

FREEPOST ENVIRONMENTAL IMPACT ASSESMENT 2A

28<sup>th</sup> October 2016

Dear Sir/Madam,

**Re: High Speed Two Phase 2a: West Midlands to Crewe – Environmental Impact Assessment Report Consultation**

As the time limit for this consultation has been rather tight, I have submitted this response within the deadline, but as issues are continuing to come to light along the line, I consider this response to be in draft form and I reserve the right to alter it and re-submit in the future.

I emphasise from the outset that I am opposed to the HS2 line as proposed. I am not opposed to the need for additional rail capacity. When I was a Parliamentary candidate, I supported the proposal by the previous Government to build a 'Stafford bypass' on the West Coast Mainline through my constituency. I have also supported the substantial improvements to the Norton Bridge junction.

HS2's problem is that the line is designed to take trains travelling at a speed which will never be reached in a relatively small country such as the UK. It therefore foregoes the opportunity to use tilt technology and thus follow the natural contours of the land and avoid settlements and difficult geographical and geological features where possible.

It is clear at present, however, that there is a parliamentary majority currently in favour of the HS2 project. It is therefore vital, as the local Member of Parliament, that I do everything I can to ensure that our community is properly served through mitigation of, and compensation for, the effects of HS2. It is in that spirit, therefore, that I am responding to the consultation.

I note that the EIA still requires significant development and while we comment on this later in this response, our comments are based on the information presented and I reserve our right to respond in greater detail or greater breadth in the future.

Important areas of the EIA are at a very early stage of development. While consultation and engagement with specific stakeholders is offered on some issues, details of this are vague and no formal consultation on the overall EIA is proposed until the Bill is deposited. I would request that an additional draft EIA is published for consultation prior to Bill deposit.

***Heritage Assets***

My concern in relation to potential impact on heritage assets of the proposed scheme are primarily its likely adverse impact on the multiple significances of Shugborough, which is an assemblage of heritage assets of the highest significance, a treasured part of the nationally important landscape of the Cannock Chase

AONB, notably as a recreational resource, community resource and ecological resource. Specific areas, all of which relate to Shugborough, which are insufficiently developed in the published assessment include:

- assessment of noise impacts on cultural heritage;
- assessment of noise impacts on tranquillity as a landscape resource;
- the methodology for the approach to historic landscape;
- assessment of off-route and cumulative effects including the consequences of changing rail traffic on the existing WCML south of Crewe;
- field work to inform the ecology and biodiversity assessments;
- photomontages to support the LVIA;
- ZTV to support the LVIA; and
- quantitative assessment of traffic effects.

One issue of concern to me as I go through the document is the fact that this consultation looks solely at the impacts considered to be significant. Although the impacts considered in the document clearly are significant, the numerous impacts for my constituents all the way along the proposed HS2a route are the most significant to them. It is vital that the needs and concerns of those individuals who will be most inconvenienced by this project are taken on board.

For example, recent changes have moved the proposed line 60 metres closer to the property of one of my constituents in Marston and placed the satellite construction site directly opposite her house. Marston Lane is due to be closed leaving her on a cul de sac section with all the construction traffic for an estimated five year period. Although not considered a significant impact as part of the whole project, it is life changing for this lady and measures should be taken to mitigate the impact.

The lack of impacts that are regarded as significant also leaves readers uncertain as to whether an impact has been assessed at all at this time. It also reduces the ability of information generated through the assessment process to be fed back into developing a better scheme. Beyond the avoidance, minimisation and mitigation of significant impacts, there should be a clear ambition to assess, avoid, reduce and mitigate less than significant effects and less than substantial impacts, both in isolation and cumulatively. Where possible this approach should also be taken to maximising benefits of the scheme along the route.

I will, therefore, be raising, with HS2 directly, the issues of mitigation that impact my individual constituents. It would seem inappropriate to raise them all, and they are numerous, in this response, as they are not referred to in this report.

### **Question 1 - Comments on the Non-technical Summary (NTS).**

Rather than comment on the summary, I refer you to my comments below on the main report.

### **Question 2 – Comments on the documents that form Volume 1 of the working draft EIA Report.**

I welcome the commitment to engage with the public and other stakeholders following the consultations (3.4.1) and for ongoing engagement with wider technical and specialist stakeholders (3.316-20). However, I would like to see more detail about how and when this engagement will take place. I am also concerned that the lack of detail in the current draft EIA coupled with the lack of a further round of consultation on the EIA prior to deposit of the Bill will hinder rather assist public and stakeholder engagement.

I welcome the identification of advance mitigation works including the translocation and creation of habitats (6.4.1) but are concerned at the omission of landscape mitigation from this list. Landscape works are identified as possible advance works in the CA2<sup>1</sup> area (CA2 report 2.3.10) and I would like confirmation that they are proposed both within this area and more widely. Currently, 6.19.1 gives a commitment to landscape mitigation being established at the earliest reasonably practical opportunity during construction. I strongly support this but consider that HS2 Ltd should go further and look at the potential for landscape mitigation significantly in advance of the start of construction, and in fact as part of the EIA process prior to deposit of the hybrid Bill. Indeed, throughout the proposed line in my constituency, the impact of construction upon my constituents would be significantly reduced if landscape mitigation could take place at

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<sup>1</sup> Community Area 2: Colwich to Yarlet.

the earliest opportunity. For example, trees planted as soon as possible will have ample opportunity to be established and growing before construction begins. Making landscape mitigation a number 1 priority also sends the message that ensuring that residents endure the minimum possible impact on their lives is forefront on HS2's agenda and not an afterthought.

