

# **Submission to the Consultation on HS2 on behalf of the constituency of Chesham and Amersham**

**from**

**Rt Hon Cheryl Gillan MP**

29 July 2011

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## **1. Overview**

I am responding to the consultation on the proposed High Speed Two rail scheme and its preferred route on behalf of my constituents in Chesham and Amersham. The scheme affects many communities including the Chalfonts, Amersham, Great Missenden, South Heath and Ballinger but has provoked widespread concern across the area.

Since the scheme was first proposed in March 2010, I have received an unprecedented number of responses from constituents and the majority view does not favour the current HS2 scheme. Many constituents do not favour any new High Speed Railway; virtually all people contacting my office have been against the proposed route through Chesham and Amersham on the grounds that the Chilterns is recognised as an Area of Outstanding Natural Beauty; and many believe that the business case has not been adequately made and that the scheme as currently proposed does not provide value for money for the tax payer particularly at this time of austerity. I have been sent only a handful of letters/emails in support of the scheme.

Some constituents make the case for other routes to be considered, a direct link to London Heathrow Airport to be provided, other transport schemes and solutions such as Rail Package 2 and question the statements on future benefits that could accrue to parts of the UK outside London.

The overwhelming weight of representations from constituents has reflected their opposition to the scheme and I hope this submission on behalf of my constituents (some of whom have responded to the consultation directly and some of whom have sought to have a voice through their Member of Parliament) will carry weight in the assessment of the consultation.

The submission has tried to capture many of the arguments and points that have been made, but the quantity of submissions has made it almost impossible to coordinate and digest. It does however highlight some of the main points that have been made either in written submissions or orally at the many meetings, rallies and events I have attended over the past year – all of which, in Chesham and Amersham, have focussed on opposing this scheme. I would like to ensure that my constituents have a real voice in this process which is no less than they deserve given the proposed route.

I have not used the rigid framework of the seven questions provided by HS2 for the consultation as it does not allow for wider comments. Also there has been a strong feeling that the questions themselves have been drafted in a leading fashion to obtain positive responses for the scheme. Some people who have contacted my office have found it difficult to respond in this procrustean format saying that the approach used was biased to elicit that positive response.

Finally, on the pastoral side of my role as an MP, in the nearly 20 years I have been the Member of Parliament in Chesham and Amersham, I have never known an issue that has caused so much anxiety or united so many people across all the age groups against a proposition. Local junior school children have composed poems against HS2, octogenarians have donated money from meagre incomes to the community organisations fighting the scheme, many constituents have broken down in my advice surgeries and some feel they have been vilified for simply wanting to protect their environment for future generations. Just because they live in proximity to the proposed route their views are no less valid nor should they be discounted as against views from other parts of the country.

As the Prime Minister said when writing to me on 11 February 2011:

“The consultation will cover both the strategic case for high speed rail as well as the proposed route for a line between London and the West Midlands and will, in both cases, explain our view of the merits of high speed rail against the other potential options for providing additional inter-urban transport capacity. The Government will make those arguments with an open mind, and will carefully consider any alternative assessments or analysis of the case for high speed rail put forward, before reaching any final decision.

The forthcoming consultation will provide a genuine opportunity for interested parties to influence the Government’s overall strategy for high speed rail, as well as the proposed line of route, on the basis of robust and clear evidence. I hope that you will encourage individuals and communities in your constituency to play a full part in the consultation process.”<sup>1</sup>

I hope this representation on their behalf will add to the outcome of the consultation.

**Rt Hon Cheryl Gillan MP**  
**Member of Parliament for Chesham and Amersham**

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<sup>1</sup> Letter from the Prime Minister to Rt Hon Cheryl Gillan MP, dated 11<sup>th</sup> February 2011. This document is attached at **Appendix 1**.

## 2. Key points made in responses from Chesham and Amersham constituents

### The Business Case<sup>2</sup>

Many of my constituents argue that the case for High Speed Rail has not been made and fails to stand up to independent scrutiny.

There are views that conclude that HS2 is a hugely expensive piece of transport infrastructure, estimated to cost £30bn overall (Net Present Value (“NPV”)), £17bn of which will be public subsidy. They consider this to be a vast sum of money to contemplate spending at a time when many families are coming to terms with adjusting their household budgets – some submissions estimate the cost of the HS2 scheme at £1000 per UK family or £51million pounds per constituency<sup>3</sup>.

Many constituents have referred in discussions with me to Matthew Sinclair, Director of the Taxpayer’s Alliance who stated in February 2011 at the time of the launch of the HS2 consultation:

*“With so much pressure on the budgets of families and businesses, it is utterly indefensible that the Government is planning on spending such an incredible amount of money on this project. There are more affordable ways of getting the capacity needed and a high speed line for the rich, on a route already served by very quick trains, can’t be the priority over giving ordinary families and firms across the country a better deal. HS2 should be cancelled.”*

### Benefit Calculations and Economic Modelling

Experts in the constituency have been working on the proposals and the following section reflects some of their work and comments.

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<sup>2</sup> See HS2 Action Alliance document entitled “High Speed 2: Review of the February 2011 Consultation business case for HS2 (June 2011 update of Initial Review)”, Review V.1.12 published 17 June 2011 for further economic analysis of the business case. This document is **attached** at **Appendix 2**.

<sup>3</sup> 51m is a consortium of Local Authorities between London and Birmingham on the HS2 route. The Group is called 51m because £51m is the cost to each Parliamentary constituency in the UK of the HS2 project. A document setting out 51m’s arguments against HS2 is **attached** at **Appendix 3**.

The whole Y network has a benefit cost ratio<sup>4</sup> (“**BCR**”) of only 2.2 (excluding Wider Economic Impacts<sup>5</sup> (“**WEIs**”)) and 2.6 when WEIs are included. Further, this reduces to 1.6 and 2.0 respectively when only Phase 1 of the HS2 scheme between London and Birmingham is considered.

The business case assumes that demand for rail travel will increase by 100% over the next 35 years without HS2, but it is argued by constituents that the Department for Transport (“**Dft**”) is using out-of-date forecasting factors and too long a time-frame in order to reach this figure. They estimate that demand for long distance train services is therefore overestimated by some 47%.

The benefit calculation employed presumes that time on board trains is wasted but accepts that technology is making people more productive. Over 40% of the £44bn of estimated benefits deriving from HS2 are based on the assumption that *all* time spent on trains is wasted. However, when travelling on any train service it can be seen that the numbers of people reviewing paperwork, making business calls, having face to face discussions with colleagues who are fellow travellers or using mobile internet connections to access the Internet whilst on the move means that there has been a huge increase in productive time on the railways. They argue that to assume that time on trains is wasted is flawed and estimating 40% of the derived benefits of HS2 to wasted time undermines the business case. HS2 Limited (“**HS2 Ltd**”) has almost acknowledged in its own Economic Case for HS2 consultation document:

*“The Department for Transport values the time spent travelling that could otherwise have been used in productive activity and assumes that all time spent travelling is unproductive. However, with laptop computers and increasingly, wireless, internet access available on modern trains, rail passengers are increasingly spending at least some of their time in productive activity<sup>6</sup>.”*

There is a widely held view amongst constituents with transport expertise that the DfT has used an unrealistic comparator for HS2 that fails to reflect improvements to capacity and services and, therefore, inflates the benefits attributed to HS2. Further, this may have been exacerbated by extending the projected growth period to 2043 as during this time period significant changes will have occurred to the existing rail network rendering such a comparison inaccurate.

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<sup>4</sup> Benefit Cost Ratio (“BCR”) means the net benefit of a scheme divided by the net cost to Government.

