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FREEPOST RTEC-AJUT-GGHH
HS2 Phase One Bill Environmental Statement
PO Box 70178
London
WC1A 9HS

Dear Sir or Madam

Little Chalfont Council's Response to the HS2 Environmental Statement

I have been asked to submit Little Chalfont Parish Council's response to the HS2 Environmental Statement.

This response is without prejudice to our contention that this consultation and the process of which it is part is deeply flawed. Significant impacts of the scheme have been ignored or inadequately assessed and unsupported assumptions made. Our submission is without prejudice to any addenda that we reserve the right to make after the closing date of the 27th February 2014 if, after further and reasonable examination of the documents, significant facts or information come to light.

INTRODUCTION

Little Chalfont is not in the direct construction area but will incur heavy traffic disruption and site traffic during the building period.

The Council feels that the response time allowed for comment was inadequate given the size of the Environmental Statement documentation. The omission of 877 pages of information from the memory sticks, the online copies and the hard copies of the consultation documents has led the House of Commons Standing Orders Committee and the House of Lords to extend the consultation period to the 10th and 27th February respectively. Even with the extension the Council considers that inadequate time has been allowed to evaluate and respond to a very long and complex document especially as the Christmas and new year holidays were in that period. In order to have researched the full impact HS2 would have on us, we would have expected to be given more time to respond.

Before giving our detailed comments on the Environmental Statement we would like to comment on the wider issues because at later stages we will not be permitted to oppose the construction of HS2.

Much of Little Chalfont is in the Chiltern Area of Outstanding Beauty (ANOB) which HS2 would severely spoil not only during construction but also when built. Ancient woodland is threatened with damage and destruction at the expense of future generations. The legislation makes clear the “Government’s responsibility to ensure that permanent protection is in place to guard against development that damages the ANQB’s special qualities. Natural England, the Government’s advisor, defines an ANOB as ‘- area of landscape outside a National Park that is of such outstanding natural beauty that it merits designation under the Countryside and Rights of Way Act 2000 to secure its conservation and enhancement. The construction of HS2 will in no way ‘secure its conservation and enhancement’. Indeed, once these unique national assets are destroyed, they cannot be replaced.

The proponents of HS2 believe the project would stimulate the economy and bring about a renaissance of the North. They sponsored a KPMG report that asserted that HS2 would significantly improve the connectedness of businesses and labour in many regions. It would be possible to improve current services when much of the intercity traffic moved to HS2. The BBC’s Business Editor, Robert Peston, said “...many of the gains to the regions that KPMG calculates are based on the reasonable notion that companies will be established in places where transport links are better. But it has taken no account of whether those regions actually contain available land to site newer or bigger companies or have people with the relevant skills to employ’. The National Audit Office said “There is no evidence that HS2 would promote growth and bridge the North/ South divide. HS2 Ltd itself admits that 73% of what they call “regeneration jobs” would be in London.

The business case for HS2 fails to recognise that time spent on trains can be economically productive by travellers using laptop computers and “smart” phones during journeys. Video conferencing is becoming an attractive alternative to physical meetings and the speedy introduction nationally of fast broadband could lessen the need to travel. Predictions of huge increases in passenger numbers are at best questionable.

Lessons should be learnt from HS1, where passenger numbers are substantially below forecasts and occupancy is about 55% of capacity at peak travel times. Services and train lengths have been cut, partly because of resistance to premium fare rates. The recent decision by the French to slash a €245 billion TGV expansion programme by almost 90% should also be noted. Apparently, it is not just the massive construction costs that alarm them but also the huge ongoing subsidies that are required. A high-speed service in the Netherlands has had to be rescued with a cash injection after the line’s operator ran up debts of €2.4 billion. Premium fares and only 15% occupancy are blamed. China has incurred a debt of US\$304 billion during the building of its high speed rail network. Apparently the railway system is currently able only to pay interest on the debt, and is unable to repay any of debt itself. Interestingly, the Chancellor has recently tried to persuade the Chinese government to invest in HS2.

When huge cuts in public sector spending are being forced on the Government, in order to reduce the enormous budget deficit, there seems to be no commercial case for spending £50 billion on a project, which would slow down the journeys of more people than it speeded up and which is neither “low carbon” nor “green.

