

High Speed 2 Environmental Statement: London Assembly response

This is the response of the London Assembly to the Environmental Statement supporting the High Speed 2 Hybrid Bill and to relevant aspects of the Bill itself. It has been prepared by the Assembly's Environment Committee.

Overall, there has been relatively little change to the proposals on which the draft Environmental Statement was based last year, despite strong views being expressed by the communities in London affected and reflected in the Assembly's response to that draft Statement. Therefore, the broad thrust of this submission is in line with the Assembly's previous comments.

Parliament should consider carefully the cost:benefit case for the proposed High Speed 2 (HS2) scheme. The body of this response identifies several areas, especially in central London, where further mitigation and/or compensation is required, which are likely to increase the financial cost of the scheme. It also identifies non-financial costs, such as the health impacts of air pollution and the loss of green space, which should be more effectively quantified and valued for use in the cost:benefit analysis. These (and other) improvements to cost evaluation¹ would then need to be looked at alongside robust and up-to-date estimates of the scheme's benefits. Parliament may need to consider further the various route and design options, especially in London, to minimise the costs and environmental impacts.

This response considers the following areas:

- the physical effects of constructing and operating the scheme;
- the air pollution impacts of constructing and operating HS2;
- the noise impacts; and
- Outer London and the Green Belt.

The Environment and Transport Committees of the London Assembly have also both previously made submissions, on the Draft Environment Statement² and on the design refinement consultation³. These covered issues with the onward travel of passengers from the London terminus and with alternative route and station options in Greater London.

Physical environmental impacts

The proposed scheme would have profound impacts on the built and green environments through a deep slice of London. It would significantly affect the communities living and working in those areas, as well as urban and suburban wildlife and ecosystems.

Well over 200 homes could be demolished in London, primarily around the Euston area. Other homes could be so severely affected by noise and other impacts that demolition is seen by

¹ Camden Council in 2013 estimated the costs to that borough alone to be £1 billion (present value) without further mitigation.

² <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/high-speed-2-response-to-draft-environment-statement>

³ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/high-speed-2-response-to-hs2-design-refinement-consultation>

some as a better option than retaining them as hard-to-let social housing. In addition, business, service and community buildings would also be lost.

There would be particularly severe effects during construction, for up to ten years. These effects would include further loss of green and open space, and disruption for businesses near the sites. About 120 homes near Old Oak Common would be surrounded by a giant building site for a decade, with reduced access to schools, childcare, shops, services and employment. Businesses to the west of Euston Station stand to be physically cut off from their largest customer base. A major charitable outdoor centre for disadvantaged and disabled young people, with tens of thousands of users, would have to close at least for the duration of works.

Mitigation and compensation

Plans to compensate for these losses and impacts are not adequate. In the current proposals there is some discussion of mitigation measures such as public open space and planting to be provided to offset losses. However, it is not clear that the mitigation will eliminate or balance the negative impact.

The Government has committed that social renters in demolished properties will be found new homes, but not necessarily in the same area. Other local people say that compensation plans are inadequate, and private tenants losing their homes will receive nothing. For the scheme giving compensation to nearby homes blighted by the proposal, there are much more limited safeguarded areas in central London than some other parts of the line.

Green space

Significant amounts of green and open space would be permanently lost. The majority of the area affected would be in the Colne Valley green belt zone (which will have a 15-metre-high rail viaduct driven through it), as would the most significant protected habitats such as an SSSI, sites of national importance for bird conservation, and ancient woodland.

However, the loss of green and open space in central London would also be keenly felt as the area is already heavily urbanised. HS2 Ltd values the loss of urban open space at a standard £54,000 per hectare but, with the lack of other local green space and the high land values in the area, Camden Council estimates that it would cost up to £82 million to re-provide a site like St James's Gardens and Euston Square. HS2 Ltd acknowledges that its valuation lacks robustness – it is therefore excluded from the main business case, and covered only in separate value-for-money advice provided by the Department for Transport (DfT). Parliament should be aware of this unquantified cost.

Air pollution

HS2 would create a permanent air pollution effect from the additional traffic and congestion discussed above. There could also be a particularly severe impact during the construction period, from the work itself and the vehicle movements necessary to take equipment and materials to and from the site.

The impact would be particularly severe around Euston, which will see some of the greatest impacts and which is already one of the most polluted parts of London. The air quality

information in the Environmental Statement is greatly enhanced from the previous draft, and now shows both how bad air pollution is still expected to be in 2026 when the scheme is to open, and how much worse it will be made by HS2.

As this Committee has repeatedly demonstrated, air pollution is one of the most serious public health issues facing London and the UK, estimated to be responsible for thousands of additional deaths per year in London alone.

Central London is the most problematic UK area for the EU Air Quality Directive. Thus, significant negative impacts on air quality here could exacerbate the UK's breach of the directive and increase the risk of large EU fines. The works span the critical period from 2015, the EU's latest date for compliance, to 2025, the date by which the Government has said London will reach the air quality targets.

Mitigation proposals

The proposals seek to address dust from construction, via a Construction Code of Practice (COCP). However, the COCP lacks quantitative baselines or standards, and leaves specifics about all sites to the environmental management plans, which are to be produced only after the scheme receives Parliamentary assent. It says very little about monitoring air pollution, with no reference to pollutant measurements, and it does not contain standards to reduce the emissions from vehicles beyond the normal levels for construction vehicles making as many trips as are deemed necessary for the work. Therefore vehicle emissions, including toxic nitrogen dioxide (NO₂) are of particular concern.

Impacts and costs of air pollution

The ES quantifies the air pollution expected from HS2. There are well-established models for estimating the considerable impact of air pollution levels in terms of additional deaths and years of life lost, but this analysis does not appear to have been made. The Committee is not satisfied that the health damage from air pollution has been included in HS2's cost:benefit case. Parliament should therefore consider the unquantified lost years of life which will be inflicted on those living, travelling and working near HS2.

Noise

Both the construction process and the high speed railway in operation will produce significant noise. There are to be noise mitigation measures, including barriers along the rail corridor and noise insulation for properties most affected. However, it is unlikely that this mitigation will fully offset the noise generated.

There are particular concerns for noise in the construction period in central London, because work will have to be undertaken at night when trains are not running, and there will still be homes immediately adjacent to the construction sites. Similar issues are likely to apply around the tunnelling sites at West Ruislip and Old Oak Common.

Operational noise will be a permanent issue where the track is not in a tunnel, including around Euston, around Ickenham and especially in the Colne Valley from the high speed elevated

viaduct. In full operation, HS2 is anticipated to operate up to 36 trains per hour (combining both directions) and for up to 19 hours per day. Noise assessments have now been published, and show maximum impact along a relatively narrow corridor, but residents in the affected areas look set to experience significant disturbance.

Outer London and the Green Belt

The impact of the route is much greater on the surface than in a tunnel, and so there are already tunnels proposed under built-up London and the Chiltern Hills Area of Outstanding Natural Beauty. To tunnel the intervening stretch, of about 4.5km through the Colne Valley and Ickenham, would be feasible, would not affect journey times, and would reduce environmental damage in this sensitive area.