9th July 2013

FREEPOST RTEC-AJUT-GGHH
Draft Environmental Statement Consultation
PO Box 70178
London WC1A 9HS

Dear Sir/Madam,

HS2 PHASE ONE: DRAFT ENVIRONMENTAL STATEMENT CONSULTATION

Thank you for the opportunity to respond to the consultation on the Draft Environmental Statement (ES). This response should be read in conjunction with our separate response to the Design Refinement consultation, which is appended. The City Council continues to work with partners including the Core Cities and the Go-HS2 consortium in supporting the delivery of HS2 and its significant predicted benefits.

The City Council fully acknowledges that development work and associated ES appraisal will continue in advance of the Hybrid Bill submission later this year. It is important that dialogue continues to address any further refinement in scheme proposals and their impacts. However, given the level of development to date and issues identified we are increasingly concerned that key areas of the ES will not be satisfactorily concluded prior to Hybrid Bill submission and these issues will remain outstanding as the parliamentary process commences. We are as always committed to working collaboratively with HS2 to seek consensus on these areas as required.

The remainder of this letter outlines key points for consideration under a number of themes, with further details on specific documents provided in Appendix A.

General

- We support the ES’s evidence on the commitment to High Speed Rail, the case for HS2, the objectives of the scheme, and the overall shape of the ‘Y’ network which features Birmingham at the centre. We support the high-level choice of corridor into the City which minimises impacts compared to other options.
- Whilst we recognise that the document needs further development, it is essential this is undertaken in good time to allow meaningful consultation on the formal ES. We are particularly concerned that transport and traffic assessments provided to date provide insufficient details to determine if measures proposed are acceptable.
- We are concerned that the ES appears to underestimate the economic challenge facing the City, and compounding this there remains a significant uncertainty with regard to HS2’s employment impacts, including the significant increase (from that in the Appraisal of Sustainability) on both employment land generally and on jobs potentially displaced. There is a need for HS2 Ltd to work more closely with the City Council on maximising economic benefits to the City - as the ES acknowledges the line into Birmingham passes through some of the most disadvantaged communities in the country. We would suggest that a shared City Council/HS2 Ltd land and employment strategy is needed, including master planning for the City Centre and Interchange stations, and the Washwood Heath area. This must include a commitment to work with the City Council to put in place a training/skills programme to enable local people to access the training and jobs created by both the construction and operation of HS2, ensuring that existing jobs are not lost and new job opportunities are maximised, and consideration of business relocations, including a commitment to seeking to relocate affected businesses within Birmingham in the first instance.
Although the new railway will need to fulfil functional requirements, it is important to remember the significant legacy the HS2 project will create on Birmingham’s landscape. It is important that HS2 Ltd should therefore work with the City Council to both mitigate the visual impact of the line and to take opportunities to improve the wider visual landscape.

City Centre Station & Connectivity

- We expect the HS2 Birmingham City Centre station to provide a world class arrival experience. The City Centre HS2 Station must include wide ranging and high quality multi-modal facilities that would be expected of such a world-class station and a gateway to Birmingham and the wider West Midlands. The associated interchange with pedestrian, cycle, bus, kiss and ride, taxi, Metro/SPRINT, and heavy rail should provide a high standard of integration with existing transport networks, serving the City Centre and beyond. Proposals to enhance the quality and provision of these supporting networks must be explored in detail and plans put forward to demonstrate a credible strategy which ensures a realistic and deliverable plan is in place to meet HS2 needs and also supports the wider City Centre.
- The development of HS2 must seek to maximise the opportunities it creates for wider transport network improvements, it must enable and certainly not preclude the provision / improvement of future transport infrastructure; for example future Metro/bus rapid transit routes, and Fort Parkway and Castle Vale stations as part of the re-introduction of local passenger rail services on the Birmingham-Tamworth Line. Where adverse impacts of additional travel demand due to HS2 are identified on the local transport network they must be mitigated. The proposal to retain general traffic access and reassign traffic onto Moor Street Queensway is of particular concern.
- The new station is at the heart of the City Centre Enterprise Zone, a significant driver for growth in the local economy that is supported by government policy. A high quality and well connected station will support and add value to the Enterprise Zone initiative.
- Design is of fundamental importance governed by a solution that will establish a strong sense of place both inside and outside of the station. The architectural precision and material quality is an important consideration, giving the station a singular identity and a strong presence which reflects a dramatically expressive state of the art solution. We expect a world class station to rival the best in the world with a distinctive approach that is expressive, striking, innovative, sustainable and contemporary in its approach to both structure and geometry. We see no evidence to date that place-making and architecture is being fully considered in matching our ambitions in promoting Birmingham as an international city in addition to the necessary functional requirements - we request that this is rectified.
- The new station should be integrated seamlessly into the surrounding urban realm to ensure that wider regeneration opportunities across the City Centre are maximised. This should include high quality and welcoming routes providing permeability across and through the station itself as well as clear and effective connections into the wider City Centre including the Digbeth area. We are disappointed to note that current proposals do not include any improvement to the physical environment of Moor Street which would be the main passenger arrival space and key pedestrian route in to the city core from the HS2 station, and is a vital pedestrian link into the Eastside regeneration area.
- The impact of the Station, including during construction, on the new City Centre Park should also be minimised. We would welcome additional and closer visualisations, for the station and viaducts (including from the Ring Road / Middleway at Curzon Circus and New Canal Street) as these would have significant impacts on the cityscape.

Washwood Heath

- We agree with the principle of locating the rolling stock depot in the West Midlands – this is logical. We note that if the Rolling Stock Depot is to proceed at Washwood Heath it now includes provision for HS2 Phases 1 and 2. Whilst the railway operational layout appears reasonable to cater for both Phases, and we agree that it is essential to provide a ‘base’ from which to expand the HS2 network northwards, we believe that the overall layout takes an excessive amount of land which reduces the significant development and therefore economic potential for this particularly deprived area of the City. In particular the extent of the balancing ponds at this location is very difficult to justify given the shortage of employment land in the City.
We request that HS2 Ltd re-visit the Washwood Heath design to improve its efficiency if this is the site that is ultimately progressed. For example, potentially locating the balancing ponds underground and considering the location of the landscaping/levels change. More complete information is again requested on employment potential including the various control/training facilities and phase 2 potential. More detailed information is requested on the precise extent of land required for construction activities.

We believe that the City Council and HS2 Ltd need to work jointly on a master planning exercise covering land use and transport for the Washwood Heath area, to explore interim and permanent uses. The land at Washwood Heath should be considered as a whole in terms of the opportunity presented – it is about maximising the jobs on the depot site and maximising the opportunity on the remaining land (including positive benefits HS2 could bring such as remediating and servicing residual employment land post completion).

Interchange Station

The location of the proposed interchange station, adjacent to the NEC and Birmingham Airport, provides a tremendous opportunity to implement strategically important development which will add real value to both the City’s and the region’s economy. The City Council is a significant owner of land to the east of the M42 (approximately 105 acres) and also has considerable interests in both the Airport and the NEC. The location of two surface car parks on this land is neither the most efficient nor economic use of the land and the City Council is concerned that the layout as currently shown in the ES. HS2 Ltd should properly engage with the City Council as landowner to undertake required masterplanning.

With significant numbers of passengers using the Interchange Station from the outset and significant areas of surface car parking shown the City Council questions the assumption that the effect of the traffic increase at the M42 junction 6 ‘would not be significant’. HS2 Ltd should provide more information on the overarching transport solution which will be needed to provide adequate access to the station.

The HS2 Birmingham Interchange station must include a fast and efficient direct link connecting that station with the NEC, existing Birmingham International station, Birmingham Airport, and to locations in East Birmingham, with consideration of serving demand from new developments as part of the M42 Gateway as appropriate.

