

# CHOLESBURY-CUM-ST LEONARDS PARISH COUNCIL

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Freepost RSLX-UCGZ-UKSS  
High Speed Rail Consultation  
PO Box 59528  
London  
SE21 9AX

20<sup>th</sup> July 2011

Dear Sir,

## **High Speed Rail – Response to Consultation Report**

The Parish of Cholesbury-cum-St. Leonards is in Chiltern District in Buckinghamshire. At its closest it is around 3km from the proposed HS2 route. It has some 398 households, home to around 980 inhabitants, of whom 20% are under 16 and another 20% are over retirement age.

The Parish Council has drawn up this response having studied the HS2 Consultation documents and other relevant sources of information, having attended the HS2 Roadshows and also having taken on board the views of local people at a well-attended public meeting held in the Parish on 15<sup>th</sup> June 2011.

The Council's response comprises answers to the questions set out in the Government's consultation on High Speed Rail and additional comments about these proposals.

## **Question 1**

**Do you agree that there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades?**

No. We do not agree that in this consultation the Government has made a strong case for its approach to enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades.

We believe future economic growth in Britain depends on properly integrated economic and infrastructure strategies, of which a well-defined inter-city transport strategy is just one. In the current absence of clear objectives set out in such a transport strategy it is impossible to see the proposal to develop HS2 as other than an ill-conceived, risky, enormously expensive and environmentally damaging experiment paid for and subsidised by the tax-payer. There is no strong business case that committing £32bn on HS2 is the best way to improve capacity, nor is it in the

national interest. The UK has a well-developed inter-city rail network which would continue to be capable of improved performance and capacity to address overcrowding.

We also note that the HS2 Consultation Report glaringly omits comparisons with anything other than the “do-minimum” alternative. This approach ignores anticipated renewal of infrastructure, normal incremental responses to address increased demand, and alternative programmes of improvement to train capacity and rail infrastructure. This is not the approved approach for assessing major proposals which should include comparison against, at least, the best alternative(s).

We do not oppose rail developments involving increases in the performance of inter-city rail travel and recognise there needs to be continual improvement in capacity and reliability to match passenger demand; we just do not believe that providing travel at over 360km/h to shave minutes from journeys of relatively short distance, such as between London and Birmingham, makes economic sense when compared with the more cost-effective combination of optimised alternative infrastructure strategies, such as Rail Package 2 and Evergreen 3, together with increasing the number of units on Pendolino trains and improvements to both timetabling and ticketing price strategies.

## **Question 2**

**Do you agree that a national high speed rail network from London to Birmingham, Leeds and Manchester (the Y network) would provide the best value for money solution (best balance of costs and benefits) for enhancing rail capacity and performance?**

No. We strongly disagree that a High Speed Rail Line from London to Leeds and Manchester via Birmingham would be the best value solution to Britain’s future rail transport demands in terms of capacity and performance.

### *Demand forecasting*

HS2 is based on a flawed business case which does not demonstrate value for money. The proposals lack robust demand forecasts for long-distance travel and such forecasts as are presented are highly questionable, being based on a forecast period extended beyond acceptable limits to achieve the required level of return. At 18 trains per hour (tph) HS2 would require train capacity levels that are considered unachievable technically. We suspect figures of 14tph and 18tph are used only because a more realistic maximum of 12tph would not provide the passenger capacity to support the proposed business case.

We also note that the Oxera report for the Transport Select Committee casts doubt on Department for Transport (DfT) predictions stating that there is a “degree of uncertainty” around the financial benefits of the Government's HS2 high-speed rail project. Indeed without significant subsidy from the tax-payer it would never break even, let alone become profitable through ticket sales.

We do not believe that HS2 would significantly benefit the larger cities in the North, but would disadvantage many smaller conurbations in the Midlands and North. It offers no advantage to the South West and Wales. We believe there are far less expensive ways to develop a rail network that meets future demand through incremental improvements, such as: removing overcrowding and pinch-points, improving trains and station infrastructure, and investing in projects that deliver capacity and regeneration benefits, such as the enhanced version of Rail Package 2, defined as RP2+ by 51m in their submission to the Transport Select Committee. This approach stressed the importance of an integrated package of enhancements involving electrification of the South West

and Wales Lines, and regional railways services such as the Midland Mainline and Northern Hub, similar to that already achieved by the Chiltern Line Evergreen Programme.

