

HS2 FORMAL RESPONSE TO THE GOVERNMENT CONSULTATION

RESPONSES TO SPECIFIC CONSULTATION QUESTIONS

1. Overview

- 1.1. In April, Warwick District Council joined the 51m group, a network of 13 Local Authorities opposed to HS2. In May this year Warwick District Council submitted a response to the House of Commons Transport Select Committee (TSC) that is charged with evaluating the HS2 proposal via a special hearing (separate from the main consultation process). At this juncture Warwick District Council also endorsed the substantive submission prepared on behalf of the 51m group to the TSC.
- 1.2. Evidence that has been assembled in co-operation with the 51m group has led us to conclude that the case for the HS2 project is not substantiated. It is evident that the business case does not stack up and that all other alternatives to achieve the transport capacity, regeneration, economic and environmental benefits as purported by the current proposal have not been given a fair hearing and therefore fully / properly explored.
- 1.3. Regarding the consultation process, we are very concerned that there have been strong statements from Government ministers in favour of HS2 that may have had the effect of discouraging people from engaging in the consultation process because they do not believe that is being conducted fairly. It is hoped that notwithstanding various statements to the contrary, the Government will approach these issues with an open mind.
- 1.4. There are major doubts about the accuracy and validity of much of the supportive data produced by HS2 Ltd and the Department of Transport and also serious questions about the basis of the assumptions that underpin the project. These concerns include passenger demand forecasts, estimates relating to overall benefits to the nation, project cost estimates, the expected regeneration benefits and the carbon impact of the proposal.
- 1.5. Warwick District Council is also particularly concerned that the HS2 Appraisal of Sustainability provides, at best, only a superficial examination of the issues that will have to be addressed as a

consequence of the HS2 proposal. Its content has omissions that will require considerable further survey and analysis (see response to question 6.) Such further work will manifestly raise the cost of the project even before any possible mitigation measures (requiring even further additional expense can be considered/ quantified).

- 1.6. It should be acknowledged that Warwick District Council is not opposed to the need for rail improvements and it fully acknowledges the need for strategic improvements to the national transport infrastructure where such advancements are well founded and are proven to be in the national interest. However there are considerable concerns that the HS2 proposal has not been well conceived as a component part of a wider more integrated transport strategy, and as a consequence is fatally flawed.
- 1.7. HS2 is at best perceived as an isolated 'vanity project' that has gathered more momentum than its financial and environmental credibility should demand. Warwick District Council does not consider HS2 to be the best way to achieve national rail improvements as there is evidence setting out alternative strategies that can be implemented more quickly (and cheaply) and without the huge environmental sacrifices required by HS2. These alternative adjustments to existing networks / rolling stock can be delivered in an incremental way (with little disruption). The alternative strategy can also benefit from ongoing re-assessment utilising accurate (shorter term) demand / capacity evaluations.
- 1.8. Given that the overall budget for the HS2 proposal is currently in excess of £30 billion (considered to be a decidedly questionable estimate by the Government on assumptions considered to be flawed), it is the opinion of the 51m advice and Warwick District Council that the Government should not spend billions of pounds, simply because High Speed Rail (and HS2 in particular) is a modern and glamorous form of infrastructure. This is particularly the case where smaller and less expensive transport schemes would give far greater benefits in environmental, social and transport terms.
- 1.9. To conclude, Warwick District Council is of the opinion that HS2 is not in the best interests of the Nation with too great a cost in terms of both finance and impacts on the environment. There are other alternatives that can deliver the same benefits far more cheaply and with less environmental damage, therefore the HS2 project should be fundamentally re-appraised/ withdrawn.

