

# HS2 Phase 1 ES Consultation

## Response by Harefield Tenants and Residents Association

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We do not wish this response to be treated as confidential.

### Introduction

Harefield Tenants and Residents Association is a membership organisation representing the village of Harefield, pop approx 7500. The village lies across two of HS2 Ltd's Community Forum areas, mostly in 7 and partly in 6. It is semi-rural in nature and surrounded by open countryside, lakes and waterways. HS2 Ltd has previously, controversially, considered it urban by virtue of being within a London Borough, but it is not clear in this consultation whether that is still or consistently the case.

HTRA has a sub-committee dedicated to HS2, which reports monthly to members. HTRA has participated in HS2 Ltd's Community Forum process and responded to all previous consultations, and has had one bilateral meeting with HS2 Ltd to explore noise and construction concerns.

This response has been compiled by the sub-committee drawing on detailed reading of the ES documents by committee members and other residents, discussion with residents at Association and other public meetings and insights gained from local businesses. The response covers general issues then provides comments on HS2 Ltd's 6 specific consultation questions.

### Contents

1. General issues .....	2
2. Comments on the Non Technical Summary .....	4
3. Comments on Volume 1 .....	7
4. Comments on Volume 2 .....	8
5. Comments on Volume 3 – Route-wide effects.....	17
6. Comments on Volume 4 – Off-route effects.....	17
7. Comments on Volume 5 – Technical appendices.....	18

## 1. General issues

We do not accept that there is a credible case for building HS2 and do not accept the assertions made in its favour in any of the ES documents.

We do not consider that HS2 Ltd has gone about consultation and engagement in any meaningful way, and do not consider that our participation in HS2's processes has led to any acceptable changes to the Proposed Scheme.

We insist that our participation in HS2 Ltd's engagement processes should not be misconstrued or misrepresented as endorsement of the principle of HS2 or any element of the Proposed Scheme.

We found the documentation extremely unwieldy documentation, with electronic versions even less user-friendly than paper versions. Problems include poor and scanty cross-referencing – these should be clickable links in electronic documents – no indexing, no sensible search facility such as postcode. Most documents are effectively unsearchable using electronic means: much of the content is drawings rather than data, with inconsistent naming and mis-spellings of place names. For Harefield, most information is presented in documents for CFA7 but some lies in CFA6 and much of CFA6 construction work has huge implications for Harefield. All of these documents need to be searched separately. There is a real risk that people will not have understood this as the chapters are not cross-referenced.

We were given false reassurances that people only needed to read the documents referring to their own area, although there was never any guidance on what that set would include. Most documents including those sent in the free set refer readers to numerous other documents and indicate they should be read in conjunction with them.

Provision of documents to libraries was unsatisfactory. Instructions to library staff were poor and it was not appropriate to ask them to install and maintain HS2 files. Harefield Library's computer set was unusable as it was wrongly installed and its paper set was incomplete with a request for a replacement document unfulfilled.

It was unacceptable for HS2 Ltd to have no roadshows for this, the biggest and to many the most important, consultation. The telephone and email enquiry system was poorly publicised and inadequate – while telephone staff generally responded politely the written response system meant delays and misunderstandings – they seldom got to the heart of the issues we asked about. A one-hit Q&A-style process is not appropriate for something of this complexity, especially with the tight timescale for response.

There were substantial differences between draft and final ES, and it is not fair to say that these differences were not problematic because there had been consultation along the way: a. there is a lot of new material in the ES; b. issues raised in previous consultations have been ignored and c. much important material is still missing. Harefield residents do not consider that they have been properly consulted at any stage and do not accept that the plans outlined in the ES can claim to have community support. They do not see any evidence that concerns have been addressed and in fact consider that most have been omitted from the ES.

We consider that the lack of attention to combined effects on individual areas has led to premature rejection of some mitigation options. The combined visual and noise impact of the viaduct across the Colne Valley will be permanent and immense. The construction work necessary for the viaduct will be devastating and lengthy.

Assessment of these combined effects would clearly demonstrate that the Proposed Scheme is a disproportionate burden on a single area, in fact overwhelming. The vast majority of these negative effects could be avoided by tunnelling under the Valley instead of building a viaduct through it. We feel that the environmental assessment needs to be redone properly to make combined effects explicit and the comparative cost of tunnel option re-examined in the light of that.

Reliance on documents that are still at draft stage such as COCP and on plans that have yet to be developed with third parties such as Environment Agency and Local Authorities means that there is no substance to much of the assessment. Mitigation proposals that rely on these non-committal drafts and non-existent agreements cannot be used as reliable evidence on which to make judgements, and we have no confidence in impact assessments based on these.

In summary, we feel that the ES is incomplete, inaccurate, misleading, frequently based on assertions and judgements rather than evidence, and with over-reliance on desk research over field research in important elements where that would be required.

Given recent public statements by the Chancellor and others about potential further developments or changes to the Proposed Scheme, such as potential redevelopment of Euston Station or the inclusion of new stations along the line, we are concerned that any environmental assessments done to date may become obsolete. We are concerned that the approach to environmental assessment has been piecemeal and ad hoc, further reducing the credibility of the project.

Finally, we are concerned that the ES relates only to "The Proposed Scheme", but the Hybrid Bill it will accompany seeks powers that go well beyond that scheme. There is no assessment of the environmental implications of the wider work potentially included in the Hybrid Bill and for Harefield these could be substantial. We are particularly concerned about the threat of losing our Green Belt status land, Heritage Asset and SSSI designations all of which contribute to the highly valued character of the village and its way of life.

