

# SUPPLEMENT FOR HS2 CONSULTATION

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**Question 1:** is about the strategy and wider context: Do you agree that there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades?

**Enhancing capacity.** The Department for Transport and Network rail indicate a passenger growth of 50-100% over the next 20-30 years. New communications technology is likely to make those numbers even smaller. The choice is:

- Progressive improvement of the existing intercity network giving up to 150% extra capacity if required on the West Coast Mainline (WCML).
- Constructing a new line (HS2) that "locks-in" more than 250% of extra capacity.

**Enhancing performance.** The current intercity journey times in the UK are already less than in Europe where lines like HS2 exist. The choice is:

- Enhancement of the WCML system if required to increase speeds to 140mph and reduce journey times for everyone.
- The new HS2 line to Manchester and Leeds that will provide high-price, high speed journeys to less than 5% of the population.

**Economic growth.** The Government's own figures show that HS2 will not change the fact that the SE will continue to grow at twice the rate of elsewhere. The choice is:

- Improving the current intercity network (RP2) and also local/regional services especially in the Midlands & North to support their economies and regional growth.
- A new additional (HS2) line into London that will turn the regions into dormitories for the SE.

**The answer.** **NO.** All of the required capacity and performance can be provided by a progressive and affordable enhancement to the current network. Support for economic growth more evenly across the country will be achieved by enhancing local & regional services, not by the HS2 proposal.

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**Question 2:** [is about the case for high speed rail](#). Do you agree that a national high speed rail network from London to Birmingham, Leeds and Manchester (the Y network) would provide the best value for money solution (best balance of costs and benefits) for enhancing rail capacity and performance?

**What are the options?** The current rail system is an extensive network that is continuing to be developed for increased speed and widespread electrification. Most of the capacity problems are at peak times and need prompt answers.

- The Government has available a plan for enhancing the existing intercity routes with longer trains, removing bottlenecks and the prospect of further speed increases to 140mph. For the WCML, this is called RP2 and the benefits can be delivered progressively over the next 5 years. All the stations on that route will benefit from those improvements.
- Government's preference is a new Y-shaped 250mph line from London to Birmingham, Manchester and Leeds with links to Heathrow and the Channel Tunnel line. The first stage to the W Midlands would not be ready until 2026 at the earliest, and will not reach Manchester & Leeds until around 2033. The majority of towns on the route will not have HS2 stations and get no direct benefit from the service.

**Value for money.** Both the HS2 and RP2 proposals are at the outline planning stage and the published budgets and business cases continue to change substantially.

- RP2 costs about ¼ of HS2 and uses up-to-date high speed intercity trains such as the 125/140mph Virgin Pendolino. RP2 can be delivered progressively in line with demand, ensuring that the benefits will be at least twice the costs (a cost-benefit ratio of 2).
- HS2 costs £17.8 billion to Birmingham and a further £16billion to Manchester & Leeds. This is an all-or-nothing project. Even with the highly optimistic passenger forecast in the proposal, the HS2 cost-benefit will only be 1.6 i.e. less than RP2. At the more realistic passenger levels that its sister service, the Channel Tunnel link HS1 achieves, it will cost more than it delivers!

**The answer.** **NO.** All of the required capacity and performance can be provided by a progressive enhancement of the current network (e.g. RP2) that will additionally deliver a speedy solution to peak-time overcrowding. HS2 is much more expensive and unaffordable. It is highly likely to cost more than the benefits it delivers, and like HS1, would probably end up being sold off at a huge loss to the taxpayer.

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**Question 3:** This question is about how to deliver the Government's proposed network: Do you agree with the Government's proposals for the phased roll-out of a national high speed rail network, and for links to Heathrow Airport and to the High Speed 1 line to the Channel Tunnel?

## **The Government's proposed network.**

- A new Y-route (HS2) is NOT a network and it is available at only a few points to a small proportion of the country. It operates like an airline on wheels.
- RP2 would radically enhance the existing intercity and regional services and be a truly integrated network.
- The proposed HS2 links to Heathrow and the Channel Tunnel line are both half-hearted compromises indicating uncertainty over their market effectiveness.

**Phased delivery of the HS2 proposal.** Any large project like this would probably require phased delivery.

- RP2 is a progressive enhancement of the current network and is therefore ideally suited to phased delivery in line with developing market expectations.
- HS2 will take 22 years from now to be completed to Manchester and Leeds. The first phase to the W Midlands will become operational first, but even that will not be ready for 15 years. So for HS2, even with phased delivery, the wait will be several decades, by which time, the market will be radically changed, in all probability making it an expensive White Elephant.

**The answer.** **NO.** RP2 is much more suited to phased delivery in line with market demand than the all-or-nothing HS2 proposal. The Heathrow and HS1 link proposals might be worthwhile but look unconvincing in their current form.

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**Question 4:** This question is about the specification for the line between London and the West Midlands: Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook?

**The Principles used.** These can be summarised as providing selected cities with an exclusive very high speed service (HS2) that claims to be both fully integrated yet separate from the current network.

- It wrongly presumes that HS2 is the most cost-effective way of providing high speed intercity services. Progressive enhancement of the current network (RP2) is much more cost effective AND it is fully networked which HS2 is not.
- Providing an exclusive HS2 service to the fortunate few and getting everyone to pay for it is fundamentally wrong.

**The Specification used.** This stems from the needs of a 250mph line passing by Heathrow, Birmingham, Manchester & Leeds and able to run 18 trains per hour each way. The desire to join the “very high speed club” causes huge problems.

