

51m response to the Environmental Statement consultation

February 2014



51m is the cross party alliance of nineteen local authorities reviewing and challenging the case for HS2.

Each Council has signed up to the following position statement:

“We are opposed to the current high speed rail proposals as they are presently outlined and do not believe that they are in the best interests of the UK as a whole in terms of the benefits claimed in the business case.

We are not opposed to the need for higher speed rail per se and fully acknowledge the need for strategic improvement to the national rail infrastructure but cannot agree with the current proposals as the economic and environmental benefits are not at all credible.

We do not believe that all the other alternatives to achieve the transport capacity, regeneration and environmental benefits have been fully explored by the Government and, with in excess of £30 billion (now £50 billion), proposed to be invested, we owe it to the nation to ensure these are fully explored.”

1) Executive summary

51m is submitting this response to the Environmental Statement and trusts that it will be given proper consideration by all Members of Parliament. It, however, questions if HS2 can be properly debated in Parliament, informed by independent expert analysis of the Environmental Statement, since this is not part of the hybrid Bill process.

Local authorities know that when using taxpayers’ money, it is important to demonstrate good value for money, deliver clear benefits and show that all alternatives have been properly evaluated. 51m has spent four years scrutinising HS2 through its many iterations and business cases and believes it fails on all counts. 51m is not alone – other organisations which question HS2 include the National Audit Office, the Public Accounts Committee, the Treasury Select Committee, the Institute of Directors, and the Institute of Economic Affairs.

51m published an ‘Optimised Alternative’ to HS2 as part of its response to the consultation in 2011. Assessed by Atkins (for Network Rail) it was reported to offer more than £5 of

return for every £1 invested. In September 2013, 51m published 'Better than HS2 – an alternative infrastructure investment strategy', setting out ways to invest £50 billion to drive economic recovery across the country, delivering jobs and growth now.

This consultation response highlights 51m's numerous concerns and reservations about the Environmental Statement, including:

- Its multiple errors, inaccuracies and omissions
- A 'think positive' approach, that aims to minimise, downplay and underestimate impacts
- The superficial and disingenuous way alternatives and options have been assessed
- Major flaws in both the baseline information and the methodologies applied
- A propaganda document that masquerades as a non-technical summary
- Strategic route wide issues that are given cursory attention
- Its use as the basis for critical decision making with very limited scrutiny

This latter point is perhaps the most crucial and yet the one that is likely to receive least attention. It has been decided that the hybrid Bill and its associated requirements are a suitable mechanism for determining, what the Secretary of State describes as the biggest infrastructure project in the UK. 51m does not believe this enables proper scrutiny and debate or for all environmental impacts to be properly assessed.

These impacts cannot be accurately measured with so many surveys and assessments still outstanding. 51m questions how Parliament can reach a decision on the project without all the available information and whilst it recognises that the HS2 proposal is not a planning application, it fails to understand why the same level of scrutiny should not be applied by Parliament. If it were applied HS2 Ltd would most likely be asked to start again and submit additional information about all land affected.

51m is concerned that despite significant media coverage and growing vocal opposition to HS2, the views of Parliament are influenced by arguments about economic growth and healing the north-south divide. Recent severe weather has highlighted the need for investment in core and critical infrastructure, with many arguing that funding should be used to improve and maintain existing railways and flood defences, rather than be wasted on a vanity project with a questionable business case.

Following detailed review 51m is confident that that the Environmental Statement and its supporting assessments (particularly the Transport Assessment) are NOT fit for purpose and a long way short of good enough for the biggest and most ambitious infrastructure project in the UK.

2) Errors, inaccuracies and omissions

Individuals, groups and communities report that the Environmental Statement fails to properly assess the very real environmental impacts of HS2. It includes a significant numbers of errors, inaccuracies and omissions and underplays effects. These are being catalogued and will be reported in detail in responses from others. Nonetheless 51m questions whether the Environmental Statement, presented as the definitive response to

environmental impacts and mitigation, can be regarded as trustworthy and independent bearing in mind the errors, inaccuracies and omissions.

