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Dear Secretary of State

High Speed 2 Design Refinement Consultation Response

I am writing to you, on behalf of the London Assembly Transport Committee, to set out our response to the HS2 Design Refinement Consultation. Our response builds on the points we raised in our submission to the Department for Transport's initial consultation in July 2011. The Committee has a range of concerns about both the business case for HS2 and specific elements of the Design Refinement.

Our previous response acknowledged the likely shortfall in rail capacity on the West Coast Main Line and the need for investment in transport infrastructure. We continue to support the principle of high speed rail. The rising estimated cost of HS2 gives us cause for concern about the value for money of the proposal. We note that the revised cost ceiling for both phases represents a near 30 per cent increase against the original estimates.¹ We would welcome assurance, therefore, that HS2 will not jeopardise funding for vital investment in other parts of the rail network.

There is a case for a fundamental review of the cost benefit analysis of HS2. In our previous response we said that the Government needed to do more to justify HS2 on economic and transport grounds. Furthermore, we recognise that necessary proposals to mitigate negative impacts of HS2 (such as more extensive tunnelling) may increase the cost of the project. In view of the revised costs for HS2 we would like to see a new cost benefit analysis, providing an updated assessment of its benefits to London and the rest of the UK.

Turning to the Design Refinement Consultation, we have responded to those questions relating to the proposals in Greater London. We have developed our response in consultation with the London Assembly Environment Committee, which has set out the Assembly's views on the Draft Environment Statement in a separate document. The opinions of London boroughs affected by HS2 also inform our submission.

The key points of our submission are:

- More should be done to improve the passenger experience at Euston and to provide better onward public transport links, particularly safe routes for pedestrians and cyclists;
- The proposals for a HS1-HS2 link remain unacceptable in light of restrictions on future development on the North London Line; we would call on the Government to re-examine proposals for a tunnelled connection which could enable operators to make use of Stratford International;

¹ In January 2012 the Department for Transport announced HS2 would cost a total of £32.7 billion. In June 2013, this figure was revised to £42.6 billion, including contingency (House of Commons Hansard, 26 June 2013: Column 343).

- The Government should consider extending the tunnel beyond West Ruislip and Ickenham to the West of the Colne Valley, and develop measures to mitigate disruption to local transport services in Hillingdon;
- The Government should set out potential service levels for a spur to Heathrow, and consider whether to defer the decision until the Airports Commission reports in 2015;
- Moving the Colne Valley viaduct does little to address the negative environmental impacts, and we would call on the Government to consider a tunnelled option.

Euston Station

Consultation area

Rather than rebuilding Euston station entirely, the new proposal would provide new shared passenger facilities to the front of the station while retaining 13 platforms, with only minor modification, at their current level on the eastern side of the site, and 11 new platforms for high speed trains on the western side, constructed at a lower level. Please give your views on this proposal, indicating whether or not you support the proposal together with your reasons.

Our previous work outlined several concerns with the proposed redevelopment of Euston as HS2's London terminus. The plans involved the potential expansion of the station by around a third and we were concerned about the lack of clarity about the extent of development at the station. In addition to the publication of detailed development plans, we called on government to consider reconfiguring the station design, using continental platform stacking.

Two years on, the design refinement fails to deliver passenger improvements at the station. There continues to be a lack of clarity over the redevelopment of the station. We note that the design refinement reduces both the physical footprint of the original plans and the loss of green space. Retaining more of the existing platforms could also reduce the disruption that passengers would experience in the construction phase. We remain concerned, however, that the refinement remains a missed opportunity to improve the passenger experience at London's sixth busiest station and in fact the additional passengers may exacerbate existing transport congestion in the area.

Euston Underground station already experiences overcrowding at peak periods and this will only worsen with the introduction of HS2. Westminster Council is also concerned about a lack of capacity on buses and the underground at Euston to deal with the dispersal of many more passengers.² We maintain our view that the construction of HS2 should not proceed without Crossrail 2. We welcome the announcement of Treasury funding of £2 million for the Crossrail 2 feasibility study and we would urge the Government to ensure that Crossrail 2 is ready for the opening of the second phase of HS2.

Furthermore HS2 will require a radical plan to provide safe onward travel for cyclists and pedestrians. TfL's evidence to the Environment Committee shows that once HS2 is built, cyclist volumes could increase by almost nine times and pedestrians by almost four times their current level.³ Our report on cycling, *Gearing Up* (November 2012), found that there should be greater provision of segregated cycling facilities in London. These are necessary to provide safe space for all travellers to access cycling as a public transport mode. Safe cycling routes to and from the station will be particularly important for Euston where access to and from the station is by very busy and dangerous roads.

² Written information from City of Westminster

³ Environment Committee response to the Draft Environmental Statement, p. 5

HS1 – HS2 link

Consultation area

This proposed change consists of the widening of the North London Line viaduct between Kentish Town Road and Hawley Road to provide capacity for HS2 trains connecting onto HS1 in addition to local passenger and freight services using the line. Please give your views on this proposal, indicating whether or not you support the proposal together with your reasons.

