(d) For rail journeys of up to 4 hours, to see a significant modal shift of air traffic to rail instead.

The benefit of reduced carbon generation per passenger/km or tonne/km if these modal switches actually take place must surely be recognised as one of the line's greatest potential benefits, much more so than pushing the speed above 320 kmh to 360 kmh to save a few minutes on the longest journeys?

A further environmental saving is in fact achieved by limiting the maximum speed on HS2 to 320 kmh, (less where route curvature or city centre penetration require a more useful or less damaging impact on built structures), with 20% less carbon generation (at the power station) at this speed, than at the proposed 360 kmh maximum. Surely all these measures could make a substantial contribution to reduction of carbon emissions? In para 6.1, you do acknowledge these commonly recurring views from submissions made during the consultation period, and we are pleased that you are reviewing these aspects again, particularly estimated GHG emissions based on modal switch primarily. The additional GHG emission during construction is relatively short compared to the life of the completed project (para 6.6.5) and of obvious lesser importance.

The destruction of otherwise untouched rural areas, some in AONBs, is for us a quite unsatisfactory outcome of the route selection that has been made. We make no apology for referring again to our own recommended route on an alignment close to the M1 and M6 motorways, which certainly would have had less damaging impacts on the rural terrain, and we know that other organisations agree with this analysis. The best of the English countryside cannot be easily replaced, no matter how substantial land restoration measures, tree planting, etc., might be.

We refer to the route of HS1 in this regard. You will recall that the first four alternative routes, which had been compared for the project and were all controversial and unpopular, were later all subsequently abandoned, in favour of the current, less destructive, and more successful route, with minimal adverse impacts on the rural or urban/suburban terrain. This is almost entirely due to the route (apart from the unavoidable tunnelled sections) closely following the A13, the Tilbury railway line, the M2 and M20 motorways, and the Maidstone-Ashford-Folkestone railway line. However the proposed HS2 route, which the DfT has chosen, has also effectively rejected the similar environmental improvements that could be achieved following the Midland Main Line (briefly), the M1 and M6 motorways. We note that in paras 3.1.9 and 3.1.10 you indicate that you would examine “route alternatives between London and the West Midlands, and means of connecting to other rail networks such as HS1.” You indicate that this analysis would include “design speed alternatives” and “following alternative routes with reduced design speeds and associated line curvature”, and we trust that the details of the study results will be published.

We would therefore welcome an appraisal of the route we advocated in our original submission to the consultation in July 2011, and in our response of 9 May 2012 to your previous rebuttal of the alternatives, but making allowance for our proposed direct route from Euston to West Hampstead, and not via Old Oak Common which was implied as an indisputable and obligatory component of the scheme in your response. We also do not believe that such a route would be any or significantly longer than your preferred route and we are confident that it would be unlikely to require any more than 10 km of tunnels, (Hampstead, Mill Hill and Luton), especially as visual intrusion would hardly be a strong feature, running close to existing motorway alignments!

7. Community

Under Community, in reference to loss of residential properties, we are very concerned about the loss of 200 homes next to Euston Station, which we claim is unnecessary. Again, in our previous submissions, we advocated a narrower footprint at Euston by using St Pancras as well (for East Midlands and North Eastern services), with possibly eight London Midland trains each peak hour being diverted between Willesden and Paddington on to Crossrail. We are confident that the rebuilt capacity at Euston, and some now admittedly expensive additional construction needed at St Pancras, if our preferred M1/M6 route alignment was adhered to, would be adequate for the expansion of services to the level predicted, especially if after reversing at St Pancras, some trains ran on directly via HS1 to Kent and eventually European destinations. This link would additionally render redundant the extremely expensive but limited capacity tunnel proposed to link HS2 with HS1 somewhere near Camden Road, which has also been criticised by many other organisations.

13. Sounds and Vibration

There is one aspect we would like to focus on, but appears missing from the document. Train passengers do not enjoy staring at tunnel walls, deep cuttings, embankments or high noise barriers. However the amount of tunnelling and other measures now planned to hide more of the railway from

line-side residents, visually and audibly, means that much longer sections of the route will consist of just such vistas from inside the trains. Train travel should be encouraged for the pleasant experience of being able to look out of windows at terrain, of almost any kind, and not just a means for travelling more quickly than other surface transport modes.

Also passengers do not enjoy staring at vast graffiti displays on lengthy noise barriers. It is relatively common on new high speed rail alignments being constructed in mainland Europe for graffiti to be plastered on retaining walls and barriers, even before any tracks or overhead gantries have been installed! Where noise barriers are planned, they should be built from materials that discourage graffiti artists. Where possible the built structures themselves should be treated with coatings, which make graffiti easier to wash off, although we accept that this may not be readily available or economic at present. This is an anti-social feature which frankly plagues many high speed rail lines across mainland Europe, further undermining the travel experience for passengers, a source of nuisance, through trespass to line-side property owners, and a not uncommon cause of death and injury to the graffiti artists themselves. However in some cases, the European railway authorities have belatedly recognised the problem, and now utilise materials other than flat concrete, which are corrugated in surface area, or otherwise misshapen, or constructed with materials where it is difficult for the “artists” to leave a readable or meaningful message or slogan.

Indeed, requests from fearful line-side proximate communities for excessive barrier provision should be resisted. The impact and volume of high-speed rail noise on communities is grossly exaggerated by many of its opponents, and in some locations only audible to communities at all in the short summer period when widows may be left open. There will presumably be few or no night services either to disturb most nocturnal sleep patterns. Help with double-glazing costs for those few who do not possess it already would be a far better community investment.

15. Traffic and Transport

We refer to our previous submissions and our objections to parkway stations, such as the proposed Birmingham Interchange Station. This is effectively the second parkway station in this area and lacks the usefulness of the Birmingham International Station; close to the Airport, NEC, and a good interchange point for other local train services. The new station will have none of these advantages as far as we can establish. It is in an unpopulated area, even further from the airport, will have no interchange with other local train services, and bus services will have to be diverted or introduced specially. This is the type of station which is a recipe for poor environmental decision making in our view, with hundreds of high speed train users arriving or leaving by car, necessarily generous levels of car parking spaces to accommodate them, and new roads, or widened existing roads, to cater for the additional traffic, few of whom will connect to the high speed trains by other public transport

The situation is almost identical to Ebbsfleet on HS1, which we and other organisations opposed. It is only 600m from Northfleet Station but with no way of getting there on foot or by bus. Ebbsfleet station has car parking spaces for several thousands of cars, but is never anywhere near full. The specially diverted “Fast-track” bus service provides an indirect route to other stations at Dartford, Greenhithe and Gravesend, but only runs half-hourly in the evenings and on Sundays. We believe a similar fate awaits Birmingham Parkway Station too.

Conclusion

We have commented on issues, which most others concerned about the project might not have a view on, and we hope you will find these useful, and even thought provoking. We are sorry if some of our comments are on issues that we have raised previously in the consultation last July, but we do so again where it is relevant to this particular consultation.

Yours faithfully,

IMcDonald

Ian McDonald
Chairman, Network Development Committee