

CUBBINGTON PARISH COUNCIL

CHAIRMAN OF THE PARISH COUNCIL: Councillor Mrs. Theresa Saul

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High Speed Rail Consultation
PO Box 59528
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20th June 2011

Dear Sir,

HIGH SPEED RAIL CONSULTATION

Since the proposals regarding the High Speed Rail project were announced, Cubbington Parish Council has been considering the implications from a local point of view and also from a wider prospective. As a result I enclose our formal comments and would request that they together with the contents of this letter, and the views expressed in it, should be treated as our submission to the public consultation.

Whilst the response is not set out using the consultation form, it is presented responding to the seven specific questions that are set out in that form. The Parish Council are confident that this will be acceptable but please let me know if this raises any problems under the procedure.

The proposed route will have severe and damaging consequences for the parish of Cubbington and the surrounding area and our very major concerns are set out in the enclosed document. However, in a wider context, we have major misgivings about the proposal to spend £750m on the HS2 project in this Parliament and the plans to spend £billions after 2015; this is an age when other essential services, such as health, police and local transport, appear to be suffering from cuts.

We also have grave concerns about the environmental damage that HS2 will cause and the fact that there is an apparent eagerness of the Government to not fall behind our neighbours in mainland Europe with high speed rail travel. We question what is the justification for this to be of such a high priority when there are so many others that are more worthy?

The Parish Council find it incomprehensible that so much importance is given to the need to shave a few minutes off rail journeys to and from London and the claim that HS2 will contribute to a solution to the north/south economic divide.

With regards to the consultation material we are of the opinion that it does not properly inform the public consultation. In the first place it is incomplete in that it does not fully examine alternatives to HS2, including enhancing existing routes or lower speed options, and fails to consider and assess adequately the environmental impacts, including noise pollution. Secondly the material does not present its evidence in a balanced way and fails to provide adequate evidence to support many of the assertions made in support of HS2.

Finally I would stress that we have taken a considerable amount of time and effort to compile our response and trust that this will be reciprocated by you in considering our response.

Yours faithfully,

Councillor Mrs. Theresa Saul
Chairman of Cubbington Parish Council

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Response to the Public Consultation on the HS2 Proposals

Question 1 – Do you agree that there is a strong case for enhancing the capacity and performance of Britain’s inter-city railway network to support economic growth over the coming decades?

Much of the evidence that has been provided in the DfT/HS2 Ltd Consultation document against this question appears to be promoting HS2 as a solution rather than concentrating on the question that has been posed, which is whether the inter-city network should be enhanced to support future economic growth. We therefore propose to concentrate on that issue in this response and defer any comments about the HS2 proposal until we consider Question 2, which is about whether the HS2 solution is the right one.

We believe that Question 1 encompasses a number of subsidiary questions:

- Is the allegation in paragraph 1.2 of the Consultation document that our railway network “dates back to the Victorian era”, and the implication therein that it is technically inadequate, justified?
- Are inter-city services overcrowded at present?
- Are the predictions of increased rail traffic in the Consultation document reliable?
- Will investment in the inter-city rail service “promote economic growth” and contribute towards closing the north-south divide?

Firstly, we will address the question of whether we have a Victorian railway. Whilst it is true that virtually all of our railway routes were laid down in the Victorian era, it is very misleading to think of them in these terms. All lines have been progressively upgraded over the years, starting with the decommissioning of steam-powered locomotives in the 1950s and 1960s. Since then trackbeds have been re-laid, welded rails have replaced fishplated jointed rails and signalling systems modernised. There has been a steady expansion of main-line overhead electrification, but there remains considerable scope for investment in this area.

The West Coast Main Line (WCML) has benefited from a £9bn upgrade and there is scope for further improvements. The Pendolino trains that are operated by Virgin Trains on this route currently operate at up to 125 mph and have the potential for 140 mph if in-cab signalling is fitted on this route. Even without this upgrade, this service meets the requirements of European Union Directive 96/48/EC Appendix 1 for existing railways, allowing the Virgin Trains service to be labelled “high speed”.