<sup>5</sup> Wide Economic Impacts (“WEI”) include the benefits from improved linkages between firms and their workers, which can lead to economies of scale and other efficiencies. Note that Department for Transport guidance for measuring these benefits is not yet even finalised so BCRs are presented with and without these impacts.

<sup>6</sup>p. 51, para 7.3.2 “The Economic Case for HS2: The Y-Network and London – West Midlands”, February 2011.

The HS2 case also says that one in five of HS2 journeys are forecast to be new trips that would not be made if HS2 is not built. This has been queried particularly at a time when Government appears to be encouraging reduction in travel. Further, technological advances would suggest that people will have less need or desire to travel so frequently, particularly for business purposes.

### **Bridging the North South Divide**

A large number of constituents have challenged the aspirations of the HS2 scheme to bridge the North-South Divide<sup>7</sup>. They believe that there is a real danger that the scheme may simply draw more people to London and, therefore, exacerbate the North-South Divide. Some have quoted Lille, France where as a result of high speed rail passing through the city, unemployment in Greater Lille actually rose relative to the French average. Their analysis of the business case suggests that 7 out of 10 jobs created by high speed rail will be in London, and not the Midlands or the North of England.

### **Value for Money<sup>8</sup>**

One of the main concerns of constituents is value for money. They challenge the commercial rationale for spending over £30bn on the scheme and have shown concern for the levels of ongoing subsidy which will be required once the scheme is operational.

They fear the extra fares of £27bn that will be generated by HS2 do not cover the capital cost of £30.4bn or the operating costs of £13.9bn, even for the full “Y” network and are concerned at the subsidy of £17bn of taxpayers’ money that is required. This subsidy could have the effect of encouraging additional travel and only supporting a small proportion of the country’s population who will in fact use HS2. Some have said anecdotally to me that this would become a railway for the “elite” or those that can afford the astronomical fares that they anticipate.

Other concerns have been voiced around the HS2 consultation documentation which fails to offer any alternatives as to how the £17bn subsidy could be used in other ways for the benefit of our national transport infrastructure and in order to create a more balanced economy which is a clear objective of HS2. They feel the consultation is one sided and fails to explore other alternatives.

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<sup>7</sup> p.43, paras. 2.8-2.14 “High Speed Rail: Investing in Britain’s Future”, February 2011.

<sup>8</sup> See point (3), HS2 Action Alliance pamphlet entitled “Rebutting the Six Myths about HS2”, v1.8 published 25 April 2011 for a detailed breakdown of the figures. This document is **attached at Appendix 4**.

Transport experts in the constituency have told me that as the DfT has not disclosed the income profile of its long distance train users and has only given figures for total rail users, the majority of which will be commuters, that this could result in the numbers being distorted.

Details of the projected effects of HS2 on classic train services are provided in the consultation documentation, however, only for Phase 1 of the scheme i.e. London to Birmingham. The documentation from HS2 Ltd states that the freed up capacity as a result of passengers switching from classic services to HS2 would benefit the classic network, freeing up more services for other cities. But given that the economic assessment assumes a £5.4bn reduction in the costs of running classic services, not an increase, the expert transport advisers in my constituency believe that this must surely mean a worsening of services between cities on the existing rail network.

Some expert commentators have also queried the value for money which the scheme offers because the service patterns outlined by HS2 Ltd in the consultation documentation appear to show HS2 as being incapable of delivering the benefits which are claimed. There are insufficient train paths to accommodate services to Heathrow or HS2 without seeing reductions in the core services. There are also concerns as to whether it will be possible to run 18 services per hour at the proposed speeds, and certainly no evidence provided that this will indeed be possible. I understand that the technology for this is not yet available and in any event train sets for the scheme have not been chosen for this very reason.

### **The Need for Speed**

The proposed HS2 scheme envisages trains running at speeds of up to 225mph and possibly up to 250mph in the future. Many people have asked me whether the UK really requires trains to run at such speeds particularly when greater electrification of our existing lines, such as the recent announcement of the electrification of the Great Western Main Line ("**GWML**") from Paddington to Cardiff (and potentially on to Swansea) could provide considerable time savings over existing services.

Some constituents have argued that further track replacement and signalling upgrades are long over-due and would undoubtedly make a difference to their own journeys as well as the travelling public nationally.

I have been told that the top speed of the West Coast Main Line ("**WCML**"), East Coast Main Line ("**ECML**") and GWML intercity services is currently 125mph, which is the speed that in Europe can qualify an upgraded railway as "high speed". At present, this speed is only limited on the existing routes by safety standards that require in-cab signalling for speeds

above 125mph. I further understand that, in fact, in-cab signalling is scheduled to be fitted on all the major routes before the “Y” is built, and this would allow 140mph for the Pendolino trains on the WCML and 225’s on the ECML.

Another matter raised over and over again is the importance that the proposed HS2 scheme attaches to speed, convenience and ease for its prospective passengers, but there is no proposed direct link to either Birmingham or Heathrow airport. This has seemed to them to run counter to the Government’s aim to encourage passengers to use rail rather than other modes of transport to reach airports.

There are no direct flights between Birmingham and Heathrow, so some people have asked how we can see any shift of passengers from air to rail during Phase 1 of the scheme as there would appear to be none. This has led them to question the DfT estimate that 6% of HS2 users will transfer from domestic flights when Phase 1 is operational. Then if Phase 2 (or the Y) is eventually built the potential to reduce the number of domestic flights between our Northern cities and London will have declined if the trend since the mid-2000s continues. BMI (the second largest airline operating out of Heathrow after British Airways), for example, withdrew its direct flight services from Heathrow to Leeds/ Bradford several years ago.

Another concern raised with me has been the locations of the London and Birmingham stations. The proposed HS2 terminal at London Euston will require a complete rebuild of the station with considerable disruption and cost to passengers and business during the years of construction. Many argue that once operational, Euston Underground in particular will struggle to cope with the number of passengers arriving on HS2. It is assumed that up to a third of passengers will alight at the Old Oak Common interchange, but this has been challenged by several objectors.

Further, if the go ahead is given to Phase 2 of the scheme – and many believe as there is no guarantee that a future government would proceed with Phase 2, it may well not happen – pressure on Euston station and the fragile Underground network that serves it will be escalated to an unbearable level.

Should HS2 be built, the location of the Birmingham terminal at Curzon Street would eliminate a substantial part of the time-savings that HS2 Ltd claim for the new route. This is because passengers will have to alight and walk about 15 minutes from Curzon Street to Birmingham New Street in order to connect with the majority of the existing services that call at Birmingham. People have told me that this would prove a considerable inconvenience to passengers wishing to connect to the classic service, especially those with heavy luggage who according to HS2 documentation are more likely to use the service (i.e. leisure travellers), or the elderly or individuals who are less mobile than others.

In the last few days some constituents have raised the tragic High Speed Rail accident in China which has triggered further anxieties.

### **Major Project and Infrastructure Spending**

A number of constituents have made some additional points on infrastructure spending.

In January 2011, the government confirmed the mandate of the new Major Projects Authority (“**MPA**”) which falls within the Efficiency and Reform Group in the Cabinet Office. The MPA is a new partnership between the Cabinet Office and HM Treasury with the fundamental aim of significantly improving the delivery success rate.<sup>9</sup>

In March 2011, the HM Treasury and Infrastructure UK issued an Implementation Plan<sup>10</sup> which sets out the measures to be taken by the Government and industry to realise savings identified in the Infrastructure Cost Review published in December 2010. This had identified potential savings of £2bn - £3bn per annum by reducing the costs of delivery of the UK’s economic infrastructure projects and programmes.

