

# Volume 1 - Introduction to Environmental Statement

(Frank Partridge, *Denham Against HS2* - February 2014)

## **Consultation Period**

Even with the extensions, the amount of time the public was given to read, digest, cross-reference and comment on the Environmental Statement, which spanned the Christmas and New Year holiday period, was inadequate. It was unreasonable to expect non-specialists to wade through the vast quantity of material in that time. For many people, especially those without internet access at home, the basic documents could only be viewed at local libraries, and were difficult to follow because of the extensive cross-referencing between them. Because of the holiday, the libraries were closed on several days during the holiday period. The consultation process was therefore fundamentally flawed.

## **Health Issues**

There is substantial anecdotal evidence of stress-related illness among residents along the proposed route who stand to lose their homes and businesses through compulsory purchase, who are suffering property blight or who cannot sell their properties. Of 286 respondents to a survey conducted by the Chilterns Conservation Board, almost 90% reported experiencing adverse effects upon their health and wellbeing, and 16.4% have sought medical help. Many of those retired or approaching retirement consider their lives have already been ruined by HS2 and fear for the future: one stroke victim was constantly worried that the undue stress precipitated by the property blight would trigger another stroke.

There is considerable anxiety about the effects on the health and wellbeing of children during the construction period, as a result of disruption, dust and noise. One respondent reported that the eldest child in the household has nightmares about HS2.

Work should have been done in advance of the consultation to identify and quantify the extent of suffering already being experienced by potentially affected communities.

## **Colne Valley Park**

HS2's impact on the Colne Valley Park would be much greater than merely localised noise, visual intrusion, ecological damage and social/community issues. There are millions of day visits to the Park each year; HS2 would result in reputational damage, *ie* a perception that with construction activity continuing for at least ten years, and the permanent fragmentation of the landscape that would result, it would not be worth visiting the Park as a whole.

## **HOAC**

Hillingdon Outdoor Activity Centre (HOAC), which focuses on disadvantaged and disabled youth, receives more than 20,000 visits each year. The site will be obliterated by HS2, with possession required from as early as 2015. A temporary site during construction will not

mitigate the permanent loss of HOAC's fitness for purpose. A new, permanent site is a necessity. The estimated cost of this – c. £7.5 million – has not been specified in the survey, or included in HS2's overall cost calculations.

## Volume 2 - CFA7 (Colne Valley)

### 2 Overview

**2.3.25** contains insufficient detail about the piling method that will be used to mitigate contamination of groundwater. It is impossible to comment on an initiative when the facts are not plainly stated. Similar omissions and vague wording appear throughout the Environmental Statement, which in places appears to have been a rushed exercise. *See 2.4.6*

**2.3.55** The construction camp at the Chiltern Tunnel portal will have overnight living accommodation for 95-140 people for five and a half years. There is great concern about how this influx will affect our small community. How will the workers access medical facilities (doctors, dentists etc), recreation facilities, pubs and leisure centres? Local facilities will be strained and there will be a considerable increase in traffic movements because the Chiltern site is not easily accessible using public transport.

**2.3.58** The information concerning the manufacture of concrete ring segments for the tunnel linings at the Chiltern tunnel compound is lacking in detail. More information should be provided about this installation.

**2.3.64** Most of the material excavated from the tunnel will be re-used as engineering fill or in environmental mitigation. How will the material be moved to alternative locations? No estimate of vehicle movements has been given.

**2.4.6** is imprecise as regards the times that preventative maintenance will be carried out, the duration of the work, and the expected levels of noise and light pollution. Without such detail, further comment has no value.

### 3 Agriculture, forestry and soils

**3.4.27** demonstrates further examples of vague and subjective assessments from which it is impossible to draw meaningful conclusions. Land requirement bringing 'an impact of medium magnitude'; loss of forestry amounting to a 'minor adverse' effect. Not only are these unspecific but they are entirely the opinion of the HS2 assessor who, inevitably, will seek to play down the impact.

