



Buckinghamshire Rural Affairs Group (BRAG) Response to HS2 Consultation

Please refer to the following report which provides a detailed response to the current HS2 consultation on behalf of Buckinghamshire Rural Affairs Group (BRAG). In summary we are opposed to the proposals for a new high speed rail route on the basis of the failure to demonstrate the need for such a huge publically-funded investment; one which is built upon shaky presumptions that are unlikely to deliver tangible economic and social benefits to the UK, whilst also contravening the Government's commitment to sustainability and environmental conservation.

The primary objective of BRAG is to achieve a positive, lasting legacy of sustainable rural communities in Buckinghamshire and Milton Keynes – communities in which people enjoy living and working, which are economically and socially vibrant, with a full range of good quality local services and that enhance local landscapes and heritage. This vision is set out in the Rural Strategy for Buckinghamshire and Milton Keynes, published in 2008, which has formed the backbone for BRAG's work over the last few of years. BRAG has been able to gain an accurate insight into the relative health of its rural communities and the issues of most paramount concern, as well as pinpointing the priority areas for action.

The Rural Strategy directs attention to the key local issues of transport and communication, economic growth and job creation, social connectivity and community cohesion as well as the improvement in access to services and facilities. On the face of it, issues that are linked to the case for HS2. However, upon closer inspection, the proposed new high speed rail link will not serve the best interests of the county's rural communities, as it will deliver scant benefits at the expense of Buckinghamshire's cherished natural environment; an invaluable social and economic asset in its own right.

BRAG recognises the value of an increased investment in the UK rail network, as part of a strategy to improve connectivity, decentralise the national economy and reduce the reliance on long distance car and air journeys. Indeed, railways offer the potential to become gateways to the country's rural communities, providing a fast and reliable form of transport and a cheaper and viable alternative to the motorcar. However, we have significant concerns about the approach and methodology which the Government has adopted to planning and consulting on proposals for a new high speed rail network – a project of great extravagance at a time of austerity, which ignores alternative options and shows a lack of recognition of evolving work patterns and the inherent value of the natural environment. Furthermore, the Government's approach to the consultation process appears to be an opportunistic venture; one which seeks to reinforce the project's very limited virtues, rather than considering the case for alternative solutions. Whilst the county's rural communities have much to contribute to the debate, they risk being further disenfranchised by the limited approach to consultation.

We consider the HS2 proposals to be an inappropriate solution in terms of improving the UK's rail infrastructure. With a business case built upon flawed projections of demand, time savings, economic growth and modal shifts, BRAG would implore the Government to strongly reconsider its commitment to HS2. Further exploration of identified alternative options would allow for the provision of an improved railway infrastructure that can benefit communities across the UK, provide a genuine substitute to car and air travel, whilst taking the Charter for High Speed Rail and the public purse into full consideration.

This question is about the strategy and wider context (Chapter I of the main consultation document). 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?

The Buckinghamshire and Milton Keynes Rural Strategy recognises a definitive need for improved local transport provision, particularly in the county's rural communities. The associated benefits are also well-accepted; greater opportunities for the continued development of the rural economy, a social asset to communities through greater cohesion and access to surrounding services, as well as a viable solution to alleviating issues associated with congestion and environmental degradation. However, it is clear that there is no evidence to show that HS2 will provide any of these advantages to the county's rural communities, let alone support economic growth across the UK as a whole. It is BRAG's assertion that a well-developed project such as East-West Rail, which has tremendous support from communities and businesses alike, would provide many of the benefits outlined above, at a fraction of the cost.

More specifically, our very real concerns over the case for HS2 are as follows:

- The argument that high speed rail travel provides material productivity benefits is at best weak, and there is no evidence to support other wider economic benefits from faster rail travel.
- There is strong evidence that improved north/south train connectivity will not redress the economic imbalance of the UK – the opposite result from that suggested within the HS2 business case.
- The assertions made in relation to the value of time saved are at best dubious – the real issue centres on that of capacity and the preferred route and location of the proposed Birmingham station, sited well away from the city centre, openly contradicts the ability to achieve these time savings.
- There is also reason to be sceptical of the assumptions made about forecasted demand – predictions are based on inadequate modeling, showed to be excessively inflated by the current performance of HSI. Perceived demand also impacts on the proposed fare structure, which is likely to require additional public subsidy and be attractive only to a privileged few.
- Insufficient weight is given to the need to reduce travel both in response to the increased use of technology and changing work patterns and also linked to reducing one's carbon footprint. A greater investment in the roll-out of high speed broadband would contribute tremendously in this respect.
- Statements suggesting that HS2 is a 'green' alternative are inaccurate and rely wholly on the source of the electricity supply. Faster trains will contribute to a significant increase in carbon emissions, particularly as the UK's search for renewable energy alternatives continues. This will be compounded if, as BAA predicts, there is an increase in long haul flights as domestic services are withdrawn.
- The development of high speed rail must not come at the expense of the conservation and enhancement of the natural environment, a fact that is effectively ignored in the HS2 proposals. The county's rural communities are both a huge economic and social asset, encapsulating quality landscapes that are afforded protection equal to that of National Parks.

