

# Transport Planning Society

## The Transport Planning Society (TPS) Submission to the HS2 Public Consultation

### *Introduction*

Overall, TPS comments on the HS2 consultation are based on a summary of our members' views, insofar as they have been able to settle them, expressed directly to us, or at the events which we have organised.

This leads us to a description of what should be expected, in transport planning terms:

- 1 for the formal appraisal of HS2,
- 2 of the key issues identified so far, particularly where these have not yet been fully recognised
- 3 for the framework which should be used to proceed any further with HS2, assuming that the consultation does not result in the scheme being put on hold. This includes how to proceed in the decision making process, and how to take into account the social, economic, health, and environmental impacts outside transport.

Before doing so we make three general comments. The first is that many members have expressed their support for creating a vision for transport in 2050, and in this sense do not have an instinctively pessimistic view of such a major scheme. However, they are concerned that the vision for HS2 is for one aspect of travel, i.e. longer distance within UK and to nearby Europe, and for one mode within it. They would support the evolution of a national strategy for longer distance travel (and alternatives to it) and relating this to an integrated approach to regional and local networks.

The second observation is that many find it impossible to support or oppose the scheme without such a clear transport planning framework in place. It is difficult to assess how individual elements can contribute to achieving objectives for economic development (national and local), carbon reduction, health improvement and reducing other environmental and social costs. The danger is that without a framework, conflicts are created and synergies missed.

Finally, HS2 would be a major investment which is at a different scale to that envisaged for the rest of the transport network. It must therefore be scrutinised in a way which commands maximum support, not simply related to the scheme itself, but based on whether it has been appraised in a transparent and rational way.

## ***Members' views***

In last year's Member Survey, HS2 was seen as a low priority, although this may have changed as plans have been brought forward. There was very little difference in opinion between our regions, which somewhat surprised us. The survey is being repeated this year and results will be available in the Autumn. Since the survey last summer, TPS has held two well attended HS2 events: one in London and one in Birmingham. These have been aimed at TPS members, other planning and transport organisations with which TPS works closely, and in Birmingham with the local business community. We organised the panels with a range of views, including supporters, opponents, and those still undecided. Members have also been encouraged to provide their views directly.

Many of the issues were similar to those raised elsewhere, although it was clear that there was a significant amount of disagreement over what should have been technical issues. In historic terms, appraisal has been strong in helping to prioritise schemes of a similar type (for example ranking road schemes in a national programme). It has never really solved the problems of comparing dissimilar modes or different scales of scheme with each other.

There are several examples of this in relation to HS2. The first is how time savings are treated. Since some time spent travelling by train is used productively, or can simply be enjoyed, in a way which it is not in a car or aeroplane, using time savings as a direct measure of benefit is a very uncertain method for assessing benefits. Some argue that this is a proxy for overcrowding, when time cannot be used or enjoyed for its own sake. This approximation needs to be made more transparent and the uncertainty clearly recognised.

It is also true that congestion on the rail network, unlike the road network (while there are no direct road user charges), can be (and already is) smoothed, and users prioritised, by the price of fares. This is likely to be necessary for HS2 due to potentially significant land use effects, for example some parts of the Midlands will suddenly become within the range of regular commuting to London. Without strong pricing policies, travel would be generated, and impacts such as parkway stations causing major traffic problems would occur, in turn creating congestion costs to local business. Pricing can smooth demand, but it is also socially regressive, a point made by several members in relation to the public subsidy required. High fares to manage demand will have their impact on private business costs, counter to one of the aims of HS2.

Another example is related to the first and is the fact that there does not appear to be an easily understood comparator – should the HS2 £32billion be spent on local rail and tram networks instead? Many cities still do not have even a rapid transit bus linking to their main rail station, let alone to their residential and business districts. Would this be more transformative than making it faster to get from Birmingham to London? Combined with higher speed rail links between the northern cities, would this better address the north/south divide? This makes it clear that, without an assessment of performance

against objectives, spending is unlikely to be cost effective. This in turn requires clear independently defined objectives which are capable of robust measurement. The consultation is weak in terms of defining objectives and thus the specific questions asked are inconsistent in terms of scope and content.

The issue of carbon emissions also needs to be clarified. When schemes are considered in isolation, various assumptions can be made about power consumption and how that power is generated. The problem is that there is no current DfT process for bringing together all the various schemes to estimate whether, as a whole, they will meet the transport targets agreed in the context of the Climate Change Act. If an investment does not make its contribution to reducing carbon (as opposed to not increasing it) money will have to be found either to purchase carbon credits, or to pay for schemes which will reduce carbon. This is a real cost and is particularly important for what will be, by some distance, the largest single transport investment made between now and 2050.