#### *Comparisons with other high speed railways*

The argument in favour of HS2 relies on comparisons with a number of high speed railways in Europe and elsewhere, which it is claimed demonstrate the success of high speed rail. Far from this being the case, supplementary evidence provided by HS2 Action Alliance to the Transport Select Committee in July 2011 (Annex 2 - Countries facing problems with their high speed railways) suggests that High Speed Rail Networks across Europe are failing to meet demand estimates, and financial difficulties of some recent high speed rail developments are resulting in services being curtailed or withdrawn. The vast majority of such networks connect cities over much greater distances (400+ miles) than London to Birmingham (113 miles), or to Manchester (184 miles) and in our view do not provide viable comparisons given the much smaller distances between cities in the UK. One of the railways referred to, the heavily-subsidised high speed rail network between Amsterdam and Brussels, is of comparable length and represents theoretical time-savings of a similar order to that proposed in the UK. However door-to-door journey times are hardly impressive, a large proportion of the possible time-saving is taken up accessing the high speed network, as would also be the case with HS2.

#### *Modal shift*

The claim that HS2 would shift passengers from air to rail is also flawed: there is no scheduled direct air traffic between Birmingham and London, 79% of journeys between Manchester and London are already by rail, the domestic air market for London is already declining and there would be no benefit to Scottish travellers for the foreseeable future. Forecast benefits based on the most optimistic modal shift modelling are at best speculative.

If HS1 is anything to go by, HS2 usage and revenues would be augmented at the expense of local and commuter services along the route, by starving local rail services of money, reducing local timetables and services, forcing passengers onto the high speed line and charging them premium fares.

### **Question 3**

#### **Do you agree with the Government's proposals for the phased roll-out of a national high speed rail network, and for links to Heathrow Airport and the High Speed 1 line to the Channel Tunnel?**

No. We do not agree with the Government's proposals for the phased roll-out of a national high speed rail network, or for links to Heathrow Airport, or the High Speed 1 line to the Channel Tunnel.

#### *Phased roll out*

The slow pace of the roll out, over 10 years, for phase 1 would address neither current, nor, critically, future anticipated levels of overcrowding on the network until 2026. It serves only to mask the massive cost of the roll-out of the project, which is particularly unaffordable given the current pessimistic economic outlook and debt recovery challenges faced by the UK. To this must be added the considerable uncertainty surrounding whether a phase 2, the 'Y' network, would be ever built, given that the models employed to forecast longer-term railway passenger demand have been notoriously inaccurate in the past. For example, 2006 passenger demand forecasts for HS1 were for 25m passengers per annum, whereas the actual figure was only 9m! For a project such as

HS2 with such a long lead time and even longer delay before any possible return on investment, current demand forecast modelling cannot be relied upon to support the business case.

#### *The HS1 Link*

The proposed link to HS1 has not yet been defined, is a high cost option, and in any case would not achieve the project objective of improving access to Europe from elsewhere in the UK. Converting the existing North London Line would produce only a low speed, low quality connection and would severely disrupt rail passenger transport for Londoners.

#### *The Heathrow Spur*

The benefits of links to Heathrow are not explained in the consultation. We understand that a Heathrow link alone would cost a further £8 billion or so, which has not been included in current costings. HS2 demand assumptions are based on a third runway at Heathrow. Now that has been scrapped, that airport's capacity has been effectively capped. What is more, the domestic air market for London is already declining. There is little compelling evidence that there would be a significant modal shift from air to rail if HS2 was extended to Manchester as 79% of travellers already use rail. In short there would be too few people using the link to Heathrow to make it cost-effective.

## **Question 4**

### **Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook?**

No. We do not agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook.

