

**SUBMISSION TO PUBLIC CONSULTATION**

# Protecting Municipal Roads During ALTO HSR Construction: Impacts of Construction Trucking and Lessons from the UK's HS2 Project

*Southern Corridor – Eastern Ontario | April 24, 2026*

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## **PURPOSE OF THIS SUBMISSION**

This submission documents the impact of construction-phase trucking of aggregate, fill, concrete, steel, and other materials on municipal and county roads along the proposed southern corridor. Drawing on extensive evidence from the UK's HS2 project, it demonstrates that without proactive, binding intervention, Eastern Ontario municipalities face years of severe road damage, inadequate compensation, and enforcement gaps. It makes seven formal requests to ALTO that must be addressed before construction proceeds.

## **Section 1 — The Scale of Construction Trucking**

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High-speed rail construction generates enormous volumes of heavy truck traffic. The track must be extremely flat and straight, requiring extensive grading, cut-and-fill operations, grade separations at every road crossing, viaducts over waterways, and elevated embankments. Even along the flatter southern corridor, the route still crosses approximately 40 km of the Frontenac Arch, requiring substantial cut-and-fill. Materials required include crushed stone and aggregate for the rail bed and embankments; concrete for grade separations and viaducts; steel for rails, structural elements, and catenary systems; and soil and fill for earthworks.

The UK's HS2 project provides instructive scale comparisons. Across its programme, HS2 anticipated that freight trains would need to remove the equivalent of three million lorry loads from the British road network. At a single railhead site in Buckinghamshire, 655 freight trains delivered 1.1 million tonnes of aggregate in just two years, representing the removal of over 116,000 truck journeys. These figures illustrate the scale of material movement that ALTO will demand, much of which will default to road transport absent deliberate, enforceable intervention.

## **Section 2 — Lessons from HS2: What Happened to Roads**

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### **2.1 Road damage was severe and underestimated**

During parliamentary questioning, an MP described roads in Buckinghamshire, Oxfordshire, Northamptonshire, and Warwickshire as having been “completely destroyed” by HS2 construction vehicles, noting that these local roads were never built to handle such weight. Buckinghamshire Council's cabinet member for transport stated publicly that HS2 construction was causing considerable disruption and damage to their already strained road network, and that the council had

been “extremely frustrated with the limited level of funding provided to date.” Rural roads had deteriorated to the point where standard pothole repair was no longer sufficient. This is directly analogous to the situation in Eastern Ontario, where municipal and county roads were designed for light rural and agricultural traffic, not sustained heavy haulage.

## **2.2 Compensation was inadequate and delayed**

HS2’s chief executive outlined a compensation package including a £3.95 million road safety fund and annual deterioration payments. However, the MP countered that Buckinghamshire had so far only been offered £93,000 in deterioration compensation, enough to resurface approximately five metres of road. HS2’s response, that there was “little point resurfacing roads that lorries were still using”, was technically logical but left communities living with wrecked infrastructure for years. This pattern of deferred compensation is the critical warning for Eastern Ontario municipalities.

## **2.3 Community disruption extended well beyond road surfaces**

The Calvert Green parish council chairman told a parliamentary transport committee that his Buckinghamshire community had seen key roads closed at very late notice, or sometimes with no notice at all, impacting local businesses and preventing school buses from reaching pupils on time, sometimes for months. Written evidence to Parliament warned of increasing road accidents, increased daily congestion, and adverse effects on local businesses and housing development.

## **2.4 Enforcement of truck routes was difficult**

Under the HS2 Act, contractors were only required to seek council approval for routes used by vehicles over 7.5 tonnes where daily movements exceeded 24. Numerous scenarios allowed heavy HS2 vehicles to use unapproved local roads. Buckinghamshire Council ultimately purchased mobile CCTV cameras specifically to monitor HS2 construction traffic. That a local authority had to invest in surveillance infrastructure to monitor compliance with a national construction project underscores the enforcement gap. A comparable dynamic is now emerging in Canada through Bill C-15, which provides ALTO with enhanced powers that may leave municipalities with limited leverage to protect their road infrastructure.

