Statement of Objection to SES3 and AP4 – November 2015

Your Memorialist is the Chiltern Society, a charity founded 50 years ago with the main purpose of conserving the Chiltern Hills. The Society has approximately 7,000 members and is based in Chesham, Bucks.

Your Memorialist is represented by John Gladwin, a trustee of the Society.

SES3 and AP4 were made available to the public on 12 October 2015. The period allowed for petitioning ended on 13th November 2015. The period allowed for the consultation on the Environmental Statements was due to end on 27 November 2015.

Your Memorialist reviewed the documents produced by the Promoter and found there to be a series of errors in the Environmental Statements, particularly in the Transport Assessments in Volume 5. A number of issues were raised with the Promoter, who finally confirmed that they were indeed errors. The Promoter then reviewed the Transport Assessments in Volume 5, and issued a revised version on 30 October 2015.

The revised version was put on the Promoter's website, and the Promoter contacted councils and libraries to establish whether they wanted electronic and/or paper copies. These were dispatched on 4 November to be available on the 5th or 6th November for the General Public. We have not seen any general notice of the update.

The Promoter claims that there were no significant changes which affect the assessment. However until one has seen the final documents, one is not aware of whether the baseline numbers or the assessment numbers have changed.

Your Memorialist presented evidence to the Board of Examiners who confirmed that SES3 and AP4 were not compliant with Standing Order 27A.

The Promoter has now extended the Consultation Period for the Environmental Statements to 23 December 2015.

We attach for your consideration a list of the corrections made by the Promoter to Volume 5 – Transport Assessments, to enable you to gauge the number of errors that were found and corrected. (See Appendix A attached) Please note that not only were numbers wrong, but data relating to one Junction was reported for another junction. We would also draw your attention to para 3.2.23

'The modelling results indicate that the A413 with Whielden Lane junction is predicted to operate within capacity during construction of the revised scheme in the AM Peak, with the highest percentage of flow to capacity predicted as 78% on the A413 (east) arm. Within the PM Peak, however, the highest percentage of flow to capacity is predicted as 106% on the A413 (east) arm. This indicates that the junction will experience significant traffic congestion and delay during the evening peak, during construction. However, the junction is forecast to operate over capacity in the 2021 baseline (101%) and therefore, although there is an increase in maximum queue lengths, there would be significant delays regardless of HS2 construction'.

The predicted queue is 125 vehicles. This is a significant impact, which was not notified.

Subsequently, your Memorialist has reviewed the revised Transport Assessment issued on 30 October. There are a significant number of 'anomalies' which require explanation. The majority relate to the 2021 baseline traffic volumes, including HS2 construction traffic, being less than the 2021 baseline without HS2 construction traffic. A schedule of these 'anomalies' is attached See Appendix B attached)

In light of the significant number of errors found in SES3 and AP4, your Memorialist believes that these Environmental Statements are non-compliant with Standing Order 27A, and as such requests that the Promoter is required to prepare new Environmental Statements SES3 and AP4ES. Further that the periods for petitioning and consultation are extended for reasonable periods after the re-issue of SES3 and AP4.

For and on behalf of the Chiltern Society

John Gladwin
Trustee

Appendix A – Volume 5 – Summary of Changes to Traffic Assessments – Document Updated 30 October 2015

Appendix B - Volume 5 – Schedule of apparent anomalies in Traffic Assessments Document dated 30 October 2015