So far from being a rundown relic of the Victorian era, our existing railway network has in many respects been kept up to date and is a worthy candidate for additional investment to improve it further.

Secondly, we need to address the question of whether inter-city services are overcrowded at present. Since paragraph 1.47 of the Consultation document identifies the WCML as being the most congested of the north-south inter-city routes we will confine our comments to that route. We believe that there is not an overall overcrowding problem on the WCML at present. There is a problem with overcrowding on a small number of trains, which is at its worst on Friday evening, but overall daytime load factors are low and below what many would consider as an economically viable level. There is a particular overcrowding problem on some of the shorter inter-city commuter journeys into London, but a solution requiring modest investment has been identified.

We suggest that the problems of low overall loading factors and high peak levels of overcrowding are a symptom of poor demand management, which are largely associated with a “turn up and board” approach to selling tickets and some effects of artificial peaks that result from the current fares regulation structure. In this age of sophisticated IT systems, it should not be too difficult to introduce better demand management, reduce peak levels of demand and improve overall loading factors.

We note that some measures are already planned or are in hand to increase the capacity of WCML services, such as providing new train sets and lengthening many of the existing sets. It would however be very wasteful of resources to react to this perceived problem of overcrowding by vastly over-provisioning services and thereby reduce load factors even further.

We are also encouraged by the “Alternatives to Travel” initiative within the Department for Transport; we consider that if this is given the necessary impetus by the DfT it could make a major contribution to reducing travel demand and, therefore, any overcrowding of transport facilities.

Thirdly we need to examine the predictions of future demand for travel that have been employed for the Consultation document. These predictions have used a short-term and out of date forecasting model to project demand up to 2043. This has been done against the background of a very untypical period in recent times where the whole ethos of the railway industry in the UK has been revolutionised and passenger demand has benefited as a result; any stimulus resulting from this change will only be medium term and has probably already worked its way out to the greater extent. The future is also very uncertain and it is far from clear what impact IT will have on business, and possibly even leisure, travel demand and what the future holds in terms of fuel supply and cost problems. You cannot project forward by looking backwards.

We have only to look at the demand predictions that were made for the HS1 project to see how imprecise demand forecasting can be. The House of Commons Transport Select Committee criticised the apparent two-fold demand overestimate for this service; it appears that little has been learnt from this experience.

Any reliance on these predictions to commit to large-scale investment over a protracted period would be foolhardy. What is needed is a step by step approach that can react to changes in demand that are detected within a reasonable timescale and without the risk of wasteful over-provisioning.

Finally, there is the question of whether investment in the inter-city rail service will promote economic growth and contribute towards closing the north-south divide. Whilst it is obvious that industry and commerce needs good transport connections between our major conurbations, there is little evidence that over-provisioning capacity on rail links will do anything to promote economic growth. If investment is to be made in inter-city rail links with the aim of stimulating the economy generally or, more specifically, addressing the north-south divide, then it needs to be done in the light of evidence that can direct such expenditure to the most efficient use. This evidence appears to be sadly lacking from the proposition set out in the Consultation document.

If investment in inter-city rail links can be shown to be economically efficient, then further work needs to be done to establish which inter-city links should be the beneficiaries of this investment. However, it may well be that the regions will benefit more from investment in other rail services, such as commuter links and regional services, or that better economic stimulus can be achieved by investing in other transport modes entirely. It is even possible that more direct investment in economic regeneration projects is a more efficient way of achieving the required stimulus.

Cubbington Parish Council believes that, above all in the current economic climate, investment needs to be carefully targeted. We feel that the huge sums planned to be spent on HS2 will inevitably result in shortages of investment into other transport projects. We want to see our existing rail services improved, both main line and branch line, and wish to see any investment applied broadly, in order to benefit the majority rather than the few.

Question 2 – 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?