The point constituents made to me was that the HS2 consultation documentation makes reference to the Infrastructure Cost Review<sup>11</sup>, and the estimated £800m cost saving as a result of HS2 Ltd’s work with this Treasury body, however, it remains unclear to them what contact HS2 Ltd and the DfT have had with the MPA, given the total capital spend on this project. Whilst I appreciate that neither initiative had been finalised at the time of publication of the HS2 consultation documentation, my constituents have asked how HS2 will fit within these schemes.

### **Policing and Security**

Concerns have been expressed to me on policing and security.<sup>12</sup> There are two aspects to this. The first is the policing and security of the proposed HS2 scheme during its construction, should a decision be taken to proceed with HS2, the second is that of the policing and security of the HS2 line once it is built and is operational.

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<sup>9</sup> See “Major Projects Authority Overview Document”, published by the Cabinet Office on 31 March 2011. This document is **attached at Appendix 5**.

<sup>10</sup> See “Infrastructure Cost Review: Implementation Plan”, published by HM Treasury and Infrastructure UK in March 2011. This document is **attached at Appendix 6**.

<sup>11</sup> See p. 38, “The Economic Case for HS2: The Y-Network and London – West Midlands”, February 2011.

<sup>12</sup> See Technical Leaflet issued by the Department for Transport and HS2 Limited, entitled “High Speed Rail Construction: Safety and Security”. This document is **attached at Appendix 7**.

During the construction phase, there will undoubtedly be increased pressure on local police resources from a variety of sources. These are likely to include protestors, safety and security of the construction workers, securing plant and equipment and the construction site and traffic management. On the latter point it has been estimated that there will be a vast increase in local traffic as result of an influx of construction vehicles and heavy plant machinery during the construction phase. This will require local traffic management schemes for a period of several years and therefore a considerable amount of police input. The introduction of a significant number of temporary workers into the proposed construction camps during the construction phase will be a further security burden.

It is not clear what costs can be attributed to policing and security at the local and/ or national level; either during the construction phase or throughout the lifetime of the operational scheme and several residents have expressed their concerns to me on the scale of costs and who will bear them.

### **Transport Select Committee Enquiry**

HS2 Ltd and the DfT will be aware that the Transport Select Committee ("**Committee**") announced an enquiry into HS2 on 18<sup>th</sup> March 2011. The enquiry's terms of reference include a detailed examination of the business case, the strategic route, how HS2 fits with the Government's transport policy objectives, and the scheme's environmental impact, amongst other subjects. The Committee first sat on 21<sup>st</sup> June 2011, with a further four sittings scheduled over the coming months. The Committee is intending to complete its report by October 2011 so that its findings can be fed into the Government's consideration of the HS2 consultation responses and its decision on whether or not to proceed with the scheme which will be taken in December 2011.

The Committee, which has taken evidence from my constituency, commissioned the consultancy "Oxera" to provide it with a report<sup>13</sup> reviewing the Government's case for High Speed Rail. The report, which I attach, raises some significant questions and areas of concern with respect to the appraisal approach taken and highlights "areas of the case that are most sensitive to the assumptions that have been made." Constituents who have seen this report have asked me to say that this report deserves proper consideration as an independent piece of work commissioned by the Committee so I am therefore mentioning this in the response on their behalf to this consultation.

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<sup>13</sup> See Oxera Report entitled, "Review of the Government's case for a High Speed Rail programme". This document is **attached** at **Appendix 8**.

## Environmental Impact

It is a matter of fact that the constituency of Chesham and Amersham lies in the heart of the Chilterns Area of Outstanding Natural Beauty (“**AONB**”). As such, those that live here feel that it is their duty to protect the area as a place of beauty and peace for those who live in it, who visit it and for future generations. The label of NIMBY which has been levelled at constituents has seemed to them offensive and has sought to trivialise the serious debate to be had on the proposed route of HS2 through such a designated area. The Chilterns is London’s nearest AONB with many features that require protection – hence its designation. I attach a letter<sup>14</sup> issued by Rt Hon Greg Clark MP, Minister for Decentralisation and Cities on 25<sup>th</sup> July 2011 which underlines the government’s commitment to protecting our natural and historic environment.

Although some constituents recognise that attempts at mitigation of the proposed route have been made, such as the incorporation into the design plans of deeper cuttings and so-called “green bridges”, for example, the fact remains that the proposed route cuts through the widest part of the Chilterns AONB. You cannot overestimate the levels of concern this has caused.

### The Area of Outstanding Natural Beauty

The National Association of AONBs website states:

*“An Area of Outstanding Natural Beauty is exactly what it says it is: a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them.*

*There are 38 AONBs in England and Wales (33 wholly in England, 4 wholly in Wales and 1 which straddles the border). Created by the legislation of the National Parks and Access to the Countryside Act of 1949, AONBs represent 18% of the Finest Countryside in England and Wales. There are also 8 AONBs in Northern Ireland.*

*Their care has been entrusted to the local authorities, organisations, community groups and the individuals who live and work within them or who value them.*

*Each AONB has been designated for special attention by reason of their high qualities. These include their flora, fauna, historical and cultural associations as well as scenic views. AONB landscapes range from rugged coastline to water meadows to gentle downland and upland moors.*

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<sup>14</sup> See “Simplification of Whitehall Planning Guidance” letter issued by Rt Hon Greg Clark MP, Minister for Decentralisation and Cities. This document is **attached** at **Appendix 9**.

*The Countryside and Rights of Way Act, 2000 (the "CRoW" Act) added further regulation and protection, ensuring the future of AONBs as important national resources."*<sup>15</sup>

The obligations on the government, society, local communities and individuals are clear with respect to AONBs. In particular, under section 85(1) of the Countryside and Rights of Way Act 2000<sup>16</sup> (the "Act"):

*"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."*

A "relevant authority" is further defined at section 85(2) of the Act as "any Minister of the Crown, any public body, any statutory undertaker, any person holding public office."

The above is familiar to many of my constituents, and they have maintained to me that as such HS2 Ltd appears to have failed in this fundamental duty. Some have even argued in this regard that the HS2 consultation itself appears to be in breach of the Act.

The Chiltern Conservation Board which is the statutory body established in 1965 whose duty it is to preserve and enhance the natural beauty of the Chilterns AONB have stated in their submission to the Transport Select Committee Enquiry into HS2:

*"The HS2 proposal will cause serious and irreversible damage to the Chilterns AONB. The Chiltern Conservation Board is not persuaded that HS2 will provide national benefits to the economy or environment."*<sup>17</sup>

Many constituents have just made the simple point – why, if Government has designated an area as an AONB in order to give it perpetual protection, is that same Government now overturning the designation at its own whim to accommodate a major piece of infrastructure – the very infrastructure the designation was designed to protect the area against ?

Some constituents have said that the DfT and HS2 Ltd do not appear to have taken into account the supplementary policies of the Act as set out in "Planning Policy Statement 7: Development in Rural Areas"<sup>18</sup> ("PPS7"), in particular sections 21-23 on AONBs. From section 21 of PPS7:

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<sup>15</sup> See the National Association for AONBs website at [www.aonb.org.uk](http://www.aonb.org.uk) / "What are AONBs?"

<sup>16</sup> See [www.legislation.gov.uk](http://www.legislation.gov.uk) for a full copy of the Countryside and Rights of Way Act 2000.

<sup>17</sup> See The Chiltern Conservation Board's submission entitled, "Submission to the Transport Select Committee Inquiry to HS2 – 16<sup>th</sup> May 2011. This document is **attached** at **Appendix 10**.

