



# HS2 Phase One environmental statement consultation

## Response Form

**This consultation will close on 27 February at 23:45**

On 25 November the High Speed Rail (London – West Midlands) Bill was introduced to Parliament seeking the powers necessary to construct and operate HS2 Phase One. In line with Parliamentary Standing Orders an Environmental Statement has been produced to accompany the Bill. A consultation is now being held on the Environmental Statement to ensure that the decision taken by Parliament at Second Reading of the Bill is informed by the public's views on the Bill's environmental impacts.

You can respond to this consultation by emailing your comments to:

[HS2PhaseOneBillES@dialoguebydesign.com](mailto:HS2PhaseOneBillES@dialoguebydesign.com)

Or writing to:

FREEPOST RTEC-AJUT-GGHH  
HS2 Phase One Bill Environmental Statement  
PO Box 70178  
London  
WC1A 9HS

You can also respond by downloading and saving this response form to your computer, completing it, and then attaching it to an email and emailing your comments to [HS2PhaseOneBillES@dialoguebydesign.com](mailto:HS2PhaseOneBillES@dialoguebydesign.com). You can also print your form and send it to the address above.

Please only use the channels described above when responding to this consultation. We cannot guarantee that responses sent to other addresses will be included in this consultation.

For more information about the consultation please visit [www.gov.uk](http://www.gov.uk) or call the HS2 Public Enquiries Team on 020 7944 4908.

Please write your response clearly in black ink within the boxes and, if you require further space, please attach a further sheet to the response form.

## Information about you

It is important to give us your name to ensure your response is included

First name: Ian
Surname: Runeckles
Address: Canal & River Trust, The Toll House, Delamere Terrace, Little Venice, London
Postcode: W2 6ND
Email: ian.runeckles@canalrivertrust.org.uk

Are you responding on behalf of an organisation? If so, please state your organisation's name and your position below:

Canal & River Trust – Strategic Planning Manager (South & South Wales)
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## Confidentiality and data protection

Anyone wishing to send comments should note that responses will be published on a publicly-accessible website in due course, but we will not publish names, addresses and signatures of individuals. As it is not possible for us to check whether the substance of responses contains other personal data, you should not include information in your response that could identify you unless you are happy for it to be made public. If you do not want any of your response to be published you should clearly mark it as "Confidential" in the "subject" of the email or at the top of your letter. However, please note the following two paragraphs.

**If you want the information you provide to be treated as confidential**, you should be aware that all information provided in response to this consultation, including personal information, may be subject to disclosure in accordance with access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). Under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with our confidentiality obligations. In view of this it would be helpful if you could explain in your response why you regard the information you have provided as confidential. If we receive a request for disclosure of the information you provide we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department for Transport or HS2 Ltd.

Please note that all responses received, whether marked Confidential or not, will be passed on in full to the Houses of Parliament and their appointed Assessor, who will analyse the responses and make a report to Parliament. That report will not contain your personal data.

I wish my response to be treated as confidential (please write your reasons below)

The Environmental Statement is made up of a number of documents. The Non-Technical Summary provides a summary of all the information contained in the Environmental Statement.

Volume 1 provides an introduction to the Environmental Statement including an overview of the impact assessment process and consultation undertaken to date, and the main strategic, route-wide and local alternatives considered.

The line of route between London and the West Midlands is described in Volume 2, which has been divided into 26 smaller geographical sections called Community Forum Areas (CFAs) and each area is covered by its own separate report.

Volume 3: route wide effects described the likely route wide environmental effects of the construction and operation of Phase One of HS2.

Volume 4: off-route effects describes the likely significant environmental effects of Phase One of HS2 expected at locations beyond the route corridor, such as rail stations, rail depots and rail lines. This volume covers areas not included in the community forum area reports in volume 2.

Volume 5 contains technical appendices, including the response to the draft Environmental Statement consultation and the draft Code of Construction Practice, setting out baseline data and other technical information.

**Please let us know your comments on the Environmental Statement in relation to the Non-Technical Summary and five volumes.**

**Question 1.** Please let us know your comments on the Non-technical summary.

**My comments on the Non-technical summary are:**

No comments.

**Question 2:** Please let us know your comments on Volume 1: Introduction to the ES and Proposed Scheme.

**My comments on Volume 1 are:**

See attached Canal & River Trust letter dated 26 February 2014 and appendices.

