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HS2 INDEPENDENT ASSESSOR

High Speed Rail (London West Midlands) Bill: Additional Provision

Summary of Issues Raised by Comments on the Supplementary Environmental Statement 2 and Additional Provision 3 Environmental Statement

REPORT

Submitted to:
The Examiners of Petitions for Private Bills

HC685

Report Number 13514980570.535/A.0





**SUMMARY OF ISSUES RAISE BY SUPPLEMENTARY
ENVIRONMENTAL INFORMATION AP3**



HIGH SPEED RAIL (LONDON - WEST MIDLANDS) BILL: ADDITIONAL PROVISION

**SUMMARY OF ISSUES RAISED BY COMMENTS ON SUPPLEMENTARY ENVIRONMENTAL
STATEMENT 2 AND AP 3 ENVIRONMENTAL STATEMENT**

Report prepared by the Independent Assessor appointed under Standing Order 224A(6)(a)

Submitted to the House of Commons by the Examiners of Petitions for Private Bills, pursuant to Standing Order 224A(6)(b) and (8)

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1.0 INTRODUCTION

This Report forms the comments of the Independent Assessor on the issues raised by comments on the Supplementary Environmental Statement 2 and Additional Provision 3 Environmental Statement, which together constitute the Supplementary Environmental Information (SEI) which accompanied the Petition for further Additional Provision (“AP3”) to the High Speed Rail (London – West Midlands) Bill, commonly known as the HS2 Bill. AP3 consists of the proposed revisions to Euston station and approach area as well as other design changes in the London Borough of Camden. In this Report ‘AP’ refers both to the overall set of amendments, and to each specific additional provision, depending on the context.

Golder Associates (UK) Ltd was appointed Independent Assessor by the Examiners of Petitions for Private Bills (officials of both Houses of Parliament) in December 2013, after an advertised public procurement procedure. The appointment was made under a Standing Order passed by the two Houses of Parliament which required the Examiners to appoint an Independent Assessor to prepare a summary of issues raised by comments on environmental statements relating to the Bill. The first such summary Report was published in April 2014 and a second Report dealing with a first round of SEI comments was published in December 2014. A third Report dealing with comments to AP2 issues was published in November 2015.

A period of public consultation on this SEI ran from 25 September 2015 to 6 November 2015. The Secretary of State for Transport set the consultation period, under the terms of the relevant Standing Order of the two Houses. The Examiners were required by the Standing Order to set a deadline for the Assessor to compile the Summary Report on the SEI and submit it to the Examiners. This period had to be a minimum of 28 days from the date all comments were sent to the Assessor following the end of the consultation period. 55 comments were received during the consultation, with an additional 52 items of junk email.

This Report sets out the work of the Independent Assessor in respect of comments received from the above consultation. It broadly follows the format of the previous Reports published on comments on the initial Environmental Statement (Golder Associates April 2014), the first round of SEI consultation (Golder Associates December 2014) and the second round of SEI consultation (Golder November 2015). This Report is intended to enable the reader to understand the patterns and key issues arising from the public consultation, along with a presentation of a synthesis of the consultation responses. The results are presented in terms of key environmental issues raised as a result of the consultation, by Community Forum Area (CFA) where possible for the proposed line.

It is not the intention of a summary report to detail each and every response. The responses received from this consultation also did not always correspond neatly to particular AP references. Therefore in this Report the Independent Assessor is presenting key issues and any CFA ‘hot spots’ which were evident from the analysis of the full responses received.

The Report is in two sections:

- i) An introductory section setting out the Terms of Reference, work programme, approach and methodology applied by the Independent Assessor;
- ii) Results, presented as
 - Key issues; and
 - CFA Results.

The Report was submitted to the Examiners on the 16 December 2015 and the Examiners submitted it to Parliament, in line with the Standing Order requirement. As required by the Standing Order, the Department for Transport will publish all responses received. The responses will be made available online at <https://hs2phaseoneap.dialoguebydesign.net/>. The Independent Assessor has no role in the publication of responses.

More information on Golder Associates is included in the initial ES consultation report (April 2014), HC (2013-14) 1199, available at <http://www.parliament.uk/documents/commons-private-bill-office/2013-1014/HS2-Independent-Assessor-Report.pdf>.