RESPONSES TO THE SEVEN SPECIFIC QUESTIONS POSED BY HS2 LIMITED ON BEHALF OF THE DfT

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

- Q1.1. Warwick District Council is not opposed to higher speed rail, and supports (where need is correctly substantiated) strategic improvements to the nations rail network. Warwick District Council strongly disagrees with the HS2 proposal as its financial and environmental costs are considered too onerous given that there are other less radical alternatives that can be delivered more quickly and very much more cheaply.
- Q1.2. The work carried out by HS2 Ltd and DfT, attempts to demonstrate that there is a strong case for enhancing the capacity and performance of the inter -city network. Page 10 of the HS2 consultation document states that the rail network is "seeing a continuing pattern of steeply rising demand". The business case for HS2 similarly assumes that the factors which led to growth in the last 15 years will continue at the same rate for a further 35 years and we consider that this assumption is simply untenable.
- Q1.3. The challenges with forecasting passenger demand are well known and it seems that even the lessons of recent history have not been reflected in the HS2 business case. For example, the demand for HS1 in 2006 (formerly known as the Channel Tunnel Rail Link) was forecast by the DfT to be 25 million passengers. The actual passenger traffic using HS1 is only around 9m – less than 40% of the predicted demand.
- Q1.4. Whilst there are some obvious examples of existing capacity issues on certain elements of the current network, there are much better, more affordable ways of solving these matters that can be delivered in a much shorter time (incrementally) and without the same adverse environmental impact that HS2 would have.
- Q1.5. Warwick District Council does not believe that HS2 is the only answer to achieving required advances in the nation's rail network. In our opinion other alternatives options have not been fully explored. In particular Rail Package 2, (RP2, DfT High Speed Rail Strategic Alternatives Study Feb 2011), referenced in the consultation and involving less expensive improvements and upgrades to the existing network, has been not been comparably examined by HS2 Ltd leading to a distorted and elevated appreciation of the benefits of HS2.
- Q1.6. A thorough examination of other alternatives carried out on behalf of the 51m group has indicated that there are a range of ways of increasing both the capacity and performance of the existing rail network. These alternatives are set out in more detail in response to Question 2 and

include the best elements of RP2 as well as other initiatives. This alternative strategy is known as the 'optimised alternative solution'. We are of the opinion that HS2 is driven by a misguided pre-occupation with reducing journey times that has deflected it from successfully identifying what the priorities for the country's rail network really should be.

Q1.7. Sir Rod Eddington, in his Review of Transport policy (2006) stated that *"because the UK is already well connected the key economic challenge is therefore to improve the performance of the existing network. There are very high returns from making the best use of existing networks (with) large projects with speculative benefits and relying on untested technology, being unlikely to generate attractive returns"*.

Q1.8. The Government's claim that HS2 could provide a unique opportunity to bridge the north south divide is wholly exaggerated and unsubstantiated. The DfT now place great emphasis on "rebalancing the economy", and "re-shaping the economic geography" of the UK. It is well established in the academic literature that the benefits of high speed rail between regional centres and a dominant capital city are likely to accrue significantly more to the capital than the regions. Essentially the argument is that is if you provide very good transport links from the hub to the spokes, there is some benefit to the spokes but most benefit to the hub. Based on the DfT's own information and evidence, 7 out of the 10 jobs that might be created as a result of HS2 would actually be in the South East which would only make the north south divide even worse. Also claims about how many jobs will be supported as a direct result of HS2 are spurious, with no evidence to support that additional jobs will be generated as a direct result of HS2, rather than being relocated from elsewhere.

Q1.9. If Government wishes to prioritise rebalancing the economy, and regenerating the Northern cities, it is considered that the way to achieve this is through significant investment in transport between the northern cities, and within their travel to work areas. This has been the clear aspiration of those regions as set out in the Northern Way strategy and transport priorities.

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?

Q2.1. No, HS2 is not considered to be the best value for money solution for enhancing rail capacity and performance.