## 2. Comments on the Non Technical Summary

This document claims to be “a summary of the Phase 1 project and its likely *significant residual* effects on the environment... a useful place to start.” (emphasis added). Our expectation was that “non-technical” would mean text written in Plain English, with key numerical information presented in simple formats such as basic tables or infographics, but this is not the case. We expected a form of précis, containing all the key points a community member would need to know, but again that is not the case.

The language of the Non-Technical Summary is as technical as any other ES document and more importantly in our view, some terms that have general meanings in everyday language are used in specific technical senses in this document. The effect of this can be to mislead the ordinary reader. The most important word in this respect in our view is “significant”. To the ordinary reader, “significant” means important or meaningful in some way. HS2 Ltd use it to apply to judgements they have made or conclusions they have drawn according to specific criteria described in the Scope and Methodology Report. Something becomes “not significant” in HS2 terms simply because of the way criteria have been set, whereas the same thing may be highly important to local people.

The other problematic word is “residual”. HS2 Ltd use this to mean effects that remain by the operational phase after construction is over and any mitigation measures have been put in place. Many of the worst effects of the HS2 project will be felt during the lengthy construction phase, and persist long afterwards while some forms of mitigation mature. HS2 Ltd considers these temporary. By summarising only the residual effects, the Non-Technical Summary omits much that is of great concern to local residents. As the construction phase can be anything up to 10 years in some places it is inappropriate to characterise this as temporary. In an area like Harefield, with higher than average proportions of elderly residents, this could mean that construction effects alone would last for the rest of their lives. Children attending local schools could be enduring construction disruption for the entire duration of their primary or secondary education. For the village as a whole, the construction phase plus the preparatory period that has now gone on for several years adds up to a more than a decade of HS2-related impact on community wellbeing. This impact needs to be recognised, assessed and included in any summary.

The summary goes on to describe how mitigation is approached. Again this is misleading as the impression given is that the various measures will be applied wherever they are needed – they will not – and that they will be sufficient – they will not.

The summary then describes the consultation and engagement process to date. It does not reflect the outcomes of either previous consultations or the engagement processes, all of which have been heavily criticised and resulted in strong, detailed, evidence-based opposition to the Proposed Scheme. We particularly object to the implication that the Proposed Scheme is now somehow shaped by consultation input – people may have provided responses and attempted to engage in discussion but the inputs have been largely ignored or rejected. We consider the section on consultation and mitigation to be a misrepresentation of what actually happened.

The environmental overview section illustrates that the extent of the environmental assessment is extremely limited. For example:

- 7.3 indicates that air quality during construction is considered in relation to dust but further reading of the main documents reveal that this is restricted only to dust at the construction sites themselves, with only 20m track-out of dust anticipated. This is unrealistic. Most residents are additionally worried about the effects of construction traffic fumes which will be felt over a much wider area. This is mentioned in the Summary but not properly explored in the main documents where most of Harefield's badly affected roads are omitted.
- 7.4 omits many issues that are important to communities such as health and wellbeing and although it mentions amenity impacts it defines these very narrowly.
- 7.5 asserts that no Grade I or Grade II\* listed buildings will be demolished but it omits to mention that several of these plus many more Grade II listed buildings will be adversely affected in other ways.
- 7.6 refers to engagement with Natural England to identify mitigation measures for ecology but does not mention the input from numerous other environmental expert organisations that have piled criticism on the mitigation proposals.
- 7.79 makes no mention of the highly controversial Colne Valley viaduct (despite the fact that it features in illustrations throughout the ES documentation) and does not explain how design could ensure that it will be "in keeping with the local landscape" which is a SSSI.
- The jobs figures given at 7.10 imply that jobs created will greatly outnumber jobs destroyed by HS2 but this masks the fact that the types and locations of jobs created and destroyed are very different. Jobs lost are unlikely to be compensated by jobs of completely different types in other parts of the country. The reference to business compensation is misleading as compensation does not cover the loss of employment, only property.
- Section 7.11 is an excellent example of the importance of the words "significant" and "residual" when used by HS2 Ltd, further complicated here by selective references to effects during construction and effects of the railway itself. This is spectacularly misleading.
- 7.12's reference to construction traffic management plans in the CoCP is misleading as these have not yet been drawn up. The CoCP is still only in draft form and therefore unreliable for the purposes of this ES. The section glosses over the congestion that will be created by construction traffic for many years, and implies that construction traffic will be limited on public roads. This is also spectacularly misleading as the vast majority of HS2's construction traffic will be using public roads.
- 7.13 introduces the term "sustainable placement", highly relevant to Harefield, defined as "on-site placement of surplus excavated material to avoid causing environmental effects (eg transport) that would otherwise be associated with the off-site disposal of that material". The inference a general reader would make is that material that is to be "sustainably placed" will not be transported from one place to another. Again this is highly misleading as the separate Glossary of Terms document goes on to explain that " 'onsite' means within the land that is required for the purposes of the Proposed Scheme". We understand this to mean that material from any part of the Scheme could be put on any other part under this definition. That would appear to be the case in Harefield where there is no excavation, but which will be the destination for millions of tonnes of spoil from elsewhere. The assertion that sites have been chosen on the basis of their suitability is not further explained in the wider ES documents so is again misleading. We cannot see any difference in reality between "sustainable placement" and what would normally be described as

- landfill, and suspect that this is simply a term invented to get round landfill obligations.
- Section 7.14 contains many assertions about flood risk prevention and water source protection that are directly contradicted by the relevant chapters of the wider ES documents so cannot be described as a helpful or even accurate summary. There is no reference to the real risk to water quality that is described in other ES documents.