Section 6.3.2 identifies the development of site specific control measures in the Local Environmental Management Plans (LEMPs), during the Parliamentary process. Sufficient detail must be provided at Bill deposit to give assurance that heritage, landscape, noise, visual and ecological impacts of construction will be appropriately mitigated.

The EIA sets out three possible methods of constructing viaducts (section 6.14). The three methods would appear likely to give rise to notably different environmental effects during the construction phase and yet avoidance or mitigation of environmental effects is not included in the list of considerations at paragraph 6.14.3. Construction of the Trent Viaduct will cause significant environmental impacts locally, especially visual. The communities of Great Haywood and Ingestre will be particularly impacted. It is vital that full consideration is given to alternative methods of construction as part of the avoidance, minimisation and mitigation of environmental impacts for this structure.

The proximity of the Trent Viaduct to the protected landscape at Shugborough, and to the communities at Great Haywood and Ingestre, plus its scale and visibility in the wider landscape mean special attention needs to be paid to its design and construction.

***I would urge HS2 Ltd, as I have done on many occasions previously, to consider this viaduct as a matter of priority, with local stakeholders including Parish, Borough and County Councils and the National Trust, and that this structure is brought to the notice of HS2 independent Design Panel as soon as possible.*** The original builders of the railways went to great pains to design viaducts and the railways with the local landscape and culture in mind. Staffordshire for instance, and particularly the Stafford area, is a red and blue brick area. Indeed, a particular type of blue brick is named after the County, and many bridges and buildings use red and blue brick. Any concrete structure will stick out like a sore thumb and it is essential that the proposed viaduct is designed to enhance, as much as possible, the landscape and fit in with its surroundings.

Paragraph 7.2.10 states that assessment of route-wide effects includes the effects of consequential changes to rail traffic on other lines, especially on the WCML between Crewe and the north. We note that an important part of the business case for HS2 is its ability to release capacity on the WCML south of Crewe. In relation to Phase 2a, paragraph 1.3.12 of the revised SMR<sup>2</sup> notes that it could open up more capacity on the WCML including for freight. I have been contacted by Stafford residents and The National Trust, who now run the Shugborough Estate. They are concerned at the potential for changes in rail traffic on the WCML through Stafford and Shugborough, and the cumulative impacts this may have, especially during the night. In the absence of detailed information about how the capacity would be used, I would suggest that it would be appropriate to take a reasonable worst-case approach to assessment. This is currently absent from the EIA.

Paragraph 7.2.11 states that off-route effects will be presented in volume 4 of the formal EIA report. There is no corresponding volume 4 in this working draft EIA and the Guide to the EIA does not identify or explain the absence of this document from the current draft.

While some mitigation measures are shown in the CA report mapbooks, it is clear that mitigation is still under development and will continue to be developed (section 9.1). I welcome the intention for opportunities for mitigation beyond that described in the draft and formal EIA reports to be considered as part of the detailed design process (9.1.9), and encourage early engagement by HS2 Ltd to ensure that the Bill allows space and resources for sufficient mitigation as may be specified in detailed design.

I support the inclusion of community engagement and consultation – to allow local people, environmental organisations and responsible authorities to raise issues and propose design and mitigation changes (9.1.3). I also welcome the collaborative working between environmental and engineering teams (9.1.3). However I am concerned that the mitigation proposals so far, while undeveloped, suggest a fragmented

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<sup>2</sup> Scope and Methodology Report.

and narrow approach to mitigation rather than a holistic and integrated approach using mitigation to achieve multiple benefits.

I am also concerned that while the design of the scheme has sought to avoid direct impacts on all heritage assets (9.7.1) and to mitigate direct impacts where this is not possible, this section is silent on the avoidance and mitigation of indirect effects on heritage assets. This needs to be remedied.

I welcome the intention to seek to achieve no net loss in biodiversity at a route-wide level (9.8.5), and continue to encourage HS2 Ltd to deliver more for biodiversity by committing to route-wide net gain. I would welcome an amendment to the EIA (5.4) that recognises the potential of attenuation and balancing ponds to play a part in ecological and landscape mitigation.

I would encourage HS2 Ltd to consider the impacts of the route on ecological connectivity at the long-term strategic scale, as well as local impacts. In determining the scope of ecological survey work, the long-range movement of species due to migration or changes in ranges due to factors such as climate change should be taken into account.

I welcome the commitment to provide long-term management of habitat creation and note the potential transfer of relevant land for management by a third party (9.8.7). A similar suggestion is made in relation to landscape and visual mitigation provided outside the rail corridor (9.11.8).

***However I am very disappointed in the stark contrast between the care which is taken over the natural habitat (with teams of up to seven people coming for hours on end to count bats) and the lack of concern for the impact on my constituents. At times I wonder if bats are more important to HS2 than humans.***

This is particularly apparent in the rejection of my and my constituents' proposals to put some of this part of the line in tunnel to avoid the huge disruption which the line will cause to the village of Hopton. There is almost no tunnelling in Staffordshire, despite the hilly terrain. This contrasts with the extensive tunnelling in Buckinghamshire.