<sup>18</sup> See "Planning Policy Statement 7: Sustainable Development in Rural Areas". This document is **attached** at **Appendix 11**.

*“Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty have been confirmed by the Government as having the highest statement of protection in relation to landscape and scenic beauty.”*

The Aarhus Convention - The United Nations Economic Commission for Europe (“**UNECE**”) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the “**Aarhus Convention**”) was adopted on 25th June 1998 in the Danish city of Aarhus at the Fourth Ministerial Conference in the 'Environment for Europe' process. The Convention’s website states:<sup>19</sup>

*“The Aarhus Convention is a new kind of environmental agreement. The Convention:*

- *Links environmental rights and human rights;*
- *Acknowledges that we owe an obligation to future generations;*
- *Establishes that sustainable development can be achieved only through the involvement of all stakeholders;*
- *Links government accountability and environmental protection; and*
- *Focuses on interactions between the public and public authorities in a democratic context.*

*The subject of the Convention goes to the heart of the relationship between people and governments. The Convention is not only an environmental agreement; it is also a Convention about government accountability, transparency and responsiveness.*

*The Aarhus Convention grants the public rights and imposes on Parties and public authorities’ obligations regarding access to information and public participation and access to justice.”*

Some constituents have raised the convention with me and questioned whether the HS2 consultation has regard to this piece of international legislation.

### **The Water Framework Directive**

Water has been a great concern of many residents not least because of their great affection for the chalk streams in the constituency. They have asked me to bring the Water Framework Directive (“**WFD**”) to HS2’s attention. This directive was adopted by the European Union in 2000, and its purpose is to introduce a new legislative approach to managing water, based not on national or political boundaries but on natural geographical and hydrological formations such as river basins.

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<sup>19</sup> See <http://www.unece.org/env/pp/> for further information on the Aarhus Convention.

Fresh, clean water is essential for human existence on this planet, and Europe's water and that in the South East of England, in particular, is under huge pressure because, amongst other reasons, demand is growing constantly. Three quarters of Europeans obtain their water supply from groundwater, locked in the Earth in aquifers.

The proposed HS2 route and the tunnelling out of London through the Chilterns have the potential to affect the water supply of London and the wider South East, because the tunnelling is through the aquifer. A large number of residents have pointed out that the HS2 consultation documentation; in particular, the Assessment of Sustainability ("AoS") does not give sufficient consideration to this important matter.

I have made enquiries on behalf of my constituents at their request and attach further information on the WFD by way of appendix to the response.<sup>20</sup>

### **Chalk Streams, the Aquifer and Groundwater**

In the Chilterns our two chalk streams are the Chess and the Misbourne. These are unique geographical and hydro geological features in the UK, and their flow, particularly that of the Misbourne waxes and wanes. In some years, the Misbourne ceases to flow through large parts of the Chilterns countryside. There has been great concern expressed to me that the impact of the proposed HS2 tunnelling through the Chilterns will at the very least disrupt or in the worse case totally destroy the Misbourne. Concerns also have arisen around the possibility of causing damage to the aquifer that lies under the Thames and stores much of the drinking water requirements for the South East of England. In addition, the potential for groundwater to be contaminated during the "enabling works" i.e. tunnelling and construction of the HS2 line is worrying a large number of people.

During the consultation period, in order to be able to respond to concerns expressed by constituents, I have met with many stakeholders to discuss the proposed HS2 scheme. One such meeting was with Dr Haydon Bailey, an eminent chalk geologist and Geological Adviser to The Chiltern Society. Dr Haydon expressed his grave concerns to me about the proposed scheme's impact on the Misbourne and the aquifer. He provided me with a paper on the potential effects on the geology and hydrology of the ground underlying the HS2 route through the Chilterns<sup>21</sup> together with a map showing the location of existing water boreholes through my constituency. The report makes concerning reading, whilst the map reveals the close proximity of the proposed HS2 Route 3 to those boreholes. A copy of this

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<sup>20</sup> See "Water Framework Directive" summary leaflet issued by the European Commission in November, 2010. This document is **attached** at **Appendix 12**.

<sup>21</sup> See The Chiltern Society paper written by Dr Haydon Bailey, Geological Adviser to The Chiltern Society, entitled "Concerns arising from the Geology and Hydrology of the ground underlying the High Speed (HS2) routes through the Chilterns." This document is **attached** at **Appendix 13**.

map is attached to this submission<sup>22</sup>. The Environment Agency already lists the Misbourne River catchment as “over-abstracted” and this underlines the concerns that have been expressed to me.

I also attach a detailed article that was published earlier in 2011 in the Institute of Water’s (“**IoW**”) magazine. The article<sup>23</sup> is written by my constituent, Dr Marilyn Fletcher, a biologist and retired member of the IoW and provides an analysis of the effect of the proposed HS2 scheme on the Misbourne and the aquifer.

### **The Chilterns Geology**

The British Geological Survey (“**BGS**”) has also assisted me in gaining answers for constituents who have asked many questions about the effect of the tunnelling.

I met with the BGS’s Head of Geology and Landscape, Dr Martin Smith, to discuss the proposed HS2 scheme and, in particular, to be briefed on the type of geological features running through my constituency. I attach a report that Dr Smith and his colleagues produced for me which provides a summary of the availability of geological and hydrogeological data for the proposed HS2 route in the vicinity of my constituency of Chesham and Amersham (“**Report**”).<sup>24</sup>

The report provides information on the geology, hydrogeology and potential geological hazards on the proposed HS2 route through my constituency. In addition to the Report’s information about the complex chalk and bedrock foundations in the area, I would draw the consultation’s attention, in particular to paragraph 3.1.1 on page 7 of the Report which states:

*“The whole of the HS2 route in this area lies within, or very close to, Groundwater Source Protection Zones for several public water supplies sources (Hampden, Amersham, Chalfont St Giles, Great Missenden, Wendover, Northmoor and West Hyde).”*

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<sup>22</sup> See “Hydro geological map showing Route 3 & Public Water Resources” provided by Dr Haydon Bailey. This document is **attached at Appendix 14**.

<sup>23</sup> See Institute of Water article published in 2011, entitled “HS2’s Approach: Does it Protect Groundwater Resources?”. This document is **attached at Appendix 15**.

<sup>24</sup> See Report provided by Dr Martin Smith and colleagues of the British Geological Survey entitled, “Summary Report on the Geology of the Proposed HS3 Route (£) in the Chesham and Amersham Constituency.” This document is **attached at Appendix 16**.

## The Appraisal of Sustainability and the Environmental Impact Assessment

The absence of a detailed, strategic Environmental Impact Assessment (“EIA”) has caused my constituents great alarm. They have told me that this is for many of them a major inadequacy of the HS2 consultation material.

As Government guidelines provide that an EIA must be produced in connection with major infrastructure projects of the nature of the proposed HS2 scheme they have wondered why a detailed EIA was not made available to them.

Many have commented that the Appraisal of Sustainability (“AoS”) on the proposed Route 3 for the scheme, which was issued with the consultation documentation, is entirely inadequate and that detailed questions were not answered to any degree of satisfaction during the roadshows.