- For example increasing speed from 155mph to 250mph saves just 7 minutes from London to Birmingham, this uses 80% more energy per mile and the noise is 4 times greater.
- 250mph requires almost straight lines that cannot easily avoid communities. Many locations will need expensive tunnels and for those who aren't lucky enough, noise & vibration will be a problem 16 hours a day.
- Unless 18 trains per hour are used, the business case gets even worse. Most countries think 14-16 trains per hour is the maximum for safety reasons.

**The route selection process.** The selected route is simply the cheapest and shortest. The issue of sustainability has taken second place in the selection process in order to hide the true costs of preventing damage to the countryside and communities.

**The answer.** **NO.** The HS2 proposal is not the answer. The basic principles are more cost-effectively met by RP2. The RP2 specification creates far fewer problems by using sensible speeds (up to 140mph) on the current network. HS2 is an expensive, damaging, and possibly less safe specification. The HS2 route selection process has simply tried to minimise the ludicrous costs.

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**Question 5:** This question is about the route for the line between London and the West Midlands: Do you agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?

**The proposed route for HS2.** RP2 is the most cost-effective and least damaging solution, and it does not require a new route. The presumption that HS2 is the answer to the needs for London to Birmingham intercity rail travel is false. It doesn't matter which of the preferred routes (2.5, 3, 4) is selected, they are all wrong.

- HS2 is an expensive and hugely damaging route created for a problem that doesn't exist. Whatever the route, it will still be an unaffordable white elephant.

**The proposed mitigation for HS2.** If the sensible choice is made (RP2) there will be almost no new mitigation required. This question is seeking answers to a problem that does not need to exist.

- The fundamental issue is that a full environmental impact assessment will not be made until **after** project approval. All of the mitigation evidence presented is based on shallow and unjustified assessments of noise and other environmental damage.
- The claims are that the undesirable effects of HS2 will be reduced. That might be true but by how much, and will that still leave unacceptable damage & intrusion?
- When HS1 was developed, design requirements called "The Kent Criteria" were created. There is no evidence that even these have been applied to HS2.
- The signs are that it will be a cheap and nasty solution to a problem that doesn't need to exist.

**The answer. NO.** None of the HS2 routes is the answer. The sensible alternative RP2 meets all of the real needs without requiring a new route. Mitigation for RP2 would be minimal and easily affordable. HS2 requires huge spending not just on the basic line but also on mitigation such as tunnelling and the eyesore of screening, all of this with no guarantee that it will be fully effective.

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**Question 6: This question is about the Appraisal of Sustainability:** Do you wish to comment on the appraisal of Sustainability of the Government's proposed route between London and the West Midlands that has been published to inform this consultation?

**The Appraisal of Sustainability report.** What is offered for this consultation exercise is a half-hearted and in places simplistic appraisal of 4 key sustainability issues (see below). It is a cheap and nasty substitute for the full Environmental Impact Assessment that should have been made available.

## **Managing energy.**

- Trains at 250mph typically use twice as much energy as conventional ones at 140-150mph. RP2 will use much less energy than HS2.
- HS2 Ltd. hopes that people switching from domestic flights to HS2 will compensate for that difference. It won't; any released domestic flight slots at Heathrow for example, will be taken by international ones with much larger CO<sub>2</sub> emissions.

## **Protecting environment & resources.**

- RP2 uses the existing network and only small amounts of new land will be needed in a few places. Environment and heritage damage will be minimal.
- The new HS2 line will cause substantial environment and heritage damage and in some cases the destruction of valuable habitats.

**Sustainable communities.** This means air quality, noise & vibration and the integrity of communities. Much of the information provided is speculative and of poor quality.

- RP2 has almost no additional impact on these issues.
- The new line for HS2 will have a huge impact during & after construction.
- So far there is no proper noise & vibration assessment available to for us to assess the severity of the inevitable impact on communities.

## **Sustainable consumption.**

- RP2 will place very small additional demands on new materials to enhance the existing network.
- HS2 will require huge quantities of metal and concrete to create the hundreds of miles of new line. This will be an unacceptable waste of new materials and energy.

**The answer.** **NO.** The Appraisal of Sustainability report is wholly inadequate for the consultation process. It is no substitute at this stage for a full Environmental Impact Assessment. The implications of HS2 are of substantial and long-lasting importance and cannot be dealt with in this way. RP2 however has minimal sustainability consequences.

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**Question 7:** **This question is about blight and compensation.** Do you agree with the options set out to assist those whose properties lose a significant amount of value as a result of any new high speed line?

## **The principles for any scheme.**

- The compensation principles should recognise that there is no significant direct benefit from HS2 to the areas affected.
- The principle of “the polluter pays” should be fully implemented.
- This means that property owners require:
  - The ability to sell for whatever reason and at any time at the un-blighted value.
  - The immediate compensation for any loss in value or market distortion from the announcement of the project.
- Firm and acceptable proposals must be in place BEFORE consultation is completed, a “trust us to get it right” approach is completely unacceptable.

## **The proposed schemes.**

- A Property Bond that delivers full value to the first sale after any announcement is the only type of scheme that would be fair and enable the market to continue in a reasonable manner.
- Any scheme (such as the Compensation Bond) that delays compensation until AFTER the line begins to operate would be punitive and totally unacceptable
- Basing a scheme on Demonstrated Hardship will inevitably leave many people suffering loss but excluded from compensation. That would be unacceptable.

**The answer.** **NO.** The consultation document simply offers a series of vague possibilities. Without firm proposals in place, this element of consultation is disingenuous and unacceptable. Any proposal such as a Property Bond should ensure full and unrestricted compensation to those affected and the costs should be met by the Government.