Code of Construction Practice

We have several comments on the Code of Construction Practice (CoCP) as follows:

- We have provided detailed inputs to scoping the CoCP, and look forward to more detailed involvement in the local area plans. We look forward to the CoCP being updated to reflect best practice and any emerging relevant issues.
- On construction compounds and activities, the temporary impacts need to be minimised, including managing HGV movements.
- We request consideration of a construction consolidation centre to both minimise HGV movements into the City Centre and wider network.
- The proposed construction boundaries need further explanation, there do not appear logical in part and do not in our view provide optimal boundaries in mitigating adverse impacts.
- We welcome the inclusion of severance as this is a particular consideration at the many locations where HS2 crosses highways in Birmingham. We particularly welcome the intention to maintain access where possible and contend that temporary bridge arrangements will be required at certain locations. In particular there is a notable concern over the closure of the Saltley Viaduct Bridge for up to 36 months given the limited alternatives in this part of the city and the potential impact on the Alum Rock Road area which is a vibrant local centre.
- The construction phase will severely restrict access to a number of buildings, including the listed Woodman Public House and Curzon Street Station building, HS2 should therefore assume responsibility for their maintenance and security during this period.
- We believe it will be important for the City Council to remain informed in order to maximise the effectiveness of its own work (both to support the delivery of HS2 and protect local interests), and to respond to queries from Elected Members, the public and other local interested parties. We would like to better understand how to manage the working relationship through the CoCP.
Our other comments on the ES consultation are shown in Appendix A attached. We look forward to continuing to work with HS2 Ltd and partners in assisting the delivery of this transformational national infrastructure project, and realising its benefits.

Yours faithfully,

Chris Tunstall
Director of Sustainability, Transport & Partnerships

Development Directorate
1 Lancaster Circus Queensway
Birmingham B4 7DJ

Telephone 0121 464 6467
Facsimile 0121 303 6379
E-mail chris.tunstall@birmingham.gov.uk
APPENDIX A - Further Birmingham City Council Comments on HS2 Phase 1 Draft Environmental Statement Documents

Volume 1 - Introduction to the Draft ES and the Proposed Scheme

1 Introduction

- We welcome the approach that environmental operations have been assessed to also include the expected Phase 2 operations; however this will need to be consistent across the ES. For instance, additional benefits including employment will need to be quantified.
- Environmental Minimum Requirements (EMR’s) are considered to be key documents; however, we note that transport matters are not outlined within EMR’s scope in Paragraph 1.4.6.

2 Background to HS2

- We fully support the Governments commitment’ to High Speed Rail and the basis on which this has and continues to be made.
- The City Council fully agrees that HS2 will provide much needed strategic transport capacity and improvements to connectivity providing a catalyst for economic growth.

3 The Proposed Scheme:

- 3.2 Generic Objectives: we agree with the overall objectives.
- 3.3 Services and operating characteristics: we would like to see further information on how frequently, early and late empty stock trains could operate, and any potential for other services e.g. parcels on the fringes of the passenger service operating hours.
- We would welcome assessment of costs/benefits of running at the higher line speed.
- 3.3.12 the table on interface with other transport modes needs to include better development of integration, including all relevant modes, and with New Street Station.
- 3.4 Proposed scheme description: We agree with the concerns raised at the southern end of Phase 1 that the proposed HS1 connection would be inadequate, and would be a missed opportunity for a more extensive UK high speed rail network enabling more direct economic links between the West Midlands and areas east/south of London. We request that HS2 Ltd give consideration to a more fit for purpose, higher capacity link, including the alternatives presented e.g. Euston Cross.
- 3.5.27 We note the intention to review options for over-site development and request that the City Council be fully involved in this process, however, we understand that station design work to date has not included the provision of necessary enabling infrastructure to be provided and question whether there is sufficient flexibility to allow future provision;
- Section 3 we fully recognise that construction activities and their impacts are temporary, however, we consider that the construction timescales are significant and that prolonged exposure to adverse impacts needs to be considered cumulatively over the construction period and appropriate mitigation put in place;
- 3.6.1 This needs to say that the enabling works will include archaeological works prior to service diversions etc.
- 3.6.9 The locations of local borrow pits need to be identified because they may have archaeological implications.
- 3.6.31 Trial holes to locate utilities - may affect archaeological remains and may therefore need to be accompanied by archaeological work.
- 3.6.37 station construction - utility diversions after demolitions will need to be preceded by archaeological work because they will affect archaeological remains.
- 3.6.43 Construction Site Compounds – the location of these needs to be carefully considered and their impact minimised, there are number of locations currently proposed, such as Eastside Park, which appear ill-considered given local impacts. We would recommend that consideration is given to a Construction Consolidation Site located within Birmingham which would potentially reduce overall land requirements for construction land requirements. These facilities also have an added benefit of reducing overall vehicle trips on the highways network.
4 Environmental Impact Assessments

- 4.2.6 The current ES underplays the wider geographic scope of impacts; it is welcome that these are acknowledged in part, but unclear when details will be provided.

5 Scope and methodology for environmental topics

- Section 5.7 deals with the scope of the ecological impact assessment. It is particularly important that detailed methodologies are clearly described where the methodology adopted varies from recognised standard approaches – e.g. in the case of reptile surveys on railway lines. Where the ecological impact assessment cannot be informed by accurate, up-to-date survey data, a precautionary approach to assessment will be adopted - this approach must be clearly described in the formal ES.
- 5.9 Land Quality: we have discussed the major sites of land contamination concern with HS2 Ltd’s Consultants, from our perspective it is consistent with our understanding and we therefore have no adverse comments.
- 5.11 Socio-economics: More work is needed on potential employment opportunities created by new business opportunities, and impact of road closures. We suggest that this section, as well as dealing with existing employment, also much more fully address potential employment opportunities that may be lost through HS2.
  - Whilst this section does recognise that businesses will be relocated, we suggest more focused efforts should be made to pick up how they will be relocated especially for those which would find it difficult to move, so that jobs are retained in Birmingham. In addition, the section must consider how local people can access the jobs and training created with appropriate programmes put in place by HS2. As the ES acknowledges, the line into Birmingham passes through some of the most disadvantaged communities in the country.
  - We would suggest that a key component of the Community impact is the need for an Equalities Impact Assessment and Health Impact Assessment. These assessments should inform the Environmental Statement.
- 5.13 Traffic and Transport - We believe there are 3 priorities: (1) Provision of efficient and high-quality access to the two HS2 West Midlands stations; (2) Wider ‘asks’ for the rest of the transport network to widen the benefits of HS2; and (3) Mitigation for all modes including maintaining the expeditious movement of traffic, and maintaining access, on the highway network – both during construction and operation.
  - We would suggest that the first and last of the above are essential to assist in delivering the HS2 Hybrid Bill, and the second point is important to get the best out of HS2. We believe that as well as mitigating impacts there are opportunities to make improvements. For example, we consider that the design of the City Centre HS2 station should open up new pedestrian routes in the City Centre, as well as incorporating an improved pedestrian link between Moor Street and New Street railway stations. Such improvements would benefit travellers regardless of whether they use HS2 or not. Likewise the workstream on exploiting released capacity on the existing network, started by Network Rail and Passenger Focus, needs to be continued to both help mitigate HS2 ‘s impacts on that network and, again, to pursue improvements. Further comments are provided in the section covering the Community Forum Area Report for Washwood Heath to Curzon Street;
  - For the temporary (construction) phase, it is critical that the City Council’s Traffic Management function continues to be fully engaged to ensure this is planned well in advance in a coordinated manner.
  - We would also appreciate more specific information on how disruption could be minimised on the adjacent Birmingham-Water Orton rail corridor, and other interfaces with the existing rail network.

