

# **Appendix 13**



## **Assessment of Sustainability Overview**

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## 13 Assessment of Sustainability (AOS) Overview

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### Introduction

- 13.1 51m Group has commissioned evidence from expert advisors as part of its consideration of the AOS. This appendix deals with the overall AOS with carbon and acoustics dealt with in more detail in appendices 6 and 18.
- The AoS concludes that HS2 is effectively an ‘unsustainable’ project in all but the economic categories. For the reasons set out in the main response 51m considers that the economic case is fundamentally flawed and that HS2 will not meet its economic objectives. The Government’s White Paper on transport titled ‘Creating Growth, Cutting Carbon’ sets out an equitable approach to transport infrastructure that places economic expansion alongside environmental and social growth. Furthermore, sustainable development is at the heart of the planning process for all new development. New infrastructure projects, even if they are considered essential for the national interest, are not exempt from being carried out in a sustainable way.
  - Booz and Co Ltd and Temple Group Ltd were commissioned to prepare the ‘HS2 London to the West Midlands Appraisal of Sustainability’ by HS2 Ltd and the DfT. [This has managed to appraise the sustainability of HS2 to a limited extent, but the key to an appraisal is not to arrive at a negative outcome. The main aim should be appraise the project and put forward mitigation to offset any negative impacts.] The AoS should not only set out the assessment of the environmental, social and environmental impacts but demonstrate what is required to ensure HS2 is a sustainable project. This provides the links and controls necessary to ensure that the design stages will not deliver an unsustainable project. The HS2 Consultation documentation fails to set out how the final scheme can be made sustainable.
  - The AoS has only assessed regional and national impacts and no local impacts have been considered in any detail. Consequently, HS2 is likely to have much more of negative impact than that already acknowledged by HS2 Ltd.
  - The published AoS resembles an initial statement of the high level sustainability performance of HS2. It would normally be expected that a

further stage would be completed to demonstrate how the negative impacts can or will be reduced, before any decision to proceed with the project would be made. Instead the AoS is a free standing document that commits HS2 Ltd to no mitigation at the design stage. This undermines the purpose of asking for people’s opinion on the outcome of the AoS.

13.2 The following comments provide an analysis of the AoS. They consider the process by which the AoS was undertaken, and an assessment of the conclusions.

**Sustainability Appraisal Conclusions**

13.3 The main issue with the AoS is that it concludes that HS2 is effectively an ‘unsustainable’ project. The report uses a scoring system to assess a number of objectives for the project. Paragraph 4.5.1 of the AoS sets out the scoring methodology:

--	Highly unsupportive of objective
-	Unsupportive of objective
0	Neutral
+	Supportive of objective
++	Highly supportive of objective

13.4 18 sustainability objectives have been considered, against which the scoring was completed. The table below sets out the topic areas and a summary assessment of HS2’s performance against each one.

No.	Topic	Summary Score	
<b>Reducing greenhouse gas emissions and combating climate change</b>			
1	Climatic factors and adaptability	-	<b>Unsupportive</b>
2	Greenhouse gases	U	Unknown although in reality it is likely to be <b>highly unsupportive</b>
<b>Natural and cultural and resource protection and environmental enhancement</b>			
3	Landscape	- --	<b>Unsupportive to Highly Unsupportive</b>
4	Cultural heritage	- --	<b>Unsupportive to Highly Unsupportive</b>

5	Biodiversity	-	<b>Unsupportive</b> (although no consideration of local sites or protected species so likely to be highly unsupportive)
6	Water resources	--	<b>Highly Unsupportive</b>
7	Flood risk	-	<b>Unsupportive</b>
<b>Creating sustainable communities</b>			
8	Air quality	U	AoS claims it is likely to be <b>Unsupportive</b> but scores it unknown
9	Noise and vibration	-	<b>Unsupportive</b>
10	Community integrity	--	<b>Highly Unsupportive</b>
11	Accessibility	- +	<b>Unsupportive to Supportive.</b> However, this appraisal does not take into consideration loss of classic line services.
12	Health and well-being	- 0	<b>Unsupportive to Neutral</b>
13	Security and safety	0	<b>Neutral</b>
14	Economic prosperity	+ ++	<b>Supportive to Highly Supportive</b>
15	Economic welfare	- ++	<b>Unsupportive to Highly Supportive</b> (most of the sub sections in this objective score positively.
<b>Sustainable Consumption and Production</b>			
16	Soil and land resources	- 0	<b>Unsupportive to Neutral</b>
17	Waste generation	- U	<b>Unsupportive to Unknown</b>
18	Resource use	U	<b>Unknown</b>

13.5 The table above shows that HS2 will be unsupportive or neutral of all but the economic objectives. The scheme is unsupportive of any of the environmental and social objectives.

13.6 51m believes that the economic case for HS2 is seriously flawed as is set out in our response to Questions 1 and 2 and HS2 Ltd acknowledges that the scheme has no environmental or social benefits. This results in the promotion of a significantly unsustainable scheme.