I have referred constituents to the HS2 consultation material on the environment – namely the passage below:

*“Our methodology was developed in Consultation with a range of Statutory Authorities including the Environment Agency and Natural England. Our methodology in carrying out the AoS was consistent with the principles of Strategic Environmental Assessment and drew on best practice from other major projects such as the Channel Tunnel Rail Link.”<sup>25</sup>*

And the outline on the reverse of the document refers to the framework used which encompasses the Government’s four sustainable development priorities, namely:

*“(i) to reduce greenhouse gas emissions and combat climate change; (ii) to protect natural and cultural resources and enhance the environment; (iii) to create sustainable communities; and (iv) to achieve sustainable consumption and production.”<sup>26</sup>*

However, this has not satisfied environmentally aware constituents of which Chesham and Amersham has many.

It is my understanding that work began on the AoS in 2009 when a reference group comprising the Environment Agency (“EA”), Natural England, English Heritage and representatives from various other government departments was formed to inform the DfT. On behalf of my constituents I met with representatives of the EA and Natural England during the consultation period to discover the depth of the environmental assessments. I understand that the EA assisted HS2 Ltd in producing the AoS and assessing likely environmental impacts for the London to Birmingham route and that should the

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<sup>25</sup> See Environmental Leaflet issued by the Department for Transport and HS2 Limited, entitled “High Speed Rail Construction: HS2’s Appraisal of Sustainability”. This document is **attached** at **Appendix 17**.

<sup>26</sup> Ibid.

government decide to proceed with the proposed HS2 scheme later this year, then the EA and other stakeholders will work on the EIA from December 2011 to April 2013, and that a further consultation on the EIA is proposed from April 2013 to September 2013. I attach information<sup>27</sup> kindly provided to me by the EA when I met with them in June 2011.

However when passing this information to constituents they believe that carrying out an EIA after the decision on the consultation is not the right way to proceed. They believe the detailed information should inform the consultation.

### **Trees, Hedgerows, Ancient Woodlands, Wildlife and Rights of Way**

Many of the objectors to the route of HS2 in Chesham and Amersham are genuinely concerned about the potential impact of the proposed HS2 route on the flora, fauna and the quality of life in the Chilterns. They believe it could be devastating, passing as it does through the Chilterns AONB

The impact on woodland, trees, hedgerows, wildlife, and micro-ecosystems could be considerable. The proposed transport corridor will cut through the countryside presenting an exclusion zone in order to make way for trains travelling at very high speeds of up to 250mph. HS2 presumes a straight route in order to achieve the desired speeds and to minimise construction costs.

Amongst the many objections raised by residents, attention has been especially drawn to ancient rights of way, such as tracks, pathways, bridleways and lanes that will be severed by the proposed HS2 corridor. I attach a summary document produced by the Chilterns Conservation Board ("Board"), the statutory body whose duty it is to protect the Chilterns AONB. It summarises many of the environmental concerns that have been raised with me by its members and others.<sup>28</sup>

I also attach a document published by The Wildlife Trusts<sup>29</sup> that considers the 160 wildlife sites that could be threatened by the proposed HS2 route, and a paper presented by The Woodland Trust<sup>30</sup>.

The latter looks at the impact on ancient woodlands of the proposed route, defined as parts of the countryside that have been continually wooded since the 1600s. These papers

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<sup>27</sup> See document provided to Rt Hon Cheryl Gillan MP by the Environment Agency at a meeting of both on 13<sup>th</sup> June 2011. This document is **attached** at **Appendix 18**.

<sup>28</sup> See The Chilterns Conservation Board leaflet entitled, "High Speed 2's Impact on the Chilterns – Facts and Figures." This document is **attached** at **Appendix 19**.

<sup>29</sup> See The Wildlife Trusts leaflet entitled, "HS2 threatens 160 wildlife sites". This document is **attached** at **Appendix 20**.

<sup>30</sup> See The Woodland Trust paper for the Westminster Hall Debate on High Speed Rail entitled, "Woodland Trust Briefing for Westminster Hall Debate on High Speed Rail March 31<sup>st</sup> 2011." This document is **attached** at **Appendix 21**.

address many of the points raised by my constituents with me and reflect many of their views as expressed to me.

Particular concern has also been expressed to me about the Site of Special Scientific Interest (“SSSI”) in my constituency known as Grim’s Ditch. This site is believed to be an Iron Age feature, part of a series of linear earthworks found in the Chilterns. The proposed HS2 Route 3 would traverse this SSSI and people believe it would be destroyed.

Campaign groups and individuals in my constituency, and many others, have worked tirelessly during the HS2 consultation period and since the announcement of the proposed HS2 route to express their concerns about the HS2 business case, but equally about the potentially negative effects of HS2 on the natural world which they see as their duty to protect.

I have also attached a pamphlet issued by the Chiltern Ridges HS2 Action Group, one of the HS2 action groups with members in my constituency, as it also represents the views expressed to me by this group and many others<sup>31</sup>.

### **Launch of the Natural Environment White Paper**

Recently some constituents have referred to the latest White Paper on the Natural Environment issued by the Department for Environment, Food and Rural Affairs (“**White Paper**”) on 7<sup>th</sup> June 2011. I attach a copy of the White Paper<sup>32</sup>. This is the first white paper on the natural environment in more than twenty years and sets out how the Government aims to deliver on its commitment to protect the environment for future generations by making our economy more environmentally sustainable and improve everyone’s quality of life and well-being.

Key policy commitments include:

- Nature Improvement Areas;
- Local Nature Partnerships;
- Biodiversity Offsets;
- Natural Capital Committee; and
- Green National Accounts.

Constituents who have raised this with me generally endorse these objectives, but they fail to see how the commitments outlined in the paper dovetail with the potential effects on the natural environment of the proposed HS2 scheme. They would particularly welcome the

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<sup>31</sup> See Chiltern Ridge HS2 Action Group pamphlet entitled, “What will be the Local Impacts of HS2?” This document is **attached at Appendix 22**.

<sup>32</sup> See the White Paper issued by the Department for Environment, Food and Rural Affairs on 7<sup>th</sup> June 2011, entitled “Natural Environment White Paper”. This document is **attached at Appendix 23**.

consultation considering the proposed HS2 scheme in the light of the launching of this White Paper.

### **Carbon Emissions and the Issues, Vibration, and Noise and Light Pollution**

Many residents have raised points about the proposed HS2 scheme saying that it does not fit within the Government's green agenda although many note that it is being presented as part of the low carbon or green economy. There are two aspects that have been raised.

The first concerns the proposed scheme's green credentials and effects during the construction phase, considering only Phase 1 construction here.

The second issue is that of HS2 carbon emissions once operational and the knock-on effects, or adverse consequences that HS2's operation may have on existing modes of transport.

Constituents questioning the modal shift from air to train also ask whether it is still appropriate to assume that freed up airport capacity as a result of passengers switching from air to rail, will lead to fewer flights. Some constituents have pointed out to me that BAA has already publically stated that it would use the freed up air slots for the operation of more long distance flights, thus more polluting journeys as a result. This is further exacerbated because current DfT and Government policy is to build no further runways in the South East, significantly a third runway at Heathrow Airport, thus adding to capacity issues in the region.

Further, according to HS2 Ltd, the number of passengers switching from planes to HS2 will be only 3.5 million per annum, which is less than 7% of all passengers forecast to use HS2 and less than 5% of all passengers using Heathrow. In terms of aviation emissions, the consultation documentation assumes a worst case scenario. This contrasts with the view of the UK's air regulatory authority, the Civil Aviation Authority, which forecasts a significant improvement in aircraft emissions over the next couple of decades, not least given huge advances in aircraft materials, aerodynamic design and super-efficient engines. Airlines are constantly driving down costs and seeking greater efficiencies so as aircraft fleets are updated with newer aircraft, incorporating green technologies, benefits to CO emissions will accompany this.