- Q2.2. One of the most significant flaws with the HS2 proposal is that they have failed to use the most appropriate alternative solutions to robustly test the HS2 proposals against. It is common practice to use the best of any alternative schemes to test the proposed scheme's business case against. In the case of HS2 they have not used the best alternative as their comparator. They have referred to Rail Package 2 but this fails to optimise the opportunity to extend and reconfigure trains and also includes unnecessary and costly infrastructure. Therefore a wholly distorted picture as to the need for and the benefits of HS2 has been forthcoming.
- Q2.3. It is our opinion that there are much cheaper incremental alternatives to HS2 which can meet the overall and peak forecast demand in a quicker and more responsible manner. The incremental ways to increase capacity (known as the 'optimised alternative' in the 51m submission) are as follows:
- Take account of "Evergreen 3" (line speed increase from London Marylebone – Birmingham), which will be completed this year and provides journey speeds to Birmingham only a few minutes than those on Virgin Trains, thereby reducing demand from Euston and increasing capacity at peak times. This scheme appears to have been deliberately ignored in the DfT business case.
 - Change train configuration on Pendolinos to reconfigure at least one carriage from first to standard. The overcrowding issues only occur in standard class carriages
 - Lengthen all existing Pendolinos to 12 (except for Liverpool, which would still be limited to 11 cars)
 - Introduce smart ticketing and demand management, to reduce peak demand.
 - Carry out some minor investments to infrastructure at certain locations to allow for improved separations between fast and slow lines.
- Q2.4. The cumulative capacity increases of the above measures would be in the order of trebling capacity at a total capital cost in the region of £2b. Of course these steps would not produce the faster journey time of HS2. But once it is understood that the majority of benefits from the journey time reductions are dependent on the assumption that business people do not work on trains, it can be seen that spending £30b for this gain is a very poor use of public money.
- Q2.5. The advantages of the incremental package of investment are that it can be delivered more quickly, considerably cheaper (to match actual increases in demand) and as a consequence of its flexibility represents a very low risk approach whilst still supporting the economic growth of the UK.
- Q2.6. It should also be emphasised that we consider that the Appraisal of Sustainability that accompanied the HS2 proposal is superficial and that

when a full Environmental Impact Assessment (and the necessary studies and mitigation requirements are totalled) the £30b price tag for HS2 will have risen significantly. This will make the alternative (incremental) alternative an even more prudent use of the public purse.

- Q2.7. If HS2 is adopted there will be capacity and / or frequency reduction to some cities, for example Coventry, Wolverhampton, Stoke-on -Trent, Leicester, Chesterfield, Peterborough and Doncaster. These reductions are included in the business case for HS2, because there is an assumed saving of around £5bn in operating costs. Any subsequent promises to maintain existing service levels to these cities would have serious impact on the HS2 business case.
- Q2.8. There are also serious technical concerns about the deliverability of the proposed services. The entire HS2 case rests on assuming 18 trains per hour can be realised for the full network, which is a figure that has never been achieved in the world for high speed rail infrastructure. High speed rail worldwide has achieved only 12-15 trains per hour. Industry experts place no reliance on being able to achieve 18 trains per hour in the foreseeable future.
- Q2.9. Significantly the full route for the rest of the 'y' beyond Birmingham has not yet been scoped, so how can anyone know what the additional costs associated with this part of the proposal are?. To proceed with this project on such a basis would appear inconceivable.

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 to the High Speed 1 line to the Channel Tunnel?

- Q3.1. No. The phased roll out is too long. If HS2 is a serious solution to the north south divide and in the national interest it should not take 20 years to deliver. There is insufficient evidence provided in any of the documents published to substantiate the business case for the proposed Heathrow Spur or indeed to HS1 (Channel Tunnel Link).
- Q3.2. There is no business case that supports a direct link to Heathrow as the demand for this service simply isn't there, as acknowledged in the report prepared by HS2 Ltd in March 2010, even when the previous Government was proposing the third runway at Heathrow. More than 90% of Heathrow's passengers originate or terminate in regions which would not be served by HS2 and for those limited number that would, the cost of building a link to Heathrow 'estimated' at £2.5bn - £3.9bn cannot be justified.
- Q3.3. As far as the link to HS1 is concerned, again it is not clear from any of the documentation issued that a full evaluation of the business case has been carried out, there is a lack of evidence to support the passenger demand for such services or that the full opportunity costs of such a link have

been properly costed in, with the delays that this will mean to other services using the existing network.