The CFA-specific chapters of the Non Technical Summary relating to Harefield are 8.6 and 8.7. CFA 6 is misleadingly named South Ruislip to Ickenham but as a result of an HS2 Ltd boundary change it should be South Ruislip to mid-Harefield. Chapter 8.6 wrongly indicates that some places are in Ickenham rather than Harefield – this is important as if someone is searching electronically using place names, information will be missed. Chapter 8.7 wrongly indicates that the Colne Valley (in HS2’s definition) includes Ickenham and Ruislip, but omits that it includes Denham, West Hyde and Maple Cross. The text of the chapter offers only a selection of the numerous impacts described in the wider ES documents and is not a fair summary of any of them.

It is particularly misleading to imply in the Summary that HOAC may be able to remain in operation, thus minimising economic impacts, and there is no mention of traffic or noise impacts in Harefield. Overall the impression given is that most important things in the area are leisure facilities whereas the area houses thousands of people and many thriving businesses. Most startlingly there is no mention of the internationally renowned Harefield Hospital whose emergency access roads will be heavily congested during HS2 construction.

In conclusion, the Non Technical Summary is not a “helpful starting point” – unless it is offered as a typically incomplete, misleading and error-strewn example of the documents that comprise the rest of the ES.

### **3. Comments on Volume 1**

Generally, we find numerous inconsistencies between how the assessment methods are described in the Volume 1 and what was actually done as reported in the CFA Reports. We find that this tends to result in under-statement of many categories of effect.

We note that Volume makes brief mention of the numerous wider powers sought in the Hybrid Bill. However, no further attention is paid to these in the rest of ES so we feel the ES is inadequate and misleading.

We are unhappy with the numerous references to consultation on the Scope and Methodology for the ES and feel that the effect of this is misleading. Few issues raised in responses were addressed and there is wide remaining discontent with the many important aspects of the ES methodology, most notably the noise assessment.

Examples of our discontent with the methodology include:

- the use of numerical triggers for assessment of significance on noise – individual houses or very small groups are discounted. This is highly relevant in Harefield.
- reliance on unspecified “professional judgement” in many cases where key informant insight would be much more appropriate, such as the insights provided through Community Forum inputs and formal consultation responses.

We are particularly discontent with the exclusion of certain elements of construction equipment and permanent infrastructure from the visual assessment, which we find counter-intuitive and misleading.

## **4. Comments on Volume 2**

### **Harefield issues, drawing on CFAs 6 and 7, accompanying Map Books and relevant Technical Appendices.**

We were surprised to note that the introductory overview of the Harefield area is still inaccurate despite our response on this issue in the Draft ES consultation. Section 2 of CFA7 Report omits many important community features including Harefield Hospital, the Cricket Club, Football Club and Royal British Legion. St Mary's Church also incorporates the internationally important ANZAC War Memorial.

South Harefield is inappropriately lumped together with Denham in para 2.1.12 – leaving aside Denham's numerous features, South Harefield's features should include local shops and food outlets, a pub, a minicab firm and a hairdresser, Harefield Marina and Chandlery, Broadwater Sailing Club, key parts of Colne Valley Country Park, nationally important fishing waters Savay and Korda Lakes, Broadwater Lake Bird Reserve, substantial open amenity space on Moorhall Road including a children's play park and Widewater Place business park which houses headquarter facilities for several large companies. (The Colne Valley Country Park covers a wide area but we consider that it is the most sensitive parts, closest to and accessible from Harefield, that are worst affected by HS2. In this area it is possible to walk for many miles without encountering traffic or even traffic noise, but the HS2 viaduct will be constructed overhead in this part of the park.) HOAC is mentioned but not the Dogs Trust which is a major visitor attraction and community facility immediately opposite it on Harvil Road.

The part of Harefield that lies within CFA6 has been completely omitted from the CFA reports – Breakspear Road North and Breakspear Road South house many important local facilities including Breakspear Crematorium. New Years Green Lane houses Harefield's community recycling centre and the main composting facility for much of West London.

We cannot repeat often enough our particular concern about the continued failure to consider effects on Harefield Hospital. All of this has been pointed out to HS2 Ltd before and its continued omission suggests that the ES is based on very poor understanding of Harefield, bordering on wilfully poor.

Our detailed comments on the CFA reports under several main headings:

#### **4.1. Multiple issues affecting Moorhall Road, Furrows, Harvil Road, Hillside / Dellside in South Harefield.**

Detailed examination of the CFA reports, Map Books and associated Technical Appendices for CFAs 6 and 7 reveal that there are multiple issues affecting this part of the village. Moorhall Road is destined to be a major construction traffic route for several main construction sites and will itself host 2 smaller construction sites. Hillside and Dellside will suffer extensively from the construction and utility work scheduled to take place in the adjacent field, including the massive electricity compounds which will permanently dominate the field. While the works that will generate problems for these roads are mentioned in the ES, the impacts of them are largely omitted. These include:

**Traffic** – it is not clear how much of the Harvil Road traffic will end up also using Moorhall Road but we anticipate it will have to be extensive in the absence of any alternative – as well as multiple access points to HS2 worksites on both sides of Moorhall Road itself it is also listed as a route for most of the larger construction sites



on other roads in the area. There appear to be many inconsistencies between traffic volume predictions in the various sets of reports, with no clear indication of how sites relate to each other or routes between them, and no assessment of construction traffic movements at the junction of Moorhall Road and Harvil Road (although there is an assessment of traffic movements at the Swakeleys end of Harvil Road). This assessment needs to be done and we suspect it will reveal that the tight junction involved will be unable to cope with the volume of traffic anticipated. We note that the DMRB cited in Volume 1 recommends special attention to junctions and roundabouts so feel that this is a serious omission from the ES.