The argument for not following a course to the North of Hopton, which could easily be in a tunnel, is that it would disturb the site of the battle of Hopton Heath. I find it extraordinary that HS2 believes that it is acceptable to cause havoc to what is a vibrant village (Hopton) for fear of disturbing the site of a relatively insignificant civil war battlefield which attracts hardly any visitors. It seems that the needs of our citizens rank behind those of bats and battlefields.

I also find it perplexing why the line follows a route to avoid the salt marsh at Pasturefields only for it to pass over another more extensive area of saltmarsh near Ingestre. This deviation adds considerable distance and hence cost (estimated at £154 million) to the line. There has been no attempt that I can see by HS2 to address this point, which has been made very clearly and powerfully by Tixall with Ingestre Parish Council.

Furthermore, the villages of Marston and Hopton find themselves as two of the very few number of villages and communities that will be split by the proposed route. In both cases, these villages will be changed forever and in Marston's case, completely devastated, possibly beyond recovery. That is why, I would again emphasise that I find it incomprehensible that the extensive tunnelling in Buckinghamshire is not matched in these areas. It is perfectly possible to tunnel under Hopton and Marston, saving villages and beautiful countryside. I would urge HS2 to consider this again. I am equally astonished with the attitude that HS2 takes with regard to compensating my constituents along the route. I have lost count of the amount of constituents who current have disagreement with HS2 over the amount of compensation they will receive. In the majority of cases, it is clear to me that HS2 are attempting to save money by cutting back on the compensation that my constituents deserve. Professional advisors (chartered surveyors etc.) who should be paid by HS2, as was the case on Phase 1, are currently unable to access payment for work undertaken for clients on phase HS2a. This has led to a number of local firms undertaking extensive work for clients without being paid, and has also left a number of my constituents without representation as their professional representatives have refused to do any more HS2a related work until payments are confirmed. This situation must be rectified immediately so that my constituents can access full and fair compensation. This multibillion pound project MUST NOT be built on the backs of my constituents.

### **Question 3 - Comments on Volume 2: Community Area (CA) reports. With special reference to CA 2 – Colwich to Yarlet and briefly CA 3 – Stone and Swynnerton.**

As a major regional visitor attraction, Shugborough is a significant land use in the area. It will become more significant over the period covered by the EIA as a result of investment following the transfer of management of the site from Staffordshire County Council to the National Trust in 2016. The National Trust have expressed their concern to me about the lack of reference to the Shugborough Estate in the documents and I would encourage conversations between HS2 Ltd. and The National Trust at the earliest opportunity.

The topography section (2.1.5) does not acknowledge that significant topographical features of the area include the broad valley of the River Trent and River Sow, which meet at Great Haywood, nestled beneath the high ground of Cannock Chase.

While both Shugborough and the Cannock Chase AONB are mentioned in relation to outdoor recreation (2.1.14) there is no reported evaluation of their importance. Both are of at least regional importance for outdoor recreation and many local employers report the strong draw that these recreation centres have for potential local employees. Both these sites are therefore of significant importance to the local economy and should be considered in this context.

The draft EIA and accompanying documents identify some changes to the HS2 proposals compared to the information previously published by HS2 Ltd. On the whole these changes tend to exacerbate its potential environmental effects on the surrounding area. I refer to my comment above regarding the need for urgent conversations with The National Trust regarding the impact on the Shugborough estate.

There is an overall increase in the height of HS2 through my constituency. The most prominent change in height is at the centre of the proposed Great Haywood viaduct where the height has increased by approximately 4.9m. Great Haywood viaduct will be approximately 700m long and around 17m in height at its tallest point where it crosses the Colwich to Macclesfield Railway. The increase in height of HS2 is most likely to result in a greater level of visibility for surrounding communities. I refer to my earlier comments regarding the need for careful design of the viaduct.

The proposed embankments either side of the Great Haywood viaduct will also increase in height. The Trent South embankment runs from the east side of the Great Haywood viaduct for approximately 1.4km in length and will be up to 16m in height and the Trent North embankment will be 1.1km in length and around 10m in height. The heights referred to relate to HS2 'proposed level' and do not include train heights or overhead line equipment. The addition of the OLE and trains make these proposed structures particularly significant in this landscape. This again proves the need for early and extensive landscaping in these areas to at least begin to mitigate and soften the impact.

Regarding the proposals for the A51 main compound and the Mill Lane satellite compound, these will have an impact on local residents and the Shugborough estate. Construction traffic is shown accessing the Mill Lane satellite compound via Great Haywood Road (CT-05-212) which potentially involves access past the main visitor entrance to Shugborough.

The proposed Mill Lane auto-transformer station is located to the north side of the HS2 track set within an embankment, behind proposed noise fencing and proposed tree planting on the south side of the embankment. The height and design of the auto-transformer station are not specified within the documentation. I would like to see information regarding this.

The noise barrier on the south side of the railway would stop part-way across the Great Haywood viaduct (2.2.19). I am very concerned at the implications of this for the noise impact that this will have for local communities and the Shugborough estate.