The Consultation documents do not provide sufficient information on the criteria used to select the proposed route and the reasons why other possible routes were rejected or not considered. None of the preferred or alternative routes avoid the Chilterns AONB and the Government has not discharged its statutory obligations to avoid permanent damage by demonstrating that HS2 is in the national interest and must be built through so far undeveloped landscape across the Chilterns.

Evidence from both current rail operators of High Speed Trains in China, Japan, Europe and the US, and from recognised rail engineering experts shows that it is not currently feasible for High Speed trains to operate a consistent and reliable service at up to 18tph, nor would future technological improvements make it likely. The HS1 operation suggests that performance improvements are unlikely. There is strong evidence indicating the southern section of the Y network would not cope with integration of services from the converging northern Y sections.

The impact on the environment of the train operation would be considerable. There has been no evidence provided that the operation would be 'carbon neutral'. All indications are that at such high speeds there would be significant CO<sub>2</sub> emissions. Furthermore noise pollution above 360km/h is known to increase disproportionately and could not be sufficiently mitigated by noise reduction measures. The business case for such high speeds has not been made. For a small reduction in speed the route could be designed to use existing rail corridors with a consequent reduction in noise, carbon emissions and damage to communities and landscapes.

## Question 5

**Do you agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?**

No, we do not agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands.

### *The proposed route*

The minor amendments of the proposals to include green tunnels and bridges and some realignment of the route through cuttings and along embankments have not addressed the disastrous impact on the people and economy along the whole route, and the landscape and ecology of such places as rural Warwickshire and the Chilterns where more than 9% of the route passes through the AONB of which less than 40% is through tunnel.

It is disingenuous to conclude that environmental impact is reduced by utilising such areas as the Misbourne Valley, which is erroneously and misleadingly described as an existing transport corridor. As part of an AONB the Misbourne Valley must be afforded maximum protection.

### *Mitigating the impact of HS2*

The Consultation documents do not provide sufficient detail of the proposed mitigation measures and lead us to conclude that they cannot be assessed or at best must be considered inadequate. At the Consultation Roadshows it was clear to us that no research has been carried out into the geological and hydrological impacts of tunnelling in the Chilterns, let alone assessed and published. We were also led to understand that no assessment of noise and light pollution has been undertaken, and would not be completed until after a decision is made to proceed and a detailed design has been developed.

We do not believe proper account has been taken of the collateral damage to roads and lanes that would be widened or otherwise permanently altered to deal with the transport of equipment, construction materials and waste spoil, and the operation and maintenance of the rail network, and which would impact upon village communities and landscape for some distance beyond the buffer zones. An as yet unpublished 'Code of Construction Practice' and other requirements on the construction industry lacking legal enforcement are patently inadequate. We have no confidence in the proposed measures to minimise permanent damage to the 'buffer zone' extending either side of the proposed route and the impact on the environment. For example, we consider replanting a totally unsatisfactory measure for replacing ancient woodland uprooted as part of the construction of HS2.

## Question 6

**Do you wish to comment on the Appraisal of Sustainability of the Government's proposed route between London and the West Midlands that has been published to inform this consultation?**

We consider the Appraisal of Sustainability (AoS) has not adequately addressed the serious environmental impacts HS2 would have along its entire route. Given this is a major infrastructure project we expect any decision about HS2 be made only after a Strategic Environmental Assessment has been undertaken to look in detail at the costs and benefits of the proposed HS2

route and other options; i.e. other preferred routes and alternative rail transport solutions. (See also UK National Ecosystem Assessment below.)

Furthermore, when questions were raised at the HS2 Roadshow in Great Missenden as to what investigations had been undertaken by HS2 Ltd into the impact of construction and operation of the HS2 rail network, we were advised no detailed assessments had yet been undertaken nor would be commissioned unless and until it was decided to proceed with the project. Without proper assessment and publication of findings it is not possible for anyone responding to the consultation to make a fully informed and balanced judgement.

We draw attention to the Treasury Green Book, which states “where lead options involve irreversibility, a full assessment of costs should include the possibility of delay, allowing more time for investigation of alternative ways to achieve the objectives”. Surely this is a perfect example where a pause is required to review and reassess the validity of the business case?