6 Approach to Mitigation

- 6.3.4 Land Acquisition and Disposal – early discussions are required on the proposed disposal policy, we would see this as part of joint-working arrangements which seek to maximise development and regeneration opportunities with the City Council playing a key role in facilitating.
6.13.7 The intention to encourage onward journeys using sustainable modes is welcome, but we consider that this does not address the major issues of infrastructure connections and wider planning of integration with other modes with HS2.

6.86 We question whether the bullets are in the right order i.e. should the “detailed research and/or field evaluation” not be carried out before demolition works. We emphasise that there needs to be an acknowledgement that where historic buildings are demolished there is a total loss of the asset and its significance.

7 Strategic and route-wide alternatives

- We agree with the overall shape of the ‘Y’ network and the location of the route corridor into Birmingham.
- We agree with the principle of a central London terminus, however we are concerned about the HS1 link – see above.

8 Local Alternatives

- We agree with the principle of locating the rolling stock depot in the West Midlands – this is logical. However we again suggest that there is a need for greater robustness on the issue of alternative rolling stock depot locations and that the impact on employment land supply within Birmingham needs to be addressed. Our Design Refinement Consultation response provides further details.

9 Landscape and visual assessment

- This will be particularly important where HS2 is indicated as running on a viaduct in the inner areas of Birmingham. Design will also be of fundamental importance in terms of both the approach to and the City Centre Station itself. Particularly for the viaducts, we see no evidence to date that design and the impact on the urban environment and visual landscape is being considered in addition to the necessary functional requirements – we request that this is rectified.

**Draft Volume 2: Report 27 Route-wide Effects**

6 Community

The City Council would contend that the impact of HS2 on communities in Birmingham is likely to be significant, particularly during the construction phase.

7 Cultural Heritage

- 7.1.3 There is a need to acknowledge that many non-designated heritage assets will be affected through physical impact as well as designated assets.

8 Ecology

- The ecological impact assessment in the formal ES needs to be informed by comprehensive and up-to-date survey data, and where this is not available, the assessment will need to follow the precautionary approach formally agreed with Natural England. The local (i.e. sub-regional) context is important when assessing the impact of the scheme on Local Wildlife Sites (paragraph 8.1.11); useful guidance in this respect should be available in Local Sites selection criteria developed by Local Sites Partnerships. We can provide a copy of the relevant guidance produced by Birmingham and the Black Country Local Sites Partnership.

11 Socio-economics

- 11.5.1 Businesses directly affected by construction: The assertion that a large proportion of displaced employees would be able to find another job relatively quickly is a very broad statement that takes no account of the wide variations in labour market conditions along the
route and for different sectors. Birmingham suffers from higher than average levels of unemployment and this is significantly worse in wards such as Washwood Heath. Displaced workers within Birmingham might therefore experience great difficulty in finding new employment, especially those with low skills from less-buoyant sectors. Like-wise marginal businesses may not be able to survive relocation.

- 11.5.4 As well as acknowledging the direct impact of jobs lost the ES should consider the impact on employment land supply within Birmingham and the job opportunities that will be lost or delayed through both the scheme itself and the uncertainty created by Safeguarding.
- 11.5.6 Direct construction employment: the statement that jobs would be accessible needs to be strengthened to include a commitment to work with the local authority and other agencies to maximise the opportunities for jobs for local people, particularly those who are currently unemployed.
- The HS2 proposals affect a number of properties and interests which are held within the City Council’s commercial property portfolio. Between them these properties and interests contribute around £500,000 per annum to the council’s commercial portfolio income. The council has a very challenging revenue budget and the annual income target for the commercial property portfolio is in excess of £25 million, this sum is then used to fund front line services. The potential permanent loss of around £500,000 worth of this income is not something which could be replaced and if the assets which produced this income were lost to the commercial property portfolio as a result of them being included in the HS2 rail scheme, the existing income targets for the commercial property portfolio would need to be compensated.

Community Forum Area Report: Castle Bromwich and Bromford

General

- We support the proposed 2.8km Bradford Tunnel from Castle Bromwich Business Park to the Drew’s Lane industrial site in Washwood Heath. This option reduces the overall environmental impact of the route, with less complication and disruption than the alternatives. The proposed design alterations should not preclude appropriate flood attenuation measures and a collaborative approach is required to maximise opportunities to address this high flood risk area.
- We request further dialogue to better understand the impact on Park Hall Nature reserve and the River Tame during the construction period and thereafter the level of mitigation to enhance this facility providing compensatory provision for impacts elsewhere on the route.
- We are concerned at the impact of the proposals on Castle Bromwich Business Park and request further dialogue on how impacts can be mitigated.

2 Overview of the Area

- 2.1.3 – Work to revise and update Birmingham’s Local Sites boundaries has recently been completed, and as a result Land at Fort Dunlop is no longer designated as a Site of Local Importance for Nature Conservation (SLINC). The section of River Tame running through Park Hall nature reserve is designated as a Site of Importance for Nature Conservation (SINC). Updated Local Sites boundary data should be requested from EcoRecord (the ecological database for Birmingham and the Black Country).
- 2.2.7 – The proposed scheme does have a significant impact on Castle Bromwich Business Park and will affect a number of businesses either permanently or during construction. HS2 Ltd should work with businesses to relocate them within Birmingham in the first instance. It is requested that HS2 Ltd liaise with the City Council regarding the relocation of the waste facility currently operated by Veolia under the City’s waste contract.
- 2.2.8 – As outlined above there is support for the proposed tunnel solution between Washwood Heath and Castle Bromwich Business Park subject to the provision of further detail (including detail on construction (including how spoil and materials will be moved to and from site as well as issues such as vibration and potential settlement)).
- 2.3.43 Archaeological survey works prior to tunnel construction we request more specific information about what works – e.g. including archaeological excavation.
- 2.6.11 & 7.5.4 – We note that the River Tame diversion through Park Hall SINC is subject to ongoing development and assessment (in consultation with the Environment Agency and the
Wildlife Trust for Birmingham and the Black Country), and the confirmed alignment will be described and assessed in the formal ES. The SINC will be subject to significant adverse effects as a result of the Proposed Scheme, so it is essential that the river diversion delivers substantial ecological gains to offset these adverse effects. The opportunity should also be taken to address flood risk within the wider river catchment where possible.

- We look forward to more information being forthcoming in the formal ES on how quickly (and how much) land needed temporarily can be released for development.
- For construction staff commuting, we request further discussion on transport requirements - there are a number of potential opportunities and issues, for example do the numbers of staff at sites include all relevant contractors/subcontractors/statutory undertakers and how would demand be catered for if it falls outside commercially viable public transport operating times.

4 Air Quality

- We note that the proposed route for southbound construction traffic to the Tameside Drive main construction compound is M6 (j6), A38 (Tyburn Road), A47 (Fort Parkway and A452 (Chester Road). Dependant on the amount and weight of the vehicles this may have an effect on residential properties on Tyburn Road. Monitoring or modelling of pollutants would be required.
- We believe that the proposed core working hours of 0800 - 1800 are acceptable; however we request information on impacts of the hour before and after core hours on air quality.
- We note that the tunnelling operations are 24/7, seven days per week. These may have air quality implications with local residents.

5 Community

- 5.2.1 There are further potential opportunities for regeneration at the Bromford and Firs estates.