For example, the Transport Assessment fails at any level to consider trip reassignment (or rat-running) in areas severely affected by construction traffic, meaning it is woefully inadequate. This fundamental error means the wider transport effects (including congestion, air quality, dust and carbon emissions) are completely overlooked. Of course, the most significant omission was the failure to publish 877 pages of critical information. This breach of Standing Orders led to both Houses of Parliament independently extending the consultation period for the Environmental Statement.

Despite these extensions 51m believes that the Environmental Statement contains insufficient information to draw adequate conclusions about the significant environmental impacts of the scheme. This in turn raises questions and casts doubts on the suggested mitigation measures. 51m trusts that MP's will take these concerns seriously and ensure that all errors and omissions are addressed in the appropriate manner by HS2 Ltd.

3) Minimising impacts

51m is concerned that the fundamental flaws in the Environmental Statement and the numerous errors, inaccuracies and omissions throughout the many volumes, combine to create a very misleading, if not disingenuous, picture of HS2's impacts. Local authorities within 51m have independently stated that the Environmental Statement does not adequately report or assess the true extent of the impacts of the scheme.

Such an assertion is based on the document's failure to identify and describe relevant, appropriate or accurate baseline information leading to unsound or inadequate mitigation proposals. Environmental effects on and costs for communities in Phase One are not properly quantified or assessed, nor does the Environmental Statement consider the environmental benefits of upgrades to existing lines.

51m argues that the Environmental Statement seeks to minimise the reported impacts on communities and singularly fails to address cumulative impacts that must be critical in a linear project of this scale and nature. This is further exacerbated by the very fragmented nature of the suite of documents and volumes that comprise the Environmental Statement, meaning that it would be near impossible for any reader to get a comprehensive overview of HS2's cumulative effects.

An aspect that is particularly current is how the Environmental Statement reflects the impacts on watercourses, drainage and flooding. To suggest that the reflections are far from crisp would be something of an understatement. A number of watercourses will need to be artificially diverted to accommodate HS2 with unknown consequences, whilst drainage schemes are designed merely to ensure the railway does not become flooded.

Previous proposals for viaducts over floodplains (January 2012) have been shelved in favour of cost saving culverts, at a time when one in a hundred year flood incidents are becoming

much more commonplace. Communities are expected to have confidence in a suite of documents that suggest ongoing liaison with the Environment Agency and local authorities is sufficient to manage future flood risk. 51m does not share such confidence.

Use of undefined and often misleading language helps minimise and downplay impacts for the uninformed reader. Terms such as 'minimal, slight and temporary' are used when describing the effects of construction or operation, but are rarely defined. 51m does not believe that any individual would call a ten year period temporary (construction phase) or claim that an increase in noise levels of 5-10dB was only slight.

If, as 51m believes, the likely significant effects on both urban and rural environments are not adequately described, then in turn the mitigation proposals will fail to address the impacts and leave communities worse off. In some cases, no mitigation is proposed, in others the limited mitigation will be provided as part of the draft Code of Construction Practice which is a very generic document, but there are no assurances that this will actually be secured.

4) Strategic alternatives and options

Under the Environmental Impact Assessment requirements, an Environmental Statement should include:

"An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice taking into account the environmental effects"

The usual way to meet this requirement is to establish clear objectives and outcomes and then identify and consider a range of alternatives that might meet them. 51m is concerned that this is not the approach taken by HS2 Ltd. Firstly although the ES does set objectives, they are different from those described in the draft ES, meaning that there has been no consistent criteria to measure the options or alternatives.

Secondly, rather than measure the options or alternatives against the objectives and outcomes to see which is most and least effective, the options have been explicitly compared with the proposed scheme (often referred to as the preferred option – i.e. HS2). 51m compares this to setting healthy eating as an objective, deciding you quite like apples and then dismissing other healthy food options simply because they are not apples.

