

The Rt Hon Philip Hammond  
MP  
Secretary of State  
Department for Transport  
Great Minster House  
76 Marsham Street  
London, SW1P 4DR

Transport Committee  
London Assembly  
City Hall  
The Queen's Walk  
London, SE1 2AA  
Switchboard: 020 7983 4000  
Web: [www.london.gov.uk](http://www.london.gov.uk)

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Dear Secretary of State

## **High Speed 2 Consultation Response**

I am writing, on behalf of the London Assembly's Transport Committee, to set out our response to the Government's consultation on High Speed 2 (HS2).<sup>1</sup> In preparation for this response, the Committee received a wide range of written submissions from local and national groups, borough representatives and transport providers such as Transport for London (TfL) and Network Rail. The Committee also visited both Euston and Old Oak Common to get a sense of the scale of work proposed for both sites and held a hearing on 14 July where we discussed the current proposals with a variety of stakeholders. In line with our main focus, this response will answer Questions 1, 2, 3, and 5 of the Government's suggested consultation questions.

Committee Members have a range of opinions on whether HS2 is the best way of achieving the transport and economic goals outlined by the Government during the consultation. There is a consensus that the current proposals are incomplete and that there are many outstanding issues which merit greater attention.

### **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?**

The Committee accepts that on the balance of evidence, there is likely to be a major capacity shortfall for the West Coast Main Line (WCML) in the next two decades and that this could have a detrimental effect on economic development in London. The Assembly has backed investment in major transport infrastructure, such as Crossrail, as a way of supporting and further enhancing economic development in the capital. We support the concept of high speed rail development in the UK and acknowledge the potential benefits it can bring as we seek to move towards a lower carbon economy. Our concerns, as outlined below, relate to how the case for this particular scheme has been put together, and the proposed route through London and its impact.

We agree that there is a case to enhance capacity and performance of the intercity rail network to support economic growth in London and the wider region, given the projected demand for travel.

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<sup>1</sup> This response has been agreed by the Conservative, Labour and Lib Dem groups on the Committee. Jenny Jones AM, Green Party Member of the Committee, does not support the response. The Green Party is opposed to the current HS2 plan as it does not accept the case for investment in transport infrastructure as a response to predicted economic growth and increased demand for travel.

**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?**

The Committee considers that high speed rail has a role in the UK in developing inter-urban connectivity, increasing rail capacity, and revitalising regional economies. Nevertheless, it is vital that any scheme, and particularly one which requires £30 billion in funding, is weighed accurately against possible alternatives, such as continued investment in the available rail infrastructure.

We acknowledge that estimating the potential costs and benefits over a 60 year period is inherently uncertain. The Committee heard from several groups that the Wider Economic Impacts (WEIs) brought about by regeneration and agglomeration of development maybe under-estimated, and could be up to three times higher than current estimates. The evidence for such claims needs to be carefully considered in the light of other studies which challenge the connection between economic regeneration and new transport infrastructure.

Several issues have been raised about how the business case has been developed, which imply that cost estimates in particular are not robust. These include: an over-reliance on journey-time savings; how fluctuating energy and ticket prices might affect the operational costs of the line; and no assessment of additional environmental and transport mitigation which will be needed to reduce HS2's negative effects. We would expect the Government, in its response to this consultation, to provide a more detailed economic break down for HS2, including the impact of scenarios such as higher energy prices on its cost/benefit ratio. A new comparative study should then be undertaken between HS2 and the alternatives considered in the consultation.

Furthermore, if HS2 is to help provide a long-term solution to capacity on the WCML, it must be approved as part of a wider national strategy which outlines proposals on road, public transport, freight and air travel. At present, HS2 risks being approved in isolation, without any firm detail on the additional transport infrastructure needed to make it a success. This would include prioritising funding for complementary projects and outlining the additional suburban and freight services which might result from released capacity. In terms of its environmental impact, the Committee has heard that HS2 could save up to one million tonnes of CO<sub>2</sub> a year. These savings will only occur if the Government pursues matching road and air transport proposals which prioritise modal shift. If the main effect of HS2 is to generate more travel, without this modal shift, then it may have a net adverse effect on the environment.