Timeline of Assessment

As noted above, the period for consultation started on 25 September and finished on 6 November.

Process

Public responses to the Consultation were submitted directly to the Department for Transport, as required by the Standing Order, with no involvement from the Independent Assessor. The consultation and the process for submitting documents were designed by HS2 Ltd, working with the Department for Transport. The process for the Consultation followed the same format as that used for the prior Environmental Statement and previous SEI consultation periods. Every response was passed on directly from electronic or physical post boxes to the Department's selected processing contactor without any third party opening or reviewing any response.

The Department's contractor was responsible for logging, opening and (in the case of hard copy responses) electronically scanning all received responses, as the responsible party of receipt. The comments were electronically transferred to the Independent Assessor in batches, with each response having its own individual reference number.

On receipt of a batch, the Independent Assessor allocated each response with another reference number appropriate for the Assessor's software programme and referring to the response position within the processing system for stand-alone referencing. Each such reference number is directly linked to the logging reference number to provide an audit trail.

The Independent Assessor developed a bespoke approach for the handling of the responses based on Golder's proprietary GoldStake response management system and created a series of management screens and dashboards to reflect the expected key issues and types of response as well as detailed management and monitoring of performance and outcomes. More details on the GoldStake system are included in the initial ES consultation report (April 2014 HC (2013 -14) 1199, available at <http://www.parliament.uk/documents/commons-private-bill-office/2013-1014/HS2-Independent-Assessor-Report.pdf>).

The database management structure also included reference and logic checks to avoid record duplications and mis-keying of records. The Independent Assessor also had access to senior specialist experts in all technical areas of environmental assessment throughout the course of the assessment to provide an additional level of expert input as necessary.

1.1 Responses

Volume of Responses

The total number of responses received by 6 November 2015 was 55, with a further 52 logged as 'junk' mail. The consultation cut off time was set as midnight on 6 November, with postal submissions accepted into the following week, provided the posting time could be demonstrated as being prior to the deadline. Electronic submissions were not accepted after midnight on 6 November.

Responses arrived in a variety of formats, including electronic use of the standard AP response form and individual emails and letters. These were supplemented by response documents submitted by a range of concerned organisations. Where possible, the Independent Assessor related each response to an appropriate CFA where this was indicated by a responder. The consultation was open to national responses (via the online consultation form) and was therefore not restricted to the public within the immediate hinterland of the affected area.



Types of Responses by volume pie chart

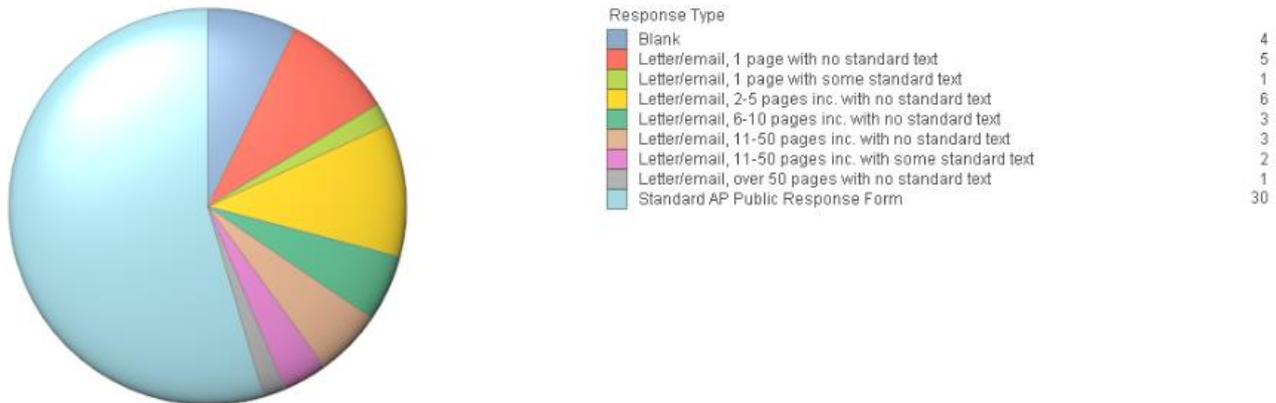


Figure 1: Responses resulting from the Public Consultation on the Supplementary Environmental Information AP3 (September – November 2015) for Phase I of HS2.