No. On the basis that the demand predictions are suspect, the business plan does not stand close scrutiny and the economic benefits are not proven, then HS2 cannot be classified as an “investment” at all; it is a multi-billion pound gamble.

We have an example of a previous “investment” in high speed rail by which to judge the HS2 proposal and that is HS1. The recent agreement with two Canadian pension funds returned only £2.1bn to the Exchequer on a project which cost over £5bn to build; this is a strange concept of investment. It appears that HS1 has not been good value for money, neither has it generated the demand that was forecast.

Cubbington Parish Council regrets that large sums of money are being spent at the moment on HS2, with a budget of around £750m for this current Parliament. This is at a time when our residents are feeling the effects of cuts in central grants to local government. In the area of transport, the effects of these cuts are only too real to our residents. The subsidy to our local bus service to Leamington Spa, upon which many of our residents rely, is under threat and we stand to lose evening and weekend services from the schedule.

We favour a prudent and distributed approach to transport investment and one which will bring benefit to the most people. Any expenditure must be made within the context of an overall and well thought out transport policy. The HS2 proposals do not fit in with this approach at all.

There may well be a place for further investment in inter-city rail services within such an overall transport policy; however we do not think that massive investment in new routes is the right way forward. We are aware that proposals were prepared for the DfT for a number of upgrades to sections of the WCML and that these were grouped into an overall scheme dubbed "Rail Package 2". We favour this approach to increasing the capacity of WCML services as it is cheaper, far more sustainable and gives better value for money than HS2. It also permits the step by step approach to increasing capacity that we suggested in our response to Question 1. Above all any urgent requirements can be addressed by Rail Package 2 much more speedily than by HS2, which will have no impact until 2026.

Question 3 – 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?

Cublington Parish Council is strongly of the opinion that the HS2 proposals should not proceed at all, so the matter of phasing is largely immaterial to us. We do not think that the UK needs the proposed network. It will only benefit a very small number of the largest cities in our country and only a very small fraction of the total number of rail users. It is a regressive proposal, in that it will use the proceeds of taxation on the many to subsidise the travel of a well-off few, a point that has been expressed by the Sustainable Development Commission in its report *Fairness in a Car Dependent Society*. Any benefits that may be realised from HS2 will largely fall on the largest conurbations; the needs of rural and town communities are totally ignored by the proposal.

We do however feel that there is some confusion about the scope of this public consultation, resulting from the extensions to Manchester and Leeds being the subject of a further consultation next year. It appears that some of the benefits that these extensions are claimed to offer, such as a better CBR and carbon emissions budget, are being put forward for consideration in this present consultation. Legislation for these extensions will, according to the timescales in the Consultation document, not be put to this current Parliament, but will be delayed until the next. Since one Parliament is not in the position to commit the next to any particular course of action, this places an uncertainty on whether the Manchester and Leeds extensions will ever be realised.

We feel strongly that this approach is wrong. Either the London to Birmingham section should be considered and consulted on as a route in isolation, or the full London-Birmingham-Manchester-Leeds network, including details of the route, should be the subject of the consultation. This principle should also extend to the Hybrid Bill, which should cover the full network. This approach would not preclude the phasing of the construction.

Question 4 – 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 work which HS2 Ltd has undertaken is flawed in two major respects; it has assumed that a new high speed rail line will be built without questioning its suitability for our crowded island and it has set a maximum speed which has led to a design which compromises any claim that the approach is consistent with the principles of sustainable development.

Cublington Parish Council views the work by HS2 Ltd as incomplete and, from the point of view of the public consultation, not fit for purpose. Only a very narrow range of options has been investigated, all of which involve building a new high speed line. England is a small country compared to many of our neighbours in Continental Europe, such as France and Spain, and we do not have swathes of countryside to absorb the impact of such a large construction project.

Using even a fraction of the resources required to realise HS2 in other ways, such as updating our present railway system, would benefit a greater number of the population and would not cause such widespread decimation to our countryside. This is the true path to sustainable development.

