

HS2 Consultation Response
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Introduction

I am responding as the MP for Ruislip Northwood and Pinner. The proposed route will pass through my constituency. It is clear from my extensive local engagement with residents that there is widespread opposition to the current HS2 proposal. This extends far beyond the relatively small number of households directly affected by proximity to the line. Furthermore the nature of the consultation has annoyed and upset many of my constituents. The residents of Harefield for example, are angry that there is no mention of the village even though the proposed viaduct across the Colne Valley changes their environment dramatically. Some have regretted the absence of a public enquiry into a project of this magnitude. Many believe that this consultation is the critical stage in the process because if a green light is given at the year-end by the Secretary of State then it will be very difficult to reverse. So this first decision will have profound consequences, not just for the area that I represent but for many other areas in the country that will pay a significant cost and receive no benefit. Given what is at stake, there is dismay at the lack of information or hard evidence on which to base any decision or meaningful response to the consultation. This reinforces their resentment at being dismissed as "Nimbys". Many have made the point that they would be prepared to accept some sacrifice if there was an overwhelming case made in the national interest. So far they feel that the case has not been made.

Question 1

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?

Few constituents would argue with the need to enhance the capacity of Britain's rail network. Our ability to compete and grow will depend in part on our ability to move people and goods quickly and cheaply. I also strongly support the emphasis that the Government places on the need to reconcile that economic challenge with minimising our impact on the environment. However, I and many others would expect the discussion on our need to risk £32 billion of taxpayers money on the construction of the proposed High Speed Rail Y Network to take place in a wider strategic context that considers the most effective integration and modernisation of our road; rail and airport networks .This debate is absent from the consultation.

In the context of rail, some constituents have pointed out that we already have a relatively fast and frequent intercity rail service. Manchester and Birmingham are not difficult places to get to. They wish to make the point that the major frustration with the rail network lies in the quality of intraregional and intraurban services, both of which are ignored by this consultation.

However, I do personally accept that there is a need to enhance capacity of the intercity network, and safeguard the long term reliability of this crucial service. I can also see that there will be pressures to reduce journey times and therefore Higher Speed Rail is very desirable, not least to get people off transport modes that generate more carbon. The issue is how much enhancement is required (in terms of both capacity and speed) and what is the best value package for delivering it? The core question is whether a new line is justified or whether we should focus on enhancing existing infrastructure. The key test then is the validity of growth projections. The case for HS2 and a new line depends on continued high levels of growth in demand for intercity rail travel and therefore the need to increase capacity on a very large scale. However, serious questions have been raised. First of all there is the very poor track record of the industry in forecasting demand, not least HS1 which is apparently running at almost a third of the anticipated demand at this point in time. With respect to HS2, confidence has not been enhanced by changes over the last two years to estimates of demand and the make-up of that demand. I understand from analysis produced by HS2 Action Alliance that a 35 year forecasting period is very unusual and raises concerns about whether enough account has been taken of demand saturation. Yes, there has been rapid growth since 1995 but is it right to assume that the drivers of demand are still valid over that long a time period? It is also strange that there is so little discussion on anticipated fares and the impact of competition from so called "classic rail". I would expect to see more sensitivity analysis. A number of analysts have argued that the Department's forecasting model is outdated not least in assuming the same old relationship between economic growth and demand. For many of my constituents the issue is straightforward: they cannot see where the forecasted demand is going to come from, not least as the Department itself are rightly cautious on modal shift assumptions. There is also concern that the business case rests on the network achieving 18 trains per hour even though the technology does not apparently exist to facilitate that frequency (even if you could fill the trains). Given the scale of public expenditure involved and the environmental cost of a new line, they feel that this proposal needs to be backed with less assertion and more evidence and robust analysis.

The same applies to the question of economic regeneration. I believe that an enhanced intercity rail network may well contribute to growth but so can many other things. Most of us have a strong sense of the national interest and the need to support both the growth and spread of prosperity. However, as tax payers we need better evidence that HS2 will deliver the regeneration effects that are claimed. Various studies, including the Eddington Transport Review and evidence from Professor John Tomaney to the Transport Select Committee, are sceptical. Many constituents point to HS2's own assessment that over 70% of the new jobs will be in London and ask how that benefits the North? I also support the view that the argument on job generation cannot be made just on the basis of direct employment generated by construction: this must be about the consequences of the operation and the capacity to generate net new jobs that are not just displaced from other areas. Furthermore, there is a strong feeling that the claimed tourism benefits will be felt by London and not the regions. International comparisons are cited but not explored in any detail.

So, there may well be a strong case for enhancing capacity of the intercity rail network. However the taxpayer can reasonably expect to access a robust and

transparent analysis of the various options in order to have confidence that the best value option is being pursued. This consultation has not generated that confidence.

