

DRAFT RESPONSE BY RAMBLERS TO HS2 CONSULTATION

This is the draft response prepared by staff at central office to the Government's consultation on HS2. It is being circulated to all Ramblers Area Chairs, Area Secretaries, Area Footpath Secretaries, Countryside Secretaries and Access Officers. These are invited to comment on the draft response, individually or on behalf of their Area, by e-mail to { [HYPERLINK "mailto:walking.environment@ramblers.org.uk"](mailto:walking.environment@ramblers.org.uk) }, or by letter to the Walking Environment team at central office, by 7 July 2011.

Those commenting should be aware that at Ramblers General Council 2011, it was agreed that the Ramblers give its support to 'The Right Lines Charter—A Charter for High Speed Rail', published 7 April 2011 by the Campaign to Protect Rural England:

{ [HYPERLINK "http://www.cpre.org.uk/what-we-do/transport/rail/update/item/1683-a-charter-for-high-speed-rail"](http://www.cpre.org.uk/what-we-do/transport/rail/update/item/1683-a-charter-for-high-speed-rail) }.

The Ramblers' draft response is necessarily drafted against the background of the Right Lines Charter, and it will be noticed that it incorporates several of its points.

Any enquiries to { [HYPERLINK "mailto:walking.environment@ramblers.org.uk"](mailto:walking.environment@ramblers.org.uk) }.

The Government's questions, and our draft answers:—

1. This question is about the strategy and wider context:

Do you agree that there is a strong case for enhancing the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades?

A. The Ramblers' charitable aims include, in summary: the protection of public footpaths and other routes used mainly for walking; the protection of the beauty of the countryside; the improvement and enhancement of the walking environment; and the promotion of walking for health, recreation and as part of an integrated system of transport. The Ramblers recognises that an efficient, sustainable transport system is vital to well-being and prosperity. We have traditionally supported public transport, but with particular emphasis on getting people to places where they want to walk, and the current proposal does not contribute to this. Walking has been shown to boost the local economy, particularly in rural areas: and we would look more favourably on an improved inter-city network if it can also allow improvements to local services. We also recognise the need to reduce the damaging impact of travel on the overall environment and on local communities and that a key priority in that is to shift journeys from road and air to rail. Properly handled—for example if it were to comply with the principles set out in the Campaign to Protect Rural England's 'Right Lines' Charter—High Speed Rail could be a viable means of increasing rail capacity

and connectivity. We believe that the Government's proposals and consultation procedures do not meet these principles; we think they should be implemented before construction of any high speed rail project commences. We note, too, that the proposal seems to treat enhancing the ability to travel at maximum speed as an end in itself; it is not clear whether other realistic options have been considered, such as reducing the need to travel in the first place, improving the capacity of other rail routes, and reducing regional economic disparities.

2. This question is about the case for high speed rail:

Do you agree that a national high speed rail network from London to Birmingham, Leeds and Manchester (the Y network) would provide the best value for money solution (best balance of costs and benefits) for enhancing rail capacity and performance?

A. We do not see ourselves as being in a position to answer the question of whether this would be the 'best value for money solution for enhancing rail capacity and performance'. We do however note that the present proposals are not part of any long-term transport strategy or of nationally-agreed priorities (while it is notable that in all other countries where High Speed rail initiatives are being developed, they are doing it within a national framework). And we are concerned that, whereas in some countries all operators of public transport co-operate to provide alternatives to the private car, in Britain there is a tendency for operators to compete with each other for passengers. There needs to be a change in the ideology which underlies the provision of integrated public transport if it is not to continue to struggle against the private car.

3. This question is about how to deliver the Government's proposed network:

Do you agree with the Government's proposals for the phased roll-out of a national high speed rail network, and for links to Heathrow Airport and to the High Speed 1 line to the Channel Tunnel?

A. On the specific question of a phased roll-out, we have no strong view. The important point for any UK strategy is to address and swiftly tackle the issues of rising carbon emissions from land transport. High Speed Rail therefore needs to be planned as a strategic element of a sustainable, near-zero-carbon transport system, with minimal effect on local communities and local facilities. We do not believe that this (or any similar) project should go ahead unless the Government has satisfactorily demonstrated compliance with the Right Lines Charter.

4. This question is about the specification for the line between London and the West Midlands:

Do you agree with the principles and specification used by HS2 Ltd to underpin its proposals for new high speed rail lines and the route selection process HS2 Ltd undertook?