Q3.4. If these costs are factored in, together with all the other under –estimates made on the HS2 costings, the benefit cost ratio will fall below the level required for investment and the scheme cannot be justified.

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?

Q4.1. No. As the overall business case is so poor and there is a complete lack of evidence that can substantiate the need for HS2, the principles and specification to underpin the proposal and route chosen do not stand up to scrutiny.

Q4.2. The specification is based on a mistaken assumption that journey time savings are considerably more valuable than they actually are. Therefore the proposals strike a wrong balance between the benefits of speed and its adverse impacts. The Government now seems to recognise that speed is less important than overcrowding, which favours lower speed solutions that can actually be implemented more quickly and cheaply.

Q4.3. The 'principles' that the Government appear to have used to justify this proposal seem to relate more to the need to have a form of transport that some other nations have and have placed a great reliance on international examples to support its case. The evidence suggests that the support is not well founded because:

- High Speed rail requirements in other countries have fundamentally different contexts:
- Other countries who have introduced high speed rail have more than halved journey times with HSR as their existing rail services were poor and slow; the West Coast Main Line is a modern 125 mile per hour railway
- The evidence has not been properly examined: for example, the Dutch HSR has financial problems; the President of SNCF has stated that the network is decaying as investment is focused on TGV (High Speed) lines, and in Germany the classic network is slow and not comparable with the UK mainlines; it is also relevant to note that the Spanish High Speed Rail network (AVE) has recently cut one of its newest (prestige) high speed train services (Toledo /Albacete and Cuenca) because of poor passenger usage.

Q4.4. In virtually all cases the distances involved in comparator countries are much longer than the journeys to be served by HS2.

Q4.5. There is also a whole debate to be had about the definition of 'high speed' and why the proposals have been designed to go up to 250mph, when anything over 125mph would constitute high speed. There is also a need

for greater transparency about why the 'preferred' route was actually chosen and the selection criteria that formally determined the route consulted on.

- Q4.6. The Government would be advised to reconsider this proposal in the context of a strategic re-appraisal of the national transport strategy, rather than starting with the assumption that we should have a High Speed rail system because other European countries have done so.

Question 5 – Do you agree that the Government's proposed route, including the approach used for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?

- Q5.1. No. It is simply not possible to agree that the proposed route is the best option for a new high speed rail line as the case for High Speed rail has not been proven. Debates about the suggested route are therefore academic until the Government has clearly demonstrated that there is a demand for this type of rail travel, above all other possible alternatives to achieve the same capacity and regeneration benefits.
- Q5.2. The Government has incurred significant expense and caused great anxiety for those residents, businesses and communities along the 'proposed' route, when it should have concentrated its efforts on the discussion about high speed rail as part of the national transport strategy and properly established the need first before ever going anywhere near suggesting possible routes.
- Q5.3. The consultation provides little clarity about what if any mitigation measures are proposed and for a scheme of this magnitude this is unacceptable. This is highlighted by the lack of detail in the Appraisal of Sustainability; therefore approaches for mitigating the impact of HS2 cannot realistically be considered and agreed as part of the consultation.

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.

- Q6.1. The Appraisal of Sustainability is wholly inadequate, lacks the necessary detail and has not been properly consulted on/ examined with regard to the other alternatives to high speed rail. The AoS provides no detail about the route beyond Birmingham and it is not therefore possible to properly assess the environmental impact and consequences as a result (both environmental and financial).

