# WEST LONDON LINE GROUP

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25 February 2014

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

Dear Sir or Madam

# Opportunity to comment on HS2 Phase One Environmental Statement Documentation

- 1. Introduction
- 1 I am writing on behalf of the West London Line Group to give the Group's responses to this documentation, summarised below and laid out on pages 3-10 of this letter.
- We sincerely trust that the planned configuration of lines at Old Oak Common will be revised to provide good interchange between GWML, HS2 and Crossrail the West London Line and other local rail and tube services:-
  - (i) in line with our comments below;
  - (ii) as anticipated in the London & SE RUS;
  - (iii) given HS2's own stated policy to maximise integration with existing rail networks;
  - (iv) to mitigate the impacts on passengers on the Northern and Victoria Lines at and through Euston;
  - (v) to avoid the denial of access to this hub from most of NW, NE, SW and South Londoners and others
  - (vi) to avoid any disgrace over the sub-optimal use of these publically-funded assets
- 3 We also hope that serious consideration will be given to our proposals for :-
  - (i) An alternative routing for an HS2-HS1 link via Clapham Junction, East Croydon, Merstham (for Gatwick and M23/M25 junction), Tonbridge and Ashford;

- (ii) HS2 to be built to accommodate Double-Deck passenger and (if later needed) Continental-gauge freight trains:
- (iii) HS2 single-line working during maintenance without 'bustitution';
- (iv) Provision for three way-stations with passing loops, each to be locally-financed and to be served once per 'cycle' between non-stop trains;
- 4 We also hope that serious consideration will be given to our related Crossrail proposal, namely a new Crossrail station on the HS2 axis at Denham Parkway covering Uxbridge, Slough, Amersham, Aylesbury, Hemel Hempstead and Watford, for the following reasons:-
  - (i) It should be well received by those with a desire for fast, direct services to the West End, City and Docklands.
  - (ii) A fully developed hub at Old Oak Common would also connect (via the WLL and NLL) this huge catchment with myriad destinations in north, north-east, west, south-west and south London and the counties beyond.
  - (iii) This Crossrail extension would also relieve pressure on neighbouring lines and the Underground in Central London and go some way to achieve greater 'buy-in' to HS2 in a large area of the commuter belt in NW London, Hertfordshire and Buckinghamshire.
  - (iv) The resultant relief on arteries such as the Jubilee Line east of Waterloo would be appreciated by many in SW and South London, Surrey and Sussex.
- 5 All the above should be allowed for in the forthcoming legislation, even though some items may not be taken forward.
- 6 I attach our set of graphics on these subjects, that we produced in December 2013

With many thanks for giving us this opportunity to comment.

Yours faithfully

Mark Balaam Chairman

## The West London Line Group's Response to the HS2 Phase One Environmental Statement Documentation

# Volume 1 | Introduction to the Environmental Statement and the Proposed Scheme

Section 1.1 Overview of High Speed Two

### Para 1.1.1

- 7 Our principal concern is the present lack of confirmation here of the provision of good communications (passenger interchanges and physical rail connections) between the West London Line, HS2, Crossrail and other rail and tube lines in the Old Oak Common area.
- 8 Such confirmation is lacking elsewhere in this document and others relating to HS2, Crossrail and those produced by Network Rail and Transport for London, the Greater London Authority and the relevant London local authorities.
- 9 However, such an approach to hub development is directly in line with Bullet Point 6 of the Sustainability Policy on page 27 of this document.
- 10 Comprehensive interlacing of HS2 and Crossrail tracks at Old Oak Common would allow cross-platform interchange between, for example, Birmingham-London HS2 trains and central London Heathrow Crossrail services, thereby reducing the need for, and the costs and environmental impacts arising from, an HS2 link from the north to Heathrow.