We make the following additional comments about specific aspects of HS2 potential environmental impact:

#### *CO<sub>2</sub> emissions*

We disagree that there is evidence that HS2 would help reduce CO<sub>2</sub> emissions. On the contrary, we contend the CO<sub>2</sub> emissions from the construction phase would be considerable. Information provided in 51M’s written evidence to the Transport Select Committee indicates that construction work would also add substantially to CO<sub>2</sub> emissions and would be ten-fold the amount predicted by HS2 Ltd (some 13m tonnes of CO<sub>2</sub> ).

Emissions from High Speed trains travelling in excess of 360km/h have been significantly underestimated. Such trains require twice as much power and produce three times the levels of CO<sub>2</sub> compared to conventional trains travelling at 200km/h. We understand there are also gross errors in the methodology behind the calculations which HS2 Ltd should be asked to reassess.

We also contend that emissions would increase significantly due to modal shift from air to rail, even at levels of modal shift much lower than that claimed by HS2 Ltd For instance, we note that BAA has already stated that far from dropping released domestic flight slots, it would use them for international travel, with greater emissions. Another example: passengers would find themselves forced to abandon deteriorating local services and use HS2’s ‘parkway stations’, involving longer road journeys.

We note that the Oxera report, commissioned for the Transport Select Committee in June 2011, also casts doubt on whether the rail link would have the environmental benefit of reducing emissions as passengers switched from domestic flights to high-speed trains, saying: “This is unlikely to occur due to the excess demand for capacity at the main airports in the south-east [Heathrow and Gatwick].”

#### *Local economy*

No account has been taken of the impact on the economy of the areas along the route during construction. Local businesses would see reduced custom or even cease to trade as a result of disruption to the road network. In the Chilterns the damage to the tourist economy has been estimated to be a reduction of some £50m pa.

### *Impact on local Public Services*

We are concerned that no account has been taken of the increased burden placed by the itinerant HS2 workforce and the construction itself on public services such as the Police, Local Authority and the National Health Service.

### *Health and well-being*

The HS2 Consultation Report is deficient in not providing an evaluation of the impact of HS2 on health and well-being. It is essential as part of a comprehensive AoS that this is considered in advance of a decision being taken about the route. Far from contributing any health or well-being benefits, we believe there would be significant detrimental impacts along the whole route for those having to suffer disruption to their daily lives during the prolonged construction phase. There would also be a permanent deleterious effect on the quality of life for those living adjacent to the railway line, near stations, including near the road network connecting to stations, electrical substations, maintenance depots, etc. It should also be noted that the route passes close to a number of areas of serious social deprivation in the London Boroughs of Camden and Hillingdon, and in Aylesbury, where there would be no stations and therefore no regeneration benefits.

### *Ecology and landscape*

We do not believe that sufficient steps are set out in the consultation documents to identify and protect wildlife habitats at risk from HS2 such as: chalk streams, unique habitats and ancient woodlands. We consider the visual impact on the landscape of HS2, for example from overhead wires, security fencing, ancillary buildings and lighting, to be massively obtrusive and unremittingly detrimental along the entire route.

### *Waste spoil*

We understand the assessment of waste spoil to be removed has been grossly miscalculated. HS2 Ltd suggests there would be 680,000 cubic metres of spoil from the tunnel excavations between the M25 and Amersham. This is based on a single tunnel despite the proposals specifying a twin-bore tunnel. This figure also excludes spoil from cuttings and underestimates the expansion of compacted spoil. The estimated waste spoil amounts to 12 million cubic metres, seventeen times the volume quoted by HS2 Ltd.

### *Aquifers*

We understand no investigation has been undertaken into the location of, or impact on, aquifers within the chalk of the Misbourne and Colne Valleys. Research carried out for the Chiltern Society indicates that there is a significant risk that drilling would result in pollution of the aquifers that supply large quantities of water to London, and the environmental impact and cost implications of this must be assessed before a decision is taken to proceed.

