

Mike Cooke
Chief Executive
London Borough of Camden
Camden Town Hall
Judd Street
WC1H 9JE

26 February 2015

By email only

Dear Mr Cooke

**High Speed Rail (London – West Midlands) Bill
Petition No.0184, AP20142, AP3072 London Borough of Camden
Letter In relation to assurances dated 30 November 2015 regarding air quality**

I am writing to you on behalf of the Promoter of the High Speed Rail (London – West Midlands) Bill currently before Parliament in relation to the assurances provided to the London Borough of Camden on 30 November 2015, specifically those in relation to the use of Euro VI vehicles and the study to set levels of ambition. We discussed this at our meeting on 28 January, and I committed to write to you with some proposals.

Since issuing this assurance, a number of questions have been raised both in relation to the potential ambiguity within the current assurance and also the potential for unintended consequences. I am therefore proposing some supporting clarifications in relation to this assurance and how it will be implemented. I would stress that these clarifications are not intended to undermine the basis upon which the assurance was offered or the intent of the Promoter to reduce potential air quality impacts in Camden resulting from the HS2 scheme.

The starting point for complying with the assurance remains that all heavy duty vehicles used on the HS2 scheme in Camden will be EURO VI. However, in the limited circumstances (described more fully below), where it is not possible to do so HS2 will provide Camden with a full explanation and evidence showing why it has not been possible to provide EURO VI vehicles in accordance with its assurance and adopt any reasonable representations Camden makes in response.

Our further discussions with UK contractors have indicated that, whilst the EURO VI market is likely to be developed sufficiently to enable the most commonly used heavy duty vehicles to be EURO VI compliant from 2017 onwards, there are a number of specialist heavy vehicles that may not be available during the early years of construction. For example, vehicles required to haul low loader trailers for the occasional transporting of heavier plant items, such as large crawler cranes or piling rigs, are likely to meet the earlier EURO V standard but it is unlikely that EURO VI compliant vehicles will be widely available during the early years of construction. These vehicles are a scarce resource operated by specialist haulage contractors and are not widely available.

As a result of the market conditions and availability of these vehicles, despite HS2 Ltd.'s best endeavours to secure EURO VI compliance there is the potential that HS2 will be unable to ensure that such vehicles are EURO VI compliant from 2017 as the assurance might suggest. However, we expect any exceptions to be minimal and reduced as the market 'catches up' with technological developments. Obviously, schemes such as the forthcoming ULEZ often include a carve-out for such specialist vehicles and so there are precedents which might form a helpful basis for comparison and discussion. Furthermore, in 2017, the majority of heavy goods vehicles operated by HS2 contractors will be transporting excavated material (notwithstanding the study currently underway to maximise removal by rail) and **I can confirm again, for avoidance of all doubt, that all of these vehicles will be EURO VI compliant from 2017.**

The other unintended consequence which may result from the assurance is the impact on SMEs. Whilst EURO VI vehicles are readily available and are operated by larger organisations, the RAC Foundation report on 'Van travel trends in Great Britain' in April 2014 leads us to the conclusion that many smaller organisations may not be using this type of vehicle in the short to medium term. Therefore, further consideration needs to be given so as not to exclude the employment opportunities HS2 will provide to these types of businesses.

In order to resolve the issues relating to specialist exemptions and SME impacts, I am proposing that the scope of the study referred to in assurance 6.2 includes collective consideration on exemptions and transition mechanisms, in line with the above information and any relevant studies/ thinking used to inform the ULEZ. Furthermore, I also propose to expand the scope of the study to include monitoring and compliance considerations to ensure that the objective of reducing adverse air quality impacts is being achieved. Annex A provides additional details of the scope of the study referred to in assurance 6.2 – which our technical teams will continue to refine with your team with a view to agreeing the scope. It is also worth reiterating that the outcomes of the study will be complete and shared in full with the London Borough of Camden before any potential House of Lords petition hearing.

As a project HS2 aspires to take a lead in ensuring the latest European emission standards are adopted and opportunities for reducing significant environmental impacts are examined and explored. The clarifications and extensions proposed (and provided in Annex A to this letter) are in line with this ambition and our continued desire to work with the London Borough of Camden to come to the right solution.

Regards,

A handwritten signature in black ink, appearing to read 'RH', written over a faint, illegible stamp or watermark.

Roger Hargreaves

Director, Hybrid Bill Delivery
High Speed Two (HS2) Limited

ANNEX A

The scope of the study referred to in assurance 6.2 of 30th November letter, will include, as a minimum:

a) Consideration of any reasonable specific specialised vehicle exemptions to assurance 6.2 above, taking into account market availability and usage patterns. As per the wording of assurance 6.2, the study will take as its starting point that all heavy duty vehicles should be Euro VI; the study will present evidence as required to show where this is not possible. Where EURO VI vehicles are shown to be unavailable, commitment will be made to use the 'next best' EURO V standards throughout.

b) Consideration of the implications of imposing EURO VI engines onto SMEs (in line with assurance 6.2a above) in the short to medium term and how to ensure these groups are not excluded from the opportunities of the HS2 project. Consideration of exempting trivial usage in the compliance regime, with reference to scoping work undertaken by TfL with regards exemptions policy and the impact on SMEs of the forthcoming London Ultra Low Emission Zone.

c) Exploring the potential for:

- adopting a London Low Emission Zone-specific benchmark for the percentage of ultra-low emissions light vehicles below 3.5t entering worksites operated by HS2 contractors by 2017.

- a London Low Emission Zone specific requirement that all vehicles operated by HS2 contractors used during the construction of the scheme be powered by Euro VI/6 (or lower emission) engines by 2020.

- working with other similar projects and potential of influencing the market in relation to impacts on air quality resulting from construction vehicles.

d) Consideration of monitoring and compliance regimes and value for money. Where EURO VI vehicles will be available and the only factor affecting their usage by HS2 contractors is cost, the study must show why the cost implications are severe enough to override the wording of assurance 6.2.