6 Cultural Heritage

- 6.4.1 “features relevant...shown on maps...” – we request that it be made clear that these maps only show designated heritage assets.
- 6.4.3 We see no evidence for the statement made in the first sentence, and believe it would be more correct to say that there is currently little evidence for intensive settlement.
- This section should also mention potential paleo environmental deposits.
- 6.5.4 The impact of enabling works including the fuel pipeline diversion, the river diversion and the pylon diversion should be mentioned.

7 Ecology

- 7.2.5 The draft Green Living Spaces Plan (www.birmingham.gov.uk/greenlivingspaces) is also relevant; it is anticipated that this document will be approved by Birmingham City Council in late summer 2013.
- 7.3.7 We note that ecological surveys are ongoing during 2013, particularly to provide comprehensive data about Park Hall SINC, where permanent adverse effects on the site’s integrity will occur as a result of the Proposed Scheme. Where full survey information is not available for this site, the ecological impact assessment must follow the formal precautionary approach agreed with Natural England.
- 7.4.5, 7.5.5 & 7.5.7 – Park Hall SINC supports a breeding population of great crested newt, but there are no specific references to their presence at this site. It is not clear whether the effects of the Proposed Scheme on great crested newts at Park Hall will be discussed in the context of route-wide effects (draft Volume 2, report 27, Paragraph 8.1.16) or in the Community Forum Area report.
- 7.4.7/Table 8 – Breeding and wintering bird surveys of areas of Minworth Sewage Works were undertaken in connection with an outline planning application for Midpoint Park 2 (2005/01263/PA). This survey data may provide useful contextual information for the ecological impact assessment in relation to breeding and wintering birds.
• 7.5.5 & 7.5.7 – Replacement woodland planting within Park Hall SINC, e.g. to link Springhill Wood to Langley Hill Wood, should use trees grown from seed collected from retained areas of ancient woodland within the SINC to ensure local provenance of new woodland stock.

10 Socio Economics

- We reiterate the general point about relocation of businesses, in the particular context of Castle Bromwich Business Park. We welcome the intention to develop discretionary enhancement measures, such as business support, supply chain engagement and local construction skills development initiatives. However we see little evidence of commitments to local employment, either new jobs or business relocations. We request to work with HS2 Ltd on assisting this process.

- 10.4.3 Employment rate - We suggest that the ONS Annual Population Survey (APS) is a better measure of employment than the 2011 Census, which is quoted in this document as it uses the working age population rather than the 16-74 population used by the Census. Also, the APS data is compatible with the unemployment rates quoted in the same paragraph. Using this source, in September 2012 employment rates for the working age population (16-64) were: Birmingham 57%; West Midlands 68%; and England 71%.

- Likewise, we suggest it is more meaningful to use the working age population for qualifications. The Census, which is the source quoted, uses the 16+ population and is therefore skewed by those of retirement age, whose skill levels are of little relevance to an analysis of the labour market. Using this source, in December 2012 qualification levels for the working age population (16-64) were:
  - Birmingham No qualifications 16% NVQ4+ 28%;
  - West Midlands No qualifications 14% NVQ4+ 28%; and
  - England No qualifications 10% NVQ4+ 34%.

The figures serve to show the challenging nature of the Birmingham labour market compared to the region and nationally, and indicate that it will be harder to mitigate against loss of employment/re-employment of displaced workers than in some other areas along the route.

- 10.4.5 The City Council is of the view that this section should be updated to reflect more recent information. The City Council’s most recent Employment Land Review (2012) shows that the available supply of high quality employment land within the City is currently falling short of UDP targets in both the best and good urban land categories. There is now an urgent need to identify new development opportunities in the best urban market. The removal of the Washwood Heath sites means that the total supply of best urban land will fall to 77 hectares which is a record low. Should development rates recover to pre-recession levels the supply of best urban land could be as low as 5/6 years demand.

- 10.5.3 Construction: the City Council is very concerned that the scheme may see 600 jobs displaced within the area. We do not agree that the economy in Castle Bromwich and its hinterland is relatively healthy; we consider it challenging to find evidence to support this assertion. If the 600 displaced jobs ‘may experience difficulties in finding and moving to suitable locations’ in a relatively healthy economy, it is clear to us that the reality is that it may be much harder than currently suggested, and we believe this should be acknowledged and addressed.

11 Sound, noise and vibration

- Please see our comments above on Section 4 Air Quality as we believe these also relate to noise.

- On tunnel boring, we request further information on potential for vibration and the noise implications of this option. The reconsultation on Property and Consultation should also include provision for properties and businesses above tunnels including provisions to address the risk of future settlement.

12 Traffic and transport

- We wish to clarify that we were consulted on the scope and methodology and supplied comments - we are concerned over the ongoing delays in providing a robust Transport Assessment (TA) which fully demonstrates impacts, mitigation and allows partners to develop
wider work on developing the transport network to accommodate and reinforce the benefits of HS2.

- The hours examined in the TA need to reflect the industrialised nature of the HS2 route into Birmingham, where working patterns do not always follow the office-style 9-5.
- We welcome the intention to investigate using rail transport to facilitate construction where feasible. We have also outlined earlier in our response the need for Construction Consolidation Centres to reduce impacts of vehicle movements.
- We believe that there needs to be a coherent strategy for transport access to the Washwood Heath site, encompassing the HS2 depot and wider development potential, and we request to work with HS2 Ltd on this. For bus access, this is provided mainly by services on Washwood Heath Road, and to a lesser extent Drews Lane, with access from the no. 11 Outer Circle from the A4040. It is suggested that as the depot site would be so large, whether the 400m accessibility standard is met depends on whereabouts on the depot site one would be walking to. The more development and hence jobs are available here, then the greater the likelihood of services being operated to or near to the site. Also the study needs to include how early/late the services run, seeing as the depot will be a 24 hour operation. There also needs to be consideration of pedestrian and cycle access.

12.5 The impacts of construction traffic on the highways network needs further consideration, HGV movements have a greater impact on highway capacity and assessment needs to be based on junction arms as well as overall junction flows.

12.5 & 12.6 The assessment of impacts and mitigation is limited to highways and vehicular movement; this needs to consider fully the impact on other modes.

12.6 No detail has been provided on likely traffic flows due to the operation of the depot nor its operational characteristics, i.e. shift patterns, we are therefore do not consider that the impacts on the A4040 could be deemed as insignificant at this stage. In relation to wider Masterplanning at this location, consideration will need to be given to infrastructure provision which meets the needs to the potential Depot facility, but also enables development of the wider site.

12.5 & 12.6 with regard to loss of parking consideration should been given to compensatory provision elsewhere and or reconfiguration of the site to allow operations to continue.

13. Water Resources and Flood Risk Assessment

- 13.4.7 PFRA is complete and available on www.birmingham.gov.uk.
- 13.5.2 There may be a need to carry out water balance studies to demonstrate that the river crossings, at shallow depth, are not having an adverse effect on river base flows.
- 13.6.12 Avoidance of passive flow paths is a good design principal as is not interrupting groundwater flows. This principal will, if applied across the design, do much to satisfy concerns about mobilisation of contaminants and effects on base flows.

Community Forum Area Report: Washwood Heath to Curzon Street

General

- We note that the Washwood Heath Rolling Stock Depot now includes provision for HS2 Phases 1 and 2. Whilst the railway operational layout appears reasonable to cater for both Phases, and we agree that it is essential to provide a ‘base’ from which to expand the HS2 network northwards, we believe that the overall layout (e.g. including the balancing ponds) takes an excessive amount of land which reduces the significant development and therefore economic potential for this particularly deprived area of the City. We request that HS2 Ltd both more fully consider alternative depot locations, and also re-visit the Washwood Heath design to improve its efficiency. For example, locating the balancing ponds underground and considering the location of the landscaping/levels change. More complete information is again requested on employment potential including the various control/training facilities and phase 2 potential. More detailed information is requested on the precise extent of land required for construction activities.
- As HS2 Ltd is aware there is support for the production of a joint master plan at Washwood Heath to fully unlock the potential of the site. The land at Washwood Heath should be considered as a whole in terms of the opportunity presented. If the depot proposal is
progressed it is about both maximising the jobs on the depot site and also maximising the opportunity on any remaining land. It is not just about delivering a railway line particularly if HS2 is to be the ‘engine for growth’ that all parties hope it will be.