### *Noise and light pollution*

We are greatly concerned that no specific assessment has so far been commissioned or noise contour maps published of the impact of noise on the areas either side of the route. Furthermore, we understand such measurements that have been taken were not done in accordance with recognised procedures resulting in both the noise levels and numbers of properties affected being severely underestimated. Those who attended the Roadshows also described the HS2 noise simulations where bird song was louder than train noise as very unconvincing.

No assessment appears to have been undertaken of the impact of light pollution both on the immediately affected areas and also the wider landscape.

## *AONB*

We contend the proposals have not met the Government's statutory obligations to demonstrate that development that is inappropriate in an AONB meets the 'exceptional circumstances' requirement of being in the national interest. The additional mitigation measures for the AONB announced by the Secretary of State for Transport in February 2011 do not adequately address these obligations.

## *UK National Ecosystem Assessment*

We note that in June 2011 the Government published the UK National Ecosystem Assessment – Synthesis of Key Findings, which aims to ensure that a more integrated, rather than conventional sectoral, approach is taken to ecosystem management so that the wider economic values of ecosystems are quantified. We would expect that the decision-making process relating to this proposed major construction and infrastructure project is used to take proper account of the economic value of ecosystem, landscape and habitats affected by the HS2 route. We believe the Government should demonstrate its commitment to this new approach by incorporating an assessment of the impact of the HS2 proposals on the ecosystems and the people living along its route as part of the assessment of the HS2 business case.

## **Question 7**

### **Do you agree with the options set out to assist those whose properties lose a significant amount of value as a result of any new high speed line?**

No. We consider the options set out to assist those whose properties lose a significant amount of value as a result of any new high speed line to be inadequate.

The Exceptional Hardship Scheme is inadequate. The blight has already taken effect, and the delay in making payments is unacceptable.

We would want to see significant improvements in tackling the problems of those needing to move soon, those not wanting to move straightaway but needing to secure the value of their property (e.g. by a Property Bond) and those needing to cope with the impact of HS2 both during construction and after the line becomes operational.

## **Additional comments**

Cholesbury cum St Leonards Parish Council has the following additional comments in relation to the evidence and arguments put forward in favour of HS2 in the Consultation Report.

### *Rebalancing the economy and the North-South Divide:*

We have no faith in HS2 Ltd's claims that their proposals would help rebalance the regional economy. Arguments put forward, both in the HS2 Consultation Report and by both present and past Ministers may be strong on rhetoric and good intentions but lack any evidential basis. On the contrary, compelling research (summarised in the written evidence from Professor John Tomaney to the Transport Select Committee – May 2011) indicates the so-called faster connectivity of HS2 would have few direct benefits, and those accruing would be in London and the South East rather than the Midlands, the North or Scotland. New rail connections as proposed would facilitate the influence of stronger businesses, predominantly in the South, over those suggested as benefiting, predominantly outside the south of England. Any improvements in labour supply are likely to be

achieved by attracting more labour to the South rather than by moving employment to the North. We understand that 73% of the regeneration jobs would be in London and a significant proportion would be relocation of existing work, not new.

Furthermore, the Oxera Report, commissioned for the transport Select Committee in June 2011, states that whilst there is “relatively little evidence presented” on the regional and socio-economic impacts of the £32 billion HS2 programme. “London is thus very likely to benefit, possibly at the expense of less service-oriented cities on the line and that areas not served by the line could also be hit. In fact, a large proportion of the quantified benefits (34%) in the economic case are to long-distance passengers from London, so the regeneration effects (if they exist) would be large in London.”

#### *Business travel productivity*

HS2 Ltd recognises that their assessments of the value of the increased time business passengers spend working “... is an area of debate.” We agree this assumption is not convincing. HS2 Ltd severely and conveniently underestimates the amount of time business travellers already spend working on trains and overestimates the unit cost (average annual salary) of business time. Furthermore latest consultation papers suggest only 30% of passengers would be business travellers. HS2 Ltd's calculation of the net gain in productivity is clearly contrived, even specious.