### Paras 1.1.2-1.1.6

- 11 There appears to be more emphasis now on building capacity beyond what is currently available on the classic network, rather than on speed. We would therefore advocate that this extra capacity is also provided between London and Birmingham on HS2 as well as on the WCML and GWML and other routes. in addition to the stations at Old Oak Common and Birmingham International, there should be three proposed intermediate way-stations, each with passing loops so that faster trains may overtake slower and/or delayed trains.
- 12 Suggested areas for the way-stations are the Chiltern Ridge, Claydon (for the East-West rail link) and North Warwickshire. Each (20-minute?) 'cycle' of trains would have at least one non-stop train between Old Oak Common and Birmingham International, with each intervening train also serving a different one of these three way-stations.
- 13 This would bring High Speed Rail to another 1.3 million people, or another 13% above the combined total populations of London (8.3m) and Birmingham (2.1m), giving the former swift rail access to both conurbations and (via Old Oak Common and Crossrail) to Heathrow Airport, as well as allowing all the latter three nodes similar speedier reach into the towns and villages of the South Midlands.
- 14 Beyond this are the benefits for much larger swathes of the UK of one-change trips avoiding London (OCTALs), e.g., Birmingham/Warwick – Old Oak Common – Romford. These include lower congestion and pollution on the intervening road

- networks and the lack of pressure on the capital's rail systems, particularly at rail termini, rail/tube interchanges and on the Underground in general.
- 15 These way-stations need not be built at the outset, but if space is made for them (both physically and within the timetabling), these could be developed later by, for example, local authorities working jointly together and/or with area regeneration or economic partnerships.
- 16 We would hope that these way-stations would involve little extra landtake or local environmental impact, but we recognise that there could be some additional strain on road systems in their localities and the need for careful and imaginative blending of car parking within local landscapes.
- 17 The Group would not want these options to delay the building of HS2, but the legislation now in prospect should not preclude their later addition.
- 18 Ensuring appropriate steps in this area are now taken to bring the possibility of HS rail travel to more people should help to increase levels of public support for HS2 still further.

### Para 1.5.8 (Table 1, Priority One) and 1.5.10

19 We would ask that in (i) ensuring that greenhouse gas emissions (91% of those due to travel come from road transport – see 2.5.8 in this document) and climate change are effectively tackled and (ii) taking the carbon effects of HS2's construction and operation into account, so too will be the expected quantified reductions in the adverse impacts of pollution and congestion on the UK road networks through modal transfer from road to rail of passengers and freight on to both HS2 and other rail routes.

#### Para 2.3.19

- 20 It should also be noted that HS2's access to Birmingham International Airport would allow greater choice and capacity for both inbound and outgoing airport users in London and the south-east.
- 21 The Group is also advocating a link between HS2 and HS1 from Old Oak Common via the West London Line, Clapham Junction (to bring both HS networks closer to SW London and to all of Southern England between East Sussex and South Devon), East Croydon, Merstham Parkway (for Gatwick Airport and the M23/M25 intersection), Tonbridge and Ashford International.

## Paras 4.2.10 and 4.3.10 (Table 6)

- 22 These paragraphs and table do not (yet) include any mention of interchange between HS2, Crossrail, GWML and the myriad other lines in the Old Oak Common area, principally the West and North London Lines which we believe, with their lengthy connections to the south and east respectively would make access to and from the HS2 network here much more easy for a large proportion of London's population.
- 23 Not only should they specify the number of platforms for the WLL and NLL, but also allow for direct connection between HS2 lines and the WLL as the first part of a further link between HS2 and HS1 (see above).