Many constituents argue that if domestic flights are displaced by long haul flights – a possible consequence of the proposed HS2 scheme – then HS2 could trigger an increase in aviation emissions. HS2 Ltd has also estimated that the demand for through trains to the continent from North of Birmingham will be very low. This is consistent with the low numbers using the existing Eurostar services, where modal shift has stagnated. So the proposed HS2 scheme will not significantly reduce the demand for short haul flights to the

continent. In fact, according to the rail industry itself, any journey taking more than three and a half hours is more likely to be taken by plane than by train.

Speed requires energy, and the faster one travels, the more energy is required. Concerns raised by constituents have included the view that once operational, the energy used by high speed trains could be almost double that of existing intercity electric trains. If HS2 is eventually authorised to travel at the current maximum permitted speed of 250mph, then up to four times more energy could be used compared with classic rail services.

They have asked me where this energy will come from. HS2 Ltd has said that the HS2 scheme is likely to be broadly carbon neutral, but that it might generate an additional 26 million tonnes of carbon dioxide. Even if the assumption is made that there will be an increase in renewable energy production, the low carbon economy will remain elusive. Many submissions made to me have said that HS2 is more likely to generate a net increase in carbon dioxide emissions. Many feel that there is just not enough information on this important side of HS2.

The effects of noise pollution once HS2 is operational, as well as the effects of vibration and light have been raised with me on many occasions. The proposed HS2 scheme envisages high speed trains running for 19 hours a day, with maintenance which is noisy and requires light, being undertaken during the five hours a night. Constituents feel that there will be many adverse effects and that not enough information has been made available.

On behalf of my constituents, I attended the Arup sound tests offered to Members of Parliament but some of my constituents attending the same sound tests, found the noise levels they were presented with to be unbelievable especially in the light of their experiences with HS1.

Part of the proposed route runs close to parts of the constituency which has a large number of Grade II listed buildings, many of which date back to the 15<sup>th</sup> Century. Many of these properties do not have foundations. Residents in this part of the constituency are highly concerned about the effects of tunnelling as well as the subsequent vibration of trains passing close to or underneath these properties.

### **Compensation, Blight, the Enabling Works and the consequent Issues of Disruption, Noise, Vibration and Spoil**

All communities along the proposed HS2 route will suffer varying degrees of disruption to their quality of life during the construction period for HS2, be this access to roads, footpaths, recreational areas and so on. However my constituents are concerned that the existing transport infrastructure in the constituency, specifically the A413 transport corridor would fail to cope. They fear substantial and highly disruptive road widening and probable

land take in the Chilterns AONB. They do not feel that the consultation documentation has adequately addressed their understandable concerns.

Properties belonging to my constituents along the route are suffering from blight and the current Exceptional Hardship Scheme has unnerved many local residents rather than allay their fears. Constituents want far more detail to be provided on how compensation would be determined, and what level of compensation would be forthcoming, for those most greatly affected along the proposed HS2 route should a decision be taken for the scheme to proceed. I attach a document prepared by the HS2 Action Alliance that offers a critical assessment of three main options that the Department for Transport is considering for compensating those affected along the proposed route.<sup>33</sup> This reflects the views of many of my constituents.

The matter of spoil removal as outlined in the consultation documentation which will result on account of the tunnelling and the digging of viaducts is of great concern to my constituents.

Constituents have asked me a number of questions. Where will transfer points be for the M25 to Amersham section of the tunnelling? Where will this material be disposed of? How many trucks per day will be required and linked to that how much spoil will be removed? These are legitimate concerns of my constituents.

It is my understanding that the spoil calculations provided in the consultation documentation are inaccurate as they underestimate the amount of likely spoil produced as a result of tunnelling. It seems that 12 million cubic metres of spoil will need to be excavated from the Chilterns AONB, rather than the claimed 680,000 cubic metres. If correct, this seems to be a fundamental error and undermines my constituents' trust in the entire HS2 consultation procedure. I attach a pamphlet issued by the Chiltern Conservation Board on this subject.<sup>34</sup>

The visual impact and the impact of noise and light pollution, not to mention the huge influx of workers into construction camps will have enormous and untold consequences for the quality of life and is of immense concern to many of my constituents. They do not believe that the HS2 consultation documentation provided sufficient information as to the location of construction camps, the quantity of heavy duty construction equipment and vehicles required or the manpower numbers that will come into the area. My constituents ask that this information be made available to them as soon as possible and that its absence has weakened the consultation process.

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<sup>33</sup> See The HS2 Action Alliance document entitled, "Compensation for Property Blight from HS2: Submission for HS2 Consultation (Question 7) by HS2 Action Alliance" dated 27<sup>th</sup> July 2011. This document is **attached** at **Appendix 24**.

<sup>34</sup> See The Chilterns Conservation Board leaflet entitled, "12 million cubic metre of spoil." This document is **attached** at **Appendix 25**.

## Mitigation

Constituents have noted the efforts made by HS2 Ltd to explain options for mitigation for the proposed HS2 route in the event that a decision is taken to proceed with the preferred route. They said:<sup>35</sup>

*“Were HS2 to be taken forward, HS2 Ltd would work closely with local groups and relevant advisory bodies to identify the most appropriate ways to mitigate the impacts of the line on local people and the environment. That would include:*

- *Developing a Code of Construction Practice to minimise the impacts during the construction period.*
- *Sustainable re-use of materials, for example using spoil from tunnels and cuttings for noise bunds and landscape screening.*
- *Noise barriers constructed alongside the line.*
- *High quality design of structures to fit with the landscape.*
- *Planting to encourage and sustain biodiversity.*
- *Proposals developed with relevant advisory authorities and, for example, local wildlife trusts and community groups.”*

Given the extensive work undertaken already by local action groups and the sound analysis provided by statutory bodies, such as the Chilterns Conservation Board as the irreversible impact that the proposed HS2 scheme would have on the Chilterns AONB, my constituents are deeply concerned that such mitigation measures may be too little too late.

Many aspects of the concerns raised with me are reflected in Buckinghamshire County Council submission to the Transport Select Committee enquiry which I attach<sup>36</sup>.

## Greater Use of Tunnelling

Some constituents who believe that this scheme will go ahead have asked, as a last resort, that HS2 should consider far greater use of tunnelling and should consider entering a tunnel close to London and emerging beyond the AONB. This would reduce the visual and noise impact of the operational line on the local community. HS2 Ltd has conceded that there have been errors in its estimated spoil calculations. There is also uncertainty over the costs of tunnelling. An appraisal of this possibility would be appreciated by some constituents.

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<sup>35</sup> See p. 110, insert box “How impacts on local people and the environment could be mitigated “High Speed Rail: Investing in Britain’s Future”, Consultation, February 2011.

<sup>36</sup> See Buckinghamshire County Council’s submission entitled, “Buckinghamshire County Council’s Submission to the Transport Select Committee on environmental costs and benefits of High Speed 2 (HS2) proposals” This document is **attached** at **Appendix 26**.

## **Technology, Working Patterns and Lifestyle Choices**

This submission has already highlighted what my constituents believe to be some significant flaws in the business case of the proposed HS2 route and, in particular their concern that the consultation fails to give sufficient value to time spent productively working on trains whilst travelling. This gives rise to a two further important points which many of my constituents have raised with me. These relate to the impact of technology on how we work and also our working patterns and lifestyle choices.

### **Broadband, Video Conferencing and Mobile Broadband**

Businesses are constantly seeking to cut costs and drive existing revenue streams, especially during a time of fiscal consolidation such as our country is facing at the moment. Many people have less disposable income to spend on the products and services offered by companies. In recent years, technological advances have been such that companies are actively encouraging their employees to travel less as a means of cutting costs and saving time.