A. We cannot see anything in the documents published by the Government that shows that environmental costs and benefits have been properly accounted for, and

this gives us trouble over agreeing with the principles and specification. We are of the view that it is not possible to predict impacts over a 75-year timescale, as is being attempted for HS2. This calls into question the methodology used for assessing HS2's benefits. Very little weight has been given in HS2's business case to the treatment of impacts which cannot be monetised, such as those on landscapes, heritage, and habitats. There is no reference to the severance of lesser highways such as public rights of way, with which the Ramblers is especially concerned, though we estimate that about 150 will be affected along the London–Birmingham route. It concerns us (as we say more fully in our answer to Question 5) that technical specifications are being met by the setting of inflexible objectives which have seriously limited the range of route options considered.

5. This question is about the route for the line between London and the West Midlands:

Do you agree that the Government's proposed route, including the approach proposed for mitigating its impacts, is the best option for a new high speed rail line between London and the West Midlands?

A. No. It is not clear that a case has been made to justify the proposed route crossing the Chilterns Area of Outstanding Natural Beauty. Though it is true that a direct line from London to the West Midlands would inevitably pass through this AONB, the constraints imposed by the underlying assumptions about speed and route have precluded less damaging options. It is claimed that the route uses an 'existing transport corridor'; but we cannot agree that the impact on the environment, and on the enjoyment of the area by walkers, of the existing conventional half-hourly trains and of traffic on the only moderately busy A413 are in the same league as the potential impact of HS2. Similar considerations apply to the impact of the scheme on the London and West Midlands green belts: the constraints that limit choice of route have not been adequately balanced against the impact on hitherto undeveloped landscape. The countryside proposed to be traversed by other parts of the route, though not protected by AONB status, is generally tranquil; but again, the constraints imposed by seeking to achieve the highest possible speeds, without consideration of whether this is the best all-round option, appear to have ruled out the environmentally preferable option of a route along existing railways or motorways. So we do not agree that this proposed route is the best option.

6. This question is about the Appraisal of Sustainability:

Do you wish to comment on the Appraisal of Sustainability of the Government's proposed route between London and the West Midlands that has been published to inform this consultation?

A. Better scrutiny should be given to the assumptions about future transport trends and policies, so as to take account of possible technological changes and alterations in cost of different forms of travel. It is a matter of particular concern to us that the impact on footpaths, bridleways and other rights of way on foot appears to have received little attention. These are highways, in law, as much as roads. Diverting a footpath causes a user of that highway considerably greater inconvenience than a road diversion of similar length would cause a driver, and can adversely affect the

character of a recreational route. We estimate that 150 paths will be crossed by the proposed route, but the Appraisal of Sustainability mentions only 27 of them—those referred to by HS2 Ltd as ‘promoted routes’ or ‘strategic routes’. HS2 Ltd have explained to us that it is only the effect on these routes, and not the effect on the likely 120 other rights of way affected, that has so far been taken into account. So the effect on most public rights of way has not been considered. This aspect of the consultation is therefore fundamentally flawed. We have received assurances from HS2 Ltd that it is their intention to avoid path closures (other than temporarily during construction). But since HS2 Ltd have told us that the effect on only a handful of ‘strategic’ routes has been considered, little or no thought can have been given to how this will be achieved; and we are concerned lest the assurances should prove impossible, or too expensive, to deliver. Even if all paths remain open, public enjoyment of them will be severely reduced by the noise levels on bridges over, or paths close to, the route. Once again we return to the point that the route traverses currently tranquil countryside, whereas if it could be sited alongside existing major railway lines or motorways the impact of additional noise would be more acceptable. We suppose that in some cases, it will be necessary to divert public paths to convenient crossing-points. For example, where a farm is severed, and provision is made for an accommodation crossing such as a bridge or cattle-tunnel for the benefit of the occupier, such a provision could also be the means of crossing the line by nearby public paths, provided the resulting diversion to the path is reasonably convenient without significant adverse effect on enjoyment. In our view, provision must be made so that any necessary diversions follow desire-lines away from the railway; they should not simply be routes within the limits of deviation which run as unnatural, ‘dog-leg’ diversions hard alongside the line from the point of severance to the new crossing-point.

7. This question is about blight and compensation:

Do you agree with the options set out to assist those whose properties lose a significant amount of value as a result of any new high speed line?

A. This is not directly relevant to our concerns as Ramblers, though we would wish ordinary principles about natural justice to apply.