

# FOI18-2188

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We consider that the refusal to accede to this request is not justified by the reasons given, and that there is overwhelming public interest in making the requested information available.

## **Regulation 12(5)(a)**

(Public safety) Factors supporting non-disclosure. Numbering refers to paragraphs in the reply.

1. 'details of locations of safety arrangements of the tunnel' presumably refers to locations of ventilation shafts, which are already in the public domain, and of cross passages, which are by their nature protected from outside interference (and might be deduced from a study of recent ground investigation works).
2. Provision of assistance to criminals. The non-disclosure of tunnel safety information might encourage criminals to suspect that the safety provisions are less than adequate, making the tunnels a more inviting target.
3. Should discussion of the safety information result in improvements to the safety arrangements, then there would be a *very considerable benefit* to the public.
4. If the network is vulnerable to attack, it would be more appropriate to address these vulnerabilities, than to attempt to keep them secret indefinitely.
5. The only sites of relevance are the tunnel portal and ventilation shaft compounds. The locations are well publicised, and they are now owned by HS2, with adequate (?) security arrangements, so a discussion of tunnel safety would not lead to any increased risk.

## **Regulation 12(5)(e)**

(Commercial confidentiality – Factors supporting non-disclosure.)

The issues raised in this section are by no means unique to the construction of tunnels, and the use of this excuse to

avoid public discussion is in direct conflict with HS2s 'Community Engagement'<sup>1</sup> strategies –

### **Consulting (p10)**

*We will arrange formal, written, public consultations on the project. These will include making plans available for public review and seeking views from a range of interested parties to inform their development and delivery.*

### **Responding (p10)**

*We will provide free and accessible options for communities to contact us to seek information and raise their concerns. We will respond to their requests and comments in a timely and comprehensive way.*

In addition, the contractors themselves have discussed their efforts to reduce the impact (and cost) of construction, for example by reducing the tunnel air flow and consequently the diameter of the ventilation shafts. Clearly, the commercial confidentiality could be achieved by redaction of cost related information; the safety related design features are already in the public domain.

### **Summary**

Our concerns with regard to the safety of the design for the 15.9km Chiltern Tunnel were raised by an HS2 slide on evacuation in the event of a fire in a tunnel, which described the other tunnel as a 'place of relative safety'. The Business Case for HS2 is based on operating up to 18 trains per hour each at an operating speed of 360kph (320kph in tunnels), with trains carrying up to 1,100 passengers. HS2 informed us that the passengers (including children and the physically handicapped) and crew would disembark onto a walkway 1.3m wide, then proceed to use cross passages 350m apart to access the other tunnel, where they would have to wait on a walkway 1.3m wide (with no trackside barrier) for a train to arrive to remove them to a place of ultimate safety. This would appear to involve a high degree of risk to the passengers, which should not be concealed from the public.

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<sup>1</sup> 'Community Engagement Strategy' Nov 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/773683/HS2\\_Community\\_Engagement\\_Strategy\\_FULL\\_HiRes\\_WEB.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/773683/HS2_Community_Engagement_Strategy_FULL_HiRes_WEB.pdf)

Once construction has started, the only practical mitigation measures would require a reduction in line speed, train frequency or both. This would further reduce the BCR, potentially rendering the line uneconomical.

Given the very large sums of money required for this project, we believe that there is an overwhelming public interest in ensuring that the design will permit safe operation at the speed and frequency assumed in gaining approval for its construction, and that the refusal to release the report into the safety of the tunnels (for the contrived reasons stated) indicate that our concerns have some foundation.