In relation to these three issues, there seemed to be a need for some auditing and greater transparency and this was a theme in the views expressed. The level of disagreement over the facts was very clear at the meetings, and we suggest that it needs to be addressed urgently following this initial consultation.

#### *Some detailed observations*

The following points summarise our members' views and work undertaken by the Board:

- There is a growing concern that the appraisal of HS2 needs to be seen in a land use context as well as transport. This context should include: aspirations of local and regional development plans, land use controls, regeneration opportunities/redeveloped of brown field sites in urban areas and potential to bring accessibility/investment to areas of high deprivation.
- The view was often repeated that in different land use and transport planning contexts, HS2 could produce benefits or disbenefits. This should be fully considered in the appraisal and this issue is reflected in many of the points which follow.
- Thus it was strongly felt that investment in HS2 has to be in addition to investment in the "classic" rail network and not instead of it. The regions have serious capacity issues now that have to be addressed (e.g. through schemes such as the Northern Hub and North West Electrification).
- Connected to this is that much of the regional support for HS2 is based on a high degree of integration with, and investment in, local public transport networks. This needs to be set out in much more detail, and included in the overall construction and funding programme. In Birmingham, for example, local providers have done a significant

amount of work on such a programme. Given their nature, these programmes should be seen as a prerequisite for HS2 and could be delivered in advance.

- Given the experience of national and local opposition to market pricing for road space, the approach to demand management needs to be defined and put in place well before HS2 is approved.
- Distributional impacts, in centres which are either served or bypassed by a high speed line require much more consideration and detail. This need not be burdensome, comparative journey times from key centres does not need complex modelling. It is the comparative journey time which is important, rather than absolute change. This is the nature of competition. For example, if one part of a city region has a slightly faster journey time to London, if another part has a far greater reduction in journey time, their relative position will change and one will suffer.
- It will be important to ensure that the Birmingham Parkway (Airport/NEC) station does not distort locational decisions, weaken the city centre, and lead to economic disbenefits (such as road congestion) and environmental problems, especially for climate change targets. This is true in other locations and the priority should be for city centre stations which will always have better links to the local and regional transport network.
- There is limited understanding of the links between economic activity, land use and transport in the current analysis. For example, Birmingham seems to be considered as part of the “non-London” economy, apart from its airport, which could provide overflow capacity for the capital. This is high risk - the dynamic impact of HS2 on Birmingham will occur far earlier than any impact on cities to the North East and North West, and the shortening of journey time envisaged may well create an entirely new relationship with London, rather than with those cities. Indeed, when phase 1 opens, London will become as easy to get to as Manchester, and much easier than Leeds or Liverpool.
- On the other hand, linking the cities north of Birmingham with each other seems well overdue. Would more schemes like the Northern Hub be better? Given the major funding needed, would this allow comprehensive packages in cities outside London (and between them) to be implemented, with greater economic, social and environmental benefits?
- Although the public consultation documents mention some route optioneering has been carried out in the early stages, it would seem that routes broadly aligned to existing motorway and intercity rail corridors have been discounted. Marginal reductions in train speed would permit high speed rail geometry to co-locate in these existing corridors with the distinct advantage of achieving significant savings in environmental and severance costs and probably in land costs and reduced opposition from objectors.

It also seems that a Euston station terminus for London has always been the preferred choice and the level of stress depends on critical assumptions about the Old Oak Common interchange.

- For example, concerns were expressed that a service from the North direct to Stratford International, sensibly linking to HS1, has not been fully considered or indeed included in the modelling. As well as offering the opportunity for international services, when Crossrail opens in 2018, Stratford will be better connected to the major business areas of The City and Canary Wharf than Euston. Furthermore, with the Olympic Park Legacy and Stratford City/Thames Gateway developments taking place, Stratford itself will become more of a 'destination'. A route alignment from the North directly to Stratford may also be lower cost than tunnelling/cutting through the Chilterns and North-west London to reach Euston. Thus in 20-30 years' time, not connecting HS2 to HS1 at Stratford could well be considered a missed opportunity to offer an alternative London rail destination from the North and provide a through service to Europe.
- In relation to the Heathrow spur, whilst being beneficial to development sites and the economy in West London, the environmental benefits gained from HS2 replacing some flights to/from the North to/from Heathrow may be out-weighted by an increase in demand for flights due to the larger catchment area and increased accessibility HS2 will bring to the airport. The role of Heathrow needs to be considered within a national long distance transport framework.
- The assessment of the HS2 scheme, possibly as a consequence of its name, has been focussed on the benefits of small/medium time savings given to some long distance rail passengers rather than other assessment criteria valued by all rail passengers, especially cost, crowding/comfort and reliability. Many rail passengers value these more than simple time savings. These criteria should, therefore, be weighted accordingly.
- The dangers of the first part of HS2 strengthening the North/South divide are clear, and one solution might be to start building it at its Northern end. This was specifically raised at our Birmingham meeting. The big problem is that the capacity problems are most severe at the Southern end.
- This is linked to another issue, which was also raised in our meetings. The cost of building HS2 is already high, and given the record of major civil engineering works may well be higher than first estimated. Put in the starkest terms, if phase 1 is delivered, will there be any money to complete phase 2?
- This was reinforced by the fact that development of route options for the branches to Leeds and Manchester appears to be only 7 months behind the London-West Midlands section yet construction will be 7 years behind. If HS2 proceeds, this suggests promoting a single hybrid bill for the entire "Y" network and not two separate bills. The split route