The Environmental Statement reports that consideration was given to a conventional speed version of Phase One of HS2 (London to Birmingham). This would be logical, as a 'standard' speed version could have a different alignment, do less damage to the environment and improve connectivity by stopping in more places. 51m was therefore surprised to read that this alternative was:

"assumed to comply with the same specification as HS2 in all respects except speed, and that it would follow the same route and provide the same connections, stations and level of service"

A proposal to provide a 'standard' speed option that stops at four stations, using exactly the same alignment as HS2. This would clearly be an inferior option since no attempt has been made to maximise its potential. 51m believes that (as in many other instances) this is a thinly veiled attempt to justify the 'preferred' scheme.

The Government dismisses upgrading existing rail lines using advice from Network Rail about forecast demand and anticipated disruption.

"Even if some options may offer good value for money, they fail to offer an effective long-term solution to crowding issues and therefore cannot be considered a viable alternative to new lines. There is a significant risk that an approach of this kind would simply create years of delay and disruption for passengers and freight services, and even after that only give rise to a railway that is still overcrowded, delaying but not avoiding the need for new lines."

But the Environmental Statement makes no comparison with the 'preferred scheme' that requires:

- Significant remodelling of Euston station throughout the construction period, causing inevitable disruption to existing services to and from this station
- Remodelling to existing or building new stations in both Phases One and Two
- Diverting, realigning and crossing rail lines, motorways and major roads in both Phases One and Two

51m notes that these impacts of HS2 are rarely mentioned, but hopes that MPs will scrutinise all proposals and options carefully to enable fair and proper comparison.

51m considers that HS2 might be justifiable, if rail travel was:

- a) The predominant mode for passenger travel in the UK, and
- b) Forecast to grow by more than 40% in 20 years

It is, however, the road network that provides for 90% of ALL passenger travel (including 75% of long distance trips) and demand for road travel is predicted to grow 44% by 2031. 51m believes this poses the question – why invest so heavily in a network that carries less than 10% of all passenger travel and no more than 25% of long distance trips?

It seems that whilst the days of 'predict and provide' are long gone for the UK road network, they still hold strong in the rail industry. MPs might do worse than consider the Alternative Infrastructure Investment Strategy published by 51m that sets out better ways to invest £50bn across the country, including public transport, roads, and superfast broadband projects.

<http://www.51m.co.uk/wp-content/uploads/2013/09/Better-than-HS2-The-51m-Alternative-Infrastructure-Investment-Strategy.pdf>

5) Baseline information and methodology

51m is disappointed but not surprised to find that the Environmental Statement includes unreliable, inadequate, inaccurate (and sometimes no) baseline information. This clearly contradicts the point:

“As required by law and Parliamentary rules, the Government has provided Parliament with a detailed statement assessing the likely significant effects of the Phase One project on the environment - the Environmental Statement.”

How can such a flawed document be detailed and properly assess the likely significant effects of HS2? The missing or defective information makes it impossible to properly identify and assess other environmental indicators or effects, or appropriate mitigation proposals.

51m believes that a significant example is the unreliable (and not fit for purpose) transport assessments that mean forecasting of congestion, air quality and noise outcomes is flawed. In turn, the need for and scale of mitigation measures to remedy the effects will be less and therefore inadequate. Fundamentally, the submitted documentation has not been prepared in accordance with the Department for Transport’s Guidance on Transport Assessment 2007, with a number of key elements missing.

Manual assignments have been undertaken on the highway networks however they do not take account of the redistribution of trips as a result of the various scheme elements. It is imperative that local models are used to assess the impacts

The statement in Volume 1 (Paragraph 7.7.2) stretches credibility:

“In addition, it has not been possible to access all land required to carry out fully comprehensive surveys. This applies to agriculture, forestry and soils, community, cultural heritage, ecology, land quality, landscape and visual, socio-economics, sound, noise and vibration, traffic and transport and water resources and flood risk. Nevertheless, it is considered that the baseline is sufficiently robust to allow the assessment of the likely significant environmental effects of the Proposed Scheme.”

Parliament is asked to accept the Environmental Statement as robust, when the evidence has not been collected. 51m urges MP’s to ask what proportion of planned surveys have not been done and if such a figure supports the conclusion that the baseline is sufficiently robust. 51m contends that it is not possible to prepare and develop an effective impact assessment and mitigation plan without all the evidence.