- 24 While we would not want to see any reduction of the 11 tph in each direction stopping at Old Oak Common, we strongly feel that it would a disgraceful suboptimal use of resources if such connections are to be denied to Londoners and others, especially given the additional pressures that would fall upon those using, joining and leaving the Northern and Victoria lines at Euston as a result.
- 25 We also note that in paragraph 5.14.5 the design of Old Oak Common will "offer opportunities to integrate with local development plans and strategies". We very much hope that this sentiment will now be firmly linked to the statements in Section 10 of the London and South East Route Utilisation Strategy (L&SE RUS), namely: -
  - "10.3.6 Development of detailed plans for High Speed 2 (HS2) is anticipated during CP5 [Control Period 5 (April 2014 to March 2019)], including the start of enabling works at key sites. As described in this RUS, detailed planning of the Old Oak Common area to become a strategic transport hub, with several routes linking to both HS2 and Crossrail services at this location, is recommended [our underlining]."
  - "10.4.2 Interventions in this time period [Control Period 6 (April 2019 to March 2024)] are envisaged by the RUS as including:
    - the development of other routes in and around the Old Oak Common area to provide synergy with HS2 [our underlining]."
  - "10.5.1 The key infrastructure interventions during this time period *Control Period 7 (April 2024 to March 2029)* envisaged by the RUS could include:
    - the completion of work on HS2 as far as Birmingham, with work commencing on expansion of the network towards Manchester and Leeds
    - <u>further development of the Old Oak Common area as a new strategic transport hub</u>, potentially including new services to Europe via the HS1-HS2 link [our underlining]"
- Old Oak Common cannot truly be a new strategic transport hub if access is denied between it and nearby local rail services such as those on the West and North London Lines, the southern section of the West Coast Main Line, Chiltern, Bakerloo and Central Lines, with the resultant lost opportunity of the connectional synergies between all of these, plus the Great Western Main Line, Crossrail and HS2.
- 27 Moreover, if so, this hub would only directly serve one of inner west London's Opportunity Areas, i.e., that at Park Royal, while denying similar transportation advantages to the two neighbouring Opportunity Areas of White City and Earl's Court via the WLL. This would significantly undermine the potential benefits of regenerating c.150 hectares of brownfield sites and the ease of access to the UK's two premier rail projects by these new residential populations and workforces in the immediate and/or close vicinity.

28 The L&SE RUS's Executive summary notes that,

"on the West London Line (WLL) by 2031 the forecasts suggest a capacity gap of some 3,000 passengers in the busiest peak hour on this route, <u>a figure which does not include the potential major impact of the proposed HS2 station at Old Oak Common</u> [our underlining]"

and

"the NLL and WLL routes run very close to the proposed HS2 station at Old Oak Common, so providing increased capacity and journey opportunities to this area on these routes will be an important factor"

- 29 This seems to indicate that access should <u>not</u> be denied between the WLL and the Old Oak Common hub. Instead, we would strongly contend that steps should be taken now, in anticipation of these new demand levels both on the WLL and at Old Oak Common.
- 30 These demand levels are forecast to be reached in only 17 years (2031); previous experience across the UK rail network (and notably on the WLL) indicates that this may be an over-estimate in terms of time taken for these levels to be achieved.
- 31 We would urge extension of the present lengthening programme to form not 8-car, but 12-car platforms at all WLL stations, or at the very least to ensure passive provision for 12-cars so that this may be created in the short-to-medium term. Twelve-car platforms would accommodate future growth generally on the WLL and the combined impacts on it of Crossrail, HS2 and other services at the Old Oak Common hub, by deploying 12-car Southern and 10-car London Overground trains on the WLL corridor, at least between Clapham Junction and Old Oak Common/Willesden Junction.
- 32 For HS2's success to be maximised, the scope of its programme, costs and timetables may have to be reviewed to include infrastructure enhancements off its direct line of route on connecting arteries, such as that suggested above on the WLL.
- 33 We trust that the full costs and benefits both of developing and of not developing interchange between HS2, Crossrail, the WLL and other lines in the Old Oak Common area will be determined to ensure which of all these connections should be provided.

#### Para 4.3.2

34 We would strongly advocate that HS2 is built wide enough to allow for maintenance to be carried out alongside bi-directional working at appropriate speeds on the adjacent track. This is to ensure that there will be <u>no or minimal 'bustitution'</u> at any time (save during major infrastructure works, e.g., replacing a bridge or strengthening a viaduct).

### Para 4.3.3

35 We would also advocate a set of services such that each of the three waystations that we have proposed is served in turn in each 'cycle' which would also have at least one train non-stop between Old Oak Common and Birmingham International.

#### Para 4.3.4

- 36 We would also advocate that HS2 is built to accommodate double-deck passenger and Continental freight gauge trains, as (i) the UK should not be seen to be behind its European counterparts, (ii) demand is likely to increase still further, (iii) this is an excellent opportunity to have such accommodated on a brand-new railway, (iv) taller but shorter trains should need less landtake at stations and depots to move the same number of passengers.
- 37 In addition, double-deck trains should also need fewer paths than single-deck trains to move the same number of passengers, as use of the former should allow sufficient timetable space to accommodate stops at the proposed way-stations above.