The Committee concludes that more needs to be done to justify HS2 on economic and transport grounds. The Government should respond by showing how the case for HS2 would change in a range of scenarios relating to levels of demand, energy and fuel price fluctuations and potential rail fare rises. HS2 should also be placed within a detailed national transport framework which demonstrates complementary road and air travel policies and how additional infrastructure will be funded.

**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?**

If HS2 is approved, then it would make sense for the network to be constructed in two phases, to prevent too much disruption to the West Coast Main Line, which will continue to be a vital suburban and inter-city route for Londoners. This agreement is contingent on a commitment to construct the full Y network, from which most of the economic benefits for London business will derive.

The links to Heathrow and High Speed 1 should be dependent on ensuring they do not adversely affect either current service patterns, or prevent future growth. While an interchange with Crossrail would provide good links with Heathrow during Phase 1, we do not have enough information to evaluate the proposed spur which will be part of Phase 2. As consultation on this is not due until 2014, we would expect that any strengthened environmental mitigation which is added to HS2's route through London, will be carried forward to plans for the spur. The lack of detailed costs on the spur also makes it difficult to compare current plans to the alternative of having a major interchange at Heathrow itself. This could be linked via the wider rail network in south London to a separate terminus in central London.

The Committee has heard concerns from TfL and Network Rail on plans for the link between High Speed 2 and High Speed 1. While this link may seem attractive, the low level of projected demand seems to have led HS2 Ltd to propose a cheap solution which would have a disproportionately adverse affect on London's hugely important orbital rail network. Running high speed trains on to the North London Line would not only reduce the speed and lengthen overall journey-times for HS2, but would also cause congestion on a route which already has a delicate mix of heavy passenger and freight traffic. During our investigation, the Committee heard alternative suggestions, such as using Stratford International (discussed further in this response) as an alternative link. This link must be re-examined and an alternative found which avoids compromising a heavily used transport corridor.

The Committee agrees that, should it be approved, HS2 should be built in the proposed phases, and that a Crossrail interchange provides adequate connection to Heathrow during Phase 1. It cannot evaluate the effectiveness of the 'spur' until more information is released in 2014. The Committee does not support the current proposed link to HS1 on the North London Line as it will adversely affect passenger and freight traffic to an unacceptable level. Alternative options must be considered.

**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?**

*General Route*

It is difficult at this stage to evaluate whether the current proposal is the best route available. The Committee has heard that the need to reach speeds of 225mph (which would make it the fastest high speed line in the world) has forced HS2 Ltd into a route design which disproportionately affects London communities. It would have been useful to have provided a variety of route options, based on different speed and service criteria, which could have facilitated a more detailed discussion on the effectiveness of HS2's design and how to mitigate the inevitable range of environmental and transport concerns.

Within the current proposal, the level of environmental mitigation along the route in west London is unacceptable, with trains running above ground through large parts of Hillingdon, including an extensive and potentially intrusive viaduct, in the Mid-Colne Valley. We would expect the Government to review the overall level of environmental mitigation to lessen the impact of construction and operation. For example, the Committee has heard that more extensive noise barriers along the route could cost as little as £7 million. Considering the major environmental and social effects of the route as currently planned, tunnelling would be a more sensible option and could use the expertise gained by Londoners in tunnel engineering during major projects such as Crossrail and

the proposed Thames Tideway Tunnel. We would welcome hearing the Government's own estimates for extra mitigation, and its own assessment of the most cost-effective solution.s

### *London Terminus*

The Committee understands that the selection of Euston as HS2's terminus is supported by transport providers and could provide an exciting and much needed opportunity to redevelop and improve London's sixth busiest station. Despite its long-favoured status, there is a lack of clarity about the extent of development required by HS2 at this vital transport interchange. The current plans would seriously affect pedestrians, bus passengers and taxi drivers. Euston station could increase in size by up to a third, which would remove valuable green space, residential areas and businesses. The Government will need to provide a more detailed plan on how Euston will be developed, and in particular, explore designs for the station, such as the continental 'stacking' of lines which could reduce the footprint of the new station and minimise the disruption caused during construction and operation. This will then allow transport providers to plan how Euston can maintain optimal operating conditions, and allow local communities to understand the level of blight likely to be caused.

