

Issued Via Email – 18th July 2025

Feedback on HS2 Environmental Improvement Plans – July 2025

Dear Kim,

Thank you for sharing HS2's latest environmental improvement plans regarding dust, noise, and the small claims process across the borough.

The attached outlines joint feedback from London Borough of Ealing (LBE) officers and residents directly impacted by the construction works. It builds on:

- Review of HS2's submitted improvement plans
- Resident testimonies and ongoing reports from impacted streets (e.g. Carr Road, Badminton Close, Wells House Road)
- Correspondence from local groups, including the Old Oak Alliance and Northolt resident groups

Whilst we welcome the development of these plans, overall, the mitigations offered are completely insufficient and are highly disappointing. The current approach does not adequately address the intensity or duration of disruption experienced by our communities — particularly in light of the programme reset pushing completion closer to 2040.

Mitigation should not be governed by what can be technically justified as “within limits”, but by what is socially and environmentally responsible, particularly when the health and wellbeing of residents is at great risk.

Given the importance of this workstream, we request that HS2 review the attached comments and present revised proposals at the next strategic board, which is due to be scheduled shortly.

We look forward to your engagement and shared commitment to improving the lived experience of those most negatively impacted by HS2's delivery.

Kind regards

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1. Dust Mitigation Plan

Summary of Issues:

- While the published approach outlines measures such as PM10 monitoring, wheel washing, and road sweeping, none of these are new, and residents report no visible improvement.
- Persistent dust is settling on windows, patios, cars, gutters and downpipes, causing blockages and long-term property degradation. The cleaning offer from HS2 to date has been insufficient and must be revisited.
- Most concerning is the inability of residents to open windows, which directly affects air quality, home ventilation, and health and wellbeing.
- Residents emphasised this is not about infrequent “Saharan dust” events — but concrete-type dust that becomes sticky when wet and is clearly construction-related.
- Several residents have reported health impacts, especially for those with respiratory issues and children. HS2 have not demonstrated how they are robustly assessing and supporting residents in these cases.
- Residents were not aware that a ‘dust champion’ existed, let alone who the specific contact was. This role has had no measurable impact for residents.

Officer Comments:

- Environmental data reviewed by LBE shows limited evidence of PM10/PM2.5 reductions, justifying further intervention.
- Current monitoring does not reflect dust deposition, which is what residents see and experience daily.
- The presence of construction-related dust on vertical surfaces (windows and facades), not just horizontal ones, indicates a wider spread and persistence of contamination than acknowledged.
- The psychological and emotional toll of being unable to open windows or use gardens freely has been consistently raised in community meetings, highlighting a quality of life concern beyond air quality metrics.
- HS2 and its contractors have not effectively communicated any root cause analysis or corrective actions in response to persistent dust complaints, leading to a loss of community trust.
- Complaints from residents point to a clear disconnect between monitoring results and lived experience, particularly in areas like Wells House Road, Midland Terrace, and Shaftesbury Gardens.

Recommendations for HS2 to:

- Treat visible dust deposition as a separate priority from PM exceedances.
- Expand mechanical ventilation offers where natural ventilation is no longer safe or viable.
- Reintroduce regular cleaning of windows, cars, pavements and gutters, or fund this via a simplified small claims route.
- Support more community-led environmental projects through CEF/BLEF funding.
- Adopt a more precautionary, resident-facing approach, where dust-related impacts are acknowledged early and mitigated proactively-even in the absence of PM threshold exceedance.
- Set up a dedicated Dust Safety & Mitigation team responsible for same-day cleaning (windows, vehicles, gutters) following high-dust activities or weather conditions that worsen dust spread, with officers also responsible for communicating the existence of HS2's Small Claims Process
- Recognise chronic dust exposure as grounds for considering a resident under the HS2 special case panel (especially for people with medical conditions or home-based workers).
- Include dust-related KPIs in contractor performance reviews, with penalties or corrective actions for prolonged non-compliance.
- Engage a third-party environmental specialist to review mitigation practices on-site and recommend adjustments based on resident impact, not just PM readings.

2. Small Claims Process

We welcome the recent changes to the small claims process — namely simplified forms, removal of quote requirements, and commitment to fortnightly updates.

However:

- Residents are unaware of any of these improvements and seemingly have not seen any benefits from them.
- There is continued confusion around eligibility, particularly for cleaning, or dust-related claims.
- Some residents report prolonged delays or no response following submissions.
- The small claims process is failing to address home damage and deterioration from HS2 works.

Recommendations for HS2 to:

- Actively publicise improvements to all affected households in Ealing.
- Confirm eligibility for routine dust-related maintenance, such as car washing and gutter clearance etc.
- Apply these process improvements beyond Wells House Road to Carr Road, Badminton Close and adjacent communities.
- Maintain monthly reporting to LBE on the status of open claims.
- Commit to clearer targets on reducing processing time for small claims.