### 5 Community

**5.4.4.** The impact on air quality and noise on the B467 at Swakeleys Road will have a **major adverse effect**. Other residential areas nearby (not mentioned in the ES) will suffer similarly. No attempt has been made to seek alternative arrangements for construction and no mitigation measures are proposed.

**5.4.5** It would not be possible to operate the Hillingdon Outdoor Activities Centre (HOAC) during the construction period, and its future beyond that is extremely doubtful. Apart from the visible impact the viaduct would have on the centre, the presence of such a large structure and the constant noise would inevitably make recreational sailing unviable. HOAC's loss would be a considerable blow to all those who use the facilities. The government should bear the full cost of a suitable relocation.

**5.4.8** The likely closure of HOAC would represent a **major adverse effect** on both Hillingdon and South Bucks.

**5.4.10** The impact of HOAC's temporary closure would be felt more many years after it reopened, because of the time it would take to re-establish its current level of activity.

**5.4.18** states that it is "*considered*" that the Colne Valley Regional Park is large enough to absorb the construction of HS2 and retain its function. This is questionable. Regular users of the park already see a park under stress, affected by noise and pollution from the M40/M25/A40. HS2 would impose a new, intolerable strain on the park.

**5.4.20** Sections of the Old Shire Lane circular walk will be closed for lengthy periods, during which it will no longer be a circular walk. This is described as a 'moderate' adverse effect, but for users of the walk the diversion, the impact of the construction works and the spoiling of fine views, will be **significant (5.4.29)**.

**5.5.3** The properties near Denham Grove Hotel will experience considerable operational noise and visual impacts over many years. This would have a **major adverse effect** on the residents' amenities and would represent a significant loss to them.

## 6 Cultural Heritage

**6.3.7** Old Shire Lane and its associated hedgerows are described as non-designated assets of low value. This lane may date back to Roman times, and during the Saxon period it formed the boundary between Wessex and Mercia. It is a culturally and historically important footpath, sunk below ground level by walkers down the ages.

The proposed removal of the hedgerow adjoining Tilehouse Lane will remove the 'screen' between local householders and the construction camp, and will have no material benefit to the construction activities.

**6.4.11** The demolition of the mediaeval Dew's Farm will constitute a **high adverse impact** resulting in a **major adverse effect**.

**6.4.27** The number of archaeological assets that will be removed permanently due to the construction will be **significant**.

**6.4.29** However much consideration is given to the historic vegetation and landscapes in the re-design, ancient woodland cannot be replaced and lakes can't be landscaped.

**6.5.4** Savay Farm (CVA023) is in a *rural*, not semi-rural setting. There are three other Grade 1-listed buildings on the farm: Nos 1, 2 and 3 The Annexe, which is attached to the main house, but are not listed in the survey. The noise of the viaduct construction and the operational noise of passing trains will constitute a **major adverse effect** to these properties, and the eight other dwellings in the grounds of the farm.

**6.5.8** A viaduct of this size cannot be hidden or even 'softened' with vegetation.

## 7 Ecology

**7.3.2** lists the considerable number of locations where HS2 ecology consultants were not permitted access to conduct a Phase 1 habitat survey. Ecological studies in sensitive areas such as this usually take many months to complete, assuming that full access is granted. Therefore, this section consists of a degree of guesswork and cannot be regarded as reliable.

**7.3.7** Destruction of part of Pinnock's Wood will be **significant**. This resource cannot be replaced.

**7.3.9** The River Misbourne is a chalk stream of some rarity, and is of **regional value**.

**7.3.12** The western bank of the River Colne, Great Halings Wood, Juniper Wood, Harefield Hall, The Lodge, the Mid Colne Valley SSSI, Dew's Dell and Breakspear House Woods are habitats of **principal importance**.

**7.4.4** The loss of breeding habitat and the disturbance of breeding birds in the Mid Colne Valley SSSI will likely result in a decline in their numbers. The same applies to wintering water birds (**7.4.5**). This will have a **permanent adverse impact** on the integrity of the SSSI, which would be **significant** at a national level.