We also share with local groups, other elected representatives and transport providers concerns over the dispersal of thousands of extra HS2 passengers during the morning rush hour, particularly when the full Y network is in operation. This will particularly affect the Victoria and Northern tube lines, which already experience severe over-crowding. Additional tube capacity, in the form of a new line linking Chelsea and Hackney ('Crossrail 2') should be constructed during Phase 1 of the scheme to ensure that local transport services are not swamped by the new passengers created by HS2. This would help unlock the bottleneck at Euston and ensure that faster inter-city journeys are not wasted due to delays in accessing transport in central London.

### *Outer London Interchange*

Old Oak Common presents a huge opportunity to regenerate a deprived area of west London and provide a necessary west/east connection to central London and Heathrow through an interchange with Crossrail. Unfortunately the current plans fail to show how HS2 can link in with the wider transport infrastructure in the area. Old Oak Common is a particularly difficult site, with operational train depots, and poor local road and public transport infrastructure. We would expect future plans to provide much more details about how HS2 can act as a catalyst for further development, and in particular, how the Government plans to work with local and regional stakeholders, such as borough and business representatives, to ensure maximum benefit for Londoners.

Finally, we are disappointed that HS2 Ltd does not seem to have examined the potential role that Stratford could play in HS2. Stratford International, which already has most of the infrastructure to accommodate high speed services, could offer an alternative east London interchange. This could help reduce the size of development and crowding at Euston, widen the market for HS2's services and provide an alternative link to HS1.

The Committee has concerns over the route of HS2 through London and the level of mitigation proposed at this stage. More work is needed to: reduce the effects of HS2 as it runs through west London; provide clarity on the design of Euston to help minimise the disruption to surrounding communities; and further develop proposals at Old Oak Common and Stratford International. We support TfL's proposal that HS2 should be supported by a new line linking Chelsea and Hackney (Crossrail 2)

## The Consultation Process

The Committee is concerned that the current consultation process is being undertaken without important information being disclosed to stakeholders. These concerns include:

- No Environmental Impact Assessment available which would look in more detail at the potential negative effects on London, including how the potential carbon deficit during construction can be mitigated. This would also have given businesses and homes affected by the line a more detailed picture of various impacts and allowed them to make a more informed decision about the benefits and costs of HS2.
- Failure to justify key parts of the design specification, such as: how the service level of 18 trains per hour can be achieved if the technology for facilitating it has not been developed; and why HS2 Ltd limited the possibility of consulting on a variety of route options by insisting on trains reaching speeds of 225 mph.
- Inadequate engagement with elected representatives. The Committee joins with several other groups in their disappointment that the DfT and HS2 Ltd refused to attend public meetings at which many of these issues were raised and discussed. For a project of this magnitude, and with the potential to disrupt thousands of people across London, it is unacceptable that the main sponsors would not meet those tasked with scrutinising plans to ensure that the cost to Londoners does not outweigh its potential benefits.

According to HS2 Ltd, 16 alterations were made to the route before publication of the current plan in February. The example of Primrose Hill, where concerted action from local residents and representatives, linked with a willingness to engage from planners, led to the re-routing of a tunnel to a less intrusive area, is an example of what the Government should be doing with all affected communities. In contrast, the Committee has received submissions from residents in Hillingdon, Queen's Park and Kilburn, that their concerns about noise, the location of potential supporting infrastructure such as vents, and the effects on local businesses have not been properly addressed.

High speed rail has enormous potential to change the economic and social geography of London. While the increased connectivity and urban regeneration potential of HS2 may benefit the region as a whole, it is imperative that its negative effects on our local communities and regional transport infrastructure are kept to an absolute minimum.

We trust this response will inform the consultation and look forward to hearing the Government's response to the concerns raised



**Caroline Pidgeon AM**  
Chair of the Transport Committee