- We appreciate that the Birmingham City Centre station design is being refined to allow for better passenger connectivity, station operations flexibility and interface with the local setting, and request continued close involvement in resolving our concerns. However we feel that there is still some way to go before the City Council is assured that the new station is the world class arrival point well connected into the surrounding City Centre that is required at this important location.
- Direct and attractive pedestrian/cycling routes should be provided between the station and Digbeth along the line of Bordesley Street and New Canal Street. Direct and attractive pedestrian/cycling routes linking the HS2 station to both Moor Street Station and New Street Station are also an essential requirement to ensure the necessary links to the regional rail network.
- The City Council consider that the following are required to ensure that the economic benefits of the station, as outlined in part by the Eastside Masterplan, are maximised in the area of the City Centre impacted by the station and viaduct structures:
  - An open wide 24 hour accessible pedestrian link between Moor Street Queensway and Bordesley Street that is over-looked, safe and attractive to ensure that pedestrian routes severed by the closure of Park Street and Fazeley Street are properly replaced and that connections to Enterprise Zone sites within Digbeth are maintained and improved.
  - Active frontages on New Canal Street to provide a safe, welcoming environment underneath the viaduct and ensure that the street is an attractive route between Eastside and Digbeth.
  - That there are high quality pedestrian connections to Moor Street Station through the provision of covered walkways, and to New Street Station through the provision of greater pedestrian priority measures to cross Moor Street Queensway and improvements to the quality of the public realm.
  - A more expansive and dynamic pedestrian movement model is required to understand how pedestrians will move to, through and around the new station, thereby helping to inform the development of the station and create safe and welcoming pedestrian connections. This will help inform the joint master plan which is to be produced for this area.
- The City Council objects to the loss of parts of the new City Centre Park, either for permanent structures or during construction. The new park forms a centre piece for the regeneration of Eastside and should not be marginalised by the HS2 scheme. In particular, the City Council remains to be convinced that the proposed realignment of New Canal Street around the Woodman Public House is either necessary or the best solution.
- The City Council is also very concerned with the proposals for an electricity sub-station and large balancing pond at the junction of Curzon Street with Curzon Circus as this would result in the under-utilisation of a key development opportunity at a landmark site at the gateway to HS2/City Centre from the city’s ring-road.
- We request continued involvement in arrangements for highway diversions/closures and are of the view that temporary pedestrian bridges and crossings should be maintained throughout the construction period at key locations. For example there is significant concern over the lengthy complete closure of Saltley Viaduct which also needs to take into account economic impacts on areas such as Alum Rock Road Local Centre. Furthermore we do not agree that the option favoured would have the least impact on community severance in a wider sense rather than simply in the immediate vicinity of the bridge. We also request discussion on the order that the diversions would be undertaken, to ensure they are coordinated, for example the issue for larger vehicles created by diverting via Duddeston Mill Road with its low bridge. We again request assurance that Freightliner will be able to continue operating during HS2 construction and operation.

2 Overview of the area

- 2.1.18 – 2.1.22 – the planning policy context is a little muddled and should be re-ordered and updated.
- 2.2.7 & 7.5.2 – It is proposed that habitat planting along the south side of the rolling stock depot at Washwood Heath will include acid grassland and an ecologically designed brown roof
provided on one of the depot buildings. The adjacent Land at Warren Road Site of Local Importance for Nature Conservation (SLINC) includes areas of acid grassland, and the potential to use green hay from this site (or Hodge Hill Common SINC – another local acid grassland site) as a source of seed for the new areas of acid grassland habitat should be investigated. Provision of additional brown roofs should also be considered, as the Washwood Heath site provides a significant opportunity to deliver substantial biodiversity enhancements; such opportunities are much more limited along other sections of the route through this CFA. This should be coordinated with wider discussion on HS2 architecture/place making.

- Effects on groundwater and potential for exfiltration of river water where crossings are shallow needs to be assessed along with the potential for mobilising groundwater.
- 2.3.42 “archaeological survey works” prior to tunnel construction- it should be more specific about what these works will entail- they’re likely to include archaeological excavation.
- 2.3.44 “archaeological survey works” prior to tunnel construction we request more specific information about what works – e.g. including archaeological excavation, e.g. graves from Park Street Gardens”.

4 Air Quality

We have comments on several specific locations as relating to the construction phase, as follows:

- We note that the proposed routes to the Washwood Heath and City Centre station main construction compounds are: A4540-A45-M42/M6; A4040-A47-A452-M42/M6; A4040-A38-M6; and A47-A41-M5. All of these routes have the potential to impact on air quality at residential properties based on number of movements and type/weight of vehicles.
- We note the following proposed temporary diversions and highlight their potential air quality implications: A47 - Arley Road with the diversion via Washwood Heath Road and Saltley Viaduct; and Saltley Viaduct closure with diversion via Adderley Road, Duddeston Mill Road and Melvina Road.
- The permanent highway closures will have air quality implications. It is not made clear where these vehicles could divert to – we request further discussion on this as part of further work on both the ES and the Transport Assessment. These closures may have a large impact on residential properties in the area and compromise any proposed LEZ areas. We believe that significant monitoring data would be needed to verify any air quality models on these busy routes. We suggest consideration of Low Emission Vehicles for the construction works as they will be coming into an AQMA made worse by traffic routing due to temporary and permanent road closures.
- We believe that the proposed core working hours of 0800 - 1800 are acceptable, however we request information on impacts of the hour before and after core hours on air quality; and
- We note that the tunnelling operations are 24/7, seven days per week. These may have air quality implications for local residents.

5 Community

- 5.4.4 – 12 residential properties in Common Lane are included within the permanent land take. HS2 Ltd should liaise with both the owners and residents of these properties and secure appropriate re-housing opportunities.
- 5.4.6 – 5.4.11 A number of business properties are affected as the rail line is routed into the City Centre including the West Midlands and Staffordshire Probation Trust building on Saltley Business Park and the Arya Samaj Vedic Mission building. Appropriate relocations within Birmingham should be identified and HS2 Ltd should work with businesses and owners to mitigate the impact of the rail line.
- It is also considered that the proposals will have an impact on residents within Northumberland Street, particularly as the rail line will be on a 20m viaduct at this point, and this should be considered by the ES.
- 5.5.12 – the ES makes reference to reduced access to properties during the construction period – it should be noted that temporary pedestrian access was maintained across the Bullring Shopping Centre site during its construction and the City Council will want HS2 to consider similar measures during the construction period.
5.5.14 – Park Street Gardens is unique and will be lost permanently. Given the lack of open space in the City Centre compensatory provision should be discussed with the City Council and provided elsewhere.

5.5.15 - It is not accepted that an area of the new City Centre Park should be lost due to the realignment of New Canal Street. The need for the realignment of New Canal Street is not accepted by the City Council. The proposal that a significant part of the site should be lost for six years to accommodate a construction compound and offices is difficult to justify and HS2 Ltd should make alternative arrangements or amend their construction programme. A significant part of the City Centre is already affected by HS2 without affecting a newly laid out park and the setting of Millennium Point and Curzon Street Station.