Even if the baseline information had all been collected, there is a further flaw that fundamentally undermines the validity of the Environmental Statement – namely the adoption of a ‘one size-fits all’ approach to various topic methodologies. 51m recognises that the Phase One route of HS2 not only covers 120+ miles, but also cuts through very different places, both urban and rural, with varying settlement patterns, population density and economies.

Methodologies appropriate in rural areas with sparse settlements, open countryside and limited traffic are inappropriate for urban areas or inner city areas. Traffic assessments that disregard traffic displacement (drivers making active journey choices based on congestion) fail to accurately model behavioural changes experienced in urban areas. The knock-on effects of congesting or closing an urban road or diverting a bus are many.

51m believes it is both unreasonable and wrong to apply similar blanket methodologies across such a diverse area, without taking full account of the fundamental differences between the places affected by the route. The methodologies used are rarely even recognised 'best practice' and little effort has been made to mitigate cumulative impacts. Instead the Environmental Statement suggests how the 'new increment' will be managed.

This failure is particularly evident when 51m local authorities have sought to consider the holistic (or cross-topic) impacts of the scheme. It has been almost impossible to build up a clear picture of the total effects because of the way the documents are structured. One of the key things the Environmental Statement should have done is present this totality and the inter-relationships between impacts.

6) Non-technical summary

The non-technical summary is a key document, a fact repeated regularly throughout the consultation period by HS2 Ltd and the Department for Transport. It will have been the starting point for many and might be for some the only document referred to. It would therefore not be unreasonable for an individual to expect to find (in summary) a description of the impacts of the proposed scheme, especially the total environmental impact.

51m believes that the non-technical summary fails to achieve this, instead it actively minimises and glosses over the effects of the scheme. It is described in simple engineering terms with little effort made to mitigate environmental effects, primarily for cost reasons. It includes much rhetoric and assertions.

The non-technical summary does little to explain to the reader why the Government has moved away from predict, manage and provide principles and reverted to 'predict and provide' for railways but not for roads. 51m is concerned that the Government's single minded approach to HS2 has helped them avoid responding to the challenges posed by Eddington and McNulty.

Modal shift has been a priority for successive Governments and there are claims that HS2 will support this:

"Encouraging a shift to modes of transport with lower carbon emissions is an important element of EU and UK Government policy in addressing climate change."

However, if published estimates are correct, HS2 will only achieve modal shift of 1% from air travel and 4% from car¹. This is just a tiny fraction of users of those other modes, showing that such a claim is further propaganda and not an assessment of an environmental impact.

The non-technical summary implies that local effects are confined to just a single community whereas the reality is that the impacted area is much wider. 51m is worried that the non-technical summary fails to make it clear that construction impacts will spread up and down, all along the line. Using the word 'temporary' to describe road closures, diversions and the effects of construction vehicles for up to seven years, is disingenuous in the extreme.

The non-technical summary states that:

“Throughout construction and operation of the Phase One project, HS2 Ltd and its contractors will be required to comply with both the EMRs (Environmental Minimum Requirements) and those statutory environmental controls.”

There is, however, no reference to how such compliance will be monitored. There is regular reference to regulations, codes and memoranda which set out limits and measures for contractors. Despite these references and paragraphs that refer to theoretical monitoring, 51m cannot find any explanation how compliance will be monitored and be demonstrably independent.

The socio-economic impacts summary in this document suggests that almost 14,600 full time construction jobs and a further 5,460 jobs for suppliers will be created and that local economies will benefit from money workers will spend in local areas. As with so many other aspects of the Environmental Statement it fails to emphasise the negatives, namely the 12,700 jobs that were to be created in projects that HS2 is now preventing and the jobs and businesses that will be lost during the construction phase.