**7.4.13** notes that more than half of the Denham Country Park Nature Reserve is required for construction of the proposed scheme. Other nature reserves in the area will also be impacted. Sections **7.4.25** to **7.4.34** outline the bird habitats and other wildlife and plantlife that will be adversely affected, including the risk of extinction of the coralroot when its main woodland habitats - the ancient woodlands of Ranston Covert and Battlesford Wood - are removed. The over-populated south-east of England cannot afford to keep eroding increasing rare and precious habitats. A report by the RSPB in 2012 stated that a fifth of British birds had disappeared in the last 50 years, primarily because of the loss of habitat. The Environmental

Statement plays down the likely impact of such an extensive loss of habitat.

**7.4.27** and **7.4.63** The farmland and hedgerows between the M25 and the A412 Denham Way/North Orbital Road is a natural habitat for corn buntings. The construction will have a **permanent adverse effect** on the local population of these birds.

## 9 Landscape and visual assessment

**9.1.3** It is wrong to describe the visual effects as reducing over time. Many features will be permanent, such as the diverted overhead power line, the Colne Valley viaduct and passing high-speed trains.

**9.4.5** Extensive earthwork profiling near the M25 and the southern portal of the Chiltern tunnel will significantly change the landscape. The height of the construction plant and viaduct, and the close proximity of construction activities coupled with the absence of intervening screening will result in significant visual effects during the construction period.

**9.4.11** The construction of the Colne Valley viaduct will result in a high magnitude of change, with a **major adverse effect**.

**9.4.27** General construction activity, cranes and significant earth-moving activities will substantially alter the character of the setting. The magnitude of change is considered **high** with a **major adverse effect**.

**9.4.91 – 9.4.94** Extensive stockpiles of earthworks, up to 5 metres high, will be visible from the Old Shire Lane Circular Walk. This will result in **major adverse change**. The survey gives no indication of how long these earthworks will remain there, and how they will be removed.

**9.4.95** The views from residential properties on Chalfont Lane (only 10 metres from the edge of the site) will suffer a high magnitude of change and **major adverse effects**. Construction lighting from the M25 and Chiltern tunnel compounds within a predominantly dark landscape will represent a **high magnitude of change** with a **major adverse effect**.

The landscape character areas (LCAs) within CFA 7 create a significant green 'lung' on the edge of north-west London.. They are well used by walkers, cyclists and horse riders and provide vitally important areas of tranquillity.

**9.5.4** to **9.5.29** describes the range of disruption to the landscape and tranquillity that would occur in the Harefield Farmland Valley Slopes LCA, the Colne River Valley LCA, the Colne Valley LCA and the Maple Cross Slopes South LCA. They are mainly assessed as having a **moderate** or **medium** adverse effect, with only the Colne River Valley LCA suffering **major** adverse effect. This is a gross under-estimation.

**9.5.31** The proposed mitigation planting will not have had time to establish itself in the receiving landscape by 2026. The planting will take up to 60 years to mature. The mitigation programme is inadequate. The area of planting in the field bounded by Tilehouse Lane, Bridleway DEN/3 and Little Halings Wood will not maintain connectivity to the surrounding ancient woodland. The new plantation will clash visually with the old, and transplantation of ancient woodland soil will not compensate for this loss of amenity.

## 10 Socio- Economics

No account has been taken of the potential disruption to people's journeys to places of work and education. Traffic from Chalfont St Peter to the M25, Rickmansworth, Watford and Denham will be diverted along the narrow Horn Hill Road, and the junction with the new access road to the motorway will be dangerous for the high number of vehicles expected to use it.

**10.4.4** There will be a significant amenity effect on Denham Grove Hotel, and at least three businesses carried out from nearby residences on Tilehouse Lane.

## 12 - Traffic and transport

As with the rest of the report, this section makes constant references to other publications, some of which were not to hand, had sections missing or contained misleading information. This led to much wasted time and effort trying to find the required information.

Volume 5 Appendix – Transport Assessment – TR-001-000

**7.3.103** Temporary closures and diversions of PRow during construction are shown on Map CT-06-001 (Volume 2, Map Book 7).

The map book contains no such map.