The cost of the project is currently estimated by the Government to be £42.6 billion, of which £14.56 billion has been set aside as contingency funding. However another £7.5 billion will need to be spent on the high-speed trains themselves. The Treasury is said to believe that the total cost, allowing for VAT and inflation, could be in excess of £70 billion.

The focus of the development has shifted over time from speed, to connectivity and lately to capacity. If capacity is the focus, why build a non-stopping unaffordable (to the tax payer and ordinary travellers) 'white elephant'?

Supporters of the project have argued that HS2 must be built in order to defuse the "capacity time bomb threatening us". Contrary to that data from Network Rail's Utilisation Survey show that the West Coast Main Line (WCML) service into Euston is the least crowded of all lines into London after HS1. The Government's own figures released in the High Court in December 2012 showed that in the evening peak the Virgin WCML trains were on average running at 52% capacity. It seems implausible that WCML will run out of capacity in the foreseeable future. Christian Woolmer, the railway historian, writing in the Evening Standard (9th July 2013) said, *"The fundamental problem with HS2 is that the scheme was drawn up without any detailed assessment of the need for it. Yes, trains heading north out of Euston are sometimes full but there is plenty of space left on most of them, as anyone travelling on expensive peak services can testify. Much of the overcrowding is a result of Virgin Trains' policy of not allowing Milton Keynes commuters to use their services and of allowing off-peak travellers on cheaper tickets to travel only after 7pm. There is also far too high a proportion of first-class accommodation, making up four out of nine carriages (now 11 on some trains)".*

Reducing first class accommodation and lengthening trains are much cheaper and less disruptive options even with the cost of lengthening platforms. HS2 has not been shown to be in the national interest compared to investment in regional transport needs as set out in the 51M alternative. It does not form part of a national transport strategy, nor even a national rail strategy.

The forecasts for the use of the HS2 service appear very optimistic. The target of filling 18 large trains per hour looks extremely challenging. The assumption is that a large proportion of the passengers would be former users of the WCML service. However, currently there are not enough of these to achieve the desired occupancy rate and so the forecasts assume a surge in travel on this route, for reasons that are not specified and at best unclear. It is conceded by HS2 Ltd that its calculations could be upset by fares policies and the competitive response of existing mainline operators. Excess capacity could force HS2 down the route of heavy fares discounting, further undermining the economics of the project.

HS2 would leave many areas with slower train travel and the reconstruction of Euston would cause chaos for eight years and the loss of six hundred homes. A big cut in intercity services running on the "classic" mainlines is built into the Department of Transport's business case for HS2, including £7.7 billion of savings in subsidies to existing services. In the business case, these savings offset part of HS2's operating costs.

The Transport Select Committee's report published in December claimed that no alternative proposals would meet capacity and connectivity demands. Cheryl Gillan, Member of Parliament for Chesham and Amersham, response was "it is questionable how they can stand by these claims, when, apparently, they took no oral evidence from opponents of HS2 or promoters of alternative

schemes. This report is little more than an extension of the propaganda already emanating from the Department of Transport and HS2 Ltd.” The alternatives include making Paddington the new London terminus for fast services to the West Midlands, making use of the terminal’s capacity, which will be freed up by the opening of Crossrail in 2018.

The terms of reference for HS2 contained an imperative that Heathrow should be integral to the route but Heathrow does not form part of the current proposal. The proposed route does not connect directly to Birmingham and there are potentially serious connection problems at Euston, where the Northern Line suffers from serious overcrowding. Passengers for the continent would need to use this line to get to St Pancras International as there will be no through trains from the north to the continent.

We believe that alternatives should be properly considered. The proposed route would be environmentally devastating to the Chilterns, an Area of Outstanding Natural Beauty, which supposedly enjoys statutory protection. The Chilterns chalk aquifer is a vitally important water resource for Buckinghamshire and London and we have serious concerns about the impact that HS2 would have on the water table, water quality, changes to ground water flows and the potential for increased risk of flooding. We also believe that this project would prove a blight on the local economy.

