

HS2 Submission

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In memory of Michael Woodhouse, whose tireless work on the HS2 project made an invaluable contribution to our work in Stafford.

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Re: High Speed Two Phase 2a: West Midlands to Crewe – A submission to the HS2 Phase 2a consultation

1.0 Introduction

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

1.0.1 I should make it clear that I oppose HS2 Phase 2a as proposed. I do not oppose the need for additional capacity and potentially a new line.

1.0.2 HS2 is designed to take trains travelling at a speed (400kph) which is very unlikely to be reached or indeed necessary in a country such as the UK where the distances between major cities are short. A design speed of no more than c300kph would be adequate and would enable the line better to follow the natural contours of the land. It could therefore more easily avoid settlements and difficult geographical and geological features.

1.0.3 At present, there remains a parliamentary majority in favour of the HS2 project as it is currently proposed. As the local Member of Parliament, I intend to continue to do everything I can to ensure that my constituents are properly served through mitigation of, and compensation for, the effects of HS2. It is in that spirit, therefore, that I make my submission.

2.0 The Case for HS2

2.0.1 As I reflected in my introduction, I do not believe that the case for HS2 has been proven at any stage. I am not opposed to railway projects and have previously supported proposals to add a Stafford by-pass onto the West Coast Main Line to solve the bottleneck mentioned in section 2.3 of the document at Colwich Junction and around Stafford.

2.0.2 One of the main points of the argument for HS2 that I believe has not been proven is the need for the railway to be 'High Speed'. Current services on the West Coast and East Coast Main Lines can be described as 'High Speed', with the proposed services from HS2 being ultra-high speed. However, despite the claims of better journey times, the decreases highlighted in the chart on page 12 are relatively small, especially given the damage and disruption that is to be caused in my constituency and across the country.

2.0.3 Little account has also been taken of modern working practices. Arguments that have been put to me and my constituents emphasise the amount of extra work that will be undertaken thanks to business travellers being able to get to their appointment or place of work quicker. However, modern technology means that people can work almost anywhere, and certainly on a train. In fact, services on the West Coast Main Line are often advertised as being suitable for business customers who can continue to work whilst they travel. A faster journey time will not necessarily increase productivity.

2.0.4 In section 2.1, the document states that **'For rail transport, the Government has stated the following key objectives: to provide sufficient capacity to meet long-term demand; to improve connectivity by delivering better journey times and making travel easier; and to improve resilience and reliability across the network.'** All of these objectives, with which I agree, can be met by other and less damaging railway projects. Furthermore, throughout section two, much mention is made of 'capacity', 'connectivity' and 'growth'. I agree that all these issues need to be addressed. Paragraph three of section 2.1 states the Government's view that 'a new railway is needed' but that does not mean it needs to be of ultra high speed. This requirement for ultra high speed has resulted in the line going

straight through several communities in my constituency whereas a high speed railway could have been designed to bypass them.

2.0.5 There is extensive tunnelling on HS2 Phase 1, especially through the Chilterns which means that the line avoids cutting through several communities. However, despite a hilly terrain in Staffordshire, the only proposed tunnels are short stretches near Whitmore and Madeley – with none in Stafford constituency. Much was made of using the UK's world-class tunnelling expertise, gained through Crossrail 1, in the construction of HS2. This argument was accepted for Phase 1 of HS2 but not for Phase 2a. My response will again propose tunnelling in the area between Ingestre and Yarlet where it makes more sense that the proposed deep cuttings. Not only would tunnels in this area reduce the impact on some communities, there would also avoid the massive disruption both to the Staffordshire Showground and two or three vital roads.

3.0 Description of the Phase 2a Scheme

3.1 The Route

3.1.1 Section 3.1 is inadequate in the way in which it describes the area through which the proposed line will pass. Even in paragraph one on page 15, the area is described as **‘a mainly rural area in Staffordshire and Cheshire East, where a number of small settlements are located.’** This description is misleading. It fails to mention that the line will carve straight through the large village of Hopton and straight past the village of Great Haywood that is a very significant large village. Marston village will be completely devastated. If everyone's plans go as expected, approx. 50% of Marston residents will have left by the end of 2018.

3.1.2 The following paragraphs also fail to represent the landscape that will be impacted as the proposed route passes through my constituency. There is no mention of Ingestre Salt Marsh, or Ingestre village, but there is, quite rightly, mention of Ingestre Park Golf Club, that will be cut in half by the proposed line. There is no mention of the National Trust's Shugborough Estate and it states that the line will run *‘adjacent’* to Great Haywood Marina. It in fact runs through the Marina. There is also mention of the line running through a camping and car parking area of the Staffordshire County Showground. This is technically correct but again downplays the significant impact that the line will have on the Showground site. The required cutting will prevent access to a large woodland area of the site. The impact will be very significant on a site which hosts national and international events. A successful farm business behind the Showground will also be devastated. In section 3.1, as the described area leaves the Stafford constituency, I note that there is no mention of Yarlet School, despite the impact that they will feel. I also note that it is, quite rightly, considered appropriate for a Golf Club to be mentioned, but a school is omitted.