We are concerned about the bridge over the Grand Union Canal as there is no sign of any assessment of its ability to cope with further heavy traffic. We raised this specific point at the Draft ES stage but there is no mention of it in the final ES.

We fear for road safety as well as congestion issues, especially as the high speed section of Moorhall Road begins at the entrances to the planned construction sites. The ES states that there are no special road safety issues to consider but we feel that the speed limit on this road is highly relevant. Moorhall Road is an important access point for recreational facilities on either side, especially at the section near Dellside, popular with dog walkers, canal users and many others. Pedestrians crossing the road will face extreme difficulty in heavy construction traffic. The large office development Widewater Place has extensive car parking that opens directly onto Moorhall Road, where drivers will have to pull out into heavy construction traffic. Car parking along Moorhall Road by local residents, leisure users and Widewater Place staff and visitors results in narrowing of the road to the extent that HGVs and local buses have difficulty passing. Substantial additional HGV traffic on this road will have serious congestion and safety implications which are not assessed.

Two small roads off Moorhall Road (Dellside and the access road for Broadwater Sailing Club) have now been indicated as needed for HS2 works – not mentioned before, or safeguarded. These pass extremely close to homes and construction traffic effects will be huge for these residents. The road at Dellside is in fact a track through woodland at the end of small front gardens and only a few metres from the cottages themselves. The other road is the only access to Moor House and Lock Cottage residences at Widewater Lock. The Dellside road (which is a track with no separate footpath) is furthermore indicated as the diversion for the Grand Union Canal towpath, which seems extremely dangerous. HS2's plans are confused and ill-informed in this area, and the scant amount of assessment that has been done is unreliable.

There is no adequate discussion of the noise impact of construction traffic, which will be considerable for residents on Moorhall Road, Harvil Road, The Furrows, Hillside and Dellside. The junction of Moorhall Road and Harvil Road is likely to become intolerable as construction traffic queues to get round the tight corner. Moorhall Road is a hill at this point meaning that lorries will be revving harder as they approach the corner especially when they have to make hill starts in traffic queues which will be the norm. The health impacts of this traffic noise and vehicle emissions have not been assessed by HS2 Ltd but the local community feels that the impact is likely to be substantial. The worry about these effects is already causing stress to local residents.

**Air quality** – The ES is incomplete, inadequate and inconsistent in relation to air quality in Harefield. Volume 1 refers to DMRB criteria, but these have not been properly used for Harefield. DMRB suggests that a boundary of 200m from affected roads should be considered, which would take in almost every local road covering hundreds of homes in South Harefield – in fact none has been assessed. Residents

are very concerned about the effects of additional traffic fumes and dust from construction traffic and sites on/around Moorhall Road and on/around Hillside, Dellside and The Furrows, all of which will be impacted by construction traffic on several sides. We have residents who suffer from severe asthma, for whom traffic emissions cause great problems. The likelihood of dust from the proposed sustainable placement areas along Harvil Road, especially the one nearest Park Lodge Farm, is also a real worry – we anticipate that piles of material will create considerable dust especially in summer. As these will be situated at the highest point in the area, we feel that dust will carry over a wide area and especially to the residential properties just downhill. The health effects of these air quality impairments have not been assessed by HS2 Ltd but the local community feels that the impact is likely to be substantial.

**Electricity compounds** – the scale and placement of the new electricity compounds on currently open land adjacent to Hillside in South Harefield, along with the associated movement of pylons and overhead lines, are of huge concern. The CFA Report is misleading in relation to this utility work, as much of the information needed to understand the whole picture is not included here. It is in Volume 1 but not cross-referenced, and as the work is split into separately named compounds, with one confusingly labelled as “Ickenham Auto-Transformer Feeder Station” when it is in fact in Harefield, it remains difficult for Harefield residents to discern the overall impact on them. The ES does not present information in a systematic way so it is unlikely that the full impact has been assessed. Noise, visual and other impacts are omitted or glossed over in the ES. It seems that the compounds have been placed in the field at points that will protect them from flooding but with no regard for the effect they will have on nearby homes. The extensive problems likely to be caused during the various operations needed to move the pylons have not been assessed. Works traffic accessing the site off Harvil Road at this point would have substantial local impact. There is no mention in the CFA 7 Report of any new access road off Harvil Road for the purposes of these works – this would be necessary as the work would commence before the Dews Farm/HOAC access roads are in place. It is however mentioned in Volume 1, which further indicates the scale of land that will be permanently required for the two compounds along with their fencing and security arrangements. It is inconsistent and unhelpful to have information disaggregated across Volumes in this way, and clear that while HS2 Ltd have at some stage been aware of substantial work that will be required, assessment of the impact has not been done.

**Socio-economic effects.** We feel that the shops at Moorhall Road will become unviable as construction traffic at this already busy corner will seriously impede access. Construction traffic noise and vehicle emissions may have substantial implications for employee health in the businesses that are open throughout the busiest parts of HS2's working day.

The large office site at Widewater Place on Moorhall Road has also been ignored in the ES – this is a substantial site employing many people with most arriving by car, local buses or from Denham station. Their journeys to and from work will be seriously affected at times. We have raised this in previous consultations but Widewater Place remains omitted from the ES.