The coalition prides itself on being “green” and in the Environmental Statement HS2 Ltd informs us that “High Speed Rail is considered to offer the appropriate balance between addressing climate change and economic benefits”. This statement is disingenuous as it does not tell us that trains travelling at 225 mph use nearly twice as much electricity as those moving at 125mph. HS2 would therefore result in massive increases in electricity consumption, (40% generated by burning coal) and carbon emissions. The idea that HS2’s carbon footprint would be reduced by a move to renewable and nuclear power generation is unlikely as 15 of the UK’s nuclear reactors are due to close in 2023 with only 4 replacements in prospect.

HS2 Ltd also claims that carbon emission saving will be made as travellers switch from air and road transport. By their own forecast only 923,000 journeys a year, from a total of 540 million long distance car journeys, would be taken off the roads, a reduction of just 0.17%. Emissions from air travel will not be reduced as it is not possible to fly between London and Birmingham.

OUR RESPONSE TO THE ENVIRONMENTAL STATEMENT

NON-TECHNICAL SUMMARY (NTS)

We believe that the conclusions of the Environmental Statement are suspect and for the most part indicate a failure to appreciate the impact of HS2 on Ecology, the Communities and Heritage Assets. The NTS either dismisses the impact of HS2 or even where it recognises impact, seeks to downplay it. The description of the project is essentially engineering based and reducing its environmental impact appears to have been sacrificed in the interest of cost saving. Section 10 of Volume 2 (CFA9) concludes that “No residual significant socio-economic effects are likely to arise during the construction of the Proposed Scheme.” (10.4.19). We are astonished at this incomprehensible assertion.

TRAFFIC

What the summary fails to acknowledge is the impact of HS2 beyond the designated route. Little Chalfont is not mentioned in the ES but there is no doubt our village would be badly affected during the period of construction and potentially afterwards. Many of our residents commute by car to work in neighbouring towns and there are employees of Little Chalfont companies who commute in the opposite direction. There is also a substantial volume of “through” traffic. Although the A404, which runs through the village, is not designated a transport route we believe that more traffic will use the road to avoid road works and congestion in the Amersham area where a vent shaft is proposed.

It can be assumed that the very high level of extra traffic on this route in conjunction with the regular congestion on the M25 and M40 would lead to many drivers seeking alternative routes. The most obvious of these is via the A404, from the M25 to Little Chalfont and on to the A413 at Amersham or via Cokes Lane/Nightingales Lane to the A413 in Chalfont St Giles. This would lead, to extra congestion through the village which would have an impact on all users of this road but especially commuters and those using the local schools.

SCHOOL TRAFFIC

Along the A404, between Junction 18 of the M25 and its junction with the A413 in Amersham, there are four schools and one college (two of these with a thousand pupils) whose only access is via the A404 and another four nearby schools for whom it is the main access. This means that traffic from these schools, combined with the many other schools in the area, leads to a build-up of traffic towards the evening peak which starts at 15.00 and not 17.00 as the report suggests. The morning peak starts around 7.30 and includes this school traffic and so the impact would be even more acute at these times.

Dr Challoner’s High School located in the village employs 129 teachers and support staff, 80 of whom drive to school. The catchment area is large and the majority of the almost 1100 students live outside Little Chalfont with 700 travelling by bus or train and 170 travelling by car.

There is a low bridge in the village where HGVs regularly get stuck causing widespread congestion. Presumably some of the HGV construction traffic would exceed the height limit and could have the same problem. Little Chalfont was not included in the traffic assessment when quite clearly it should have been.

CONSTRUCTION TRAFFIC

The excavation of the Amersham ventilation shaft alone will result in up to 400 single vehicle journeys per day (Vol.2 CFA8 page 144). Up to 200 of these will be made by HGVs with LGVs and cars accounting for the balance. This equates to 40 additional movements per working hour. The delays identified in the report resulting from the extra traffic associated with this construction must be expected to put lives at risk.

There is no estimate of the carbon emissions from these vehicles. Similarly there is no estimate of the additional carbon emissions of vehicles delayed by this additional traffic. The condition of the roads in the area is not of the highest quality and the additional heavy traffic will cause further

deterioration. No mention is made of reparation to councils for the damaged caused by construction vehicles.

We were told at Forum discussions with HS2 Ltd there was no intention to send heavy lorry traffic through Little Chalfont as it is not a designated route for construction traffic. There appears to be no provision to check that that will happen or any penalties that would be imposed on contractors breaking the agreement. The process for enforcement of the code of construction appears weak with the responsibility for compliance falling mainly upon the contractors and their sub-contractors.