Paras 5.1.2 – 5.5.6

38 It would appear that double-deck trains could be accommodated in Figures 14-16. We trust that they will also be able to traverse all the proposed tunnels (Figure 17) and that the design of the tunnels and the TBMs will allow this.

Paras 5.9.3, 5.10.2, 5.10.6, 5.14.2 – 5.14.5,

- 39 We note that, due to the taller profile of double-deck trains, some adjustments may be necessary in terms of (i) station design, (ii) the heights of noise mitigation barriers, over bridges and fencing, and (iii) depths of cuttings.
- 40 Network Rail confirmed in a matter of weeks the clearances needed to run double-deck trains powered by overhead line equipment under a new 1km park in west London.

## Para 7.6.2

41 Provision should be made within the hybrid Bill for suitable changes throughout the length of HS2 and at the Old Oak Common hub to allow for track re-alignment and necessary supporting structures to (i) allow double-deck trains on HS2, (ii) maximise interchange between HS2 and Crossrail and existing rail services in the area, and (iii) provide a direct connection between HS2 and the WLL as the first part of an alternative link between HS2 and HS1 via Clapham Junction, East Croydon, Merstham, Tonbridge and Ashford, even if none of these is needed at the outset.

#### Section 8.9

42 We note that, due to the possibly greater weight of double-deck trains, some adjustments may be necessary in terms of sound, noise and/or vibration mitigation.

Paras 10.4.12 - 10.4.15

43 Despite the selection of Old Oak Common as an intermediate station instead of six other options, no comment has been made, nor any reasons given, as to whether interchange should be effected or not with the WLL and/or any of up to six other lines at this 'hub', despite the wording in the L&SE RUS above and the

fact that the WLL runs within only 800 metres of the centre of the combined GWML/HS2/Crossrail station footprint.

44 This is a very serious omission in this report and it should be rectified as soon as possible.

# Volume 2 | Community Forum Area report (CFA1 | Euston - Station and Approach)

Para 12.3.20

45 This states that by 2041 the morning peak flow into and the evening peak flow from Euston will have increased by 46% and 58% respectively; but there does not appear to be any explanation as to how the Northern and Victoria Lines are to cope with such increases in demand.

# Volume 2 | Community Forum Area report (CFA4 | Kilburn (Brent) to Old Oak Common)

Para 2.2.5

- 46 No mention is made of the Southern WLL service between Milton Keynes Central and South Croydon
- 47 We deeply regret the present non-inclusion of any interchange between the WLL and the GWML/HS2/Crossrail station.

#### **Related matters**

### Crossrail via HS2 axis to Denham Parkway

- 48 We would also advocate a new western arm for Crossrail on the HS2 axis to a new station at Denham Parkway, at the crossing by HS2 of the A412, close to the latter's junction with the M25. This would have a catchment covering Uxbridge, Slough, Amersham, Aylesbury, Hemel Hempstead and Watford with a strong demand for fast, direct services to the West End, City and Docklands.
- 49 A fully developed hub at Old Oak Common would also connect (via the WLL and NLL) this huge catchment with myriad destinations in north, north-east, west, south-west and south London and the counties beyond.
- 50 Provision of this Crossrail extension would relieve pressure on key stations on neighbouring classic lines and the Underground in Central London and go some way to achieve greater 'buy-in' to HS2 in a large area of the commuter belt in NW London, Hertfordshire and Buckinghamshire.
- 51 The resultant relief on arteries such as the Jubilee Line east of Waterloo would be appreciated by many in SW and South London, Surrey and Sussex.

#### **Conclusions**

- 52 We sincerely trust that the planned configuration of lines at Old Oak Common will be revised to provide good interchange between GWML, HS2 and Crossrail the West London Line and other local rail and tube services:-
  - (i) in line with our comments above;
  - (ii) as anticipated in the London & SE RUS;
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