Figure 1 shows that the most common type of response received was the Standard AP Response form made available by the consultation organisers. The format of the AP consultation response form was based on the previous versions used in the prior consultation phases. Most submissions received in this category were between 6 and 15 pages long.

No campaigns specific to the SEI and therefore constituting 'standard text' were identified. The responses also included formal submissions from a range of organisations including local authorities, special interest groups and others at a parish level. Many of these were providing supplementary comments to their original responses to the Environmental Statement consultation. Documents submitted ranged from single page submissions to 250 pages.

Calibration with Environmental Statement Categories

The Independent Assessor has used the categorisation of issues as defined in the ES where possible as the foundation of its analysis. This was the format followed during the reporting of the ES consultation phase and all other rounds of SEI consultation. This method enables the presentation and discussion of results in Section 2.0 of this Report to be easily related to the material and locations presented in the SEI material accompanying the AP.

These categories have been supplemented by the Independent Assessor to include a smaller number of issues that arose from multiple submissions in the response results. The Assessor has also used the designation of CFAs and specific APs as the foundation of the results presentation in section 2.0. These will enable interested parties to quickly gain an understanding of the relevant AP and relate it to local issues (where expressed in this manner). An interactive CFA map is also available at <http://www.hs2.org.uk/draft-environmental-statement/community-forum-areas-map>.

1.2 Campaigns

As previously mentioned no 'campaigns' specific to the AP3 Consultation and therefore constituting 'standard text' were identified by the Independent Assessor.

2.0 RESULTS

This section of the Report presents a summary of the key issues and concerns received from all respondents to the AP3 (September - November) consultation. The Key Issues section is designed to provide the reader



SUMMARY OF ISSUES RAISE BY SUPPLEMENTARY ENVIRONMENTAL INFORMATION AP3

with a quick and accurate picture of the feedback received from the entire consultation. The results include responses from a range of respondents from individuals to public authorities. It does not evaluate responses on a technical level against assumptions presented in the AP. Responses specifically referencing individual CFAs are referenced in section 2.2.

This section is intended to provide the reader with a snapshot of the issues expressed within each category. However, where particular geographical features or themes are a recurring element of the relevant responses this Report highlights those issues.

Key issues are presented below ranked in numerical order of comments received. Many responses referred to numerous issues within each response. The separate issues were logged as separate comments where appropriate. Consequently the figure for the total number of comments/issues is greater than the total number of responses.

Issues relating to the construction phases (noise and vibration, traffic and transport and air quality) were of the greatest concern for respondents to this AP consultation. This reflects the fact that the majority of responses were concerned with the North London CFA areas.