EMERGENCY SERVICES

No mention is made of the likely impact on emergency services during the construction period. The main accident and emergency cases go to Stoke Mandeville Hospital via the A404 and A413. Amersham Hospital has around 50,000 outpatient visits per year, many from Little Chalfont, is situated in Weilden Street which is an approach road to the ventilation and intervention shaft site in Amersham. The A413 will be impacted by heavier traffic on that route. The Chilterns Crematorium is also close to the shaft construction compound and will no doubt be affected by traffic travelling to and from the numerous compounds using the A413. The Amersham bypass will be badly affected and for most journeys cannot be avoided. The area has a wide range of diverse small to medium sized manufacturing businesses with specialist, highly skilled staff. Little Chalfont is worldwide headquarters of GE Healthcare which is one of the largest employers in the area. The nearest ambulance and fire stations serving Little Chalfont are both located in Amersham approximately 2.5 miles away.

The South Central Ambulance Service serves our village and works well at present. However, they admit “delivering emergency services across Buckinghamshire is a challenge with increasing demand, significant rurality and the changing configuration of hospital services.” Its task would undoubtedly be made more difficult by any disruption to traffic flows.

The Amersham Fire Station has two fire engines. One crewed by eleven full-time firefighters the other by eleven on-call firefighters. The nearest large fire station is in High Wycombe nine miles away. The response times of both Amersham (10 minutes for a ‘live risk’ incident) and High Wycombe could be adversely affected by heavier traffic, road diversions and road closures resulting from the construction of HS2. These conditions would also affect the time taken for the on-call firefighters to arrive at the station before attending the incident. If a major incident occurred in the area which HS2 might fall under, ten pumps, supporting specialist appliances and officers would be mobilised. Support would come from a range of stations in the area like Gerrards Cross, Chesham, Great Missenden or Beaconsfield all of which would require appliances to travel on roads that might be subject to congestion or closure during the eight years of HS2 construction. The manufacturing site of GE Healthcare in Little Chalfont uses radio-active materials in its production. No provision has been made to counter any delays the emergency services might encounter in attending an incident on the site.

BUSINESS & EMPLOYMENT

The business and employment paragraph 10.4.3 in the section on Socio-Economics states that “no non-agricultural businesses have been identified, which are expected to suffer significant amenity effects from the proposed scheme.” It is estimated that the Chilterns ANOB has 55 million visits per

year which generates revenue of £400 million but no mention is made of tourism in Volume 2 of the report on the Central Chilterns (Area 9). Tourism is important to the area with shops, public houses and restaurants benefitting. Little Chalfont has frequent train services which makes it a very good start or end point for walkers wishing to enjoy the Chiltern Hills and Chess Valley. It is also a favourite destination for cyclists, who also use shops and public houses. It seems unlikely that tourism would continue on the existing scale whilst HS2 was being built, or indeed afterwards. We think HS2 would blight the visitor economy, which accounts for over 9% of all employment in Buckinghamshire.

CONCLUSION

HS2 would bring no benefits to Little Chalfont, indeed the traffic congestion, pollution and the reduction in property values during construction will be to the detriment of our residents. Our local economy would also be affected. With no local access to HS2 residents would have to travel to London to join the service making it quicker and cheaper to drive to Birmingham. It would damage and cause huge inconvenience to traffic through and around our village none of which have been addressed in the Environmental Statement. The HS2 scheme makes no business sense and it is almost impossible to think of anything less “green” than this ill conceived project on which the nation cannot afford to waste £50 billion. The 51 Group has suggested alternatives such as the upgrade of the existing network, which would deliver the same capacity at a fraction of the cost of HS2 but this has not been used as a comparator. If the proposed route is forced upon us, then we believe that the Chiltern bored tunnel should be extended to north of Wendover, which the Environmental Statement recognises would substantially reduce the damage to the environment, heritage sites and the Chilterns ANOB.

Please feel free to contact me if you require any further information from Little Chalfont Parish Council on this matter, which raises great concern for us on both a national and local level.

Yours faithfully

Janet Mason
Parish Clerk