3. Noise Mitigation Plan

Resident Issues/Concerns:

- The current allowable construction noise levels of up to 80dB are simply unliveable. As one resident put it: *"It's like a car alarm going off 24/7 — for years."*
- There is a disconnect between monitor readings and actual lived impact. Reporting noise as "within limits" dismisses resident distress.
- Residents were not aware that a 'noise champion' existed, let alone who the specific contact was. This role has had no measurable impact for residents.
- Reports continue of worker shouting, swearing and whistling — especially during night shifts.
- Short notice (less than one week) of 24-hour working patterns and large deliveries is a regular concern.
- Noise barriers are failing to block sound at both ground level and first-floor height, especially from works at the mouth of the site.
- Vibration from heavy works described as *"earthquake-like shaking"*, impacting homes despite additional glazing.
- Resident perception is that HS2's acoustic barriers are not fit for purpose and do not respond to real-world site conditions.
- Criticism of the design approach, stating: *"They really need to up their game and read up on how noise works... they turn a blind eye to reality."*

Officer Position:

- Section 61 consents are not enough on their own. Where ongoing disruption is foreseeable, respite and temporary relocation options must be made available.
- Timely respite (e.g. hotel stays or daytime alternatives) is often lacking. Support should be proactive when breaches occur, not offered after the fact.

- Behavioural standards must be regularly communicated and upheld across the workforce.
- Advance notice for disruptive works must be improved.
- Mitigation measures should be judged by their real-world impact on residents — not simply whether they meet regulatory requirements.
- How effective are the BPM acoustic barriers? Especially in areas where resident complaints persist despite their installation.
- Officers support the resident's call for functional, not symbolic noise shielding and a deeper review of real-world conditions.
- Ealing's Environmental Health Officers have advised that additional air and noise monitoring would serve little purpose unless it directly leads to meaningful action. The current monitoring setup already assesses the impact of planned works, and further data collection alone is unlikely to improve outcomes for residents. The focus should now shift from gathering more evidence to implementing effective, outcome-driven mitigation measures.
- These key mitigation measures have only recently been adopted by one contractor-over a decade into construction. These should have been standard across all contractors from the outset.
- Many of the listed actions are not new, and residents report too many notifications, which may lead to confusion rather than reassurance. It remains unclear whether these measures are actually improving the noise experience for residents.
- Ealing recognises HS2's Code of Construction Practice, but frequent exceedances of SOAEL-especially during extended hours-are causing widespread annoyance.
- HS2's insulation scheme is welcome, but communication around eligibility and access needs improvement.
- Residents are frustrated that, despite occasional high noise levels, the area hasn't qualified for PDCS support due to strict duration criteria.

Recommendations for HS2 to:

- Review baseline noise limits in high-impact areas and acknowledge that prolonged 65–80dB exposure is not acceptable.
- Introduce named noise champions to all impacted households.
- Enforce contractor behaviour standards and respond to any breaches.
- Provide respite packages or away-day offers where prolonged noisy works are planned.
- Improve communication and provide a minimum of 2 weeks' notice for all disruptive or extended hours works.

- Mitigation should be outcome-based, not just compliance-based.
- Re-evaluate the effectiveness of BPM acoustic barriers, especially where complaints continue despite installations.
- Look into stronger noise mitigation options, such as full enclosures like those being reviewed by BBVS, as current measures are not enough.
- Respite support should be proactive when breaches occur, not offered after the fact.
- HS2 should share full details of the PDCS policy, including how eligibility is reviewed and how close some areas may be to qualifying.

4. Wider Context – Long-Term Disruption

The recent reset of the HS2 programme, pushing completion to at least 2039, has transformed this project into a long-term mega-construction site. The consequences are no longer temporary or tolerable — they are chronic, structural and far-reaching.

As highlighted by the Old Oak Alliance (a coalition of resident groups in Wells House Road, Shaftesbury Gardens, North Acton, Oaklands Rise, and others), communities now face:

- 15+ years of noise, dust, vibration and light pollution
- The long-term impact on property value is clear, but there is still no recognition of residents' financial losses or provision of fair compensation.
- Increasing levels of mental and physical health stress
- Lack of access to usable outdoor space or windows for ventilation
- A perception that mitigation is tied to arbitrary thresholds rather than community wellbeing
- Public transport changes - especially on Old Oak Common Lane, which have worsened local isolation.

Recommendations for HS2 to:

- Urgently revise and publish updated Environmental Impact Assessments (EIAs) to reflect the extended timeline and altered scope.
- Establish a cross-borough working group (including MPs, TfL, OPDC and relevant councils) to address long-term impacts in a coordinated way.
- Expand access to the Prolonged Disturbance Compensation Scheme (PDCS) and consider new support mechanisms for long-term blight.
- Greening and environmental mitigation must be proactive, outcome-based, and delivered early to protect homes from the cumulative impacts of construction.
- Commission a plan with DfE, TfL and OPDC to explore how the opening of the Elizabeth Line station at Old Oak Common can be expedited