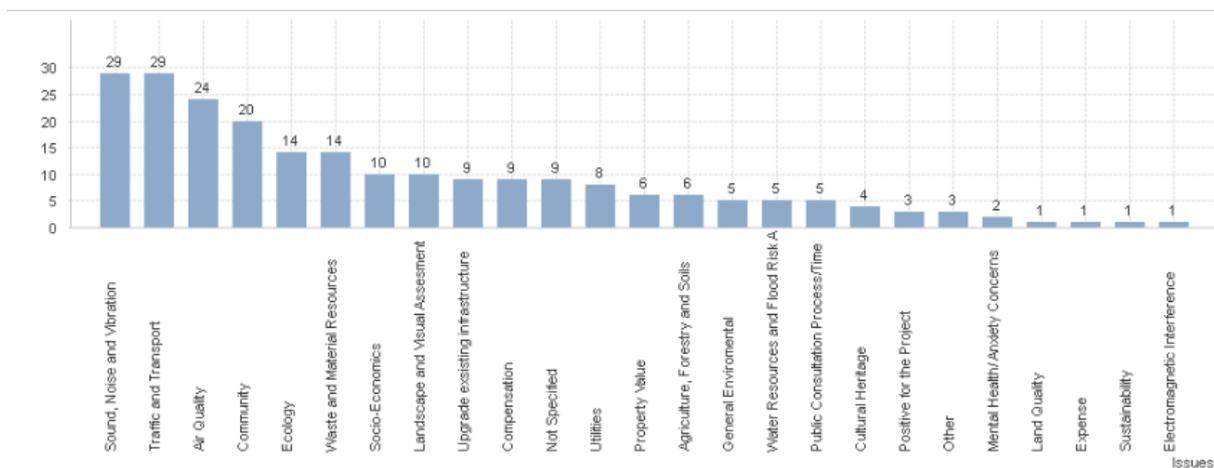


Figure 2: Volume of Responses per category

Issue =1: Sound, Noise and Vibration – 29 Comments

This was the highest ranked response issue from the consultation. The majority of responses were concerned with particular concerns local to the respondent. Respondents were concerned about the potential for 'out of hours' working to impact quality of life from noise pollution and potential damage to housing and business assets from vibration associated with construction activity. Concern was expressed about inadequate mitigation proposals for minimising impacts from noise and vibration and the effectiveness of the proposed Construction Environmental Management Plans.

Respondents were also unconvinced that cumulative impacts from all construction activities had been fully assessed in terms of environmental impacts. Some respondents were concerned that the noise methodology used to measure impacts was inadequate, with the use of averages in the impact assessment minimising the significance of noise impacts to the local area and particular receptors.

Issue =1: Traffic and Transport – 29 Comments

Respondents were concerned about a number of sub issues within this category. Many noted that AP3 suggested that 800 daily HGV movements are projected in the Euston and Camden area and this raised concern for many respondents, including potential cumulative effects on traffic flows, bus routes and cyclist amenity. The proposed traffic planning for the HGV parks and construction traffic routing was seen as creating significant impact issues. Potential disruption of emergency vehicle access was a concern for many respondents as was the proposed duration of the construction period.



Concern was expressed that the proposed 10 operating hours in the Euston area will create HGV peaking and queueing which will adversely impact the surrounding areas. Respondents also questioned whether the proposed construction planning is likely too ambitious and consequently traffic and transport impacts had been underestimated in the mitigation planning. Some respondents were concerned about the cumulative impacts on east-west transportation flows as well as potential disruption for the Crossrail projects

Many respondents also queried whether enough thought had been given to the potential use of rail to replace HGV movements throughout the construction phase.

Issue 3: Air Quality – 24 Comments

Respondent concern in this category was focussed on the potential for air quality impacts from construction traffic and construction activities. Many raise queries on the methodology used for assessing likely impacts from dust in particular, the perceived impact this will have on quality of life and the mitigation measures proposed to control this issue. Some respondents request further implementation of air quality monitoring stations in the Euston area to better model baseline impacts and improve mitigation measures.

Issue 4: Community – 20 Comments

Respondents all expressed concern about the construction impacts on the 'living and environment for all households' in the affected areas. It was felt that the proposed duration of construction will strongly affect all local communities and that local businesses are likely to be 'heavily affected'. Some respondents stated that there has not been enough 'meaningful' community engagement and that the potential loss of open spaces, green areas, trees and children's services were potentially significant community issues.

Some respondents were concerned about the potential impact on the arts and tourism in the North London area. Some respondents recognised the long term potentially positive impacts of the proposed Euston station for the area as long as the redevelopment created 'beneficial environments for passengers and the surrounding communities' along with improved accessibility measures for the new station facilities.

Issue =5: Ecology – 14 Comments

Respondents were concerned about insufficient proposed ecological mitigation and on-going monitoring during the construction period. The increased length of construction disruption is seen as negatively affecting the recovery of habitats and local populations. Respondents were also concerned that elements of local biodiversity were not sufficiently considered and required further surveys and work.

The majority of respondents were concerned about a particular hedgehog population in the Regents Park area which they felt required further study and protection from the proposals.

Issue =5: Waste and Material Resources – 14 Comments

All the respondents who highlighted this issue are concerned over the level of HGV movements which will likely be required to transport wastes arising from construction, demolition and excavation. A common theme is the request to further consider the use of rail transport options (and perhaps conveyors) to minimise truck movements and increase sustainable construction measures. Some respondents noted that AP3 measures will require an increase in waste production from previous proposals and registered their discontent over this development.