More specifically on the City Centre station area, we have an urgent concern over land at the junction of Curzon Circle & Lawley Middleway (known as Eastside Locks), which is the subject of a Development Agreement. Development of the area is being pursued with the building line up to Curzon Circle. HS2 Ltd’s proposals now show an encroachment into this area, as part of the proposed junction works to convert the roundabout into a signal controlled junction. We understand this diversion will require permanent land take and the City Council is concerned that this will impact on the ability of the development to proceed as proposed. It is crucial that this first development in the phased redevelopment of Eastside Locks is delivered as the proceeds of the transaction will be used to deliver strategic infrastructure in the remaining undeveloped area and be the catalyst to deliver the remaining phases. We emphasise that there is a need for HS2 Ltd to provide greater detail on justification for the land take proposed, and assurance that the development can go ahead, whilst still providing sufficient Middle Ring Road highway capacity for both this area and the wider City.

The Construction Phase drawing (CT-050142) indicates that Curzon St Station (Listed Grade I) and the Woodman PH (Listed Grade II) would be isolated within the development site. This would be unacceptable as it will prevent the letting and reuse of these buildings until the opening of the HS2 station. The ES needs to assess the significant environmental heritage damage that these buildings will suffer if left empty and isolated over a significant period of time during construction activities. We consider that both buildings should remain open with easy access from Eastside City Park with suitable noise and dust pollution protection to minimise the environmental impacts upon the park. Alternatively, HS2 should assume responsibility for the maintenance and security of these properties where access is restricted during the construction process.

6 Cultural Heritage

6.4.1 “features relevant…shown on maps…” – we request that it be made clear that these maps only show designated heritage assets.

6.4.3 Actually Birmingham was a medieval market and industrial town.

The proposals do incorporate the loss of the Fox and Grapes Public House which is grade II listed. HS2 Ltd should provide a robust analysis to justify why this listed building cannot be accommodated within the scheme (this is currently lacking from the ES).

7 Ecology

7.3.5, 7.4.8/Table 9 – We note that ecological surveys are ongoing during 2013 - Saltley Viaduct should be a particular focus for black restart surveys, as the species has been recorded at this location in the past. Para 7.3.5 states that amphibian surveys of two ponds at the Network Rail office off Duddeston Mill Road and adjacent to the A47 Heartlands Parkway and the River Rea will be undertaken; however in relation to amphibians, Table 9 states that no suitable habitat occurs within or close to the route of the Proposed Scheme, therefore no sites have been selected as requiring amphibian survey. Clarification of this situation is required.

7.4.6 – The River Tame is designated as a Site of Local Importance for Nature Conservation (SLINC) - boundary and citation details are available from EcoRecord.

7.5.4 & 7.5.17 – The proposed diversion of sections of the River Rea and Washwood Heath Brook provide excellent opportunities to significantly enhance the habitat quality and connectivity of these watercourses. In this highly urbanised part of Birmingham, the rivers, streams and canals are important habitat corridors and have an important role in aiding species dispersal.
9 Landscape and Visual Assessment

- The proposals will require the remodelling of parts of the new Eastside City Park and Park Street Gardens (largely lost to the station) to ensure that there is a successful interface between the station building and the park environment. The environmental impact of the height of the station needs to be considered to ensure that it does not completely overshadow the open space within the park as the station building is to the south of the site, the Environmental Statement needs to address the need for a sun-path analysis of the station building to inform the designs of the roof structure, or any potential over-site development, to maximise the light levels at ground level.

- There is still concern that the station building is not responding well to the sloped topography of the site in order to maximise an active frontage (to include elements of retail/food & drink uses) to the promenade. The landscape treatment of the promenade and the building levels need to work properly together to achieve a safe and attractive environment alongside the building. The principle needs to be established at this stage to lead the detailed design that follows. The effects of wind funnelling from the station along this route should also be assessed.

- The proposals show the re-routing of the Curzon Street/New Canal Street corner by bringing it into the new Eastside City Park. This will have a significant impact upon the quality of the environment of the park as it will bring noise, air pollution and safety issues for users of the performance and events area of the park. The ES (paragraph 6.8.6 Built Heritage) fails to consider the setting of Listed Buildings; the re-routed road will adversely impact the setting of the Grade II Listed Woodman PH which will become surrounded on 3 sides by highway – this will threaten the economic viability of the premises and destroy its setting within the park. In addition, the road in its current alignment provides the context for the Woodman in relation to the Grade I Listed Curzon St Station building. The justification for the proposal hinges upon a section of wall attached to the Grade I Listed Building, thereby forming part of the Listing. The wall has been repaired and poorly extended with modern materials; removal was considered acceptable under a previous plan for an extension to the building. Given the wider significant environmental and cultural damage, the ES should allow for the consideration of an option that repositions and restores the wall to allow for any highway improvement if deemed necessary.

- We request that consideration be given to an alternative location for the electrical sub-station that is currently proposed for a prominent location opposite the Birmingham City University Campus and alongside the canal within the Warwick Barr Conservation Area – e.g. consider relocation to Saltley.

- The location and extent of the proposed balancing pond at Curzon Street should also be reconsidered. Other technical solutions that do not require such an extensive area of land should be explored including the potential to improve the visibility and water quality of the River Rea as part of any solution.

10 Socio Economics

- 10.4.5 – the City Council does not agree with the analysis of the employment land supply at this point. The figure seems to be solely based on take up since the economic downturn (rather than historic levels of take up) and seems to ignore more recent evidence of improved levels of take up (driven in part by demand in the advanced manufacturing sector and the expansion of Jaguar Land Rover). More recent work by Warwick Economics and Consulting and the City Council’s Employment Land Review (ELR) 2012 demonstrates a shortage of employment land against UDP targets. Indeed the ELR states that “Currently the readily available supply of best urban land falls short of the UDP target and there are significant concerns over the adequacy of long term supply. There is not an adequate supply of best urban land to meet demand once the employment market emerges from the recession. This is compounded by the limited amount of not readily available land, a situation that is exacerbated by the proposed safeguarding of the Washwood Heath sites”. This section therefore needs to be re-written to reflect the current position in terms of the city’s employment land supply.

- We reiterate the general point about relocation of businesses, in the context of not only Washwood Heath but areas such as Saltley Business Park and Castle Bromwich Business Park. We welcome the intention to develop discretionary enhancement measures, such as business support, supply chain engagement and local construction skills development.
initiatives and request involvement. However we see little evidence of commitments to local employment, either new jobs or business relocations. This must be addressed by HS2 Ltd.

- This is particularly important given HS2 Ltd’s estimate of the numbers of jobs displaced on the Birmingham Spur (circa 3,500 compared with 1,500 for previous estimate), which is particularly concerning given the lack of updated information on how many jobs could be created through development around the City Centre station.

- 10.5.8 The City Council challenges the assertion in the ES that the loss of an estimated 2,850 jobs is “relatively modest compared to the scale of economic activity and opportunity in the area”. The loss of so many jobs in Birmingham is clearly significant.

- As we have previously emphasised, we intend to work with HS2 Ltd and other stakeholders in developing a ‘masterplan’ for the Washwood Heath area. If the depot is progressed this will require HS2 Ltd working with the City Council to maximise employment on the depot itself and on the remaining land post construction.

- The socio-economic section should also consider the impact on businesses and local centres caused by disruption and severance during the construction of the line for example the impact on Alum Rock Road as a result of the closure of Saltley Viaduct for up to 3 years.

11 Sound, Noise and Vibration

Please see our comments above on Section 4 Air Quality as we believe these also relate to noise.

12 Traffic and transport

- We wish to clarify that we were consulted on the scope and methodology and supplied comments - we are concerned over the ongoing delays in providing a robust Transport Assessment (TA) which fully demonstrates impacts, mitigation and allows partners to develop wider work on developing the transport network to accommodate and reinforce the benefits of HS2.

