



South Bucks
District Council



Buckinghamshire Authorities
c/o Buckinghamshire County Council
County Hall
Walton Street
Aylesbury
Bucks
HP20 1UA

11 July 2013

FREEPOST RTEC-AJUT-GGHH
Draft Environmental Statement Consultation
PO Box 70178
London
WC1A 9HS

Dear Sirs

**Consultation Responses on behalf of Buckinghamshire Councils to the HS2
Draft Environmental Statement**

Please find attached the response to the recent Draft Environmental Statement (ES) Consultation. We do not wish the responses to be treated as confidential:

- Draft Volume 1
- Draft Code of Construction Practice
- Report 27 Route Wide Effects
- Community Forum Area Reports 7-14

Please note that these submissions are made on behalf of all Buckinghamshire Councils, namely:

- Aylesbury Vale District Council
- Buckinghamshire County Council
- Chiltern District Council
- South Bucks District Council
- Wycombe District Council

It is expected that any published report or summary of responses to these consultations will identify all five Councils. In the attached responses the phrase 'the Councils' is used to refer to all five Buckinghamshire Councils as listed.

The Councils are frustrated that upon requesting certain information (ahead of the draft ES consultation launch on 16 May) we were constantly advised that it was not available but 'would be in the draft ES'. These hopes were dashed when the draft ES was published and the true paucity of information was revealed.

The Councils now hope to see this information ideally before publication of the final version of the ES, or at the latest, on publication. Assurances have been given that there will be an opportunity to comment on the formal ES, but it remains unclear how HS2 Ltd, its consultants, technical experts and Parliament will be able to acknowledge, review, assess, and incorporate those comments to ensure they are included and appropriately reflected within the HS2 proposals included in the Hybrid Bill.

A letter was sent to the Secretary of State for Transport on 10 June to register Buckinghamshire concerns about major deficiencies in the consultation process, and how the launch of the consultation was handled and managed.

There were a number of logistical issues with access to consultation material; incorrect material being deposited in the wrong libraries, delays in the arrival of material requested, incorrect advertisements and short notice of HS2 events in local papers. HS2 Ltd will be aware that any consultation must be properly conducted. As explained in the attached responses, the exercise undertaken in respect of the draft ES falls far short of that.

Prior to that, a letter had been sent to HS2 Ltd dated 22 May, to express concern at only being given 8 weeks to develop a response. This expectation of an extension to the consultation, coupled with trying to support and assist local communities and individuals in formulating their responses to the consultations, has created considerable resource pressures for local authorities, at a time of austerity in the public sector. A response letter was received on 8 July from Simon Burns refusing to extend the consultation period. No response has been received from HS2 Ltd.

The consultation began ahead of the Appeal Court hearings in June when a change in the Government's position was signalled. There it was stated that the eventual decision by Parliament would be approached with an open mind, would include an assessment of reasonable alternatives and that the final ES would therefore assess and invite comments on all reasonable alternatives to the current HS2 proposal.

In light of that change of position the current draft ES is inaccurate and misleading, since in Volume 1 (7.3.38) clearly states the 'reasons for rejection' for a number of alternatives to HS2. Regardless of the changing position, some reasons for rejection are inappropriate. For instance, options cannot be dismissed on grounds of cost at this stage, since cost is a matter for the decision maker not a matter to be determined during the EIA process. Indeed, to accord with the Aarhus convention, details of cost should be made public.

One of the greatest failings in the draft ES is the assessment of impacts of the HS2 proposals, both singular and cumulative, on individuals and communities, i.e. the people who are directly and indirectly affected by this major infrastructure scheme. Indeed, many people are unaware of the major effects that HS2 will have on them and the places they live, work and visit.

As the longest single linear barrier to be built through Buckinghamshire, the impact of HS2 will be significant, dividing and intrusive upon communities and their local environments. The draft ES fails to reflect this in any way and does not recognise personal property loss or the impact on visitor-based economies. Costs to society are treated in a generic fashion and presented in market terms, with no consideration, for instance, of the positive contribution that the environment makes in terms of recreation, health or wellbeing.

The scale and nature of HS2 means that it will have a much greater impact on the communities it bisects than is suggested by the draft ES. It is therefore wrong to consider it in isolation of other major infrastructure proposals, such as possible expansion at Heathrow and intensification of other transport routes. This is a further example of how cumulative impacts have been overlooked or ignored.

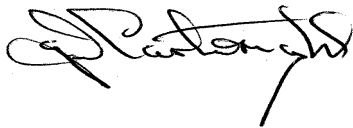
The Councils are concerned that HS2 Ltd seems intent on merely satisfying the minimum environmental standards rather than seeking to exceed them. It should be an expectation and requirement that should the project proceed, HS2 Ltd will seek to achieve the best standard of mitigation and provide adequate compensation for all individuals and communities affected.

The Councils are disappointed that the draft ES says very little about the actual impacts on the environment or how these will be mitigated. At best it suggests it will monitor and manage certain aspects, or will provide the appropriate mitigation (with very little detailed information). At worst certain assessments are absent, limited, or rely upon the statement that they will be considered in the final ES.

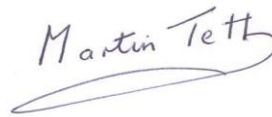
The Councils feel that this is not acceptable for such a high profile proposal and consider that an inadequate consultation exercise would be at risk of challenge if carried out by a developer or a promoting local authority.

In light of the very detailed and considerable comments that the local authorities in Buckinghamshire have made on all of these consultations, we expect to receive a report back on the responses to these matters in the coming months in advance of the formal ES being published. We will look to engage on these issues with HS2 Ltd at the HS2 Bucks and Herts Liaison Forum, which we expect to meet again in early September.

Yours faithfully,



Cllr John Cartwright
Leader, Aylesbury Vale District Council



Cllr Martin Tett
Leader, Buckinghamshire County Council



Cllr Nick Rose
Leader, Chiltern District Council



Cllr Roger Reed
Deputy Leader, South Bucks District
Council



Cllr Hugh McCarthy
Deputy Leader, Wycombe District Council