13.7 In standard appraisal methodologies, if a high level plan or project scores as

poorly as HS2 has done, then either an alternative should be selected or considerable high level work should be undertaken to seek to turn the negatives into positives. This would include committing to the types of mitigations and policies necessary to ensure future implementation stages are sustainable. This approach provides the link and control between high level appraisals and ensuring the more detailed development stages can deliver sustainable outcomes. Indeed, the Government requires local authorities to take this approach when considering their own Local Development Frameworks.

- 13.8 The generic mitigation measures outlined in the AoS for each topic area are very broad and they are not set out as a specific policy requirement for later stages to adhere to. For example, the generic mitigation measures for community, accessibility, health and well-being include:
- Opportunities could be considered to enhance facilities for cyclists and pedestrians to encourage, amongst other things, healthier lifestyles.
  - Where community impacts are anticipated, notably at Euston and Washwood Heath, HS2 Ltd would work closely with local authorities and with local people, businesses and community representatives to help to ensure that issues are managed sensitively.
- 13.9 Another example of very broad generic mitigation measures are those for biodiversity, which include:
- Mitigation measures for where habitat impacts are identified, compensation could be made through optimising habitat management of site.
  - Mitigation measures for land take and fragmentation impacts could be considered where they occur along the proposed route.
- 13.10 These mitigation measures are far too generic to have any practical weight at future decision making stages. The mitigation details provide no accountability or comfort that suitable measures will be put in place in the design stage. The consultation documentation is highly non-committal regarding mitigation which undermines the point of a sustainability appraisal. Basically, the AoS for HS2 scores the project as unsustainable but there are no suggestions to seek to improve that position.
- 13.11 It would be expected that further mitigation policies would be presented at this stage to demonstrate how the project could be supportive of the sustainability goals set by HS2 Ltd as opposed to the unsupportive project it

currently is.

- 13.12 Instead of committed mitigation and detailed policies for the design stages, HS2 Ltd has instead relied on unsubstantiated sums of money to provide comfort that compensation and mitigation can be delivered. This amounts to £939 million and £215 million respectively as set out in Table 7 of the Consultation document dated February 2011, the 'Economic Case for HS2'. These sums are provided without doing any high level work as to what the mitigation may look like, its actual cost, or where it may be located. In addition there are no policy commitments to ensure design stages will take into account the sustainability objectives set by HS2 Ltd.
- 13.13 The AoS also highlights the Government's failure to follow its own political agenda if it were to proceed to the next stage of HS2. For example, the carbon impacts are considered unsupportive of HS2 Ltd's climate change objectives. This undermines the Government's assertions that all transport decisions will consider growth and carbon in equal measures as set out in:
- Creating Growth, Cutting Carbon. Transport White Paper (Jan 2011)
  - DfT's 5 year Business Plan 2011 - 2015
  - DfT's April 2011 Transport Business Case
- 13.14 It is 51m's view that there is a significant disconnect between the high level AoS and the design stages. There is no commitment to policies on specific mitigation which in turn means that there is no commitment from HS2 Ltd to find solutions to the myriad of negative environmental and social impacts they have found.

#### **No consideration of alternatives**

- 13.15 The AoS has only been carried out for one rail option, rather than as a comparative assessment of different options. The process by which the proposed route has been defined has not been carried out in an open and transparent way. By not undertaking a comparative high level assessment of the alternatives to HS2 and the proposed route, it is not possible to determine whether the scheme is the most sustainable way to meet the purported "need". The assessment highlights a range of negatives with the proposed routes and it is therefore essential to carry out a more rigorous assessment to determine whether alternatives are more sustainable.

#### **No consideration of local impacts**

- 13.16 The AoS was not developed in consultation with local authorities who are

public authorities with key environmental, social and economic responsibilities. The project has therefore been progressed without their input. Partly as a consequence, the AoS has only considered regional and national impacts and virtually no local impacts have been considered. This means that the impacts on local features such as nature reserves, landscapes and settings, employment areas and waste sites are all ignored. The AoS is therefore not an accurate (or informative) portrayal of all the sustainability impacts and thus HS2 is likely to have much more of negative impact than that already acknowledged.

#### **Lack of understanding of regional and national assets considered**

- 13.17 Even in respect of regional and national assets, the AoS does not adequately set out the specific areas that have been considered in the appraisal. It does not provide a list of all the sites that have been designated as regional or national assets. As a consequence it is not possible to fully appraise the HS2 assessment even at this very high level. For example, the AoS scores regional landscape impacts on the West Ruislip to Aylesbury route as ‘unsupportive’ of the sustainability objectives. However, in this section of the route HS2 is proposed to dissect a Country Park, an SSSI and an AONB. It is impossible to understand how this impact could be scored as anything other than “highly unsupportive”. There is no justification for the score given. This provides an example of the difficulties in scrutinising the AoS, which in turn makes the Consultation process quite meaningless.

#### **Summary**

- 13.18 All high level sustainability appraisals are open to levels of subjectivity and cannot cover every detail. The AoS should provide the start to an iterative approach to ensuring a project provides the best outcomes. The HS2 AoS does not clearly set out how sustainability has been assessed at each stage of the development process and it does not provide any links to the design stage.