- The assessment of traffic and transport does not fully set HS2 in the context of wider improvements within the City Centre; the focus is on highways improvements and does not make reference to wider sustainable transport measures, i.e. Sprint, Metro, Cycling Network development.

- Given the scale of construction activities in this community forum area, particularly in the City Centre, we would suggest that the impacts of temporary/permanent closures and ongoing restrictions will have significant impacts on the transport network. We would suggest that there is a need for enabling transport infrastructure to be put in place early in the construction programme to minimise these impacts where possible.

- The assessment of impacts and statements of residual significant effects is not supported and unproven, indeed, we would suggest that some of the conclusions drawn in the are incorrect;

- For construction traffic, we support the general principle of moving goods by rail where feasible but suggest this may be more feasible in the Washwood Heath/Saltley areas due to the lack of existing terminals/space for temporary ones close to the City Centre. We also wish to reiterate the need to minimise movements through exploring a Construction Consolidation Centre. The level of construction traffic will be significant and given the nature of vehicles has a disproportionate impact on capacity. With regard to Para 12.6.7, we would suggest that the nature of vehicle types will vary across the construction period, impacts may be higher where the proportion of HGV’s is greater.

- Whilst we recognise that more work is needed on the TA, we do not agree with the assertion that increased demand from HS2 would simply be absorbed within existing public transport networks with no requirement for wider improvements. Indeed Paragraph 12.7.15 and 12.7.24 suggests that further work is required to confirm the impacts.

- The current design proposals will lead to Park Street being closed, with traffic diverted onto Moor Street Queensway to provide the alternative route. This will have a significant environmental impact, which needs to be properly assessed, including the quality of the pedestrian environment of Moor Street in terms of noise, air quality and safety of a higher volume of pedestrians and traffic. This issue has been raised repeatedly with HS2 and no evidence provided to demonstrate the proposals are acceptable;

- The regeneration of the Bordesley Street area of Digbeth could be transformed by HS2 and therefore the business case for the HS2 project in the City Centre would be undermined if this
area is not properly connected to HS2 and the city core. The regeneration of the Digbeth area of the city centre is a vital outcome for the city from the HS2 scheme. The proposals sever current pedestrian and vehicular links into Digbeth at Fazeley Street and Park Street. Without appropriate mitigation for these routes, investment may not be forthcoming and there will be a significant environmental impact upon the quality of the physical environment within the Digbeth Conservation Area as its buildings would be physically and economically detached from the city core. The City Council’s Eastside Masterplan recommended the bridging of the West Coast Mainline between Moor Street and Park Street to create a new public plaza with taxi facilities fronting a Digbeth entrance to the HS2 station.

- The proposals within the draft ES currently appear inadequate to cater for suitable replacement pedestrian links from Moor Street to Digbeth amongst the taxi/HS2 needs for the space. The quality of environment created here needs to be assessed fully as it is a potentially very narrow space. In addition, staircases will need to be wide with clear sight-lines from top to bottom (as opposed to zigzag vertical layouts) in order to provide safe, attractive routes. Escalators should be included in addition to lifts to provide a choice down to the taxi level – lifts can become full quickly and add time when handling luggage etc.

13. Water Resources and Flood Risk Assessment

- 13.2.1 Generally agreed but include contaminants.
- 13.4.7 PFRA is complete and available on www.birmingham.gov.uk.
- 13.5.2 There may be a need to carry out water balance studies to demonstrate that the river crossings, at shallow depth, are not having an adverse effect on river base flows.
- 13.5.7 Once again checks to ensure base flows in the river are not affected by tunnel construction at shallow depth.
- 13.5.9 Washwood Heath Brook is ordinary watercourse therefore agree construction with BCC as Land Drainage Authority as well as EA. In this respect a natural channel or a channel with good potential for biodiversity is required.
- 13.6.12 Avoidance of passive flow paths is a good design principal as is not interrupting groundwater flows. This principal will if applied across the design do much to satisfy concerns about mobilisation of contaminants and effects on base flows.

**Community Forum Area Report: Birmingham Interchange and Chelmsley Wood**

The City Council is a major landowner at this location with its interests including the NEC, Birmingham Airport and a large area of land to the east of the M42. As such it should and will have a major influence on how proposals are implemented in this area. Our response to this Community Forum Area Report has been developed in consultation with the NEC Group.

HS2’s proposals for the Interchange Station include the station itself; People Mover and associated depot; rail infrastructure; a number of surface car parks and balancing ponds. As such the proposals pay no attention to the potential for growth and development at this location – a location where high speed rail, Birmingham Airport, the West Coast mainline, NEC and M42 Corridor are all in close proximity. In our opinion this is a significant oversight.

The City Council’s land to the east of the M42 (approximately 105 acres) is strategically important as it is located between the NEC and the proposed Interchange Station. The location of two surface car parks on this land and a significant number of large balancing ponds which is neither the most efficient nor economic use of the land and the City Council is concerned at the layout as currently shown in the ES. There is a tremendous opportunity at this location for development on a significant scale which will provide an opportunity for growth and add real value to both the City’s and the region’s economy without compromising the existing function of Birmingham city centre. HS2 Ltd should properly engage with the City Council as landowner to master plan this area (something which has been lacking to date).

The City Council supports a public transport connection linking the Interchange Station to the NEC, Birmingham International Rail Station and the Airport. However, partners should be more involved in the design and routing of the proposed People Mover in terms of how it relates to the
opportunities on the City Council’s land to the east of the M42 and its impact on the operation and future aspirations of the NEC.

During the construction process a number of site compounds are shown both on the City Council’s land to the east of the M42 (it is also indicated that this area will be used for temporary workers accommodation) and on the NEC site. We have serious concerns with regard to compound locations at the NEC, removing parking in East 5 and West Car Parks will have contractual issues with Genting and Birmingham Airport respectively and for the tenants’ significant financial loss, threats to employment, and disruption to 2 key employers in the region. The loss of East 4 car park and perimeter road by Hall 3 will result in operational and contractual issues for the NEC resulting in financial loss, inconvenience and lost business. The NEC attracts over 3 million people a year, contributes £2.1bn to the economy and supports 29,000 jobs. The proposed loss of 5,200 car parking spaces for 12 months would not be acceptable to the City Council and NEC. Therefore, urgent discussions are required with HS2 to mitigate the loss of parking and locate alternative compound sites.

In terms of the City Council’s land to the east of the M42, the Council understands the need for temporary working space but HS2 should provide details of how these temporary uses will be managed and how quickly the land will be delivered back to the landowner once the construction process is complete.

We would welcome discussions with HS2 as proposed in clause 8.5.13 as the works will prevent mineral extraction on the NEC site and areas east of the M42.

The ES states that significant numbers of passengers will be using the Interchange Station from the outset (building to 7000 passengers in the morning peak and 8000 passengers in the evening peak by 2041) and significant areas of surface car parking are shown. HS2 Ltd should provide more information on the overarching transport solution, including enhanced public transport services (such as rapid transit routes into East Birmingham) and highway improvements, which will need to be provided to handle this number of people accessing the station. Junction 6 of the M42 is already heavily congested and there have been instances where the junction has ‘locked’ impacting on both the motorway network and the A45 (the gateway to the Airport, NEC and wider city). It is felt that more work will be required to junction 6 than has been outlined in the ES and potentially a new junction on the M42 in order to deal with traffic accessing the station. The City Council certainly questions the finding at paragraph 12.6.15 that the effect of the traffic increase at this important junction ‘would not be significant’.