This question is about the case for high speed rail (Chapter 2 of the main consultation document). 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?

BRAG does not consider that a new national high speed rail network provides the best value for money solution. The Buckinghamshire and Milton Keynes Rural Strategy clearly outlines an appetite for improved transport connectivity in rural communities, a fact that is echoed across the UK. The fundamental problem is the inability for HS2 to address the priorities and concerns that are reflected within the Rural Strategy; issues that can be rectified in a manner which is far more cost-effective and truly reflective of local needs. Indeed, this is true of rural areas along the route, which in some cases may see a displacement of existing local services, in favour of a high speed railway system. This is seen in practice in areas along the HSI corridor, who now face a more difficult and lengthy journey than before the high speed line was introduced.

BRAG questions the true value of the project based on:

- The business case includes a number of invalid assumptions; travel time is unproductive, demand will continue to grow at a high rate and that no other improvements will be made to the rail network over the next few decades. Each has been logically challenged and when adjusted for severely undermines the long-term value attributed to HS2.
- The economic case does not include any costs, real or notional, for the damage to the environment; a tremendous oversight. The economic and social value of Buckinghamshire's countryside is demonstrable and underpins the vitality of our rural communities.
- The business case does not include any long term negative impacts in relation to the local economy or communities affected by the construction of the line and no weight is assigned to the effect of the construction phase itself, which will be lengthy and substantial. The recent discovery of gross inaccuracies linked to the disposal of spoil as part of the construction process, call into question the validity of other assumptions, including those regarding the project's value for money.
- Other options utilising the existing network to improve capacity and performance have not been adequately investigated or compared in preparing the business case. A variety of evidence, including that compiled by HS2 Ltd and Arup, suggest that better value for money can be delivered through lower cost alternatives, additional rolling stock and upgrading existing services, which can be implemented quickly and be phased to match fluctuations in demand.
- The need for additional capacity is masked by the insistence that rail infrastructure improvements must be driven by the pursuit of high speeds. Given the marginal allotted time savings and the restricted geography of the UK, target speeds more akin to European definitions may lead to other solutions that offer better value for money and are a true representation of the country's 'green' credentials.

This question is about how to deliver the Government's proposed network (Chapter 3 of the main consultation document). 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 the High Speed 1 line to the Channel Tunnel?

BRAG is opposed to the planned high speed rail network, hence we do not agree with the proposed roll-out with links to HSI and Heathrow Airport. Recent evidence suggests that this specified connectivity is not commercially viable, nor does it represent good value for money given the costs of construction and associated engineering intricacies. BRAG would suggest the Government looks at alternative options to improve connectivity to both Heathrow Airport and HSI, which are genuinely accessible to local users.

In the case of Heathrow, these should seek to alleviate significant issues of congestion due to the use of the car and excessive pressure on the nearby motorway system through linking the airport's provision for expanded connectivity with existing domestic services. With regard to HSI, the priority should be on improving the local train services that have been displaced by under-utilised high speed variants, with some commuters facing longer journey times to London than at the beginning of the 20th Century. Similarly, regional proposals such as East-West Rail, would offer genuine benefits to surrounding rural communities, at a level of investment that is very small when compared to HS2.

This question is about the specification for the line between London and the West Midlands (Chapter 4 of the main consultation document). 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?

BRAG does not agree with the methodology of the HS2 design and specification process, as outlined in the responses to Questions 1 and 2.