**Question 3:** Please let us know your comments on Volume 2: Community Forum Area reports.

You are welcome to comment on one, a number or all the reports listed below. Please tick the reports described below that your comments apply to. If making comment on more than one report, please indicate clearly in your response the report to which your comments relate.

Please tick those reports you wish to comment on below:

- |                                                                                |                                                                            |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> CFA 1 Euston                               | <input checked="" type="checkbox"/> CFA 15 Greatworth to Lower Boddington  |
| <input checked="" type="checkbox"/> CFA 2 Camden and HS1 Link                  | <input checked="" type="checkbox"/> CFA 16 Ladbroke and Southam            |
| <input checked="" type="checkbox"/> CFA 3 Primrose Hill to Kilburn (Camden)    | <input checked="" type="checkbox"/> CFA 17 Offchurch and Cubbington        |
| <input checked="" type="checkbox"/> CFA 4 Kilburn (Brent) to Old Oak Common    | <input type="checkbox"/> CFA 18 Stoneleigh, Kenilworth and Burton Green    |
| <input checked="" type="checkbox"/> CFA 5 Northolt Corridor                    | <input type="checkbox"/> CFA 19 Coleshill Junction                         |
| <input type="checkbox"/> CFA 6 South Ruislip to Ickenham                       | <input checked="" type="checkbox"/> CFA 20 Curdworth to Middleton          |
| <input checked="" type="checkbox"/> CFA 7 Colne Valley                         | <input type="checkbox"/> CFA 21 Drayton Bassett, Hints and Weeford         |
| <input type="checkbox"/> CFA 8 The Chalfonts and Amersham                      | <input checked="" type="checkbox"/> CFA 22 Whittington to Handsacre        |
| <input type="checkbox"/> CFA 9 Central Chilterns                               | <input type="checkbox"/> CFA 23 Balsall Common & Hampton-in-Arden          |
| <input checked="" type="checkbox"/> CFA 10 Dunsmore, Wendover & Halton         | <input type="checkbox"/> CFA 24 Birmingham Interchange and Chelmsley Wood  |
| <input type="checkbox"/> CFA 11 Stoke Mandeville and Aylesbury                 | <input type="checkbox"/> CFA 25 Castle Bromwich and Bromford               |
| <input type="checkbox"/> CFA 12 Waddesdon and Quainton                         | <input checked="" type="checkbox"/> CFA 26 Washwood Heath to Curzon Street |
| <input type="checkbox"/> CFA 13 Calvert, Steeple Claydon, Twyford and Chetwode | <input type="checkbox"/> Don't know                                        |
| <input type="checkbox"/> CFA 14 Newton Purcell to Brackley                     |                                                                            |

**My comments with regard to the reports ticked above are:**

See attached Canal & River Trust letter dated 26 February 2014 and appendices.

**Question 4:** Please let us know your comments on Volume 3: Route-wide effects.

**My comments on Volume 3 are:**

See attached Canal & River Trust letter dated 26 February 2014 and appendices.

The Trust has worked closely with Inland Waterways Association (IWA) to understand the potential impacts of HS2 on the inland waterways and agreed the general principles for the protection of inland waterways (either owned by the Trust or third parties, including restoration groups) affected by HS2:

- **Protection of Routes** – No canal should be lost or blocked, whether a restoration project or a navigation in use, and where the route crosses a waterway, the waterway should be restored to a minimum of navigation standard, whether the navigation is presently extant or not;
- **Navigation** – There should be minimal disruption to navigation during the construction phase, and any necessary impacts should be integrated with CRT's planned stoppage programmes;
- **Waterway gauge** - there should be no detriment to the constructed gauge of any waterway due to HS2, particularly in respect of headroom, taking account of any proposed enhancements on freight waterways. Any waterway crossings or other alterations to the waterway should comply with CRT's policy of headroom of 3 metres over water, and 2.75m over towpaths, with a minimum width of 12m for broad and 6m for narrow canals;
- **Mitigation** – wherever possible, mitigation should be completed in advance of construction; and
- **Betterment** – opportunities should be sought to achieve betterment for waterways within the planning process as compensation for environmental and heritage damage caused by HS2's construction and operation.

The Trust also endorses the comments made by the Inland Waterways Association in respect of Volume 3.

**Question 5:** Please let us know your comments on Volume 4: Off-route effects.

**My comments on Volume 4 are:**

No comments.