Several calculations are wildly inaccurate:

**Table 7-3:** Colne Valley road network future baseline flows (vehicles) – PM peak shows six roads (including the A40) where baseline flow was just *one vehicle* in the one hour period, and six others (including the A412) where it was in single figures.

Assessments such as this are so obviously incorrect that further study and conclusion is meaningless.

**7.3.100** states 'that bus and coach services will not be impacted by construction of the Proposed Scheme except as a result of potential additional traffic congestion and delay at locations identified above.' This is surely an understatement of the impact the project would have on bus and coach passengers who would be unable to seek alternative routes in order to

avoid congestion and delays. The 331 bus service between Uxbridge and Harefield/Mount Vernon would be especially badly affected.

Vol. 5 Appendix – Transport Assessment – TR-001-000

**Table 7-19** outlines the effects on seven Public Rights of Way, one of which is Old Shire Lane, which dates back at least to Saxon times. Two of these paths will be closed for up to five and a half years. The remainder will be subject to diversions adding < 1.2kms. This is a considerable inconvenience in a precious area of countryside, used for recreation and leisure by many people and will have a major adverse effect on their enjoyment in this area.

**12.4.2** Measures are promised to reduce construction lorry trips during peak periods. How will these be enforced, and what action will be taken if the rules are broken? Since the tunnelling will be operational 24 hours a day (**12.4.5**) how can peak period restrictions be enforced?

**12.4.14** The six-month road closure at Chalfont Lane while a temporary access road is constructed will result in a 6.1km diversion, followed by a six-year diversion of 1.6km. This will have a **major adverse effect** on vehicle-users, in terms of time and additional running costs. For a regular user the diversion equates to an extra 1,215km over the period.

**12.4.15** It has been estimated that construction will result in increased traffic flows of more than 30%, and a significant increase in traffic-related severance for non-motorised users such as pedestrians, cyclists and horse riders. Significant increases in motorised traffic will make the affected roads extremely dangerous.

### **General points**

South Buckinghamshire already suffers from traffic congestion, especially when the stretch of the M25 between the M40 and M4 is slow-moving, and motorists seek alternative routes via local roads. The extra congestion will mean delays for business traffic and commuters, increasing pollution and creating incalculable costs for industry.

The assumption (**12.4.5**) that HS2 workers starting work at 8am and leaving at 6pm would therefore be *"arriving before the morning peak hour and leaving after the evening peak hour"* is woefully inaccurate. The morning peak period in this part of South Bucks runs between 7.30am and 9.30 am and the evening peak builds up from 4.00pm with school traffic until 6.30pm.

Overall, the traffic calculations in the Environmental Statement are weak and fail to reflect current usage. Some of the data is palpably incorrect.

## **13 Water Resources**

**13.3.24** There is considerable local concern about the chalk aquifer being vulnerable to contamination from gravel deposits and lakes.

**13.4.43** The Colne Valley viaduct construction is likely to disrupt groundwater flow, which could lead to abstractions from public water supplies near the route, and could have a **major impact** especially during times of drought.

## Volume Two – Map books

Several of the visualisations in the map book do not give a realistic impression of how the Colne Valley would look after the railway was built.

The verifiable montages showing the Grand Union Canal crossing point omits the catenary wires above the viaduct, which would add several metres to its height. Viewpoint 052-3-002 shows the wires, but they are ‘greyed out’ to appear less of an eyesore. Viewpoint 058-2-005 significantly downplays the alteration to the environment in the SSSI, the loss of trees and the impact of the construction camp between Tilehouse Lane and the M25. The aerial view of the Colne Valley (LV-15-002) wrongly identifies the De Vere Hotel, which is on the other side of the proposed line. The representation also suggests that water-borne activities at HOAC will continue unaffected by the construction, when this is palpably never likely to happen.

# Volume 5 | Technical Appendices

## Transport Assessment (TR-001-000)

### Part 6: Country assessment

#### Traffic and transport

Volume 5 Appendix – Transport Assessment – TR-001-000 | Country assessment (CFA7)

**7.3.103** “Temporary closures and diversions of PRow during construction are shown on Map CT-06-001 (Volume 2, Map Book 7).” There is no such map in the map book.