# **Section 3 – Effective Mitigations from HS2 That ALTO Must Commit To**

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## **3.1 Rail-based materials delivery**

HS2 established railhead facilities along the route to deliver aggregate and construction materials by freight train rather than by road. At one new facility in Buckinghamshire, approximately 1,800 freight trains were expected over three years, eliminating the equivalent of 300,000 lorry movements. Across the programme, HS2 expected to remove three million lorries from roads using 30,000 freight trains. Existing rail lines run through the Eastern Ontario corridor; ALTO must be required to maximize rail-based delivery with measurable, binding targets.

## **3.2 Conveyor belt systems**

HS2 deployed conveyor belt systems at critical locations. In West London, a 1.7-mile network of conveyors moved over five million tonnes of excavated spoil, eliminating one million lorry movements. In Wendover, Buckinghamshire, a 1.3 km conveyor carried 550,000 cubic metres of material, avoiding approximately 70,000 lorry journeys through rural roads. The conveyors were fully enclosed to limit dust and noise. ALTO should be required to assess conveyor deployment wherever it would eliminate significant truck volumes through residential communities.

### 3.3 On-alignment material movement

Once materials reached HS2 construction sites by rail, they were moved along the trace of the new high-speed line itself keeping material away from local road users. Using the construction corridor as an internal haul route is a critical strategy that ALTO should commit to in the design phase as a binding construction condition.

## Section 4 – Eastern Ontario’s Specific Vulnerabilities

Factor	Eastern Ontario Concern
<b>Spring weight restrictions</b>	Ontario municipal roads are subject to half-load season restrictions during frost heave. This factor has no UK equivalent and would compress construction schedules into fewer months, intensifying truck traffic during permissible periods and accelerating deterioration.
<b>Road design standards</b>	County and township roads were designed for light rural traffic. Many lack the base structure to withstand sustained heavy haulage without accelerated deterioration of pavement, shoulders, and subsurface.
<b>Agricultural conflicts</b>	Construction traffic will conflict with seasonal farm equipment movements during planting and harvest, and with dairy and livestock operations that depend on daily road access.
<b>Small town through-routes</b>	Many affected communities have main streets that also serve as through-roads. HS2 experience in villages such as Wendover showed that construction traffic transforms quiet communities.
<b>Municipal fiscal capacity</b>	Smaller townships may lack the administrative capacity to document road damage, monitor compliance, and pursue compensation claims — unlike larger UK counties such as Buckinghamshire.
<b>Distance from aggregate sources</b>	Aggregate may need to be trucked significant distances from quarry sources, increasing the number of road-kilometres affected and the duration of heavy traffic on each route.

### ALTO’s CEO confirms: discussions with firefighters about road access were ongoing during the consultation period

On CBC Ottawa Morning on March 25, 2026, ALTO CEO Martin Imbleau confirmed that the consultation period had not resolved critical questions about emergency access. He stated that the consultation was receiving feedback specifically about “what is the distance between the underpass and the overpass for the farmers to have access to the land” and that ALTO was in active discussions with firefighters to ensure that emergency access would not be severed. These consultations about crossing spacing and emergency service access were ongoing as of one day before the consultation closed — not concluded before it opened.

Imbleau also confirmed the total fencing commitment that makes these questions acute: “Nothing can cross it. If at 330 kilometres you cross a deer, it’s a huge incident... overpass and underpass will have to be strategically positioned.” And he described the scale: “We’re talking a thousand kilometres and 300 community. So it’s thousands of crossings that we’re talking about.” Discussions about emergency vehicle crossing requirements are a prerequisite to any responsible route decision. Those discussions had not concluded by the time the consultation closed. The formal requests in Section 5 should be read in that context.