Question 2

Do you agree that the 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 cost benefits) for enhancing rail capacity and performance?

The clear majority view in my constituency, from those who have engaged with the matter, is that the high speed Y Network is unlikely to be the best value for money option. Furthermore there is considerable frustration at what is seen as a failure to take seriously some alternatives that may be less glamorous but potentially carry a better risk/reward ratio.

I have already expressed concerns about the validity of the demand projections for HS2. There are also doubts about the estimate of benefits. The Oxera report on the Government's case for a High Speed Rail programme prepared for the Transport Select Committee points to the fact that the largest component of the monetised estimated benefits of high-speed rail are apparently attributed to the hypothetical value of journey time savings. In the case of the HS2 (London–Birmingham) proposal I understand that the value of attributed to time saving represents some £5.7 billion out of the £20.6 billion of total benefits, or 28%.¹ In the case of the Y Network the attributed value of time saving represents £14bn billion of the total £44bn benefits or 31%.² The explicit premise is that time spent on trains is wasted. This seems very remote from the experience of both business and leisure travellers in 2011, let alone in 2033 with all the anticipated progress in technology. The valuation of time is complex, but this looks a very shaky foundation on which to build a business case for spending £32 billion of taxpayers money on building a new railway line.

History is on the side of those sceptics who believe that HS2 benefits are likely to be overstated and costs underestimated. Given relatively low benefit cost ratios, this is not reassuring. It is also felt that the claimed benefits have been distorted by comparisons being made with a 'do – minimum' scenario over the next 30 years - which is unrealistic and Rail Package 2 – which could be improved. Furthermore, there are many people who are concerned that so little weight appears to be given to the environmental and social cost of this project. In my constituency, residents of Ickenham and Harefield are dismayed at the impact of the proposed viaduct on the beautiful Colne Valley. The loss of the Hillingdon Outdoor Activities Centre will be keenly felt by thousands of children who use it (40,000 visitors a year). Many of my constituents walk in the Chilterns and do not understand why so little value appears to be attached to this area of Outstanding Natural Beauty. I understand that further 'up the line' there is even more concern about the environmental damage. The process of construction will also carry a cost to the local economies, which do not

¹ Review of the Government's Case for a High Speed Rail Programme, Oxera, 20th June 2011, 3.2, P. 7, <http://www.oxera.com/cmsDocuments/Advice%20on%20the%20government's%20high-speed%20rail%20programme%20200611.pdf>

² <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmtran/writev/rail/m153.htm>

appear to have been factored in. For example in my constituency alone, a number of important arterial roads (Ickenham Road, Breakspear Road South and Harvil Road) will be closed which in turn will significantly increase congestion and damage the local economy.

The project makes no sense if it is just about getting to Birmingham a little faster. The benefit to cost ratio of Phase 1 is small; the carbon cost high and other options to increase capacity, such as RP2 or an optimised variant, would almost certainly deliver better value. As the consultation makes clear, this is about the Y and the prospect of significant savings in journey time to Manchester and Leeds. However there can be no meaningful debate about the merits of the Y Network as no route has been selected, and there is no serious analysis of alternatives. This is frustrating to my constituents as they feel that the full project should have been consulted on with much more information available to the country in order to make an assessment of whether it is worth taking the next, critical step.

Finally, there are a significant number of “armchair analysts” in my constituency who have done their homework. They point to apparently serious analysis, not least by ‘51m’ and their “Optimised Alternative”, which appears to show significant potential to increase capacity by upgrading the existing network, with significantly lower costs and ongoing taxpayer subsidy. They also believe that this will release benefits much faster than HS2 and these benefits could be more widely spread across the country. They argue that given the huge risks involved with HS2 and the tremendous uncertainty around long term forecasts, it makes more sense to focus at this time on an incremental approach. Yes there will be some disruption to services but this needs to be set against the massive disruption that HS2 will generate, not least at Euston for 7-8 years, For all these reasons, there is little confidence in my constituency that HS2 represents the best value option for the taxpayer. I have sympathy with those who feel that a genuinely independent and transparent comparison of options would be desirable.

Question 3

Do you agree with the Government's proposals for a phased roll-out of a national high speed network and for links to Heathrow and the High Speed 1 line to the Channel Tunnel?

Question 4

Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for high speed rail lines and the route selection process HS2 Ltd undertook?

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?

I will take these questions together. It is worth repeating my concern that the HS2 proposal has not persuaded the majority of my constituents that a new line is required versus the option of enhancing existing infrastructure on an incremental basis. The premise of these questions is that a new line is required.