51m believes that the non-technical summary will give a reader (for example, an MP seeking an overview) a view of the proposed scheme that is skewed and rose-tinted, leading them to ask what individuals, groups and Councils are complaining about. In this respect 51m urges MPs to consider the statement that:

“Overall, the assessment concludes that the project is unlikely to result in any significant adverse effects on the special characteristics of the Chilterns AONB”

and ask how a 21 metre wide railway bed with associated cuttings or embankments can fail to adversely impact on a nationally designated (and supposedly protected) area. A few minutes spent in an internet search engine looking for 'HS1 construction' images will completely disprove this statement.

https://www.google.co.uk/search?q=hs1+construction&source=lnms&tbn=isch&sa=X&ei=ZCMHU5TfHaiM7Qa3zYDABg&ved=0CAgQ_AUoAg&biw=1366&bih=587

¹ *Economic case for HS2 (Paragraph 5.2.2, page 82); October 2013*

7) Volume 1

The introduction to Volume 1 states that a spur may be provided to enable rail access to Heathrow Airport:

“Provision has been made for extensions to the Phase One network at a later date for a future link to Heathrow Airport.”

51m believes that the Environmental Statement should have provided significantly more detail than this statement. It also feels it would be entirely reasonable for the Government to undertake a full and comprehensive consultation after the 2015 Airports commission has reported on the future of airports in the UK.

Volume 1 suggests that the extent of land take to provide the scheme is significant and 51m is not convinced that all land owners have been advised if their land is required for the scheme. 51m is also concerned that after construction there will be many small areas of unwanted (and potentially abandoned) land that cannot be returned to its former use.

The statement that it will be returned to previous use is caveated by the phrase where reasonably practicable and subject to landowner agreement. 51m feels that this gives too much flexibility to HS2 and means there is a significant risk of retaining land for other associated uses which is not acceptable.

The document seeks to make a convincing case for additional capacity on north / south railway lines:

“Further major upgrades to the existing lines in these corridors would not be sufficient to meet the long-term capacity needs for passengers or freight.”

Such a bold statement is questioned by 51m since figures show that the East Coast Main Line has not seen any growth in passengers and that HS2 will have no capacity for freight.

Volume 1 also makes a comparison between HS2 and HS1 to try and justify the project suggesting that the success of HS1 (80% of the travel market between London and Paris) is because of its high speed and centre to centre service. This is a poor argument for HS2 as it serves a very different market. To get from London to Paris by car you have to cross the Channel by ferry, which is time consuming, and there are no other rail alternatives than HS1.

Volume 1 makes much of the consultation and engagement process carried out by HS2 Ltd. 51m vigorously challenge these assertions, since the process has merely provided a voice for HS2 Ltd, enabling them to disseminate information, rather than engage in meaningful dialogue to reflect local concerns about key issues and mitigation and affect improvements to the scheme. 51m also questions the effectiveness of the Planning and Environment Forums and continues to press for a high level route-wide Forum (as for Crossrail).

With little detail provided in the (still) draft Code of Construction Practice, the Environmental Statement suggests that guidance on specific variations to core working hours and / or extra hours likely to be required will be included within the (to be developed) LEMPs after consultation with local authorities. 51m is concerned that this means Councils

will actually have little or no control on working hours which is unacceptable. HS2 are clearly planning to work outside of the defined core times but 51m does not want this to become the expectation rather than the exception.

The Environmental Statement surprisingly chooses to exclude both cranes (construction phase) and overhead line equipment (operational phase) from modelling the visual impact:

“on the basis that this rarely gives rise to significant effects if it is the only element visible.”

51m has to contest this assertion. Such infrastructure has a significant visual impact in almost any landscape, with the extent of impact dependent on location and mitigation.

8) Volume 2 – Community Forum Areas

It would not be appropriate or a good use of time for 51m to comment in detail on the individual Community Forum Area reports or map books. Individuals, communities and Councils are best placed to respond to local matters and issues, since they know their localities best. There are, however, some general points that 51m wishes to raise about the CFA reports and map books, which should be relevant to all areas.

As with so many other aspects of the Environmental Statement the CFA reports are littered with errors, inaccuracies and omissions. Basic information about communities is incorrect that raises understandable questions about the accuracy of the entire document. As the CFA reports are expected to be a key point of reference for the average reader, such errors are inexcusable.