There is no assessment of the impacts on business travel within the area – there are numerous small businesses whose owners live locally, such as a resident of Church Hill who has a business at Crows Nest Farm on Breakspear Road South. He will be caught by heavy traffic congestion on Harvil Road and Breakspear Road South, even if he travels via Breakspear Road North. He would happily consider walking across the ProW connecting the two roads, but that will also be blocked. His access to his

business would be severely hampered. This kind of small-scale local business where people both live and work within the Harefield area is likely to be severely impacted, but the impact has not been assessed.

There is no assessment of the complex threats to local non-profit organisations. Organisations like HOAC, the Dogs Trust and Colne Valley CIC work through a mixture of grant and other funding, volunteer support and community goodwill. Financial and strategic planning is long term and complex with many interdependencies especially on funding – most grant funding is conditional on donor confidence in certainties about value for money invested and often requires match funding. HS2 is destroying that confidence, jeopardising even current funding. Community and volunteer goodwill is also threatened, with the risk that people who have worked long and hard to build facilities will be disillusioned if they are destroyed or damaged for HS2. The quality of life in Harefield is greatly enhanced by high levels of local community involvement in non-profit activity both in large high-profile organisations and numerous small voluntary groups and associations. The ES omits any assessment of this aspect of community and socio-economic impact.

#### **4.2. Noise, including errors and inconsistencies in the assessment**

**Viaduct noise barriers** – there is to be a 3m barrier on the Denham side and a 1.4m barrier on the Harefield side. HS2 Ltd simply assert that this is adequate to protect Harefield. (We have asked HS2 Ltd for further explanation but been simply referred back to the assertions in the ES. The technical appendices do not supply actual measurements or calculations we can check.) We do not understand this and fear that this arrangement will simply bounce noise across the open water where it will carry even further towards Harefield homes both at South Harefield and further up into the village along the valley side. We know from experience that sound often carries to South Harefield - from activity on the other side of Broadwater Lake, from the existing Chiltern Lines and from existing operations at Skip Lane off Harvil Road. We cannot see how HS2 construction and operational noise would not also do this, being much closer to Harefield than any of these existing sites and in many cases coming from overhead sources.

We have found important errors in the way noise has been assessed around Harefield, and inconsistency between the Technical Appendices and the CFA Report. As only one example, the numbers and nature of properties around Widewater Lock are wrongly recorded. We feel this is important because HS2 Ltd consider the number and nature of properties involved when deciding on the significance of noise impact. Some of the specific problems with the location IDs and related measurement locations in this area are:

402669 – this claims in one part of the technical appendix to represent 3 residences of typical construction – the location is in fact on Widewater Place business park where there are no residences. In another part of the appendix it claims to represent 7 “G5” receptors.

700375 – this is the isolated Weir Cottage, whose noise levels have been assessed using the measurements taken at the Horse and Barge pub (391607)

391607 – this is the Horse and Barge Pub, categorised as a residence in one part of the Technical appendix and as a G5 receptor in another (it has owner's accommodation above but is principally a pub). It was itself the source of considerable noise nuisance throughout the baseline measurement period and has subsequently been prosecuted for this. Ironically, the pub is shown as one of the properties that will suffer an adverse noise effect on the noise maps.

700374 – this appears to be Moor House, described as one residence of typical character. The location should however also include the neighbouring Lock Cottage, (Grade 2 listed and therefore not of typical character). There is another residential property, Canal Cottage, on the other side of Moorhall Road at Harefield Marina, which has also been omitted. However, despite not being recognised in the number of properties counted at location 700374, in the map book showing noise effects at specific properties, Lock Cottage is shown as affected whereas Moor House itself is not.

The Horse and Barge site is a good example of internal inconsistencies in the assessment. It is identified as location 391607, and had a measurement location onsite (LM5107). There is a further location ID 711000 for the pub's visitor moorings, which was assessed using the Widewater Lock measurement location CS3018 rather than the pub's own measurement location. In the Technical Appendix SV003-007 on page 16 the location is described as a residential receptor of typical design representing one impact. It is assessed as "NA – not generally adverse". On page 27 of the same document it is described as a G5 (office and commercial) receptor with a "B" effect. In CFA7 Report Mapbook it is shown as yellow (minor adverse) for operational noise effects (along with Lock Cottage but not Moor House which was assessed from the same baseline point). Numerous other nearby properties on Hillside and Dellside are also shown as yellow (minor adverse). The CFA7 Report itself, section 11, however, implies that no residential properties in the area will suffer adverse impacts, and the table summarising "community" effects completely omits the South Harefield area despite all the yellow dots on the maps.

The noise measurement locations for this area (on Widewater Lock and at the Horse and Barge pub) were known to be problematic because of ongoing noise complaints in the area and have, as predicted, generated high baseline levels of noise. The pub site generated a night time maximum of 92Db, which is now indicated as the baseline for the isolated and tranquil Weir Cottage. The pub was subject to noise abatement enforcement action during this period. Measurements taken at the canal lock very close to Harleyford Aggregates' problematic gravel processing works which were and remain subject to noise nuisance complaints. We pointed this out to HS2 Ltd at the time so they were well aware that the site was not a reliable indicator of "legitimate" noise in South Harefield.