For reasons that I have explained, there is frustration that the Government is taking a two phased approach to consultation. Given the lack of information on the proposals beyond Birmingham, it is hard to see how anyone can make considered judgements on value for money if we do not know the route and therefore have no robust analysis of likely costs and social; environmental and economic impacts. Furthermore In theory this could result in the London to Birmingham route being built with no agreement or funding being secured for the Y Network. The local view is that we should have had the chance to assess the detail and feasibility of the whole Y Network.

Of particular concern is the proposal for linking HS2 to Heathrow. Hillingdon Council have warned that this may in time reopen the debate about a third runway at Heathrow, which faces implacable opposition in the Borough. There are two further concerns. First there is frustration that there is such vagueness about route options, even though any loop could have a profound impact on the area- not least Ickenham. The second concern is about the lack of a business case. While on the face of it there is logic in seeking to connect HS2 with a key transport hub, the taxpayer would expect to see this underpinned by a robust and credible business case. None is presented, other than an assertion about a "compelling strategic case". This seems to contradict HS2's own report to Government in March 2010 which makes it clear that they do not expect significant modal shift from passengers flying from the North West or the Midlands. Indeed they forecasted the equivalent of just one train load each way per day. The current rail links from London to Heathrow are very good so, it is not clear what this compelling strategic case is in reality. The lack of one is puzzling and it matters because it seems that the Heathrow link has been the primary driver of selecting this Western route with all the environmental costs attached to it. In the absence of a robust case for a Heathrow loop, the logic must be to explore more direct route options North alongside existing transport corridors.

The other issue concerns speed. The faster the speed required the less flexibility on the route. Designing a 250 mph railway reduces the options considerably. However, I am not convinced that the ability to travel at that speed will matter so much to the business or leisure traveller that it justifies this hugely expensive option above others. The problem at the moment is apparently crowding and reliability not so much journey time, which you plan for and can use productively. I have already argued that the economic benefits of reduced journey time have been exaggerated. Even so the intercity network is already quick and could be made quicker still with enhancements. The question is How High Speed do we need to be? Since HS2 have produced no substantive evidence of consumer attitudes to back their assertions, the question remains open. If we can compromise on speed a little then more route options open up which carry much less environmental cost. It is disappointing that there has not been more debate on this issue or assessment of different cost benefit scenarios.

In relation to mitigation impacts, I just have two points. First you cannot mitigate a new viaduct across a beautiful valley and area of lakes. The second is around noise. On one level of course all HS2 noise is 'new noise' and therefore unwelcome to my constituents. There is also concern about the lack of clarity on night time noise which will be a particular concern. I have listened in the Arup sound studio to simulations of noise impact in three different locations in my constituency – all at different distances from the proposed track. In preparing these simulations, some assumptions were made about noise mitigation measures. However there is no guarantee that these will be the mitigation measures adopted. Therefore I have to report considerable local scepticism about the mitigation measures proposed and the frustration about lack of certainty.

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?

I would simply say that many constituents feel that there should have been a full Environmental Impact Assessment at this stage, rather than this compromise. Furthermore the Appraisal does not address the local environmental impacts in sufficient detail. Having said that, it is worth noting that the appraisal makes clear that the project does not support any of the sustainability objectives. In short there is no environmental case.

There is also some local scepticism about the claim for carbon neutrality for the Y project; given the energy intensiveness of the project and the low levels of anticipated modal shift. Furthermore, BAA have made it clear that any freed capacity at Heathrow is likely to be filled by long haul flights which generate significantly more carbon (and it is not clear that this has been factored in).

I have also received a report from a local Geological Society that is very concerned about the impact of tunnelling on the aquifers that provide water for the region. This concern is backed up by some apparently serious research.

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?

The main point to register is that blight is now real and confirmed by local estate agents. I support the principle of the Exceptional Hardship Scheme, although some constituents feel that it should be renamed. However, I am uncomfortable about the restriction on it and consequences for homeowners who do not have to move now but whose freedom to do so in future is now seriously curtailed or can only be bought by offering significant discounts on the value of their homes.

The other point is that many constituents have said that they found it was hard to respond to this question, again because of the lack of meaningful information. There

is some support for a "bond based scheme" as long as it addresses the wider impacts on the community.

Conclusion

There is a strong case for enhancing the reliability of the rail network. A faster intercity service to the North is desirable. However, the taxpayer needs to feel confidence that the Government has been sufficiently rigorous in assessing the options before making such a big decision on their behalf. There is insufficient confidence in the validity of the HS2 business case and there is no environmental case. The superficial arguments for a Heathrow link need to be re-considered, not least if such a link is the primary reason for choosing a route that contains such a big environmental cost.

-ENDS-