The accompanying map books are provided to support the text, illustrating the words and setting out the construction and operational phases, as well as the range of environmental baselines. Some are misleading since they do not always properly represent the CFA report descriptions and their orientation and scale makes interpretation very difficult. Plan and profile maps are notably absent, meaning any changes to horizontal alignment are difficult to determine and assess. 51m believes that this is a significant omission and should have been available as part of the consultation, as with the draft ES.

Photomontages in the map books are also very misleading – some might argue so misleading as to be deliberately disingenuous. Not only do they generally present the line in the middle to far distance, but they also fail to properly show the overhead line equipment despite the obvious visual impacts of the gantries and catenaries. There are few, if any, down the line images.

Hidden away in one of the supporting volumes are complex instructions for how the photomontages should be viewed – suggesting the images be set a specific distance from the viewer and curved in a particular radius from the eyes. If, as suggested by HS2 Ltd, an ordinary resident need refer to ‘a few hundred pages’ which presumably would include map books and photomontages, why are such instructions not part of the map book? 51m regards this as a further example of a lack of transparency.

9) Strategic matters

9a) Noise and air quality

To assess noise, sound and vibration matters requires a lengthy paper chase cross-referencing between documents within the Environmental Statement. When the paper chase is over there is often no substance or answer found. An example is claiming that varying barrier heights will mitigate noise when there is no detail about barrier construction, because such detail depends on the Environmental Minimum requirements yet to be set and then detailed design.

51m has severe concerns about the proposed methodology to identify adverse noise impacts for both day and especially night time noise, because it believes that it will systematically underestimate impacts in areas where background noise is already low. In addition, 51m has identified a major omission, namely that there is no comprehensive sound, noise and vibration baseline assessment in the AONB (except for those places where the community lives or works).

The Environmental Statement suggests significant noise effects for individual and small groups of properties are only identified when significant observed adverse effect levels (SOAELs) set by HS2 Ltd are exceeded. If the SOAEL is not exceeded no attempt is made to consider the change in noise levels. 51m is gravely concerned about this approach, since it ignores changes that may be significant to individuals. Our belief is that the methodologies used to identify significant effects underestimates these effects to the point that the ES does not identify all properties that will suffer serious noise impacts.

Further to this, although using a sixteen hour day time LAeq is standard practice, 51m is worried that this may conceal the significance of noise impacts in the evening when all residents should have a reasonable expectation of peace and quiet. This also applies to the use of an eight hour night time LAeq, when trains will only operate for three hours. By averaging (smoothing) data across the whole period, significant impacts between 23.00 and 00.00 and between 05.00 and 07.00 are likely to be hidden.

The Environmental Statement sets a standard for limits of observed adverse effect levels (LOAELs). 51m believes that the LOAEL for HS2 should be based on the total noise not just HS2 train noise. There are significant communities along the route where the **TOTAL** noise exceeds the LOAEL but because HS2 only noise is less than the LOAEL no further assessment is proposed.

51m is also concerned that the adoption of route wide of LOEAL's and SOAEL's contradicts National Planning Policy Framework guidance. This recommends that existing noise at the site of the proposed operations and background noise levels at nearby noise-sensitive properties should be assessed. The Environmental Statement singularly fails to achieve this.

With the scale of construction proposed across the route, 51m does not believe that air quality impacts from both direct and indirect sources have been adequately assessed. The

Environmental Statement relies on the Design Manual for Roads and Bridges and fails to use any air quality monitoring data. This is not sufficient for a project of this nature. No new air quality monitoring has been undertaken and existing data held by Councils has not been used to consider localised hotspots or existing air quality issues.

Despite some significant claims about new tree planting and replacement of lost woodland the Environmental Statement does not consider the loss of existing trees and vegetation. This must be an oversight, since such losses will inevitably lead to a deterioration in levels of local air quality. Parts of the route already have poor air quality.