It seems cynical at best to have placed baseline noise measurement equipment in the two noisiest locations in the area, in the full knowledge that they were subject to ongoing noise complaints from local communities. These circumstances are not acknowledged in the ES despite being repeatedly drawn to HS2 Ltd's attention in the Community Forum meetings, in writing and at a bi-lateral meeting with HS2 Ltd. We feel that the "future baseline" needs reassessment for this area – eg the pub has now been prosecuted for its noise abatement order breaches and had its hours cut, eliminating noisy night-time activity. It is likely that the gravel works will be required to introduce better noise management measure. We also feel that the multiple errors found just in this one small section of the assessment, where the properties involved are few, distinctive and easily identifiable, cast doubt on the reliability and quality of the noise assessment as a whole. We have not repeated this exercise for other sites in the village but would expect similar discrepancies to occur based on the poor sense of local geography that permeates the ES. We conclude that noise has not been properly assessed.

### **4.3. The Royal Brompton and Harefield Hospital (“Harefield Hospital”)**

There is no mention of this anywhere in ES – CFA reports, technical appendices or even in the Health Impact Assessment. This is despite many attempts to raise the issue with HS2 Ltd both at Community Forum meetings and in formal responses to previous consultations, and despite the Hospital’s international reputation. The Hospital itself has also made direct contact with HS2 Ltd but there is still no mention of it in the ES. It is a centre of excellence for heart and lung transplants and is the “blue light” hospital for heart attack victims in the area. Moorhall Road and Harvil Road are main routes to the hospital for emergency and routine users of the hospital. The consequences of delays caused by construction traffic on these and other roads could be extremely serious – survival rates for heart attacks are improved if treatment can take place within 60 minutes and any delay reduces successful outcomes. Alternative routes such as Park Lane, a narrow country road accessed from A412, or Breakspear Road North would also be badly compromised by HS2 construction traffic and access via Rickmansworth Road would involve an extremely lengthy detour on narrow, winding country roads requiring slow driving speeds. The impact on Harefield Hospital is likely to be substantial and is a serious omission from the ES.

### **4.4. Bus services U9 and 331**

Both of these will be badly affected by construction traffic congestion. U9 gets a single mention in CFA6 Report but no impact has been assessed. It is not mentioned at all in CFA7 Report despite the fact that it serves Harefield village and all the facilities along Harvil Road (Dogs Trust, HOAC, South Harefield residences and shops, St Mary’s Church.) Most importantly, it serves Harefield Hospital which is itself omitted. There is a hint in CFA Reports that construction workers are to be encouraged to use “sustainable” transport options in the area but this would imply the unusable U9. The disruption to U9 will have knock-on effects for 331 but as that too will be badly affected by construction traffic impacts on Moorhall Road, there is not much hope for bus users. This impact is likely to be substantial but has been omitted from the ES.

### **4.5. Widewater Lock Conservation Area**

We profoundly disagree with the conclusion in the Cultural Heritage Appendix that this CA will not be affected – with 2 overhead crossing points for the viaduct in clear view and close earshot, massive construction site and traffic impacts as well as vibration threats to the listed building next to the bridge, we cannot understand how HS2 Ltd can come to this conclusion. The Grade II listed Cottage is mentioned in a couple of places within the ES but is not actually in the Technical Appendix Vol 5 Cultural Heritage CFA 7 Baseline report - para 4.3.21 of that omits reference to Lock Cottage in its description of the CA and is factually wrong about the extent and reason for the CA designation, which extends well beyond the lock itself.

The proximity of construction sites to the CA and the fact that a major construction traffic route crosses it has been pointed out on many occasions including our Draft ES response.

It appears that only construction effects have been considered, not permanent effects in the operational phase – in summary, the ES is incomplete in this respect and the assessment that has been done is flawed.

#### **4.6. Public Rights of Way**

Only one local PRoW issue seems to be documented in the ES – the stopping up of the Grand Union Canal towpath, resulting in a diversion round Harefield Marina and continuation along the opposite bank as far as the white bridge (as far as we can see from the Map Book as detail is not given in the Report). The technical appendix estimates this to be an additional 7 mins walk, and considers this negligible, but it describes it as diversion via existing footpath U34. Footpath U34 does not, however, follow this route round the Marina – it goes across the fields at the end of Dellside where it will itself become stopped up during construction, and subsequently realigned. It is possible that the 7 mins estimated walk only goes as far as the end of Dellside – it certainly wouldn't take you all the way round the Marina. In order to get to the path that leads around the Marina from U34 people will have to join the woodland path that HS2 Ltd have meanwhile indicated as “required for construction” – likely to be carrying construction vehicles. The walking time required to follow the diversion to the point where it rejoins the Grand Union Canal, opposite the original stopping up point, is more than double the 7 mins indicated in the ES without allowing for the interruptions that would be needed to avoid HS2 construction vehicles using the same path. Cyclists using the diverted route would have to carry their bicycles up a set of steps from the towpath then join the heavy HS2 construction traffic on Moorhall Road before making a right hand turn across that traffic to join the diverted route. The safety implications of this diversion are mind-boggling and illustrate how poorly the assessment has been done.

There is reference in the Hybrid Bill Plans to a temporary bridge over the Grand Union Canal but we have found no reference to this in the ES. It is not clear whether this is to be for construction workers' use or for the public, or whether it will be pedestrian and/or vehicle use. Its environmental impact is not assessed.