While woodland habitat creation west of the Trent North embankment is shown on CT-06-212, 213 and 214 it is not mentioned in paragraphs 2.2.19/20 and the landscape potential of this habitat mitigation measure is not discussed. Similarly, the balancing ponds shown on CT-06-212 and referred to in 2.2.19 do not appear to have been thought about as part of the potential landscape mitigation or in relation to their heritage

consequences. While I welcome the general mention of hedgerow planting in this area reported at 2.2.20, more detail regarding this, including whether it is being considered both for its contribution to landscape and ecological mitigation, would be beneficial.

The use of advance mitigation works, including habitat creation and landscape planting (2.3.10), will be an essential part of mitigating adverse environmental effects. A firm commitment to mitigation at the earliest opportunity would be a big step forward, as would a detailed timetable for this as part of the hybrid Bill Environmental Statement (ES). Such a commitment would go beyond section 12.3.1 of the Draft Code of Construction Practice, where the decision for early planting is left to contractors, by making detail available prior to deposit of the hybrid Bill.

Local communities will be keen to see clarification of whether the areas for soil storage (2.3.19) are just the compounds and temporary material stockpiles shown on the construction phase drawings (CT-05 series) or whether additional land would be required. The potential temporary visual and landscape effects of soil storage is a concern, as well as the potential flood risk consequences.

The reporting of timelines for the operation of the compounds is very helpful and I know local groups are grateful for the detailed information, as am I. Paragraph 6.6.6 of Volume 1 of the draft EIA identifies a number of factors that have influenced siting of construction compounds. These do not include flood risk, and I would be grateful for these risks to be considered and reported, given the potential threat to local rivers and water courses.

### ***Maintenance of national, regional and local transport links***

It will be essential to have a timescale for all scheduled roadworks. In the Stafford & Stone area, HS2 proposes to cross all of our major links to the north of England, i.e., the M6, A34, A518, A51. Also, a popular local diversion for the A34 and A518, the B5066 will be moved at Hopton. It is vital that works are not taking place on more than one of these routes at the same time. From a national perspective, any plan to restrict traffic on the M6 and A34 at the same time, even overnight, would cause complete traffic chaos, as local experience will testify. I am yet to receive assurances that the plans for construction will ensure that the road network will be kept flowing.

The plan for HS2 is based on a proposal to provide economic prosperity and create employment. It is vital, therefore, that Staffordshire's residents and businesses can utilise the highway network with little delay as a result of increased HS2 related traffic during and after construction. The work to construct HS2 will also seriously impact the main routes to the Staffordshire County Showground and Shugborough Estate. Any proposed works must be timetabled with regard to the events which take place at these venues.

### ***Moreton***

At Moreton, as the line enters my constituency, the line goes through what is currently referred to as the Coley Cutting. This is a deep cutting with farms and an elderly car home nearby. Such is the depth of the cutting as it passes Moreton House Farm, the feeling will be more of being on the edge of a cliff rather than being next to a railway line. A great degree more mitigation needs to be planned for Moreton and much better compensation for those residents who at the moment are being told that they can stay next to a very deep cutting through their community.

### ***Toldish Lane***

Colwich footpath 55 south of Toldish Lane will be stopped up (2.3.29). This provides a link between footpath 54 and Toldish Lane. The stopping up of this route will reduce permeability through the landscape. A new footpath overbridge is proposed to the north of Tithebarn Covert for Colwich Footpath 54. While details of the design of the bridge are not known, it is shown as being around 8m in height and so it may be visible from parts of the park at Shugborough and by local communities. The sensitivity of its design and detailed positioning is therefore important and I refer you to the comments that I made about the design of the Trent Valley Viaduct.

### ***Hoo Mill Lane***

The Mill Lane appears to have access issues. Access to this compound appears problematic for anything other than light vehicles. Hoo Mill Lane is constrained by a bridge under the existing railway and another over the canal. There is potential that traffic associated with this compound would pass through a route which involves narrow bridges over the canal and River Sow and therefore may be less suitable for heavy traffic. It would be beneficial for detailed information on the likely traffic associated with this compound to be made available alongside details of how it will be controlled.

Regarding Cultural heritage, I note that Paragraph 10.3.14 of the revised SMR identifies the National Trust, Battlefields Trust, Canal and River Trust and The Gardens Trust as additional consultees, which I welcome and encourage as much discussion and consultation as possible.

Detailed assessment of the effects on historic landscape will be considered in the formal EIA report (7.2.2). Paragraph 10.3.6 of the revised SMR states that a technical note setting out the historic landscape assessment methodology is being developed by HS2 Ltd in discussion with Historic England's landscape specialists. I would request that HS2 Ltd to provide the opportunity to input to this methodology and its application prior to publication of the formal EIA.

### ***Shugborough, Ingestre and Tixall***

While consideration of the effects of noise on heritage is mentioned at 7.2.7, there is no detail further in the chapter about whether or how the cultural heritage consequences of noise have actually been considered. No detail is provided of how such an assessment will be undertaken in practice. Nor is there any indication of locations where it is thought likely to be a relevant issue. As well as the grade I listed mansion of Shugborough Hall, the grade I registered park and garden at Shugborough has notably tranquil areas, such as the Island Arboretum, the gardens near the Chinese House and the park near the Essex Bridge, which are at risk from both construction noise and operational noise. Tranquillity is a key part of the design and heritage significance of Shugborough and I would ask that this is addressed.