With regard to Construction activities it is imperative that HS2 have further informed dialogue with the City Council, NEC Group and Airport to minimise disruptions caused by road closures and any associated diversion routes. HS2 should note: that is important that all contractors working on NEC land comply with the NEC Construction Guidelines and obtain the relevant work permits from the NEC where necessary; Construction programs (works on the NEC site) referred to in clause 5.1.2 must be agreed in advance with the NEC to mitigate financial losses; and potential of damage to NEC property could be substantial the proposed £7,500 limit in clause 5.1.10 for property damage claims is inadequate and must not be limited.
APPENDIX B - Birmingham City Council’s Response to HS2 Phase 1 (London-West Midlands) Design Refinements

9th July 2013

FREEPOST RTEC-AGCS-CZCY
Design Refinement Consultation
PO Box 1152
Harrow
HA1 9LH

Dear Sir/Madam,

HS2 PHASE ONE: DESIGN REFINEMENT CONSULTATION

Thank you for the opportunity to respond to the consultation on the HS2 Phase One Design Refinements. This response should be read in conjunction with our separate response to the Draft Environmental Statement (ES) consultation, which is appended to this letter for reference. The City Council continues to work with partners including the Core Cities and the Go-HS2 consortium in supporting the delivery of HS2 and its significant predicted benefits.

Our response to the Design Refinement consultation focuses on those aspects which directly affect the City, however, we have considered wider network changes and responded accordingly. Whilst not part of this consultation the City does consider that current proposals for Birmingham City Centre Station and Birmingham Interchange Station need considerable development to ensure that they meet our aspirations for a transformational and iconic gateway to the West Midlands with required wider transport connectivity and surrounding public realm enhancements, such as Eastside Park. We acknowledge that further detailed design will be undertaken on the proposals and look forward to working with HS2 in taking forward these measures to further mitigate impacts and reach optimal solutions. Our comments on those proposals outlined in the Design Refinement follow.

- We fully support the proposed 2.8km Bromford Tunnel from Castle Bromwich Business Park to the Drew’s Lane industrial site in Washwood Heath. This option reduces the overall environmental impact of the route, with less complication and disruption than the alternatives. The option also presents significant cost-savings, estimated around £200 million, which could fund wider improvements. We understand that the extent of the tunnel is still being considered; particularly in relation to extension eastwards under the Park Hall Wood area which would further mitigate adverse environmental impacts. The proposed design alterations should not preclude appropriate flood attenuation measures and a collaborative approach is required to maximise opportunities to address this high flood risk area.

- On Washwood Heath Depot, we consider that the railway/operational layout proposed are logical if the depot facility comes forward at this location and welcome the location of both Phase 1 and Phase 2 facilities. However, we re-iterate our concerns about land take (for the Depot and the access rail tracks) and the wider economic potential of this area – as stated in our ES response, we believe there is a need for the City Council to work with HS2 Ltd on joint master planning for Washwood Heath to maximise employment opportunities for this important site. The need to maximise the economic potential in Washwood Heath is particularly important in the context of the state of the local labour market; the unemployment rate in Washwood Heath ward is over twice the Birmingham-wide rate and over five times the national rate. The description of the Depot facilities appears to under-sell the potential for this area and the potential for associated industries to support HS2. We request that HS2 Ltd more fully considers the depot impact and also re-visit the Washwood Heath design to improve its efficiency. For example, the proposed balancing ponds are far too expansive and alternative solutions should be identified.

- The proposed amendments to both Bromford Tunnel and the Washwood Heath Depot are supported, but we are concerned that full consideration has not been given to wider supporting
measures, such as access improvements. This is both to meet operational requirements and to ensure that arrangements facilitate the development of sites remaining post completion of HS2.

- The proposed design alterations relating to the depot alignment and rebuilding of Saltley Viaduct do result in a greater impact on Saltley Business Park. HS2 will need to produce a strategy to minimise the impacts on the area, particularly during construction activities over 36-months. This should include business relocations as required.

- As proposed in the 2010 Command Paper, we request that consideration is given to a rail connection between HS2 and the existing classic rail network, between Washwood Heath and Water Orton. This would enable through classic compatible services from HS2 into New Street station and beyond – which would potentially enable through high-speed services to a greater range of destinations, as well as providing additional operational flexibility. We are disappointed that not even passive provision for such a link has been considered with the proposed Design Refinements consultation.

- For the HS2-HS1 Link, we note that there has been an incremental improvement in proposed track capacity. However, we remain concerned that the proposed scheme needs further consideration so that a ‘fit for purpose’ link can be provided for the longer term, that caters for not just HS2 international demand but also for direct domestic passenger services (e.g. between Birmingham and south/east of London) and freight growth. A recent Greengauge 21 study, demonstrated there is concern that the currently proposed single track mixed use HS1/HS2 link is likely to constrain international service opportunities, especially with the completion of Phase 2. We request that HS2 Ltd continue to work closely with Network Rail, Transport for London and other relevant bodies on consideration of a further enhanced solution such as the Euston Cross proposal or at the very least a fully segregated twin track HS2-HS1 link.

- In respect of Euston Station the proposals for a more integrated concourse for HS2 and West Coast Main Line services is welcomed. However, there is still some concern in respect of the impact of the construction works on existing rail services into London Euston. The proposed link between Crossrail at Old Oak Common and the West Coast Main Line slow lines would appear to offer a solution to this potential lack of capacity at Euston as it would enable the re-routing of some West Coast Main Line suburban / outer suburban rail services away from Euston and onto the new Crossrail network. Further consideration of this WCML link to Crossrail, which would also provide new journey opportunities, is therefore supported.

- We acknowledge that the provision of an appropriate junction in Phase 1 to allow connections and development of a link to Heathrow in Phase 2 would reduce cost and be less disruptive once the network is operational. However, we remain to be convinced on the overall business case for this link and are keen to ensure that any link does not effect connectivity between the West Midlands and London. We consider that High quality access to Heathrow Airport could be delivered via Crossrail at Old Oak Common which would still provide considerable accessibility improvements to Heathrow from the West Midlands compared to existing journeys. Moreover, the Davies Commission was set up in 2012 to provide a steer to a long term strategy for aviation in the UK including the role of Heathrow as the UK only hub airport. A decision on a separate Heathrow Spur should be made once the Davies Commission has fully reported.

- We support proposed design refinements which address technical issues and further reduce overall environmental impacts, including those proposed at Water Orton and Chelsmely Wood Curve.

- We support proposed design refinements which provide necessary enabling infrastructure to support future provision to Leeds and Manchester. However, we note that the realigned link at Handsacre still connects into the complex and congested section of the West Coast Main Line between Lichfield and Colwich Junction. This is likely to act a capacity constraint until the completion of Phase 2 of HS2 in 2032. We would support the continuation of the proposed
Manchester spur to an alternative connection with the West Coast Main Line to the north of Colwich Junction as part of a further design refinement to the phase 1 HS2 route.

- We support proposed design refinements which support the efficient operation of the rail network, i.e. **maintenance loops and depots**.

We look forward to continuing to work with HS2 Ltd and partners in assisting the delivery of this transformational national infrastructure project, and realising its benefits.

Yours faithfully,

Chris Tunstall
Director of Sustainability, Transport & Partnerships

---

**Development Directorate**

1 Lancaster Circus Queensway
Birmingham B4 7DJ

<table>
<thead>
<tr>
<th>Telephone</th>
<th>0121 464 6467</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facsimile</td>
<td>0121 303 6379</td>
</tr>
<tr>
<td>E-mail</td>
<td><a href="mailto:chris.tunstall@birmingham.gov.uk">chris.tunstall@birmingham.gov.uk</a></td>
</tr>
</tbody>
</table>