Several other local PRoWs will be affected during HS2 construction but are not documented in CFA reports or elsewhere. The sustainable placement area beside Park Lodge Farm off Harvil Road in CFA7 is crossed by PRoWs which are shown on the mapbook but not indicated as closed at any time. This seems to be an important omission, resulting in an understatement of the environmental impact. Also, there have been Parliamentary Notices posted on footpaths in another area that has never been mentioned by HS2 Ltd and is not covered by any of the Hybrid Bill maps or ES documentation. This is the area to the other side of Park Lodge Farm off Church Hill, where footpath U25 leads to paths U27 and 26. These paths had PNs posted on them. It is not clear whether this was an error or whether work is in fact planned for the area but not documented. Either way the assessment process has proved unreliable.

#### **4.7. Visual impact**

The ES is inadequate and grossly misleading in relation to the visual impact of HS2 in Harefield. Local residents have been consistently infuriated by the judgements made by HS2 Ltd about the impact of a 2+ mile long viaduct on an area that is widely valued for its relatively natural beauty, currently mostly designated as Country Park within the boundaries of a London Borough. The rural village feel of Harefield and its surroundings is cherished both by residents and visitors, and this is largely a result of its stunning panoramic views over open countryside, lakes and waterways. A concrete viaduct running across the middle of this and visible from almost every angle can only have a significant impact, but HS2 Ltd's assessment manages to suggest otherwise.

HS2 Ltd's photomontages purporting to show local views have enraged local people, who simply feel insulted by what has been presented in the ES documents. Again the CFA fails to present information in a systematic way, simply selecting a few viewpoints and assessing them with inconsistent criteria, making it difficult to discern the overall impact. It makes bizarre leaps from describing the sometimes enormous new features that will be introduced into a view to then assessing the impact as not significant, and hops between assessing construction and operational phase effects. Effects on individual homes, whole streets and amenity settings are jumbled up, with no clear or acceptable weighting given to each. Great store is set by the removal of pylons from some views but no mention made of their introduction to nearby areas. Screening trees are presented as if they are improvements to views that are currently open countryside. There is reference to mitigation ambitions through design specifications, but this is inconsistent with the viaduct and noise barrier designs illustrated throughout the ES documents. As with other types of impact in the ES, the need to consult numerous separate documents with inconsistent terminology and poor cross-referencing makes it difficult to understand the overall effect. This in turn makes the misleading photomontages all the more reprehensible as most readers will rely on these.

It is clear that the visual assessment has been done by people with little understanding of the local geography. Most of Harefield sits on a hill along one side of the Colne Valley, and the most prized views are open views across the lakes and countryside. South Harefield is oriented towards the Grand Union Canal, lakes and surrounding open countryside. All of these vistas will be compromised by HS2 construction sites for many years and by the viaduct in perpetuity. This is a massive negative impact and no amount of planting around the concrete piers, which is the only idea on offer in the ES, will ever mitigate it. No assessment has been made of the likelihood that the vast expanses of concrete surface introduced to the area by HS2 will become targets for graffiti artists. The visual assessment is completely inadequate and misleading.

We cannot overstate the importance of considering all these effects in combination, which is how they will be experienced by Harefield residents and visitors. People will be seeing and hearing the construction work and eventual trains, breathing in dust and traffic emissions, suffering transport disruption and losing local amenity all at the same time. In order to properly represent the environmental impact the ES should assess the effects in combination, not separately. We offer the following simple table of combined effects Harefield residents perceive around the village, and would point out that it has taken many hours of forensic examination of multiple ES documents to gather this together. The ES as it stands is an unreasonable way to present such information to affected residents and in many cases fails to assess the effects of the impacts indicated.

Table: Residents' summary of combined impacts on Harefield at selected locations

Street	Noise	View	Air quality***	Local road congestion	Flooding – increased risk from construction works or “sustainable placement”	Utility diversion work (electricity only – others missing)
Moorhall Rd	Y	Y	Y	Y	Y	Y
Dellside	Y	Y	Y	Y		Y**
Hillside	Y	Y	Y	Y		Y**
The Furrows	Y	Y	Y	Y	Y	Y
Harvil Road	Y	Y	Y	Y (plus specific realignment-related work)	Y	Y
Peerless Drive	Y		?	Exit to Moorhall Rd via Truesdale compromised		
Truesdale Drive	Y		Y (from Moorhall Road traffic)	Y – exit onto Moorhall Road and possibly additional local “ratrun” risk		
Broadwater Gdns	Y			Y – exit onto Church Hill		
Priory Avenue				Local ratrun risk and use as alternative to the Truesdale exit from Peerless Drive		
Merle Avenue	Y	Y	? from across valley			
Dovedale Close	Y	Y	Y			
Park Lane	Y	Y	Y	Y from local traffic avoiding construction routes and possibly–from overspill construction traffic route*		
High Street				Knock-on from Harvil and Breakspear		
Church Hill	N	N	N	Knock-on from Harvil and Breakspear		
Jack’s Lane	Y	N	?	? Exit onto Park Lane		
Breakspear Rd Sth	Y	Y	Y	Y	Y	
Breakspear Rd Nth	Y	Y	Y	Y	Y	
New Year’s Green Lane	Y	Y	Y	Y	Y	



## **5. Comments on Volume 3 – Route-wide effects**

This document does not contain what we expected. At the simplest, we expected this document to provide tables totalling the various impacts across the route to enable a more holistic look at the overall effect of the scheme. However the document separates out some types of impact for consideration at purely local level, but aggregates others. We feel that this is an important flaw as it masks impacts that are deemed insignificant according to HS2 Ltd's methodology at local level because they are too few in numbers – such as noise impacts on individual or very small groups of dwellings. Taken together, there must be many hundreds of such adverse effects across every element of the assessment. A route-wide assessment should make these explicit.