Source: CBC Ottawa Morning, March 25, 2026. [cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093](https://www.cbc.ca/listen/live-radio/1-100-ottawa-morning/clip/16205093)

## Section 5 — Formal Requests

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1	<p><b>Require pre-construction road condition surveys funded by ALTO</b></p> <p>ALTO must fund comprehensive, independent road condition surveys of all municipal and county roads within the potential construction haul zone before any construction activity begins. These surveys must establish legally defensible baselines for damage claims. Without baseline documentation, municipalities will struggle to prove that road deterioration is attributable to construction traffic.</p>
2	<p><b>Negotiate binding road restoration agreements with upfront funding</b></p> <p>Road restoration agreements must include upfront and annual funding during construction and not be reduced to solely end-of-project promises. HS2 demonstrated that deferred compensation leaves communities with damaged roads for years. Agreements must specify annual deterioration payments, interim repair schedules, and post-construction restoration standards with independent verification.</p>
3	<p><b>Mandate maximum use of rail delivery and on-alignment hauling with measurable targets</b></p> <p>Enforceable requirements must specify the percentage of materials moved by truck versus by rail, with binding targets. Eastern Ontario's existing freight corridors make rail delivery feasible. On-alignment material movement using the construction corridor as an internal haul route must be a design-phase requirement, not a post-design option.</p>
4	<p><b>Establish designated and enforceable haul routes with binding penalties</b></p> <p>Construction truck traffic must be restricted to designated routes primarily using provincial highways (Highways 401 and 7) and purpose-upgraded connector roads. Advisory signage and voluntary compliance are inadequate: HS2's experience showed councils resorting to CCTV monitoring to track violations. Agreements must include binding financial penalties for non-compliance.</p>
5	<p><b>Protect spring weight restriction periods</b></p> <p>Construction schedules must respect Ontario's spring half-load season on municipal roads, or ALTO must fund upgrades to designated haul routes sufficient to eliminate the need for seasonal restrictions on those roads. This is unique to the Canadian context and must be addressed explicitly in the construction framework.</p>
6	<p><b>Establish an independent construction commissioner</b></p> <p>An independent construction commissioner with authority to receive complaints from residents and municipalities, investigate construction traffic incidents, mediate disputes, and direct remedial action must be established before construction begins. HS2's Independent Construction Commissioner handled dozens of individual cases per quarter and is the minimum standard.</p>
7	<p><b>Establish community impact funds for municipalities</b></p> <p>Dedicated community impact funds for municipalities along the construction corridor must be established as a condition of route selection. Camden Council in London secured £3.5 million from HS2 plus £2.4 million from the Road Safety Fund; Buckinghamshire received £3.95 million for road safety improvements. Equivalent funds, scaled for the Canadian context, are the minimum standard.</p>

## Key Sources

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Highways Magazine. "HS2 Exec and MPs Joust Over Compensation for Completely Destroyed Roads." 2024. (£93,000 compensation vs £3.95M fund; roads described as "completely destroyed.")

Building Magazine. "HS2 Contractors Under Fire for Catalogue of Errors at Rural Sites." January 2021. (Calvert Green village disruption; school buses unable to reach pupils.)

RailFreight.com. "HS2 Moves Ten Million Tonnes of Construction Material by Rail." March 2023. (3 million lorry load equivalent removed from roads.)

Rail Market. "HS2 Has Opened a New Railhead for the Transport of Construction Materials." November 2022. (655 freight trains; 1.1M tonnes; 116,000+ truck journeys eliminated at one site.)

HS2 Ltd. "London Conveyor Belt Network." July 2024. (1.7-mile network; 5M tonnes; 1M lorry movements eliminated.)

Railvolution. "SPOILED for Choice – HS2 Reveals Third Conveyor." August 2023. (1.3 km Wendover conveyor; 70,000 lorry journeys avoided.)

Buckinghamshire Council. "HS2 Large Goods Vehicles on Our Roads." 2024. (CCTV monitoring; enforcement gap; spring weight restrictions context.)

UK Parliament. Written Evidence on HS2 and the Environment. HS20003. (Construction phase major adverse impacts.)

THX News. "HS2 Ltd Construction Complaints Decline." May 2025. (Independent Construction Commissioner case volumes.)

Camden Council. "Reducing the Impact of HS2." 2024. (£3.5M community fund + £2.4M Road Safety Fund secured.)