- Q6.2. Warwick District Council believes that the High Speed 2 proposal will cause considerable environmental damage both in the short term, during construction, and in the longer term, once operational, and throughout its life. The appraisal is considered inadequate for such a major infrastructure proposal and does not include sufficient data regarding a range of issues, particularly in relation to local data sets.
- Q6.3. The following paragraphs set out the main issues of concern regarding matters related to (or not addressed appropriately) by the AoS. It should be noted that whilst these are issues of local importance to Warwick District the same points will often be relevant to many other areas (nationally) throughout the intended route. It is therefore our belief that the AoS only addresses (superficially) a small number of the matters that are relevant, and that as a consequence of the cost of further work and investigations required (and where necessary future mitigation) the business case for the project will be further undermined.
- Q6.4. **Noise.** Noise is a concern that will affect the future of both the built and natural environment. HS2 Ltd does not have robust data on which to base noise assessments. The noise as a train passes along a track comes from a number of sources that include; mechanical noise from motors, fans and other equipment, rolling noise from wheels as well as aerodynamic noise from air flow. There are also differing levels/ severity of noise emissions as a consequence of whether the track is in a cutting or elevated on embankments/ bridged sections.
- Q6.5. Trains measured under test conditions on perfect tracks do not necessarily represent a true reflection of what can happen in real life. Data regarding noise impacts at 360 -400 kph can only be estimated as they have not been measured. In our view the assessment of source noise, mitigation and impacts has inadequately described the true impact of this proposal on the affected residents and therefore may have significantly underestimated the true environmental and monetary cost of these impacts.
- Q6.6. The lack of precise detail and the unclear way that noise impacts were indicated in the AoS (utilising the three levels of noise appraisal criteria on inadequate base maps) has caused a great deal of anxiety to resident in Warwick District. The current noise analysis and supporting information is therefore deemed inappropriate. The adoption of the noise criteria used by HS2 Ltd appears to deliberately try to quell public anxiety about potential effects. A full Environmental Impact Assessment (based on an agreed set of criteria) will therefore need to be carried out to determine the detailed and true effects of noise on communities. As a consequence of the lack of a detailed noise analysis (utilising agreed criteria) the environmental impacts cannot be properly assessed and therefore the estimated costs of mitigating such impacts cannot be accurately quantified. This will also have an adverse impact on the overall costs of the project and its overall benefit cost ratio.

- Q6.7. **Natural Environment.** HS2 has recognised the EU and UK legislation to protect listed sites and species of biodiversity value. However HS2 has only used part of the data that is readily available without any detailed survey work. Only data on Birmingham and London's Local Wildlife Sites (LWS) has been used despite Warwickshire's being publicly available since the summer of 2010. This is considered to be a substantial flaw in the project that will have further negative effects on the business (cost) rationale. The proposed route is well populated with European, national and county important species (none of which are appraised in this report).
- Q6.8. A preliminary scoping exercise identifies some 55 features of local conservation/ biodiversity value in Warwick District that will be either directly or indirectly affected by the proposal. This is only a preliminary list and the wider impact on networks and the connectivity of habitat by the loss of any of these features is yet to be established.
- Q6.9. There are particular local concerns that HS2 will have a direct impact on several valuable areas of ancient woodland/valuable habitat. These include the destruction of South Cubbington Wood (17ha) and the recently identified champion pear tree adjacent to it as well as impacts on North Cubbington Wood (16.5ha). Other Ancient woodland impacted upon includes Crackley Wood (5.6Ha), Broadwells Wood (8.46Ha), Rough Knowles Wood (4.7Ha) and Black Waste Wood (8.46Ha).
- Q6.10. Warwickshire County Council has commissioned further habitat survey work that will be used to ensure that any decisions and recommendations relating to HS2 are made with the benefit of quality, up-to-date data.
- Q6.11. Warwick District Council remains sceptical about claims in the AoS that *'The proposed railway would present a significant opportunity to re-enforce and enhance biodiversity... and that it would provide a green corridor to be colonised by plants and animals to form links between existing habitats'*. Our initial concerns are focussed on habitat and species eradication and the related severance issues caused by loss of valuable natural assets and the imposition of the rail route.
- Q6.12. The AoS goes on further to state that *'Where sites of ecological interest and local interest are likely to be affected, further work will be undertaken during more detailed design , and management plans would be drawn up and implemented to help minimise the adverse impacts on biodiversity'*. We are of the opinion that the true cost implications of such 'further work' will add a huge additional burden to the already questionable financial viability of the proposal.
- Q6.13. The HS2 report has not specifically appraised and assessed impacts on Geology and Geomorphology other than in hydrological terms. This is contrary to referenced government strategies and policies.
- Q6.14. **Flood risk** remains a high profile local issue and whilst it is easy to identify the position of main rivers and associated flood plains, any

