

Gavin Bostock  
Communications and Stakeholder Advisor  
HS2 Limited  
55 Victoria Street  
London  
SW1H 0EU

Your ref:

My ref:

Please ask for:  
**Nick O'Donnell**

Date:  
**5 July 2011**

Dear Mr Bostock,

**SUBJECT: HS2 CONSULTATION RESPONSE**

In response to the current consultation on the High Speed 2 route, Ealing Council wishes to lodge a holding objection to the route plans.

The Council recognises the wider benefits of the proposal in improved connectivity, enhanced journey times and greater access to employment opportunities. However, at this stage, there is insufficient information primarily on the effects of the proposal at local level within the Borough. Given the sensitivity of a number of planned interfaces, until more detailed plans and assessment is undertaken, the Council is unable to fully ascertain key impacts and possible acceptable mitigation within large parts of the route through the Borough.

In particular, key issues that must be addressed further are:

- There is a lack of clear information on the business case and justification for the scheme. Without this, and without clear benefits to the Borough, Ealing is unable to support the project.
- Further explanation and detail on alternative route alignment options that were considered in the engineering process. It is unclear how the current route was selected and what the impact would have been had an alternative route been adopted.
- There is a lack of justification for the current route alignment. A view has been expressed that were the entire route in tunnel, it would avoid significant impacts in Ealing.
- The potential Heathrow "stub end" link suggests a junction in the Northolt area with a south-facing connection. This is referenced as being located in the area around Willow Tree Primary School and that there will be "some permanent land acquisition". However, there is insufficient detail on this. The Council is concerned about the implications of a Heathrow link and seeks assurances that any future

link from the Northolt area would be entirely tunnelled and not a surface line.

- The main tunnel boring activity will be towards Acton from the Old Oak Common end. HS2 reports suggest, "Existing rail infrastructure could be utilised for removing excavated material and transporting in tunnel lining segments". However, Ealing Council will need details of a draft Code of Construction Practice (CoCP), worksite plans and construction programme, a full traffic impact assessment around worksites and a clear commitment and understanding on how the spoil from the receiving site will be treated.
- The potential impacts on other stations in Ealing such as North Acton and Acton Main Line has not been made clear enough. The HS2 documentation to date fails to address the problems and opportunities from the planned alignment including wider connectivity and impact, which is a key consideration.
- Construction of the retained cut would involve severance of Park Royal Road for construction and the road would be closed for a "prolonged period". Given the significant potential transport impacts of these works, Ealing Council will need detailed plans on how this will be undertaken and managed.
- The replacement of East Bridge at Hanger Lane would necessitate a "Comprehensive traffic management regime" so as to keep disruption to traffic to reasonable minimum. The Appraisal of Sustainability states "There would be a risk of significant disruption to traffic over several months in relation to this work", yet there are no details of how this will be adequately mitigated. There is concern that the significant traffic disruption would impact over a very wide area.
- Airborne noise at sensitive locations, construction noise, vibration and ground-borne noise have been appraised at a commentary level only. The need to determine the significant effects and subsequent mitigation measures is essential in realising if any key noise issues exist. Until this work is done within an Environmental Impact Assessment (EIA) on the construction and operation of the route, key noise impacts cannot be determined.
- Severance of public walking and cycling routes. A comprehensive strategy on how cyclists and pedestrians in the area will be catered for is imperative. For example, there is no information as to whether there will be replacement temporary footbridges replacing those being modified, for example at Carr Road.
- There is a lack of clarity on the effect and impact on land and property in the Borough. It would appear that approximately 60-65 properties are at risk of demolition and around 325 at risk of land take. Clearly, such numbers are significant and clarity on exactly which properties will be demolished, which are at risk of land take and how sufficient design and construction mitigation can be adopted to minimise impact need to be explored.
- Examination of the drawings shows that the new line will affect the Victoria Road Waste Transfer Station in neighbouring Hillingdon. It would appear that a 15m strip of land along the southern boundary of the site would be lost and the current rail sidings would need to be

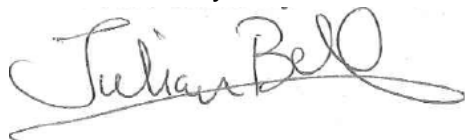
removed. Unless greater certainty can be achieved over the future of the Victoria Road site it is possible that the implications of the new rail link will put into question a site that currently offers part of the solution to residual waste treatment in west London. Currently it is proposed to include this site in a procurement for dealing with residual waste in west London, but it's future is currently very unclear. The Council's preference would be for the line to be either diverted along the southern boundary of the site or put in tunnel and the rail access guaranteed.

In summary therefore, there would appear to be significant impacts of the route within the Borough without anywhere near sufficient detail on how these will be mitigated. There is also a lack of justification on what benefits the scheme will bring to Ealing, despite some of the greatest negative impacts occurring within the Borough. Ideally, such a public consultation would have included the following documents to allow people to make an informed decision on the scheme:

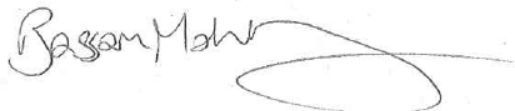
- Statement of Aims
- Environmental Impact Assessment and Environmental Statement
- Estimated costs
- Book of Reference
- Plans and Cross Sections
- A Traffic Impact Assessment
- Construction Impact Assessment
- Draft Code of Construction Practice

The Council would encourage the HS2 design team to work with officers within Ealing's transport team to work through these issues if the HS2 route is approved to go ahead to further design. In the interim, the Council will maintain a holding objection pending further detail.

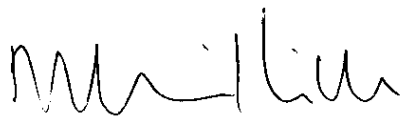
Yours sincerely



Julian Bell,  
Council Leader



Bassam Mahfouz  
Cabinet Member for Transport and Environment



David Millican  
Leader, Conservative