The draft EIA contains no discussion of possible construction or operation impacts on the heritage significance of Shugborough by affecting the settings of its heritage assets. However, alternative routes B5-7.3a and B5-7.3b are reported as retaining the setting of Shugborough Hall in its existing landscape (2.5.27-8 and Alternatives Report 6.3.24-5). This suggests that the proposed route is considered not to retain Shugborough's setting, which is understandably concerning.

I consider that there would be both construction and operation impacts on the Shugborough heritage assets. These include impacts arising through the introduction of noise to the hall, garden, island arboretum and park; changes to the views from the Triumphal Arch across the parkland towards the Hall and out into the Trent Valley; changes to views of the Triumphal Arch from the higher land to the south within the historic park; and changes to the landscape setting of Shugborough.

The proposed railway would run between the historic parklands of Ingestre and Tixall, which the report acknowledges were formerly set out partially in relation to one another. The historic relationship between Shugborough, Ingestre and Tixall should also be taken into consideration. Historically, parkland clumps and specimen trees were purposefully planted beyond the boundaries of the parklands, extending the influence of the designed landscapes into the agricultural and riparian landscape beyond.

There is a long history of transport corridors being carved through and close to Shugborough including the Staffordshire and Worcestershire Canal completed in 1772, the Trent and Mersey Canal completed in 1777 and the two railway lines through the south and east of the park. Significant mitigation measures were employed to help integrate the Staffs and Worcs Canal and the two railway lines including the creation of a Broad Water combined with tree planting along the former and tunnelling and the creation of distinctive, extremely carefully designed, and locally relevant bridges and tunnel mouths to the latter. These could be seen as a precedent for how HS2 could be mitigated in the area.

As a general observation, the EIA in the Ecology and biodiversity chapter seems to be in particularly early stages of development and, as noted at Volume 1 paragraph 8.7.9, is based on desk study rather than field survey. Consequently, it is generic in approach with limited engagement with specific issues or specific locations. I would encourage extensive discussion with all interested parties as this part of the EIA takes shape.

While the impact of noise on tranquillity is identified as a landscape issue in Volume 1 paragraph 8.13.2, the CA2 landscape chapter of the draft EIA does not discuss the matter at all. A great deal of the countryside and village communities that are affected by the proposed HS2 route through my constituency are considered to be tranquil, something that would be seriously impacted by the construction and operation of the railway. The National Trust tell me that they have taken advice from acoustic consultants, who consider that the gardens and island arboretum at Shugborough would be affected by both the construction and operation of HS2 in a manner that it should be considered as a landscape impact as well as a heritage impact.

The general limitation of landscape and visual receptors to within 500m, or 1km at settlement edges limits consideration of the effects arising from the introduction of a strong linear feature, such as the Trent Valley viaduct, across the wider landscape where it can be seen from a distance. The topography of this community area is such that there are extensive views from elevated land across wide areas of lower lying land and the same is true of other community areas. An example of this in CA2 is the view from the Satnall Hills (within the Cannock Chase AONB and including land within and on the edge of Shugborough Park) northwards across and along the Trent Valley. We consider that this may give rise to significant landscape impacts at a level wider than the LCAs identified. This should be addressed in the EIA and appropriate measures taken to avoid, minimise or mitigate such impacts.

An overview map showing the LCAs for the entire community area either within the map book or as a figure within this chapter would be very useful to facilitate public and stakeholder engagement over landscape issues. This could also show the AONB boundary, which ought also to be shown on the relevant maps in the map book (CT-10 series).

The draft EIA doesn't explain the justification for the sub-division of the LCAs from those in the published Staffordshire Landscape Character Assessment, such as the distinction between the Shugborough Riparian Alluvial Lowlands and the Ingestre Riparian Alluvial Lowlands. It would be useful to have this and also the consideration of larger scale landscape character areas relevant to HS2 Phase 2a.

The National Trust have asked me to point out that it is incorrect to say that the park at Shugborough is enclosed by a dense tree belt. Although there is a tree belt, there are views across it from elevated parts of the park including the land around the grade I Triumphal Arch and higher land further south of the Arch, where the views outwards are in the direction of the proposed railway. In addition, the parkland plan shows that historically there were views outwards from the lower lying areas of the park to encompass features outside Shugborough including Tixall Gatehouse and Ingestre Hall. The Trust tell me that they are considering how to reinstate some of these outward views from the lower areas of Shugborough within its management of the historic park following the handover from Staffordshire County Council. The approach to and success of mitigation of the Trent Viaduct and associated embankments may impinge on their ability to reinstate historic views.

Volume 1, paragraph 8.13.2 states that potential noise effects on cultural heritage and tranquillity are reported in the cultural heritage and landscape and visual chapters. However, there is no indication that this has happened so far. When it does happen, it will need to be informed by baseline data and technical assessment of potential noise arising from construction and operation of the scheme.