Further likely air quality effects have also been overlooked. Insufficient consideration has been given to cumulative traffic impacts, where both direct and indirect effects of building the line are combined. In addition, the Environmental Statement has failed to properly consider the necessary preparatory works and utility diversions that will be required and will inevitably affect air quality.

9b) Traffic and transport

51m believes that the transport assessment accompanying the Environmental Statement is fatally flawed and not fit for purpose. Indeed, many local authorities state that if such a poor transport assessment was received for any other planning proposal a developer would be asked to start again. MP's are asked to consider if the Bill's promoter should be allowed to cut corners in this way, or be expected to meet nationally recognised standards.

The transport assessment is based on a number of assumptions that cannot be examined or scrutinised without further information or additional clarification. This includes:

- Traffic count and accident data for all the sites included in the Environmental Statement
- Clarify how the various TEMPRO growth rates have been derived
- Test transport impacts with potential / likely development sites
- Identify sites where fatalities have occurred and what mitigation may be necessary
- Information to show how daily and peak hour trip generation rates were determined
- Explain why local transport models were not used to assess the impact of proposals
- Consider the traffic impacts of the scheme during an off peak period
- Provide more detailed information on the likely number and nature of mass haul trips
- Assess all new highway junctions to ensure they can operate within capacity limits
- Clarify how construction traffic impacts between CFAs is calculated
- Model all junctions shown to be significantly affected by the proposals
- Provide information about traffic management for utilities works and diversions

51m expects highway condition surveys to be carried out for the numerous haul and diversion routes. These surveys will inform work to upgrade these routes that must be carried out before construction begins. Linked to this, 51m has concerns about width and carriageway conditions across the route and expects further dialogue with Councils on mitigation or improvement proposals, such as widening or passing places.

The transport assessment assumes that no driver will choose to take a different route, change their time of travel, or use a different mode as a consequence of congestion or delays created by HS2. Such an assumption is unbelievable but excuses any assessment of the environmental impact on areas on diversion routes or known rat runs; a further failing of the Environmental Statement.

The transport assessment has assessed travel time and delays under very generic headings – severe, moderate and minor. Without proper definition or clarification such classifications are meaningless. 51m believes that time and delays should be assessed in real time, namely minutes and hours, especially for public transport services. Further, on roads served by bus services, even minor impacts affect reliability. To provide reliable services with increased congestion requires either lower service levels or increased resources.

51m urges MPs to review submissions from local transport authorities to understand the specific problems in each locality. These will share similar concerns, reservations and doubts about the fundamental way transport assessments have been conducted. 51m believes that the approach taken has helped gloss over many issues that will have a fundamental effect on people's lives.

9c) Socio-economic assessment

51m is convinced that HS2 will have a negative impact on large parts of the country's economy, during both the construction and operational phases. The KPMG business case report (commissioned by HS2 Ltd) found that during operation, the economy in Buckinghamshire would see GDP reduce by between £14m and £96m (0.1 – 0.5 per cent of total output), while Oxford Economics' assessment stated £44.2m would be lost to the Buckinghamshire economy in each year of construction. And, interestingly a survey of members of the Institute of Directors, including respondents from areas where stations are proposed, found 70 per cent believed HS2 would have no impact on their overall productivity.

The Environmental Statement suggests that the:

“Indicative rate of successful relocation is judged to be 88% and employment at these businesses will not be lost”

51m is convinced that such an assumption is flawed because:

- It is based on a single response² to an FOI request not peer-reviewed academic research
- The FOI request refers to pre-recession trading conditions in the London market
- Trading conditions are now markedly different to 2007
- The London market is not applicable route-wide

Further, the 88% figure is not supported by the source because the number of businesses continuing to trade was 173 not 183, meaning the indicative rate should be five percent

² <http://www.gamesmonitor.org.uk/files/business%20relocation%20FOI%20response.pdf>

lower (83%). Secondly only a little over half of businesses (105 of 208) continued to trade locally whilst others had to relocate over large distances. 51m believes that the figure of 1,510 jobs lost is therefore not reliable, based as it is on the use of a flawed methodology.