approach does not create confidence that HS2 to the North really is a unified proposal. To put this as simply as possible, is HS2 actually a scheme from London to Birmingham, and is Birmingham northwards really HS3?

- As plans come forward, it was felt that compensation issues could be extensive, and be relevant to city centre locations as well as greenfield land. It was questioned whether these have been fully identified and included in the costs.
- Key assumptions about local transport feeder networks and location of land-use developments must also be included in any scheme evaluation, cost/benefits analysis and modelling. The two are connected and not necessarily covered by using national assumptions or the collection of models which have been adapted for the current consultation.
- There was, however, clear consensus that the issue of growth in rail demand needs to be addressed, both for passenger and freight, though the latter was often ignored in the past. This recognition of rail freight's growing role was welcomed. However, it should be noted that the passenger growth forecasts appear to be particularly high and to depend, in part, on assumptions that conditions on the strategic roads will deteriorate. There are clearly risks involved from such assumptions, augmented further by the absence of a National Transport Strategy which includes all longer distance travel modes (including coaches).
- In addition, it is possible to manage rail demand through price, for road this is an option only partly achieved through fuel taxes (and oil price) on car and coach travel, and this will reduce as fuel efficient vehicles come forward. For road freight, external costs are not met and are not planned to be met, since LRUC will be a minimal euro-vignette scheme. If an increase in rail capacity is a given, then the Treasury and Webtag guidelines of assessing genuine alternatives to HS2 for achieving this should be followed. Has it been done so far?
- Contrasting with the view that HS2 benefits depended on the context was the feeling that a clear commitment to investing in transport outside London, and at such a scale, had benefits beyond those measured by benefit to cost ratios. There were genuine fears that opposition might endanger any such investment.

## ***Conclusions***

Overall the TPS concludes that there is a need to:

- 1 Create confidence in the technical analysis: including route options, passenger growth forecasts, and overall impact on the economy, carbon emissions and environment.
- 2 Compare HS2 with a convincing best performing capacity led option (possibly including some new lines), and being transparent about whether HS2 will delay other short to medium term capacity increases and can itself deliver capacity soon enough.
- 3 Understand the real impacts of HS2: reducing rail access times between some parts of the Midlands and London to those of current commuters, but not doing so in many other parts of the country (although Glasgow and Edinburgh may cross a different time threshold in relation to air travel).
- 4 Set out precisely how the potentially adverse land use effects are to be tackled, for example the dangers of using parkway stations and not serving many cities or city centres.
- 5 Understand the investment needed in local networks to feed HS2, and how this can be funded and fully guaranteed.
- 6 Make clear the real opportunity cost of the HS2 investment, for example less spending to relieve overcrowded services in the south and south west, and on city region rail networks, and rapid transit systems elsewhere.

## ***Recommendation***

In terms of how to proceed, there is a need to resolve these issues in a rational manner. Following on from this consultation there needs to be a process created which can resolve some of the hotly contested technical issues and this in turn requires the participation of parties with different views on HS2. Only in this way can confidence be created in the evidence base on which a decision will be made.

There are several established approaches to this, and the Transport Select Committee has been undertaking hearings on the subject. However, our preference is for something less interrogatory. The difference between an Examination in Public, and a Public Inquiry, is considerable, and the former tends to produce a more transparent and less polarised outcome.

This raises the final issue of how an examination of HS2 fits within a rapidly changing landscape of localism (and the removal of transport planning guidance), and any National Infrastructure Plan for transport. It is possible that the first may be too narrow for such a scheme, and the latter too broad. In this sense HS2 illustrates the need for a clear framework within which transport investment, both public and private, can take place.