bridges and structures required to be built in the flood plain will be subject to Land Drainage Consent from the Environment Agency so as to minimise any risk of exacerbating fluvial flooding.

- Q6.15. Where the route is close to Leamington, it passes through an area which has been prone to severe surface water flooding, (over 40 properties in Cubbington were flooded in the floods of 2007). This area should be modelled in great detail to ensure that this situation is not made worse by the proposed development.
- Q6.16. **Principal groundwater aquifers** and Environment Agency Groundwater protection zones are traversed by the proposed route across Warwick District. The AoS states that '*In some places groundwater resources may be subject to effects of the rail line*' and that '*Construction techniques would be implemented to reduce such risks to a minimum*'. The design of HS2 should include a full assessment of the impact on aquifers and the identification of any potential impact on water supply to Coventry and any local springs that may run dry. This could harm local natural habitats, deprive farmers of stock watering facilities and inhibit the irrigation of farm land.
- Q6.17. The cutting through of the aquifers may destroy existing natural drainage paths and create new ones. The impact of the new paths will need to be assessed to ensure that local areas sensitive to ground water flooding are not made worse (see paragraph 6.14 above).
- Q6.18. At this stage of the process, it is not possible to identify every potential problem relating to flooding and drainage. However, we would expect that as part of the detailed design stage, a full hydrological model is created. We anticipate that the required '*construction techniques*' referred to in paragraph 6.15 above may add a significant burden to the overall project budget.
- Q6.19. **Landscape Character and Visual Impact.** Landscape character is determined by particular combinations of geology, soil, topography, as well as the pattern of settlement, the shape and size of fields, the extent and type of woodland and the use of the land together with its heritage and culture. Each area has a defined local character, distinctiveness and sense of place.
- Q6.20. The proposed railway line will traverse Arden and Dunsmore landscape character areas in Warwick District, which will be damaged considerably. The AoS makes no reference to possible impacts and the scale of any changes to the character of such areas. There are no references to the visual intrusion of catenary masts that will support the electric cables supplying power to the rail network as well as the bridges that will be needed to allow the continuity of existing road and rights of way. In the event that acoustic fences are required to mitigate noise impacts, these will also cause significant visual impacts on the existing landscape.
- Q6.21. **Agricultural land and Farmsteads** will be also be subjected to significant impacts as a consequence of the proposal. It has not been

possible to ascertain the level of farmland severance and the overall impact this might have, however this should be pursued in conjunction with the National Union of Farmers as many local farming interests have voiced such concerns regarding the future viability of their property and businesses as well as concerns that such issues may not be able to be rectified by future mitigation strategies.