Our previous response found that the proposed HS1-HS2 link on the North London Line (NLL) would have a negative impact on local rail services and surrounding communities. In our view, the original plans for the link were based on the cheapest option, with little regard for existing services on the NLL. These concerns related to the impact of increased congestion on suburban rail and freight services, which would have also reduced the speed of HS2.

The design refinement addresses our concerns about capacity only partially. We note that HS2 Ltd proposes to widen a section of the NLL by five metres. This would limit the options for further development to the London Overground on this section of the track, and constrain future capacity for freight services. Additionally, the construction impacts for local residents remain unacceptable. Furthermore, the design refinement does not improve the frequency of potential connections, as it allows only up to three HS2 trains per hour to connect to HS1. Providing the link at the lowest cost appears to remain the overriding factor and the design refinement does not allay our concerns.

We continue to hold the view that Government should re-examine the case for creating a dedicated tunnelled connection between HS2 and HS1. A tunnelled HS1-HS2 connection would address concerns about worsening overcrowding and remove the risk of future constraints on the NLL, and reduce the blight on nearby communities in North London. HS2 Ltd should investigate options for the location of a tunnelled link that maximises ease of connection for passengers and minimises disruption at surface level.

A design that facilitates greater HS1-HS2 connections could also incentivise operators to make use of Stratford International station. We previously concluded that HS2 Ltd should re-examine proposals for a HS1-HS2 link at Stratford International station. We note that stakeholders have proposed other options, such as a 'Euston Cross' HS1-HS2 link.⁴ In any event, developing a design that facilitates more connecting services between HS1 and HS2⁵ would provide passengers from the Midlands, the North, and the Continent greater access to new commercial opportunities in east London.

Northolt Corridor

Consultation area

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

The proposals for a tunnelled section between Old Oak Common and Northolt are a partial improvement on the previous proposal which included a larger section running above ground. We are

⁴ Written information from LB Hammersmith and Fulham and Royal Borough of Kensington and Chelsea (joint response)

⁵ Than the maximum 3tph currently proposed in the HS2 Design Refinement

concerned, however, that the proposed tunnelled section is not as extensive as it could be. Greater tunnelling would mitigate the environmental and social impacts of HS2, such as noise. We would urge the Government to revisit options to extend the tunnel to the west of the Colne Valley – avoiding the need for a viaduct across the River Colne – as suggested by the London Borough of Hillingdon.⁶

Communities near the proposed tunnelled section are concerned about the impact of the scheme both in the construction phase and once HS2 is operational. Residents in Hillingdon would be particularly affected by the high volume of HGV traffic that would pass through the borough during construction.⁷ Traffic disruption would last for seven years, causing adverse impacts on congestion, pollution and bus routes. There would also be safety risks to both cyclists and pedestrians, who could be at risk from increased heavy traffic movements. We would want HS2 Ltd to work closely with TfL to install segregated cycle lanes in the borough (and on other roads used by HS2 construction vehicles) to protect cyclists from high volumes of HGV traffic.

Heathrow junctions

Consultation area

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

To date, the business case for a spur to Heathrow has not been made due to a lack of information being made available. Our previous response said that the effectiveness of a spur cannot be evaluated until more information is released. We note that HS2 Ltd has not included an indicative service specification for the London-Heathrow HS2 link, despite doing so for other services on the route.⁸ The Government should provide more information about the service levels HS2 would intend to run on the spur to enable us and others to make a reasoned assessment about the benefits or disadvantages of the link.

In addition, the Committee has heard that the decision to include a link to Heathrow may be premature. The Airports Commission has yet to conclude whether Heathrow will remain London's major airport hub. The Assembly does not support any expansion of Heathrow, as we set out in our recent report on airport capacity (May 2013). We are aware of calls for the Government to defer the decision over inclusion of junctions for a Heathrow spur until the Airports Commission reports in 2015.

Colne Valley Viaduct

Consultation area

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

We are in favour of attempts to reduce the environmental impact of HS2 on the River Colne but the HS2 Design Refinement represents a very marginal improvement on the January 2012 proposals. We previously expressed concern that the proposed viaduct would be intrusive on its surroundings. The Assembly's Environment Committee's submission sets out the negative impact that an above ground alignment on this section would have for vegetation, wildlife, and the waterways. The proposal to

⁶ Written information from LB Hillingdon

⁷ Written information from Ickenham Residents Association

⁸ Written information from LB Hillingdon

simply re-locate the viaduct does not deal with the physical and environmental impact of the alignment in the Colne Valley. In common with our view on the Northolt Corridor, we would like the Government to revisit options for this section of the route – approximately 4.5km – to be tunnelled.

We trust that the Department for Transport will take account of these points and we look forward to hearing your response to our views.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Valerie Shawcross', with a stylized flourish at the end.

Valerie Shawcross CBE AM
Chair of the Transport Committee