More specifically, we are particularly concerned at the Government's fascination with high speed which is neither necessary (with respect to achieving greater capacity), nor true to its commitment to make the UK more environmentally sustainable. The route proposals are therefore restricted by the need to travel quickly, requiring the use of excessively costly engineering works and construction phases, as well as the acquisition of rolling stock that will reach speeds of up to 400 km/h. Additionally, the route selection process appears to have ignored the guidance of well-respected engineering consultants such as Arup, who in an advisory capacity outlined alternative proposals that could be delivered using existing transport corridors, thereby minimising environmental degradation and disruption and reducing costs by linking to current rail infrastructure.

Of equal concern is the distinct lack of value attributed to the destruction of the countryside along the proposed routes; each of which dissects the Chilterns Area of Outstanding Natural Beauty, Metropolitan Green Belt as well as the attractive rural environs to the north of the county. The impact of construction will not only threaten the vitality and economic prosperity of many communities and households, but will have a substantial impact on a natural environment that is rightly revered and entitled to the greatest degree of legal protection.

This question is about the route for the line between London and the West Midlands (Chapter 5 and Annex B of the main consultation document). 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?

BRAG does not agree with the development of HS2, nor the proposed route which will run through the length of Buckinghamshire's rural heartland, disrupting many and benefitting few. Constrained by an obsession for speed and ignoring more cost-effective options which deliver equal capacity benefits, the route represents an uneconomic choice which is unnecessarily damaging to some of England's most cherished countryside. BRAG is committed to achieving a balance between sustainable development and the conservation of the natural environment; HS2 meets neither of these objectives.

Equally, the level of mitigation assigned to the line appears to be inadequate given the quality of landscapes en route; recent amendments to the route design and specification offers little to suggest that greater emphasis will be placed on adequate and effective mitigation, particularly given the associated costs. Additionally, the decision to undertake detailed environmental assessments after the selected route has been chosen seems perverse and misguided. This level of detail is essential in determining what routes may be most appropriate, whilst a detailed knowledge of an area's geography, topography and ecology must surely be essential in ensuring that mitigation is delivered

to the highest possible standard. This also raises serious concerns as to the validity of the consultation process and the ability to input into a decision which seems worryingly predetermined.

This question is about the Appraisal of Sustainability (Chapter 5 of the main consultation document). 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?

BRAG considers the sustainability appraisal to be insufficient and lacking in the necessary detail to make an informed decision as to the viability of the HS2 project. It is evident that the appraisal contains factual inaccuracies, for example HS2 Ltd's substantial under-valuation of the amount of spoil generated by the construction process.

The appraisal of sustainability represents a strategic assessment; one which ignores the consequences of HS2 at a local level. This is not satisfactory given the many local impacts which are likely to affect rural communities along the proposed route. The potential effects of noise pollution are insufficiently addressed as is the impact on local ecology, flora and fauna. Each of these need greater attention and a real sense of urgency given the Government's legal obligations to the countryside and the welfare of local residents.

It is our view that the Appraisal of Sustainability should adequately assess the economic consequences of HS2 at the local level and its relative effect on the vitality of numerous communities along the proposed route; whether this be linked to tourism or the reduced commercial viability of businesses, farmers and landowners.

The sustainability merits of the project are at best dubious. Of the 66 identified impacts associated with the construction and subsequent running of HS2, only 9 comply with sustainability objectives as set by the Government, whilst more than 50% conflict greatly with an ongoing commitment to embed 'green' principles throughout all aspects of UK society. This is not a sound basis on which to proceed with the proposed new high speed rail line.

This question is about blight and compensation (Annex A of the main consultation document). 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?

Whilst the Compensation Scheme proposals appear to accept the substantial level of blight that HS2 will impose on households, businesses and landowners along the duration of the route, many of which are long-standing and in rural areas, the mitigation deals only with that which can be assigned a monetary value. In reality, the scheme is likely to have indefinite impacts on individuals and communities who place great value on the quality of their surroundings and the sense of place that constitutes the fabric of one's home. It is unlikely that any level of mitigation would be sufficient to restore this connection.

Linked to this, the mitigation process must also reflect the impacts on the collective; communities, many of which rural, who will face significant disruption and loss of amenity throughout the proposed construction period of HS2, and beyond. This is likely to manifest itself in a variety of ways – increased traffic movements, associated air and noise pollution as well as restricted access to the countryside and, in some cases, the loss of amenities and services altogether. This will undoubtedly have a substantial impact on rural areas in particular – the Rural Strategy identifies all of these as existing issues and priorities for action. Whilst BRAG is against the development of HS2, if the proposals go ahead then adequate mitigation must be assigned to ensure these community related issues are not further accentuated and where possible, appropriately compensated.