

Chapter 13



Environmental Impacts

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13 ENVIRONMENTAL IMPACTS

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- 13.1 This chapter relates to the following questions listed by the Committee:
- 6.2 - Are environmental costs and benefits (including in relation to noise) correctly accounted for in the business case?
- 13.2 The High Speed 2 (HS2) proposals will cause considerable environmental damage both during construction and throughout its life. The Appraisal of Sustainability (AoS) prepared by HS2 includes a series of objectives against which the proposals are measured, ranging from highly unsupportive through to highly supportive.
- 13.3 No aspect of HS2 scores positively in the AoS for its environmental impacts, and whilst this is not uncommon at an early stage for any major development project since it indicates where mitigation is most required, HS2 Ltd has not suggested any mitigation measures, but rather allocated an amount of funding for future investigations.
- 13.4 Further consideration and review of the AoS has highlighted that determining the total environmental costs and impact of the HS2 proposals is not currently possible, since not all the relevant information, surveys or supporting data has been either published or in many cases undertaken.
- 13.5 Since so little has been done to consider mitigation or sufficient evidence provided to demonstrate that it has, every individual and group is being asked to respond to a consultation with insufficient information or data to make an informed and balanced judgement.

APPRAISAL OF SUSTAINABILITY (AoS)

- 13.6 51m believes that not only does the AoS lack necessary detail but it is also an unsatisfactory compromise that tries and fails to meet the needs of SEA, NATA, WebTag and other guidance. The Government argues that HS2 proposals linking London and Birmingham should be considered a 'project', subject to EIA. But proposals for Phase 2, linking to Heathrow, Manchester and Leeds, suggest it is a series of projects, or possibly a programme and therefore subject to SEA.
- 13.7 The consultation documents including AoS provide no detail whatsoever about the route of the line north of Birmingham and therefore no assessment of environmental consequences is possible. Given that the line will have to go

through very environmentally sensitive areas such as across the Pennines, this is a very serious omission.

ENVIRONMENTAL COSTS

Water

- 13.8 The AoS acknowledges that HS2 will impact on groundwater and therefore does not meet DfT sustainability objectives. Any damage to groundwater could have effects on water supply that cannot necessarily be fixed, even with expensive solutions which are yet to be determined.
- 13.9 The AoS acknowledges this significant risk but fails to reassure and evidence that it can be managed. Rather the AoS assumes that money earmarked for mitigation will cover all eventualities even though the Catchment Abstraction Management Strategies (CAMS, 2007) concluded that the Colne catchment, including the Misbourne, Chess, Gade, and Bulbourne chalk streams (internationally scarce and protected habitats) was already 'over-abstracted'.

Noise

- 13.10 HSR has specific noise characteristics compared with classic rail and although HS2 have focused a lot on noise in their road shows with the noise booth, it is clear that this does not a true reflection of the impacts and they have provided little detail on the real impacts in the areas either side of the route. Fundamental to understanding the impact of noise on dwellings, business, schools, AONB etc is the production of noise contours. The only way that the noise impacts can be understood is for contours to be produced.

Planning requirements

- 13.11 Designated Areas of Outstanding Natural Beauty (AONB) are protected by national legislation, there is a presumption to refuse inappropriate development and proposals must identify exceptional circumstances for approval. 51m does not believe HS2 has yet been proven to be in the national interest and therefore there are no demonstrable exceptional circumstances.
- 13.12 Planning Policy Statement 9 (PPS9) sets out a sensible and defensible decision making process to ensure ecological impacts are properly assessed. It sets the principle that all information is collected and assessed and impacts mitigated or compensated. HS2 Ltd have proposed a single route, without assessing data, assuming that all ecological issues can be overcome, inconsistent with PPS9.

Historic environment and heritage impacts

- 13.13 A number of historic environment and heritage assets will be impacted along the route and the anticipated effects may be direct physical damage, loss of historic character, visual and noise intrusion.
- 13.14 To suggest that: 'Where practicable, the vertical alignment could be adjusted to avoid any identified deposits of archaeological significance' fails to take account of likely engineering constraints, meaning that most archaeological sites along the line would be destroyed.

Biodiversity and habitat impacts

- 13.15 The Government's Lawton Report (2010) stressed the importance of wildlife corridors, stating that one of the actions to rebuild an ecological network was enhanced connections between, or joining sites, through physical corridors, or stepping stones. As a result the Government announced its intention to take action to protect wildlife, halving the loss of habitats.
- 13.16 It also identifies that if required ecological compensation and /or mitigation cannot be delivered within the existing footprint, some form of compensatory offsetting should be provided, at minimum on a 1:1 ratio.
- 13.17 The AoS provides insufficient information about biodiversity and habitat impacts, and does not adequately consider protected species. It fails to determine how cumulative impacts may be mitigated and key species protected. 51m believes this is a significant omission.