- Q6.22. **Built/ Historic Environment.** The HS2 route runs in close proximity to several settlements in Warwick District. There are concerns that the AoS has not given sufficient regard to the impacts of visual intrusion, noise and vibration in relation to parts of Kenilworth (the Crackley Location in particular) as well as Burton Green (where there may be specific community severance issues) and Stareton Village. There are potentially similar implications for the villages of Offchurch, Cubbington, Stoneleigh and Ashow (including potential impacts on the context and setting of their designated Conservation Areas).
- Q6.23. There are also concerns that relate to the impact of HS2 on the integrity of the very sensitive (and narrow) area of Green Belt land that currently affords a degree of separation between the urban areas of Kenilworth from Coventry that is critical in maintaining their own individual identity. This is particularly relevant with regard to the future of the land and farm holdings at Milburn Grange Farm, Dalehouse Farm and New Kingswood Farm in this locality.
- Q6.24. Warwick District is also blessed with many Heritage assets, some of which are under threat from the HS2 proposal (for example, Stoneleigh Abbey, East Lodge, Stare Bridge and the associated Historic Parkland of this area). It is considered that there will be no measures that will be able to mitigate for the impact on such features as their setting will and intrinsic value will be damaged considerably. It should be recognised that it is beyond question such impacts will not be measurable in terms of monetary sums within the overall business case, however they represent a real environmental cost.
- Q6.25. **Employment Sites / Potential Economic Impacts (Economic Welfare / Planned Developments/ Investment).** The National Agricultural Centre (Showground) at Stoneleigh is the home of the Royal Agricultural Society of England. This site is currently a significant employment location within Warwick District (attracting over 750000 visitors a year) and a number of businesses (generating an estimated £80 million pounds worth of business) and employees (over 2000 jobs on site) which will be affected directly or indirectly by the proposed HS2 route. The NAC currently has the benefit of planning consent for its comprehensive redevelopment and refurbishment, including significant access improvements to the site from the nearby A46. It is considered that these plans and future aspirations are very much at risk as a consequence of the HS2 proposal.

- Q6.26. The route of HS2 passes through land owned by Warwick University, although it does not affect their current aspirations (the University has planning permission to extend their campus by 171,000 square metres) it could impede on any future expansion to the south. Further examination of any indirect impacts will also be required, particularly noise.
- Q6.27. The line of HS2 affects the north eastern area of Kenilworth Golf Club. The Golf Club are particularly concerned that the loss of part of the course may prejudice its future operation and the viability of this long established, recreational asset.
- Q6.28. Indirectly, HS2 is likely to have a wider detrimental impact on the strength of the District's economy, and employment prospects including tourism, rural businesses (agriculture) and associated farm diversification projects. HS2 is therefore considered a threat to the District's economy which is widely regarded as one of the strongest local economies in the Region.
- Q6.29. Any alterations (potential reductions) to the current rail services in the area will impact on the District's attractiveness for inward investment and tourism and will also have to be given careful consideration. These impacts have not been assessed by HS2.
- Q6.30. **Existing Road networks/ Rights of Way.** The HS2 proposal crosses a considerable number of roads across Warwick District. The result of this is that it will have a considerable short term (during construction) and long term impact on our present highway network. A considerable number of existing roads will require lifting over the new line; as such they will require new bridges to be constructed over the proposed track.
- Q6.31. The changes and alterations to roads are just indicative on the current plans and there is insufficient information proposed at this time to see if the proposals acceptable to the Highway Authority (Warwickshire County Council). These proposed changes will require a considerable amount of review and assessment and consultation before final details emerge and become acceptable. Up to now there has been no consultation with Warwickshire County Council as the Highway Authority with respect to the changes to the road network.
- Q6.32. Changes to the road network during construction will need very careful managing to reduce disruption. In particular alteration to a road can have knock on affects to other roads and the travel patterns of communities within the area.
- Q6.33. Warwick District has many Public Rights of Way that are a mixture of footpaths, bridleways, restricted bridleways and byways. A detailed examination of the impacts on these Rights of Way will have to be undertaken and it is considered that mitigation/ reconnection of all of these routes may be cost prohibitive and add to concerns of additional community severance and the loss of public enjoyment of such accessibility.