Issue =7: Landscape and Visual Assessment – 10 Comments

Respondents were concerned over alterations to the existing landscapes and the 'character' of their area by the proposed project infrastructure. Respondents highlighted particular instances of relevance to themselves and their communities, but common themes include blocking of views, loss of open spaces and amenity blight. The design parameters for the development of the proposed Euston Station were discussed by some respondents as well as the issue of raising the Hampstead Road Bridge, which could result in increased visual impacts for some community receptors.

Issue =7: Socio-economics – 10 Comments

Comments in this category mostly relate to perceived threats to business and livelihoods as a result of the AP3 proposals. This includes potential disruption from proposals to change current access patterns as well



as proposed land take of existing assets and disruption proximity to existing commercial and community premises. Some respondents questioned the underlying socio-economic assumptions and modelling used by the project.

Issue =9: Compensation – 9 Comments

Respondents were concerned that the level of proposed compensation is inadequate compared to the potential 'blight' on property value, quality of life disruption and level of long term impact on existing residences and business. The duration and extent of the proposed construction is a common theme, with some respondents expressing concern about the potential negative effect on insurance cover for their property.

Issue =9: Not Specified – 9 Comments

This category included a number of blank responses where the respondent had not written any comments or concerns within their submission. Others included brief statements concerning the project without any reference to particular issues and one response submitted a nihilistic statement concerning the project in general.

Issue =9: Upgrade Existing Infrastructure – 9 Comments

The majority of these comments expressed the view that upgrading of transportation linkages and connectivity between the project and existing and proposed transportation initiatives were a key requirement for inclusion in the proposed project planning. These include impacts on surrounding surface projects, existing London Underground and Network Rail stations and general connectivity and transport flows. One respondent strongly argued for the Euston station development to go ahead.

Issue 12: Utilities – 8 Comments

Respondents were concerned that the level of disruption which will be occasioned by the diversion of utilities in the Euston and Camden areas has been under estimated. Some respondents questioned the robustness of the project's understanding of the utilities infrastructure in the area and the long term disruption and impacts from the construction activities on utility provision for local communities.

Issue =13: Property Value – 6 comments

Respondents in this category expressed concern about potential property blight and negative impact on values for property likely to be impacted by the project.

Issue =13: Agriculture, Forestry and Soils – 6 Comments

With the majority of respondents for this AP focusing on the North London area, comments in this category were concerned with potential impacts on urban green spaces and particular patches of woodland which are likely to be affected by the positioning and construction of tunnel air shafts. Only one respondent raised the issue of potential loss of green belt and farming land.

Issue =15: General Environmental – 5 Comments

These comprised general comments on the utility of green resources in the urban area and concern that existing areas were not being treated with appropriate respect and care. Some respondents also noted that residual negative impacts on their neighbourhood were likely to be substantial.

Issue =15: Water Resources and Flood Risk – 5 Comments

The majority of comments in this section were concerned with the temporary and permanent effects of the construction activities on surface water, groundwater and flood risk for the built environment.

Issue =15: Public Consultation Process – 5 Comments

Comments in this category were concerned with the perceived lack of time available for respondents to study the documentation in order to submit detailed responses. Some respondents stated that they believed the public engagement in their area was inadequate.



Issue 18: Cultural Heritage – 4 Comments

Cultural heritage issues mentioned by respondents focused on buildings likely to be affected by construction activities and re-development. Respondents highlighted listed buildings in the Euston and Camden area as well as amenity areas and aspects of the built environment of importance for local communities. The majority of respondents highlighted particular areas of concerns, with a minority making general comments about impacts on 'precious buildings' without specifying any particular examples.

Issue =19: Other – 3 Comments

This issue includes a miscellany of issues from the perceived shortcomings of the new Euston development façade design, comments on terminology used in the AP documentation, and the philosophy of the Euston design concepts.