The Environmental Statement suggests that:

“A large proportion of employees who may lose their jobs as a consequence of their employer closing or relocating, will be able to re-enter the workforce relatively quickly given the size and strength of the relevant local labour market.”

51m asserts that the term ‘relatively quickly’ is too vague to be useful in this context. With almost a quarter of job seekers out of work for over a year, the confidence that those losing their jobs will quickly re-enter the workforce is misplaced. Such analysis should be reviewed with reference to labour market realities including the role of increased employment among the over 65s, increased part-time and increased self-employment, as well as population growth, underpinning the recent improvements in the UK labour market.

Data presented in each CFA report is taken from the most recent Census. 51m is concerned that using this data conceals local variations and differences that would be apparent if the Annual Population Survey data (APS) were analysed. Census information introduces non-standard age ranges into employment rates and frustrates on going monitoring as the age ranges of the Census do not match the working age analysis of the APS.

51m challenges the Government to prove that HS2 achieves economic benefit across the UK. There is sufficient doubt and little proof that the project can meet some of the claims made by Government Ministers and HS2 Ltd. Scrutiny of each business case has left 51m wondering what economic benefits HS2 will achieve.

10) Decision making and scrutiny

HS2 Ltd, the Department for Transport and the Government have decided that the hybrid Bill and its associated requirements are a suitable mechanism for determining the biggest infrastructure project in the UK. 51m urges MP’s to question whether this enables sufficient scrutiny and debate and if it allows for all environmental impacts to be properly assessed.

Despite the volume of materials presented in the Environmental Statement, 51m contends that there are still large omissions and inaccuracies that prevent robust conclusions being drawn about the project. Surveys and assessments critical to determining impacts remain outstanding. 51m questions how Parliament can reach a decision on the project without all the information available.

As reported elsewhere in this response, parts of the Environmental Statement read like promotional or propaganda material for HS2. Councils would not accept such an approach from developers providing information in support of a planning application. Whilst 51m recognises that the HS2 proposal is not a planning application, it fails to understand why the same level of scrutiny should not be applied by Parliament.

If this were an outline application for planning permission the information provided would be insufficient and not fit for purpose. In reality a planning authority would ask the developer to start again and submit additional information about all land affected. Additionally all Councillors would be cautious about making either positive or negative statements about the proposals ahead of Planning Committee to reduce the risk of challenge. Apparently similar rules are not applied for a hybrid Bill.

Whilst lobbying is regarded as an inappropriate activity, at Westminster MP's will inevitably be exposed to civil servants from the Department for Transport and officials from HS2 Ltd. Councils affiliated to 51m are bound by Parliamentary rules that do not allow similar approaches – a further example of inequality inherent in the hybrid Bill process.

Ironically, HS2 has been regularly scrutinised by the Transport Select Committee, the Public Accounts Committee, National Audit Office and most recently the Environmental Audit Committee. These have sought to question different aspects of the project but have failed to challenge the underlying principles of HS2 or the number of business cases.

51m is concerned that despite significant, growing and vocal opposition to HS2, the views of Parliament are influenced by arguments about economic growth and healing the north-south divide. MP's are encouraged to refer to the National Planning Policy Framework (NPPF) and consider how HS2 meets the '*exceptional circumstances*' that justify development within the greenbelt or AONB.

11) Conclusion

51m remains opposed to the HS2 proposals. It welcomes the growing number of individuals and organisations, across the country, that have joined it in challenging the business case and questioning the need for the new north-south railway. It recognises that the country needs investment in infrastructure, but believes there are better projects that can be delivered quickly, at less cost, and with better returns. It is not against growth and jobs but believes in a more balanced investment strategy, where every part of the country reaps the rewards.

51m trusts that this response to the Environmental Statement consultation will help inform MP's in their consideration of the hybrid Bill for HS2. It urges MP's to consider both the issues identified above and responses from Councils and affected communities that highlight the shortcomings and deficiencies of the Environmental Statement. 51m believes that as a result the Environmental Statement is not fit for purpose and certainly not good enough for the biggest infrastructure project in the UK.