- Q6.34. There are two sections of Greenway in the District. These routes utilise disused rail lines as sustainable transport routes and/ or as popular recreation sites for walking, cycling and horse riding. HS2 will affect both the Offchurch Greenway and the Kenilworth Greenway; the latter includes the National Lottery, Peoples Millions, Connect2 Kenilworth sustainable transport route that is currently under construction.
- Q6.35. The Kenilworth Greenway/ Connect 2Kenilworth runs between Kenilworth, and Berkswell, in Solihull. The route is wholly owned by Warwickshire County Council. It also features in the University of Warwick Master Plan for expansion of the campus and their green travel plan. The scheme is very high profile and there is a great deal of public expectation for its completion. The HS2 proposal does not mention the need for the provision of a safe crossing to maintain its future integrity. HS2 also merges with the line of the Greenway at Burton Green where the Greenway is in a deep cutting. The current HS2 proposal shows the route in a filled 'green' tunnel within the cutting. No provision is made for the Connect2 route and unless the route can be placed on top of the filled tunnel, it would be truncated by HS2.
- Q6.36. The Offchurch Greenway forms part of the Sustrans National Cycle Network (Route 41), running between Warwick and Rugby. The effect of the HS2 route bisecting the Offchurch Greenway (in cutting) would be to prevent members of the public from using the Greenway and would require the provision of a bridge or underpass to provide safe passage across HS2 in order for this connection to remain functional.
- Q6.37. **HS2 – Construction.** Construction of the HS2 line will have a major adverse impact on the surrounding areas. This will be in terms of noise, visual intrusion and dust etc as well as traffic disruption caused by road re-alignment and the need for new bridges to accommodate the passage of existing roads over the rail line. The lack of detail regarding construction and intended mitigation that has been provided in the consultation means that it is not possible to assess these impacts.

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?

- Q7.1. There needs to be appropriate schemes in place to protect the interests of all of those that may be affected by the proposed HS2 scheme and these measures need to be fair, accessible and easy to understand.
- Q7.2. It is difficult (given the information supplied thus far) to determine what constitutes 'significant' amount of value. Is it only these which will be eligible for compensation?

- Q7.3. An appropriate compensation scheme needs to consider not just the loss of value but of the change in living conditions. If a property is within a certain distance of the line there should be an option that it is bought, if the owner wishes, with suitable relocation expenses as well as the opportunity to purchase a like for like property.
- Q7.4. The impact of the scheme may not be fully known within 12 months of the opening of the line so there should be an additional fund that can be used for repair and damage to properties some ten to 15 years later that may be caused by vibration or subsidence, especially to older properties that may be Listed. Relocation as well as monetary compensation should therefore also be an option.
- Q7.5. Compensation should not only be given to individuals but to the community that the scheme is running through as they ultimately pay a price for an additional piece of infrastructure. This could be the opportunity that where there is off-site planting that these areas are opened for the general public to use and that improved footpath / cycle links may be created as well as creating wildlife linkages.
- Q7.6. In the HS2 literature it refers to "Further Phases" and implies that those along future parts of the route need not comment on the blight and compensation measures now as they will change in the future. However this is misleading and may lead to fewer responses from those further up the line.
- Q7.7. It is the District Council's view that there is an imperative need for immediate action to assist those affected by the HS2 proposal. It is already two years since residents and businesses have been told that they may be affected. Certainty of options for blight and compensation need to be expedited. At the same time, compensation needs to be proper and adequate. Should the proposal proceed, WDC will wish to be involved in detailed discussions with HS2 on this issue.
- Q7.8. **Mitigation.** Although the District Council strongly objects to HS2, if the decision is taken to go ahead with the scheme it would like to fully engage with HS2 to discuss what mitigation measures will be required at the earliest possible opportunity. This requirement (in conjunction/consultation with local Action Groups and communities) must take place well in advance of detailed engineering plans being formulated / issued and as a part of the Environmental Impact Assessment (EIA) process.