My constituents point out that not only are they seeing the ever more extensive roll out of broadband and Wi-Fi solutions, which allow them to work “virtually” in the place of their choosing, but there is increasing demand for super-fast mobile broadband connections, such as are common place in the Far East, for example, South Korea. They argue that we should be investing more in this super-fast broadband technology and not be left behind as our competitors in the developed and emerging world economies press on with such investment. Indeed, one pointed out that the Minister for Transport has stated this is one of the aims of the DfT transport policy. They note that the Secretary of State for Culture, Media and Sport has also encouraged the adoption of super-fast broadband connections across the UK.

Further, my constituents are concerned that no account seems to have been taken of the increasing trend for companies to make use of video-conferencing facilities which allow colleagues to meet virtually. This saves on travel costs at a time of constrained budgets and increases the productive work time of employees who travel less (they concede that some productive work time is inevitably lost when travelling, for example, when driving to and from a station or airport). It also reduces carbon dioxide emissions which result from travelling.

Many of my constituents are aware that mobile phone technologies continue to develop at a considerable rate, not least thanks to the roll out of 3G mobile broadband and the advent of the era of the smartphone and other mobile devices such as tablet devices. The mobile

network and these devices allow people to work and be in constant contact whilst on the move. It is also reasonable to assume that the present limitations on these technologies that we all experience from time to time, such as poor mobile network reception will diminish over time. Further the market penetration of individuals owning the requisite smart phones will only increase as these technologies become cheaper and more accessible to a greater proportion of the population.

### **Working Patterns and Lifestyle Choices**

As companies cut costs, it is not only travel budgets that are reduced. My constituents point out that the advance of technology, particularly in the fields of mobile/ smart phones, super-fast broadband, Wifi and video-conferencing, means that they as employees can quite satisfactorily, and some would argue more productively, work from home or at another location of their own choosing. This reduces the need for people to travel to and from the office or elsewhere, and it can increase productivity as employees are happier because work fits more around their varied lifestyles. Further, this cuts the need for and, therefore, cost of office space for business.

So-called “hot-desking” has become the norm for many companies and some of my constituents have told me that they already work in such office environments and it is not atypical for companies to have, for the sake of argument, 100 work stations in the office and yet 120 full time employees who are notionally based at that location. In this regard, I attach a study on this phenomena, also known as “flexible working”, that was published by Regus<sup>37</sup>, an office rental business, in March of this year. The Management Summary in this document states:

*“Offering employees flexible working conditions (defined as being able to choose when and where to work), reduces costs, contributes to business performance, improves motivation and productivity, helps access a wider talent pool, and helps retain employees through an improved work-life balance.”<sup>38</sup>*

In this context, some constituents have argued that spending a considerable amount of money on a high speed train that may prove expensive to use and thus accessible to the few, just as the existing HS1 service and associated javelin services are not meeting forecasted demand, looks like embarking on a project that is in fact an out-dated technology.

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<sup>37</sup> See Regus study published in March 2011, entitled, “Flexible goes global: A global research report amongst business assessing take up and attitudes towards flexible working.” This document is **attached at Appendix 27.**

<sup>38</sup> Ibid. p.2

Based on such evidence, many of my constituents believe that the roll out of a super high-speed broadband network should be one of the government's top priorities in order to support greater use of and meet growing demand for video-conferencing and other online services to drive business, jobs and wealth creation, and other real-time collaborative infrastructures.

One of my constituents brought to my attention a recent report from Digital Europe which stated that £15 billion invested in the UK's ICT infrastructure – better access to mobile and broadband networks, an intelligent transport structure and smart power grids – would create approximately 700,000 UK jobs, over half of which would come from small businesses. This reflects views expressed to me about where the future growth really lies.

## Alternatives

Many constituents feel, if this scheme goes ahead, that there should be alternative routes considered and some favour alternative transport infrastructure improvements. If the scheme goes ahead they would like alternatives considered in depth.

The Atkins document of February 2011 looked at “Strategic Alternatives to the Proposed ‘Y’ Network” and summarises each of the three upgrade options to the existing rail network that were considered but simply concludes,

*“The proposed works would be disruptive to passengers. The extent of this depends on the scheme design and the scope of staging works, and has not been assessed in detail at this stage.”<sup>39</sup>*

Transport specialists who have analysed these three briefly worked up scenarios have concluded that they contain elements that are unnecessary which inevitably leads to each of them representing poor value for money – and thus making the HS2 business case appear stronger

Constituents have indicated to me that by not developing these best alternatives to HS2, it is impossible to make an informed decision about whether the proposed HS2 scheme is the best value for money. In addition, it would seem that the information provided is misleading. One example of this is that Scenarios A and B fail to include the Evergreen 3 package of upgrades between London Marylebone and Birmingham on the Chiltern Railways line which will soon be completed and add 20% more capacity to that route alone.

### **Route 1.5 Via Heathrow<sup>40</sup>**

The issue of London Heathrow has also been a strong feature of representations. It seems necessary to re-assess the route via Heathrow. One justification for a high speed rail network is based on reducing the North-South divide and the economic benefits this would provide, drawing comparisons with the experience of Continental countries with high speed rail. Yet the proposed solution is concerned primarily with moving people about within the UK and erecting a system which will result in trains travelling at high speed within a few miles of Heathrow.

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<sup>39</sup> See Atkins document entitled, “High Speed Rail Strategic Alternatives Study: Strategic Alternatives to the Proposed ‘Y’ Network,” published in February 2011 at p.28. This document is attached at **Appendix 28**.

<sup>40</sup> See Scheme Development Leaflet issued by the Department for Transport and HS2 Limited entitled, “High Speed Rail Consultation: Alternative Routes Considered “Route 1.5” Via Heathrow”. This document is **attached at Appendix 29**.

Many European capitals have stations at their principal airports, thus benefitting international traffic – both ways

The provision of a service to Heathrow only as part of the second phase has frequently been commented on adversely with correspondents – if the scheme proceeds - wanting this link made during the initial phase. Currently it is perceived that the Old Oak Common proposal means everyone having to change trains causing the associated and inevitable problems for passengers.

In fact, seeing Heathrow become a transport hub with direct connections not only to High Speed Rail, but also to Crossrail, the London Underground, Great Western Services and the Heathrow Express brings significant gains to business more quickly than the proposed Route 3. The wider economic benefits for the Western Corridor or Thames Valley Corridor, an important area of wealth creation in the UK, are self-evident, not to mention linking Great Western Services to Wales and the West Country directly with High Speed Rail and air travel. Quicker gains for more people would make a stronger argument for this particular HS2 route. Some have pointed out the benefits whereby Birmingham Airport could be reached from the Heathrow Hub as well as having the potential to ease congestion and demand for flights at Heathrow by moving passengers to Birmingham Airport.

### **Addressing Capacity Issues and Infrastructure Renewal on the Existing Network**

There is some agreement from some respondents that increased rail capacity is required, but it is a current demand. Solutions to address the capacity issues on the WCML have been developed and could be implemented quickly and at far less cost, both in financial and environmental terms.