Shugborough Hall is shown as a non-residential receptor on drawing SV-01-107. The explanation for this, given on page 43 of the Summary Report on the SMR consultation rather than in any of the draft EIA documents, is in relation to its heritage significance. This document also states, "Should the landscape and visual assessment identify the area surrounding Shugborough Hall as a highly tranquil landscape, where sound is a material factor, then the outside space will also be specifically included within the sound assessment where a potential impact may occur." However, the Hall is only one of several highly significant heritage assets at Shugborough that are also sensitive receptors potentially affected by noise from the construction and operation of HS2. Others include the Chinese House, gardens, park and arboretum. These are "resources which are prized for providing tranquillity" and should be regarded as 'quiet areas' (13.1.1 and footnote 91). The National Trust tells me that, as a minimum, locations in the northern extent of the Shugborough estate should be specifically included in the formal EIA noise assessment, along with the publically accessible gardens, parkland and heritage assets in this more northern region. The assessment should include Shugborough Hall itself, given the importance of the building itself. Additional

points should include the park south of the Essex Bridge, the north west side of the Island Arboretum and the garden close to the Chinese House.

The draft EIA proposes a noise barrier along part of the south side of the proposed Trent Viaduct. I consider that this would not sufficiently protect the communities in this locations and the significance of the heritage assets at Shugborough and their tranquillity. We recommend that the noise barrier should be extended across the full width of the Great Haywood Viaduct and the embankment to the west of the viaduct as far as the location where the HS2 line enters cutting. Continuation of the noise barrier across the viaduct would also have the benefit of balancing the appearance of the viaduct structure.

No quantitative assessment of traffic has been undertaken at this stage (14.2.4). This clearly limits the usefulness of the information in the draft EIA and my ability to comment on traffic issues. I would highlight again the points that I have made previously regarding the extensive road network that will be impacted in my constituency. While creation of a haul route is identified as an avoidance or mitigation measure (14.4.1) in various areas across the constituency, there is no confirmation that this is either proposed or achievable at various points, for example where the railway will cross the Trent. This could leave construction traffic levels on this section of the A513 largely unmitigated and could lead to traffic problems across the constituency.

The Trent and its tributary the Sow are of ecological importance and there is concern that construction within the Trent Floodplain may negatively impact the rivers through unintentional pollution or changes to the flow regime. Shugborough is also immediately downstream of the proposed Trent Viaduct and the A51 and Mill Lane construction compounds, so potentially at risk from water-borne pollution from construction activities and stockpiled materials. Shugborough is vulnerable to flooding with the gardens and low-lying areas of the park falling within the flood risk zones of the Trent and Sow. Given the vulnerability and significance of Shugborough we would regard any increase in flood risk as significant. I welcome the aim for there to be no increased risk of flooding for vulnerable receptors during the lifetime of the proposed scheme taking account of climate change impacts (Vol. 1, 9.17.2) and would like confirmation that Shugborough including the gardens and historic garden structures is considered a vulnerable receptor. As hydraulic modelling is currently underway (15.2.6), I would like to see the conclusions of this in relation to flood risk at Shugborough prior to publication of the formal EIA. We would also like to see details of the replacement floodplain storage areas for the Trent Viaduct piers (15.4.11) and a firmer commitment to them than is shown at 15.4.26.

The construction of the Trent Viaduct will give rise to a temporary increase in flood risk although these will be reduced as far as is reasonably practicable (15.4.25). Early implementation of the permanent replacement floodplain storage would provide additional mitigation of construction impacts and we would like to see this happen. Mitigation of pollution and flood-risk impacts is largely set out in the CoCP (15.4.9). I am concerned at the potential for flooding of the construction compounds to cause pollution and note that flood risk is not listed as a factor in the selection of compound sites.

At Ingestre, the proposed route and all associated features between approximately Ch 206+000 and Ch 207+000 are constructed on the site of an historic salt marsh that is still being fed by active brine springs. Substantial surface and underground workings exist in this area that have been created over a period of at least 250 years in an attempt to make previously unproductive marshland suitable for agricultural use. Natural salt dissolution under this area is not only producing an up-welling of saturated brine but also a volumetric loss of underlying ground amounting many cubic metres per year. In many cases, not just at Ingestre, but along the line, it is not just land take that is involved but the usability of land that remains (whether untouched by construction or used temporarily and then restored). While severance is addressed, there is no mention of, for example, the effects on ground moisture conditions arising from permanent alteration of the water table and/or surface drainage characteristics arising from the principal engineering works. In particular, the creation of deep cuttings through sandstone aquifers, as in the vicinity of Upper Hanyards, has the potential to lower the water table to the detriment of the adjoining farmland and woodland. These issues need to be addressed.

### ***Staffordshire Showground and Hopton Village***

Prior to the November 2015 announcement, the preferred route passed through the edge of the Staffordshire County Showground, divided Hopton village and carried on toward Marston. The route design

at that time featured two deep cuttings and a 'green tunnel' adjacent to Hopton village, which although very undesirable gave some hope to residents of screening from the high speed train operational noise and visual pollution. Local responses, including my own, to the route design consultation in 2014 suggested a bored tunnel under Hopton or at least cut and cover tunnels in place of the cuttings, combined with the proposed green tunnel.