Table 7-3: Colne Valley road network future baseline flows (vehicles) – PM peak shows six roads (including the A40) where Baseline flow was just *one vehicle* in the one hour period, and six others (including the A412) where it was in single figures.

Table 7-4: AM peak figures shows seven roads with just *one vehicle in the hour* and five others with single figure flows. Harvil Road is shown as having three vehicles northbound

and four southbound in the AM peak, but 365 vehicles NB and just four SB in the PM peak period.

Table 7-5: – PM peak has two roads with one vehicle in the hour and nine others in single figures.

These assessments are so obviously incorrect that further study and conclusion is meaningless. Other tables are very misleading and contain jargon that is impossible for the lay person to understand. As an example 7.2.72 states: *The 2012 future traffic baseline with Proposed Scheme construction traffic flows on the strategic road network, where traffic flows (all vehicles or HGVs during either AM or PM peak) will change by 10% or more, are shown in Table 7-10 and Table 7-11 for AM and PM flows respectively.* This renders the data meaningless and so a reasoned understanding of the implications is impossible.

**7.3.98** states that *there will be rail possessions further north on the Marylebone to Aylesbury Line and to the south on the Chiltern Main Line at West Ruislip, which will affect some users of passenger services stopping at stations in this area. The possessions will be short-term and generally take place during mid-week nights or at weekends. Therefore the impacts of these possessions on rail users in this area are not forecast to be substantial.*

This is another gross underestimate of the likely impact. Passengers from a wide area use the line for leisure pursuits at the weekends. It is also a well-used route for passengers visiting Wembley Stadium. As there is no reference to rail possessions in the CFA6 section of the appendix it is impossible to know the implications for passengers using these services. No mention is made of alternative transport arrangements for these passengers.

**7.3.100** states that *bus and coach services will not be impacted by construction of the Proposed Scheme except as a result of potential additional traffic congestion and delay at locations identified above.* This is surely an understatement of the impact this would have on bus and coach passengers who would be unable to seek alternative routes in order to avoid congestion and delays.

Table **7-19** outlines the effects on seven Public Rights of Way, one of which is The Old Shire Lane which dates back to Saxon times, and possibly beyond. Two of these paths will be closed for up to five and a half years. The remainder will be subject to diversions adding up to 1.2kms. This is a considerable inconvenience in a precious area of countryside on the edge of London, used for recreation and leisure by many people and will have a major adverse effect on their enjoyment of this area.

Volume 5 Appendix - Transport Assessment - TR-001-000 | Country assessment (CFA 8)

**7.4.77** states that *there will be rail possessions further north on the Marylebone to Aylesbury Line and to the south on the Chilton Main Line which will affect some users of passenger services stopping at stations in this area. The possessions will be short-term and generally take place during mid-week nights or at weekends. Therefore the impacts of these possessions on rail users in this area will not be substantial.* See response to 7.3.98 above.

Volume 5 Appendix – Transport Assessment – TR-001-000 Country Assessments (CFA9)

**7.5.32** states that Central Chilterns construction activity phasing is summarised in Figure 7-4. This only shows advance works and those for the Chilterns Tunnel Main Compound and the Little Missenden vent shaft Satellite Compound but *no activity whatsoever at the remaining*

sites. This serious omission should be corrected before the second reading of the bill.

**7.5.87** states that *there will be rail possessions further north on the Marylebone to Aylesbury Line which will affect some users of passenger services stopping at the station in this area. The possessions will be short term and generally take place during mid-week nights or at weekends.* See response to 7.3.98 above.

Volume 5 Appendix - Transport Assessment - TR-001-000 | Country assessment (CFA 10)  
**7.6.93** states that *the Proposed Scheme in this study area will require temporary possessions on the Marylebone to Aylesbury Line for the construction of Small Dean viaduct and demolition of School Hill overbridge.* There will be five possessions for a total of 81 hours between 2018 and 2020. The impacts of these possessions on those rail users affected in this area will be substantial. There are no details of any alternative transport arrangements that would be made available to those concerned.