There are elements of our railway network that desperately need investment and increasing the proportion of track miles that are electrified (currently less than half) would make a big contribution to making powering the railways potentially more sustainable. After a period of neglect our road network is crying out for investment, to make journeys by bus or car easier, particularly for those in the rural areas.

Question 5 – 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?

No. It is difficult to imagine that a proposal to build a new London to Birmingham line could have been conceived that causes more environmental or social damage than the one that has been put forward for public consultation. It is clearly the case that the claimed, yet unproven, economic benefits have been allowed to take too great a priority over the economic and social damage that the proposal will cause. It is also apparent that the advantage to the few is being allowed to override the well-being of the many who will suffer from the effects of HS2 and the vast majority that will be required to contribute to the costs but will derive no benefit at all from it.

The Consultation document appears to regard mitigation as a sufficient salve for environmental damage; it is not. The truly sustainable approach is to minimise the environmental damage in the first place and the current HS2 proposal clearly fails to do this.

We in Cublington have seen how mitigation has very limited benefit in the realignment that was published in September last year. In our neighbourhood the aim was to take

the line of the route away from the nearby village of Stoneleigh, which is about 4.5 km north of Cubbington along the line of the track. The aim of the realignment appeared to be to move the track about 500 metres further away from Stoneleigh, but retain the original alignment as soon as possible on the sections of track north and south of Stoneleigh.

However because of the constraints imposed by the minimum curve radius, the displacement from the original alignment is still about 150 metres when the track reaches Cubbington, bringing HS2 closer to our village. There is a similar effect to the north of Stoneleigh, where Kenilworth suffers. This seems to be a feature of HS2 design; if the design is changed to improve the situation for one settlement, then another is almost bound to suffer a worse situation.

Question 6 – 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?

Yes. Cubbington Parish Council views the Appraisal of Sustainability as flawed. We hold this view because the document starts from two assumptions:

- That the construction of a new high speed rail link between London and Birmingham is the only possible solution to increasing passenger capacity on that route, when there are clearly other more sustainable solutions that should be considered also.
- That the design must cater for a maximum operating speed of 400 kph, when clearly lower design speeds offer a more sustainable approach that should also be considered.

The Appraisal of Sustainability also fails to provide our community with sufficient information on the levels of noise pollution that we will suffer. We were promised “noise contour maps” by the Secretary of State for Transport when he announced the public consultation to the House of Commons on 20th December 2010. All that has been provided in the Appraisal of Sustainability is the drawing series HS2-BZT-00-DR-SU-003-00 to HS2-BZT-00-DR-SU-003-42 (within section 3.5 of Volume 2); these drawings are described as “Residential Airborne Noise Appraisal Maps”. These are clearly not noise contour maps and provide insufficient data to enable our residents to make an assessment of how bad the noise nuisance will be around their dwellings. Since noise pollution is one of the chief concerns of our community, this is clearly a major shortcoming of the Appraisal of Sustainability.

We also have major misgivings about the methodology that is being employed by HS2 Ltd to assess noise pollution levels and are willing to discuss these in detail with HS2 Ltd should we be given the opportunity.

In the light of these observations about the Appraisal of Sustainability the Cubbington Parish Council regards it as not fit for the purpose of properly informing the public consultation.

The effects from HS2 that Cubbington Parish will suffer receive scant consideration in the Appraisal of Sustainability. The maps that cover the section of the route that passes through Cubbington are drawings HS2-ARP-00-DR-RW-04021 and HS2-ARP-00-DR-RW-04022.

The route passes through the countryside to the east of our village, passing within 450 metres of its eastern edge; this area is an important recreational resource for our community and is much utilised and enjoyed by ramblers, dog walkers, our children and many others who appreciate this stretch of unspoilt countryside which is only ten minutes walk from the village. The long distance Shakespeare's Avon Way footpath passes through this area and, as a result, our parish is host to many ramblers from far afield.