We feel that route-wide effects should include issues that will be common to every part of the route. These could include crime and safety implications. We do not feel that the CoCP is the only place these need to be considered as many will persist into the operational phase. HS2 is likely to remain a highly controversial piece of infrastructure that attracts hostility and protest. After completion it is likely to become a target for vandalism, particularly graffiti but potentially other types of offence such as theft of material. In the worst scenarios, an iconic piece of infrastructure on this scale could be a target for terrorism. The measures needed to prevent crime at all of these levels need to be identified and their environmental impact assessed, including their ongoing costs. We feel that this should be done at route-wide level as HS2 is a national project imposed on local authorities and police forces.

An inconsistent approach to cumulative or aggregated effects is apparent both within Volume 3 and across the wider ES document set – Volume 1 claims in many places that cumulative effects are considered but in the CFA reports and in Volume 3 the assessment does not do this as para 1.3.2 confirms. We had pressed for this in responses to previous consultations – both the Scope and Methodology consultation and the Draft ES Consultation. The ES is inadequate and misleading as a result of the failure to assess cumulative effects.

## **6. Comments on Volume 4 – Off-route effects**

Again this document does not contain what we expected, taking a very limited view of what constitutes an off-route effect. It is largely restricted to some transport infrastructure implications at a handful of sites HS2 may use, and does not consider many other issues that we would consider “off-route effects” such as socio-economic and community effects on areas where HS2 will have knock-on effects. These could include economic disbenefits to communities because of advantage elsewhere. This is especially relevant to the socio-economic impact as many jobs will be displaced from one area to another. We are also deeply concerned that the potential impact of the powers sought in the Hybrid Bill is not properly described here or anywhere else in the ES, apart from a small reference to them to some of them in Volume 1. The wide powers sought to change things like the designation of heritage assets, planning restrictions and almost anything else the Government sees fit, on or off route, all have serious environmental implications and these ought to be outlined in the Off-route Effects Assessment.

## 7. Comments on Volume 5 – Technical appendices

We find these to be unwieldy and badly presented, with little or no cross-referencing and no meaningful indexing. It is unacceptable to have to open several different PDF files simultaneously in order to get a complete set of supporting information for the simplest enquiry such as the noise data sources for a particular location. It is even more unacceptable to discover that even after such a search, basic but crucial information is missing.

In spite of the large volume of information contained in the appendices, important things are still missing such as the pass-by decibel level of the trains at operational speed. This question has been asked repeatedly throughout the Community Forum process, in previous consultations and in bi-lateral meetings and always met with the same answer – it will be in the ES. It is not. Without this it is impossible to judge whether the noise assessments are reasonable or not. All the technical advice we have been given suggests they are not, and the withholding of this key information only increases the concern. Until this information is made available the assessment cannot be considered complete and further consultation should be done when it is available so that people can give properly informed comment.

We have repeatedly asked for discussion of the locations for viewpoints and noise measurement sites, expressing concern about their representativeness and scepticism about the predictions made in the Draft ES. The information given in the technical appendices again only confirms our suspicions that selections have often been inappropriate, effects underplayed and assessments unreliable. A stunning example of this is the photomontage in CFA 7 purporting to be the view from the Old Orchard pub in Harefield. At Draft ES stage, we pointed out that the viewpoint seemed to be taken from a much lower point but were disregarded. The Technical Appendix now confirms this is the case – the viewpoint is clearly some 15+m further down the hill, looking obliquely across the valley rather than over its whole panorama where the visual impact will be extensive. The photomontage is highly misleading and HS2 Ltd have known this since Draft ES stage.

We also pointed out problems with the description of other viewpoint sites such as the Grand Union Canal towpath at the viaduct crossing point and Harefield Marina. Both of these present vistas that miss the point – most viewers would look towards the viaduct from Moorhall Road (rather than towards Moorhall Road from practically under the viaduct). The view across Harefield Marina again misses the point – people would more naturally look straight along the towpath in the direction of travel rather than sideways.

We found the technical appendices on visual impact to be quite surprising in that they revealed many more assessment points than suggested in the CFA Report. The number of viewpoints and range of locations was more encouraging than the Report suggests. We were pleased to discover that important locations within Harefield Village on the valley side (such as Mount Pleasant, Merle Avenue and Park Lane) were included however we profoundly disagree with the judgements made about the severity of impact on most of them.

An outrageous aspect of the visualisations from the community's point of view is the decision, described in Volume 1 but not elsewhere, to disregard overhead line infrastructure equipment and tall construction equipment in making assessments of visual impact. This is completely counter-intuitive and makes no sense to residents. The overhead line infrastructure will be extremely visible along the whole length of

the viaduct and large construction equipment will be highly prominent on the skyline from numerous residential and amenity viewpoints throughout the Colne Valley. HS2 Ltd's assessment method results in a gross understatement of the visual impact of the viaduct in and around Harefield.

We commented at Draft ES stage on the Draft CoCP and are disappointed that comments have not been reflected. The document is still presented as a Draft with much important detail yet to be negotiated with third parties such as local authorities. The proposals rely too heavily on third parties for monitoring and enforcement and make no provision for funding the resources required. The proposals still rely too much on dealing with problems after they occur rather than preventing them, and there are no means by which residents can have problematic work halted while solutions are found. As so much of the ES refers to arrangements that have yet to be made, it is impossible for residents to know what is actually being proposed, and therefore impossible to assess what the environmental impacts are likely to be. Further consultation is required on this when there are firm proposals on the table.