Issue =19: Positive for the Project – 3 Comments

Responses in this category focused on the redevelopment of Euston and regeneration opportunities generally. Respondents urged the project to 'be ambitious' in its objectives and highlighted the importance of the Central London development and transport link.

Issue 21: Mental Health /Anxiety – 2 Comments

One respondent highlighted concerns on the impact of project construction on the well-being and mental health of particular vulnerable community members and the other respondent referred to individual concerns.

Issue =22: Land Quality – 1 Comment

One respondent was concerned about the mitigation planning for contaminated land, remediation and land quality management.

Issue =22: Electro-magnetic interference – 1 Comment

This is a query concerning potential impacts from one sub-station and whether it will comply with 2013/35/EU requirements by the compliance deadline of July 2016.

Issue =22: Expense – 1 Comment

Comments in this category focused on the overall cost of the HS2 project, with the respondent questioning the merit of the project.

Issue =22: Sustainability – 1 Comment

This respondent made a comment that the contribution of the project to climate change required further analysis and that the project would have an extensive impact on the carbon footprint of the Camden area.



2.1 Community Forum Areas and related Additional Provisions (APs)

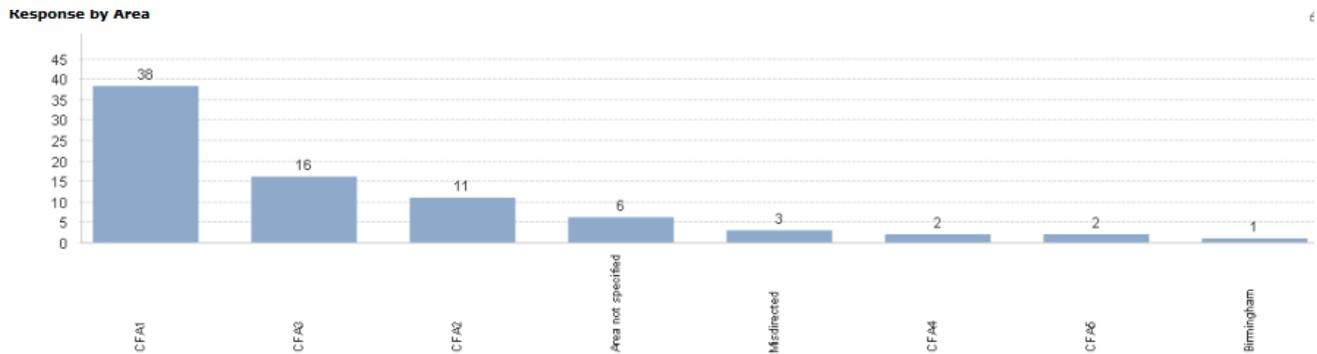


Figure 3: Responses by volume against CFA and key issue area.

The area covered in the AP3 consultation considered the proposed revision to Euston station and approach area as well as other design changes in the London Borough of Camden. This resulted in responses from the following CFA designations with six submissions either not referring to any CFA or any identifying marker which could assist in allocation:

CFA 1 – Euston Station and Approach – 38 Comments

CFA 3 – Primrose Hill to Kilburn (Camden) – 16 Comments

CFA 2 – Camden – 11 Comments

CFA 4 – Kilburn (Brent) to Old Oak Common – 2 Comments

CFA 5 –Northolt Corridor – 1 Comment

Three submissions were mis-directed and one submission was received from Birmingham.

Figure 3 above illustrates that the concentration of responses is on CFA 1. The majority of responses for the second highest CFA designations (CFA 2 and CFA 3) were discussed in submissions which also included comments on CFA 1. Consequently the analysis of findings by issue in Section 2.0 above brings out all the key points for this overview.

Some submissions included lengthy listings of particular design and environmental topics under specific location (e.g. road, building, transport route etc.). These can be found by reference to the original response document which will be posted on <https://hs2phaseoneap.dialoguebydesign.net/> as it is not the purpose of this report to replicate submissions in full.



Report Signature Page

GOLDER ASSOCIATES (UK) LTD

A handwritten signature in black ink, appearing to read 'Petrides'.

Christina Petrides
UK EIA Leader

A handwritten signature in black ink, appearing to read 'Simon D. Aldrich'.

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