The modifications to the route near Hopton announced in November 2015, were to raise the vertical alignment of the track by around 4.5 metres thus reducing the depth of the cuttings in addition to the removal of the green tunnel from the design. The reason offered for this decision was that it was necessary to prevent flooding where the railway crosses an unnamed brook. I am told that the brook in question rarely reaches a depth greater than 15cm and I believe that more information is needed to explain why the track now needs to be 30 times higher than the depth of water.

If the current horizontal route alignment is finally confirmed, priority consideration needs to be given to minimizing the impact on Hopton residents by reconsidering the route design to include tunnelling techniques and a vertical alignment affording the maximum possible noise and visual mitigation.

Regarding Hopton specifically, I would make the following points on their behalf:

1. The residents of Mount Edge and the MOD will be severed from the rest of Hopton village and must have reasonable access by foot/cycle to Hopton village to avoid the additional 1.2km due to the displaced new Hopton Lane. I suggest that the solution is to provide a foot/cycle bridge near the intersection of the railway and (old) Hopton Lane.

2. Although HS2 Ltd. have provided a good selection of maps in 'plan' view, there are no elevation projections or data of the finished landscape around Hopton. Can we please have elevation/3D information for Hopton surrounds to help residents, particularly in the area of Kings Drive, understand the changes in landscape and views that might be expected?

3. There seems to be some confusion as to whether the horizontal alignment of the track through Hopton has been altered (up to 40 metres?) since November 2015. Can the local residents please have a definitive answer on this question and how many households may be affected by compensation zone changes due to change in proximity to the route centreline?

4. Concerning the footpaths/rights of way near Hopton Culvert, the walking route from Kings Drive to the Beacon Hill is a route used regularly by many people. The proposed footpath diversion and overbridge will necessitate an inconvenient extension of that route. We suggest that the existing footpath alignment could be maintained by provision of a pedestrian underpass through the embankment and under the railway at this point thereby providing a more direct path to Beacon Hill.

5. Both construction work and (later on) service train noise levels are of great concern to all Hopton residents. The information currently available from HS2 Ltd. consists of computer modelled noise level contour maps and draft Code of Practice documents using a form of noise analysis and data that will be incomprehensible to most people. This data may be useful in satisfying National health and safety standards but what we would suggest is that residents need a more practical and understandable method of presentation including a realistic demonstration of passing train peak noise levels and frequency content.

6. Local school children are currently collected from a bus stop at the entrance to Mount Edge (a private road) and the stop is also used by normal service buses. Can we assume that the proposed new extension link between Mount Edge and the revised Sandon Road (B5066) will be an adopted road with footpaths, drainage and lighting? We suggest that a replacement bus stop and turning provision (roundabout?) for the buses will have to be provided on this link road.

7. We assume that the redundant lower part of Hopton Lane will be blocked off to traffic from the revised Sandon Road. If this is not the case it will inevitably encourage undesirable fly tipping and unauthorized overnight parking.

8. We notice that over a short isolated section of the lower part of Hopton Lane the map is marked with a 'green dash' indicating 'construction traffic route' on the TSB/Oct2016 construction phase map CT-05-216. This does not seem to make sense and at this proximity construction traffic would be totally unacceptable to Mount Edge residents.

9. It appears from the proposed scheme map CT-06-216 that residents on the north side of Mount Edge will be very exposed to visual/noise effects from the railway cutting exit especially prior to the proposed tree planting becoming established. We would suggest that they may benefit from additional screening methods and the use of more mature trees adjacent to the redundant Hopton Lane section.

10. It is anticipated that the new Sandon Road and the new Hopton Lane will have pavements and cycle paths. This needs to be confirmed and marked on the proposed scheme maps.

11. Traffic congestion is a topic that concerns Hopton residents as our local link roads (A518, B5066, Beaconside and A51) at times have to handle volumes of traffic beyond their capacity for example due to the frequent closures of the M6 motorway between north and south Stafford junctions. With the village also under threat from construction traffic associated with a nearby building development of some 3100 houses we would ask how HS2 intends to manage their construction traffic near to Hopton in order to prevent the local road transport situation coming to standstill.

## **Marston**

The villages of Marston and Hopton find themselves as two of the very few number of villages and communities that will be split by the proposed route. In both cases, these villages will be changed forever and in Marston's case, completely devastated, possibly beyond recovery. That is why, I would again emphasise that I find it incomprehensible that the extensive tunnelling in Buckinghamshire is not matched in these areas. It is perfectly possible to tunnel under Hopton and Marston, saving villages and beautiful countryside. I would urge HS2 to consider this again. I am equally astonished with the attitude that HS2 takes with regard to compensating my constituents along the route. I have lost count of the amount of constituents who current have disagreement with HS2 over the amount of compensation they will receive. In the majority of cases, it is clear to me that HS2 are attempting to save money by cutting back on the compensation that my constituents deserve. Professional advisors (chartered surveyors etc.) who should be paid by HS2, as was the case on Phase 1, are currently unable to access payment for work undertaken for clients on phase HS2a. This has led to a number of local firms undertaking extensive work for clients without being paid, and has also left a number of my constituents without representation as their professional representatives have refused to do any more HS2a related work until payments are confirmed. This situation must be rectified immediately so that my constituents can access full and fair compensation. This multibillion pound project MUST NOT be built on the backs of my constituents.