The Oxera Report for the Transport Select Committee states “With the advent of technologies such as laptops and wifi internet networks, which allow people to work on trains, the HS2 Ltd argument that increased productivity would contribute to the profitability of long-distance rail travel is long outdated.” Oxera also sensitivity tested the productivity benefits of HS2 and concluded that the value of time for business users is reduced by one-third. This reduced the Benefit Cost Ratio (BCR) for phase 1 of HS2 from 2.0 to 1.7 or, for the ‘Y network’, from 2.6 to 2.1 so bringing the viability of the project into question.

It is our view that far greater national benefit would be gained by investing in improved productivity on all public transport, reducing overcrowding, developing existing intercity rail facilities and maintaining facilities at local level. Even better, invest in technological alternatives to travel, such as developing and accelerating the implementation of a proper strategy for the nation's digital infrastructure.

#### *Inadequate Comparison of Alternatives*

HS2 Ltd compares its proposals only with the “do minimum” case. It omits any comparison with the ‘best alternatives’ such as Rail Package 2. The Oxera report for the Transport Select Committee agrees. It says “There are some potential inconsistencies between the assessment of the strategic alternatives and high-speed options. The business case for the High Speed Rail programme covers WEIs [Wider Economic Impacts] ..... In contrast to the high-speed options, the analysis of the strategic alternatives appears to omit WEIs ..... The WEIs for the London–West Midlands strategic alternative Package 2 were previously estimated in the 2010 business case. If these were to be added to the current BCR estimates for Package 2 (i.e. 1.9), its BCR would reach 2.0—the same ratio as HS2.”

We see this failure to seek to compare HS2 with the ‘best alternative’ as bringing the credibility of the business case and the validity of the consultation process into doubt.

#### *Phase 2 –The ‘Y’ Network*

We draw to the Government’s attention the serious criticism of the HS2 proposals by the Oxera Report for the Transport Select Committee with regard to the Y network, which observes there has been little scrutiny of the business case, costs or risks associated with the Y network for which

nothing more than a 'high-level assessment' has been provided. The report also points out that there is no appraisal of the wider economic impacts for the Y network..." nor of the extent to which the extensions to Leeds and Manchester would displace or add to benefits from the HS2 line."

#### *The HS2 Roadshows*

We were, in general, disappointed by the failure of the HS2, DfT and associated representatives to provide adequate answers to many of the important questions put to them on the proposal, particularly those relating to the impact of noise on local communities, impact of tunnelling on the geology and aquifers in the Chilterns and the basis of the economic case.

### **Summary**

In conclusion, Cholesbury-cum-St Leonards Parish Council is convinced that:-

- HS2 is not a cost-effective way to develop the nation's rail network
- The demand for HS2 has been overestimated
- The train capacity claimed for the HS2 network is unrealistic
- The resulting modal shift from air to rail is overestimated
- HS2 would most likely increase CO<sub>2</sub> emissions
- The benefits claimed for the Heathrow Spur are a fallacy
- HS2 business travel productivity arguments are flawed
- HS2 would not redress differences in regional economies
- HS2 would reduce services and value for money to local areas along the whole route
- HS2 would severely damage the economy and environment of the Chilterns, the Colne Valley and rural Warwickshire

The Parish Council is emphatically against the construction of High Speed 2 based as it is on a failed business case, and involving the outlay of £32bn when we are facing a prolonged period of national austerity.

The Council has drawn attention to several serious flaws in the way that the Government's HS2 Consultation has been presented: the use of the "do-minimum" comparator rather than realistic alternatives; the use of unrealistic, discredited long-range demand forecasting to justify the business case; the absence of detail or scrutiny of the business case of the whole route including the 'Y' Network; and no detailed Strategic Environment Assessment on the impact of HS2 has been carried out as set out in the Treasury Green Book. As a consequence we contend any decision reached in favour of proceeding with the HS2 proposals would be open to legal challenge.

The Council supports alternative transport options involving the incremental development of the West and East Coast Main Lines, regional railways such as the Midland Main Line and Chiltern Line and investment in train, track and engineering infrastructure; timetabling and ticketing strategies.

The Council also encourages the Government to fulfil its commitment to accelerate the development of technological solutions through investment in a national super-fast broadband network to support web conferencing and other business to business connectivity.

Yours faithfully,

Mrs Susie Bell  
Clerk to the Council