Cubbington Parish Council has many concerns about the impacts of HS2 on the dwellings and the environment within our parish, particularly as these effects are not sufficiently detailed in the Appraisal of Sustainability. Chief amongst our concerns are:

- The Cubbington Church of England Primary School is located on the eastern edge of the village. Its grounds are a mere 600 metres from the proposed centreline of the track. We are concerned that noise pollution will blight our children's educations.
- The heart of our community, centred on our church which has its origins in the early twelfth century, is less than one kilometre away from the route.
- Our much loved designated ancient woodland, South Cubbington Wood, will be largely destroyed by the excavation of a huge cutting for HS2. This is a valuable wildlife habitat and recreational resource. It is home to a number of rare plants, including small-leaved lime and wild service trees. Once destroyed it will be lost forever.
- Our National Champion wild pear tree lies directly in the path of the proposed HS2 cutting and will be destroyed by its construction.
- The beautiful and unspoilt valley of the River Leam will be badly despoiled by the construction of an embankment and viaduct for HS2.
- A number of dwellings outside the village proper will suffer worse effects than the village. In particular properties near where HS2 will cross the A445 Leicester Lane will be as close as 125 metres to the proposed track centreline, where the track is approximately at ground level. These properties will also suffer badly from the works necessary to reroute the A445 to construct a bridge to take the road over the railway.

In the foreword to the document *Securing the Future* that was published by the UK Government in 2005, the then Prime Minister, Tony Blair, comments:

Make the wrong choices now and future generations will live with a changed climate, depleted resources and without the green space and biodiversity that contribute both to our standard of living and our quality of life. Each of us needs to make the right choices to secure a future that is fairer, where we can all live within our environmental limits. This means sustainable development.

It far from clear that the present Government is following this advice; it appears that the environment still comes a very poor second best when the glamour of a large scale project beckons. The Government does not appear to appreciate just how importantly many people regard protecting the environment from irreversible damage and that many feel that we have gone much too far in damaging our environmental legacy to future generations already. The apparent disregard for the environment that the DfT is demonstrating is, to say the least, very disappointing from the “greenest government ever” (the Prime Minister, 14th May 2010).

Question 7 – 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?

Cubbington Parish Council wishes to reserve its position on the matter of the details of a scheme to assist property owners until the public consultation is held next year. However we strongly support the principle of a scheme to operate in addition to the rather poor statutory provisions that are in place and wish to make the following general comments that we hope will assist the DfT in formulating proposals for next year’s consultation.

- We consider it unfair to expect property owners to effectively contribute towards the overall cost of HS2 by suffering a loss on the unblighted value of their property should they wish to sell it, for whatever reason.
- The 15% threshold below the unblighted price that has been operating for the Exceptional Hardship Scheme is unfair in that it inevitably requires that some property owners will suffer a financial loss when they sell.
- Any scheme should reflect the true geographical impact of HS2 on the property market, rather than setting arbitrary proximity criteria.
- Property owners should not feel trapped in their dwellings by a depressed property market. The Government should be there in support of the market to prevent this.
- Any decisions taken by the body adjudicating on the scheme, and the reasons for those decisions, should be subject to public scrutiny.
- If the decisions are to be at the discretion of the Secretary of State, then he should be prepared to justify his decision to the appellant; our experience of the EHS has shown us that this has not been the case. Also it is vital, in the interests of fair play, that there is an appeal mechanism available to appellants to challenge any decision that they consider unfair.

We suggest that an appropriate first step for the Government in preparing for next year’s consultation would be to carry out a review of the operation of the Exceptional Hardship Scheme, the results of which should be published. We are concerned by information that was obtained at a recent HS2 Ltd seminar, that only one in four appellants is successful. We suggest that the review of the EHS should determine why the success rate is so low and analyse the failures in terms of the five criteria which apply.

If the DfT plans to consult on only one of the compensation scheme options that are described in the Consultation document, then we would prefer that to be a bond-based property purchase scheme, as we believe that that would offer the best chance of satisfying our requirements that are set out above.