Furthermore, it is welcomed that HS2 is proposing some planting schemes along the line through Marston, especially between Yarlet Lane and the proposed HS2 line. However, it would be greatly appreciated if this scheme could be extended along Yarlet Lane and Marston Lane, not only to protect visual and noise impact on the village of Marston, but also to protect communities further afield to the north of Stafford and the north of the town itself. Also, concerns have been raised by the local community regarding the rerouting of Marston Lane as it travels under the proposed routes. It appears, from responses my staff have received, that this is a cost issue. I would ask that Marston Lane is not re-routed, as the current proposal would create two cul de sacs, leaving some properties trapped at the end of a lane. This creates safety and community implications.

## ***Yarlet and Yarlet School***

If the Proposed Scheme goes ahead the future of Yarlet School, one of the only schools to be affected by the proposed HS2 route, will depend on parents being satisfied that adequate measures are taken on at least three fronts:

Substantial reduction in the width of the Yarlet South cutting ( 2.2.34 ) and the preservation of Yarlet Wood; Ensuring the maintenance of reliable road access to Yarlet School ( 2.3.4/ 2.3.74 ); and Adequate screening of the A34 East and West satellite compounds and transfer node to minimise damage to children ( 2.3.66-76 )

Yarlet School has been identified as a sensitive receptor susceptible to changes in air quality due to proximity to dust generating activities. The School will argue for the maximum degree of preservation of Yarlet Wood and the woodland beside the A34 on Yarlet Hill, as well as the preservation of the pond to the North of Yarlet Wood and the adjacent ancient oak. The School welcomes the statement that consideration of potential health issues is an integral part of the planning and design of the Proposed Scheme, and further that mitigation measures will include reducing visual intrusion and noise, as far as reasonably practicable, and incorporating landscape design and screening into the design.

Some of the major construction sites are planned for the area next to the school and there is therefore a significant risk of annoyance and disturbance to Yarlet School from construction sites, and that significant measures will need to be taken to ensure that there are no direct health or wellbeing effects on the School as a result of air quality around construction sites.

Road access to the School must on no account be impeded. An important criterion for the choice of an independent school is accessibility. Most of our parents have to be at work shortly after dropping their children off so delays would not be tolerated. With this in mind, road access to the school must on no account be impeded. A likely outcome of any additional congestion on the A34 would be to lose families to competitor independent schools. In turn, this would threaten the viability of the school.

The School must be consulted on the draft traffic management plan and be given a genuine opportunity to influence its outcome; and in light of the fact that all traffic visiting the School would otherwise be obliged to cross the proposed bridge across the Proposed Scheme on two occasions on each visit, the School wishes to enter into consultation on the construction of road access to and egress from the School on the North West side of the School campus.

The School has also notified HS2 of the existence of a land drainage system leading down Yarlet Hill to the stream at the North West extremity of the School campus. It is hoped that this may assist with the culvert design.

#### **Question 4 – Views on Volume 3 - Route wide effects**

It is unclear from the text in section 6, whether the reporting of any cultural heritage impacts at a route-wide level is proposed. Although this section discusses individual heritage assets, it does not mention the assessment of impacts on historic landscape which is to be developed for the formal EIA. Our comments on this are set out above.

The assessment of the route-wide ecological effects in Volume 3 is particularly limited, a fact acknowledged in the report itself at 7.1.2 – 7.1.3. Despite this, it concludes (at 7.2.5) that “*The Design ... and other mitigation included at this stage would help to reduce the effects on other habitats (excluding ancient woodland – of which 6.5ha would be permanently lost) to a level that would not be significant*”.

Whilst acknowledging that this is of necessity a preliminary assessment, it is disappointing that it gives so little consideration to the potential impacts of the route upon wider ecological networks. A fenced corridor with a minimum width of 20m will cause habitat fragmentation and loss of connectivity, potentially creating a barrier to movement to a far greater range of species than those referenced at 7.3.2. Without more detailed assessment of these landscape-scale impacts, in the context of a changing climate, and strategic mitigation such as construction of ‘green bridges’, it is hard to see how the Proposed Scheme can achieve its ambition of ‘no net loss’ of biodiversity.

The statement that there would be no significant route-wide landscape or visual effects (10.1.1) from the introduction of 60km of railway, including 5.6km of viaduct, 22.7km of embankment and 26km of cutting (table 21), very little of which is alongside existing similar features, suggests that the approach of aggregating up consideration of the effects of small sections of the scheme from fine-grained, localised Landscape Character Areas and visual receptors within 1km of the line is seriously missing the point. A more constructive approach to route-wide assessment in this instance would be to consider afresh the effect that construction and operation of the route as a whole have on the landscape of the area considered at the broad-scale of regional or national character areas.

The non-technical summary needs to fairly summarise what is in the main report. Given the preliminary nature of the draft I anticipate the summary for the formal will need to be re-written from the main report of the formal EIA rather than being revised from the current NTS. On that basis, I have not commented in detail on the summary but would expect my comments on the main report to be read through as appropriate.

Thank you for the opportunity to take part in this consultation.

Yours sincerely

Jeremy Lefroy MP  
Member of Parliament for the Stafford Constituency