**Question 6:** Please let us know your comments on Volume 5: Appendices and map books. You are welcome to comment on one, a number, or all the appendices. Please indicate in your response which report(s) your comments apply to (e.g. the draft Code of Construction Practice).

**My comments on Volume 5 are:**

See attached Canal & River Trust letter dated 26 February 2014 and appendices. In particular, the Routewide effects regarding noise, which states:

Noise

The Trust is very concerned about noise disruption in quiet rural areas blighting sections of the waterway. As a minimum, all parts of the waterway network should be protected as "Quiet" areas as per Section 13 of the Code of Construction Practice. Noise protection on viaducts is not as effective as earth structures at reducing the noise contours, so there is a disproportionate impact on waterways at crossing points. Noise protection should be provided to reduce the impact on the waterway corridors (please also see our comments below on casual mooring) not only during the construction phase but also in the operational phase.

Noise disruption will be frequent and continues for large parts of the day which will be intolerable for mooring sites, including casual moorings. The Trust will require the waterways to be treated as residential areas but allowing for the lower sound insulation provided by the shell of a boat compared to a house. Mitigation for boats off the Trust's waterspace should be discussed with the operators/owners of the mooring sites.

Moorings are used in a number of ways. Long –term moorings (i.e. the parking space for the boat) may be used for leisure purposes or could be someone's primary residence i.e. a residential mooring. Even use for leisure purposes can mean that boaters spend a significant period of time at the mooring location. There are also designated visitor mooring areas i.e. an area used by boaters for mooring whilst on a cruise. In addition to these moorings the relevant waterway legislation permits casual mooring for up to 14 days at a time by any licensed boat along any length of towpath. The exceptions to this are where the towpath is designated for use by long term permit holders, the moorings are visitor moorings where the duration of stay has a specific time limit or the towpath is designated as a 'no mooring' stretch. Casual and visitor mooring can be undertaken by any boat regardless of how it is being used, whether it is a boater on holiday or someone for whom their boat is their primary residence. The impact of HS2 on all forms of mooring needs to be considered and addressed.

The Trust is extremely concerned that HS2 Ltd has failed to understand the fundamental purpose, function and appeal of canals as quiet and peaceful corridors for exploring and enjoying, whether by boat, by bike or on foot. The Trust is disappointed that HS2 Ltd has determined that in Volume 5 Technical Appendix (Sound, noise and vibration) - Appendix SV-001-000: Annex G page 7 that canals do not merit protection as 'noise sensitive receptors' and will only enjoy noise mitigation measures where this is proposed for residential and non-residential receptors in the

vicinity. HS2 Ltd has focussed on assessing noise impacts on the canals in relation to permanent residential and leisure moorings only. It has failed to address the impact on casual and visitor moorings used as primary residences for 'continuous cruisers'. It has also not addressed the noise impact on the other 90% of users of the canal corridor, e.g. walkers, cyclists, anglers, etc, that will be discouraged from using the canals in the vicinity of interface points undermining the Trust's ability to continue to deliver significant public benefits.

In respect of moorings, Annex G states that "temporary and static moorings have, by their nature, transitory use with users staying only for short periods of time (e.g. a few hours at a time)". This is not correct. Users have the right to moor along the entire length of the canal network for up to 14 days unless restrictions indicate otherwise. Annex G adds that "People generally use such moorings when starting on journeys to other locations along the waterways network or whilst en-route between locations". The Trust would like to understand the basis for this conclusion. The Trust agrees with Annex G in that "Increases in noise due to construction and operation of the Proposed Scheme may adversely affect the acoustic character of the area around such facilities". However, the Trust strongly disagrees with the conclusion that "users will not be exposed to any increased noise for long periods" and "any adverse noise effects on users are not considered significant". Users may be exposed to such noise pollution for extended periods of time causing significant adverse noise effects.

The fundamental point is that the Trust's customers have until now enjoyed peaceful and quiet visits to the canal at the interfaces with the Proposed Scheme and would continue to be able to do so if the Proposed Scheme had not proposed to cross the canals at the interfaces. It is therefore not unreasonable for the Trust to expect the impact on the canals to be minimised in line with Government policy on noise pollution and for canals and offline facilities to be afforded the same protection as other noise sensitive receptors such as residential properties.

**The Trust also endorses the comments made by the Inland Waterways Association (IWA) in respect of Volume 5.**

Thank you for completing the consultation response form. Responses to the consultation will be analysed and used to produce a summary report which will help inform Parliament's consideration of the scheme.