A package of WCML upgrade measures known as Rail Package 2 (“**RP2**”) was developed by the DfT for Government as alternative to Phase 1 of the HS2 scheme, namely to relieve the pressing capacity issues on the London to West Midlands route. According to the group based partly in my constituency, HS2 Action Alliance:

- *“RP2 provides all the capacity DfT say is needed and has less crowding;*
- *is cheaper than HS2 (£2bn net cost not £11.9bn – on DfT 2010 figures;*
- *can be delivered more quickly (no waiting to 2026);*
- *takes a risk free incremental approach (it’s not all or nothing); and*
- *is better value for money (50% better than HS2, on DfT figures)<sup>41</sup>.”*

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<sup>41</sup> See HS2 Action Alliance pamphlet entitled “RP2 not HS2: A better alternative to high speed rail” published March 2011 for a detailed breakdown of the figures. This document is **attached** at **Appendix 30**.

They provide a detailed analysis which is attached and argue that the upgrade would be quicker to implement and far less damaging on the environment, because the improvements are to an existing transport corridor, rather than “virgin” territory, such as the Chilterns AONB.

There are already three major transport corridors between London and the West Midlands, WCML, Chiltern Railways (“**Chiltern**”) and Midlands Main Line (“**MML**”).

HS2 Action Alliance have made the point that Chiltern, which operates out of Marylebone Station up to the West Midlands, is investing £250 million of private money in its Evergreen 3 scheme to reduce journey times between London and the West Midlands. By creating the so-called “Chiltern Mainline” journey times between London and the West Midlands will be slashed by 20%<sup>42</sup>. The Chiltern Mainline is being created in stages meaning that faster trains on the existing line between the West Midlands, Oxfordshire, Buckinghamshire and London will start to run from 2011. A brand new line to Oxford is expected to launch in 2013. New tracks, new junctions, new trains and new platforms will deliver faster trains and more capacity along the length of this popular route. They have said that the HS2 proposals do not appear to take into account these significant developments.

On the MML they also point out that there are some capacity problems during the morning peak period, where almost half the trains arriving at this time have standing passengers. However, they have said that this is due to the relatively short distance commuting passengers from Bedford, Luton and Luton Airport Parkway. The average all day load factor south of Leicester of 39% indicates that there is no significant capacity issue on this route. Further, they make the point that construction of the Thameslink project which is ongoing will deliver a major increase in capacity South of Bedford, where train lengths are to be extended from 8 to 12 cars. Once completed, the Thameslink services will offer a viable alternative to those passengers currently experiencing capacity issues on the MML.

### **The M1 Corridor Route: 2M against Heathrow Expansion**

Many people have suggested to me that the consultation should have included another possible High Speed route, namely the M1 Corridor Route. This route was developed by the 2M Group, an all-party alliance of local authorities concerned at the impact of Heathrow Expansion on their communities, in 2008.

Constituents believe in some cases that this M1 Corridor route does more to connect the North-South divide, more quickly, whilst integrating our existing airport and rail transport infrastructure.

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<sup>42</sup> See Chiltern Railways Leaflet “Timetable Update”. This document is **attached** at **Appendix 31**.

The 2M Group's proposal document said:

*"The M1 offers a direct corridor for the new line. The topography allows a straight and level alignment while the existing noise and pollution from the motorway has discouraged residential development alongside the route. This makes the M1 suitable for the parallel construction of a high speed line."*<sup>43</sup>

The estimated costs of this scheme have been quoted at £30bn, with completion of all four phases scheduled for 2030, several years before the proposed Y route would be complete. Constituents also pointed out that this route would also include the additional benefit of having added high speed rail connections to Scotland by 2030.

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<sup>43</sup> See document entitled "2M against Heathrow Expansion". This document is **attached** at **Appendix 31A**.

## Appendices

**Appendix 1** - [Letter from the Prime Minister to Rt Hon Cheryl Gillan MP, dated 11th February 2011](#)

**Appendix 2** – [HS2 Action Alliance “High Speed 2: Review of the February 2011 Consultation business case for HS2 \(June 2011 update of Initial Review\)”](#)

**Appendix 3** - [51m’s arguments against HS2](#)

**Appendix 4** - [HS2 Action Alliance “Rebutting the Six Myths about HS2”, v1.8, 25 April 2011](#)

**Appendix 5** - [Cabinet Office “Major Projects Authority Overview Document”, 31 March 2011](#)

**Appendix 6** - [HM Treasury “Infrastructure Cost Review: Implementation Plan”, March 2011](#)

**Appendix 7** – [DfT “The Economic Case for HS2: The Y-Network and London – West Midlands”, February 2011](#)

**Appendix 8** - [Oxera “Review of the Government’s case for a High Speed Rail programme”.](#)

**Appendix 9** - [“Simplification of Whitehall Planning Guidance” letter issued by Rt Hon Greg Clark MP, Minister for Decentralisation and Cities.](#)

**Appendix 10** - [The Chiltern Conservation Board “Submission to the Transport Select Committee Inquiry to HS2, 16 May 2011](#)

**Appendix 11** - [DCLG “Planning Policy Statement 7: Sustainable Development in Rural Areas”](#)

**Appendix 12** - [European Commission “Water Framework Directive” November 2010](#)

**Appendix 13** - [The Chiltern Society “Concerns arising from the Geology and Hydrology of the ground underlying the High Speed \(HS2\)”](#)

**Appendix 14** - [“Hydro geological map showing Route 3 & Public Water Resources” provided by Dr Haydon Bailey](#)

**Appendix 15** - [British Geological Survey “Summary Report on the Geology of the Proposed HS3 Route \(£\) in the Chesham and Amersham Constituency.”](#)

**Appendix 16** - [Dr Martin Smith and colleagues of the British Geological Survey entitled, “Summary Report on the Geology of the Proposed HS3 Route \(£\) in the Chesham and Amersham Constituency.”](#)

**Appendix 17** - [DfT and HS2 Ltd. “High Speed Rail Construction: HS2’s Appraisal of Sustainability”.](#)

**Appendix 18** - [document provided to Rt Hon Cheryl Gillan MP by the Environment Agency at a meeting of both on 13<sup>th</sup> June 2011.](#)

**Appendix 19** - [The Chilterns Conservation Board, “High Speed 2’s Impact on the Chilterns – Facts and Figures”](#)

- Appendix 20** - [The Wildlife Trusts, "HS2 threatens 160 wildlife sites"](#)
- Appendix 21** - [The Woodland Trust "Woodland Trust Briefing for Westminster Hall Debate on High Speed Rail", 31st March 2011](#)
- Appendix 22** - [Chiltern Ridge HS2 Action Group, "What will be the Local Impacts of HS2?"](#)
- Appendix 23** - [Department for Environment, Food and Rural Affairs "Natural Environment White Paper", 7th June 2011](#)
- Appendix 24** - [HS2 Action Alliance "Compensation for Property Blight from HS2: Submission for HS2 Consultation \(Question 7\)", 27th July 2011](#)
- Appendix 25** - [The Chilterns Conservation Board, "12 million cubic metre of spoil."](#)
- Appendix 26** - ["Buckinghamshire County Council's Submission to the Transport Select Committee on environmental costs and benefits of High Speed 2 \(HS2\) proposals"](#)
- Appendix 27** - [Regus "Flexible goes global: A global research report amongst business assessing take up and attitudes towards flexible working", March 2011](#)
- Appendix 28** - [Atkins "High Speed Rail Strategic Alternatives Study: Strategic Alternatives to the Proposed 'Y' Network", February 2011](#)
- Appendix 29** - [Department for Transport and HS2 Limited "High Speed Rail Consultation: Alternative Routes Considered "Route 1.5" Via Heathrow"](#)
- Appendix 30** - [HS2 Action Alliance "RP2 not HS2: A better alternative to high speed rail", March 2011](#)
- Appendix 31** - [Chiltern Railways "Timetable Update"](#)
- Appendix 31a** - ["2M against Heathrow Expansion"](#)