



Campaign to Protect
Rural England

High Speed Rail Consultation A CPRE Briefing – March 2011

The Campaign to Protect Rural England (CPRE) supports the principle of new rail capacity but is very concerned both about the way the High Speed 2 (HS2) proposals are being currently being progressed and their detail.

We have produced a research report called *Getting Back on Track* that sets out our concerns in greater depth and which is available on our website. Our key concerns are:

- **HS2 needs a wider transport strategy to fit into.** At present HS2 sits in a policy vacuum, following the welcome cancellation of new runways and the commitment to make ‘rail the long distance mode of choice’. The previous Government proposed to publish a strategic transport White Paper in 2012 as the final part of its *Delivering a Sustainable Transport System* work. There is no strategic overarching policy proposed in the Department for Transport’s business plan which covers the period up to 2015. HS2 is still being planned around previous policy and assumptions, such as a 178% increase in domestic flights and petrol costing £1.25 (in 2009 prices) a litre in 2030.
- **The public needs to be given more opportunity to participate in the planning of HS2.** We believe planning should be a participative process rather than just involve a consultation once detailed plans have been drawn up. On the continent there is widespread public participation throughout the process of creating plans for high speed lines – from working out initial objectives and broad potential corridors before considering potential routes and then finally precise alignments. The Rt Hon Greg Clark MP, Minister for Decentralisation, said in a speech in November that “The last government resorted to imposition - this government believes in participation.”

There is only one option on offer for the Government’s High Speed Rail consultation. It may be that national interests do need to take precedence in some places over local interests. In order to ensure that local people feel they have been dealt with fairly, they need to be involved in the process, rather than just given an opportunity to feed into a consultation many are already saying is a done deal. The evidence from the Channel Tunnel Rail Link (High Speed 1) and other major projects is that early and full public involvement can reduce opposition and lead to better design and delivery of projects

- **The 250mph straitjacket should be abandoned.** The aim to make HS2 the fastest railway in the world means that very few route choices are possible. HS2 would have to be so straight it could not follow valleys, railways or roads but would slice through open countryside. The justification that we need to keep up with China is not a persuasive one: many Chinese lines being planned are only aiming for 200mph or 220mph speeds, while the few that are being designed for 250mph are as much as over three times as long as our lines. In Europe and America the fastest lines being proposed are 220mph.
- **Protecting tranquillity needs to be taken more seriously.** Although the Secretary of State has stated that he loves the ‘beauty and tranquillity’ of our countryside, HS2 Ltd has subsequently confirmed to CPRE that protecting tranquil areas of the countryside ‘has not formed part of our methodology to date’. Indeed the Appraisal of Sustainability states that HS2’s impact on tranquillity remains ‘unknown’. A recent review of the EU’s Environmental Noise Directive has revealed that there has been a failure to protect quiet areas from intrusion and that clearer rules were needed. HS2 is a long term project that needs to be designed for the stricter environmental standards likely to be in force when it operates, not simply those in force today.

Consultation Questions

We are still in the process of consulting our branches and members about the consultation questions but have produced the following answers to some of the questions based on our previous policy and research.

i) 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?

12. Major rail enhancements are needed, not just to support economic prosperity but to secure other goals such as tackling climate change, reducing social exclusion, improving quality of life and reducing the overall impact of the transport system on the natural environment. We use the phrase economic prosperity rather than growth because it is important that our economy is resilient against extreme weather, oil price spikes etc.

13. Although inter-city routes are important, investment will produce the greatest benefits if it is drawn up as part of a nationwide transport strategy. This needs to include improvements to the whole rail network, including regional and rural branch lines that feed into main lines, as well as complementary transport and land use planning to secure modal shift and regeneration.

ii) 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?

14. There already is a national HSR network, which is defined in UK law as comprising of the West Coast, East Coast and Great Western Main Lines as well as High Speed 1. There is a good case for a new line between London and the Midlands, to relieve congested main lines that have very limited potential to provide train paths for additional passenger or freight services.

15. Until a study into the best options for major improvements to rail connectivity between and within the Midlands and the North is completed, it would be premature to come to any conclusion that new High Speed Lines north of Birmingham should be the main priority to improve the national rail network. There are many competing priorities for investment, including upgrading linespeeds and gauge clearance on existing lines, extending electrification, in particular on the Midland Mainline and Transpennine Routes. These would all have impacts on services and both passenger and freight demand.

16. The approach to value for money in the business case for HS2 is seriously flawed. Besides being very sensitive to changes in policy, assumptions and data, it does not take account of real world economic impacts (being based on valuations of future time savings) or indeed impact on the natural environment. A new and more transparent approach to appraisal is needed to take account of future policy choices and external uncertainty, such as oil prices.

iii) 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?

16. In principle yes but we do not agree with the detail. A phased approach to investment makes sense in principle – indeed to do otherwise would be unaffordable. But as explained above, the case for the second phase has not yet been made due to the lack of consideration of alternatives to new lines north of Birmingham.

17. The principle of the link to HS1 is supported but we need to be convinced that the proposed route will not impact on local rail services in London. The Mawhinney Review into HSR access to Heathrow made clear that there could only be a case for a dedicated HSR link

to Heathrow if there was a second phase to HS2. It did not, however, find a case for such an additional link. The link proposed in the consultation therefore is not supported.

iv) 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?

18. No. We believe that the 400km/h design speed is unnecessarily high and there is no compelling case made for it anywhere in the consultation documents. The optimal design speed – based on a balance of environmental, social and economic costs and benefits – is likely to be lower, between about 300 and 360km/h, which is the norm for high speed rail being planned in other countries. In a crowded country such as Britain the negatives of very high speed lines, e.g. the noise and lack of routing flexibility, significantly outweigh the very small time savings.

19. The requirement for parkway stations to be included was wrong. These are likely to be in Green Belt and would result in unsustainable patterns of transport and land use, while the international evidence strongly suggests these out-of-town stations would be of limited economic benefit to regional economies. The proposal for a Birmingham Interchange would unfortunately lead to all these problems. New stations need to be integrated with public transport and high density development to ensure they do not lead to road congestion.

20. These principles and specifications should have been subject to public consultation at an earlier stage and should have been tested within a wider transport strategy and appraisal process that tests proposals against a range of future scenarios.

v) 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?

21. No - As noted in the answer above, there has been a failure to develop and test route options for High Speed Lines with different design speeds. There is a significant gap between the options of a 200km/h conventional line and a 400km/h high speed line that were considered. Planning policy, such as Planning Policy Statement 7: *Sustainable Development in Rural Areas*, the Treasury Green Book, the Strategic Environmental Assessment Directive and Human Rights Act case law all require consideration of a wider range of route options than was considered by HS2 Ltd.

22. The approach to mitigation was flawed in that mitigation has only been considered once the route had been designed to particular specifications, rather than those specifications being influenced by the need to balance environmental and social impacts with economic benefits.

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