3.1.3 I note in a later paragraph that Whitmore Heath and Barhill Wood are to have twin bore tunnels. I welcome this for the residents there, but must then ask the question why none of the settlements in my constituency are too having a twin bore tunnel under their communities. I have previously asked for a tunnel at the Staffordshire Showground, at Hopton and at Yarlet School. To tunnel in these locations would be a huge improvement for local residents, yet our requests have fallen on deaf ears. *I would again ask that tunnels be constructed in whole or part between Ingestre and Yarlet.*

3.2 Bridges & Viaducts

3.2.1 The route will run on a viaduct over the current Macclesfield to Colwich line at the Great Haywood Marina. At the exhibition events held in the area, HS2 staff believed that the viaduct would be white concrete and the illustrative pictures in the document do seem to

bear this out. Such a design will stick out like a sore thumb in the Staffordshire countryside. Many bridges in the area, some of them listed are made of the traditional red and blue bricks that are dotted around our area. I would ask that the viaduct is redesigned to be in keeping with local architecture – perhaps with red and blue brick facing. This may be a little more expensive. However this structure will be designed to last for at least 200 years. First class design is essential.

3.3 Site Haul Routes

3.3.1 I strongly welcome the proposal for Site Haul Routes and all suggestions that will keep traffic disruption to a minimum. The construction of this railway will virtually take over parts of my constituency for a number of years and I would encourage further consideration of how disruption can be mitigated.

3.4 Heritage Assets and the Impact on Historic Buildings

3.4.1 The impact of HS2 on historic buildings and heritage is twofold.

Specific buildings and areas:

- Shugborough;
- Cannock Chase AONB;
- Ingestre Hall

General landscapes:

- The Trent Valley near Great Haywood;
- The landscape near Ingestre;
- The landscape at Marston.

3.4.2 HS2 Phase 2a will have a more significant visual impact on all of these areas than the major changes of the past 200 years – namely the advent of canals, the West Coast mainline and roads. This is due to

- a) The Trent Valley Viaduct;
- b) The high embankments topped by the catenary;
- c) The speed and frequency of the trains and the associated noise.

3.4.3 As a major regional visitor attraction, Shugborough represents 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 has 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.

3.4.4 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.

3.4.5 While both Shugborough and the Cannock Case 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.

3.4.6 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.

3.5 Landscape Mitigation

3.5.1 I welcome the identification of advance mitigation works including the translocation and creation of habitats. Landscape works are identified as possible advance works in the area and I would like confirmation that they are proposed both within this area and more widely. Currently, HS2 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. 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 the earliest opportunity. For example, trees planted as soon as possible will have ample opportunity to be established and growing before construction begins.

3.5.2 Making landscape mitigation a number one 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. Indeed, in a number of places in my constituency, HS2 is in the process of buying parcels of land in preparation for construction. As will always be the case for a project of this magnitude, this leaves many field corners and strips, that will be purchased as the proposed line will cut them off from access, but which will not be required for construction purposes. These pieces of land are perfect for mounds of earth and planting schemes, which could be done in advance of any major construction works.

4.0 Construction and Operation of the Proposed Scheme

4.1 Construction Compounds & Worksites

4.1.1 With specific reference to the proposed compound on the A51 Lichfield Road at Great Haywood, I am concerned that due regard is not being taken for local residents who find themselves next to proposed compounds rather than the proposed route itself. I have been in touch with constituents who will be surrounded by the proposed compound and face, in their retirement, being surrounded by a high 'security hoarding' with a noisy compound behind, rather than by the fields behind their home. They wish to sell to HS2 and move on. In fact, I believe that their property would make a more comfortable office or rest room for staff on the compound, or even accommodation. However, they have been told by HS2 that a large hoarding erected around their home is sufficient. I disagree, and much more consideration should be made for residents who find themselves next to these compounds. Many of my constituents are told, as we see in the document, that compounds and other areas used only for the construction of HS2, will be returned to their former use after construction. Very sadly, a good number of my constituents who are affected by these proposals, and who are being told by HS2 that they will only have to tolerate it for a few years, will not live to see the end of the project. It is not acceptable in any way for my constituents to be expected to live their twilight years on a building site.

4.1.2 The construction sites that are being developed will be established in some very close knit communities. I would be very keen to see a strong ethos of building links between these

communities and the construction compounds. The recent Network Rail works at Norton Bridge included tours of the site and the current works for the local community and these were very successful. I would like to see these ideas repeated with HS2. Perhaps local school children and students could be invited in, possibly even with regular link ups with the schools. Stafford also has a rich history of engineering and there could be some excellent opportunities to link up with local businesses and organisations. I would also ask that a code of behaviour for staff is implemented for things such as bad language etc., to help with community relations.

4.1.3 Regarding the proposed Railhead at Yarnfield, I agree with and support the points made by the MP for Stone, Sir Bill Cash,

4.2 Borrow Pits

4.2.1 I welcome this proposal and its intention to keep as much construction traffic off the roads as possible.

4.3 Working Hours

4.3.1 I believe that the proposal on working hours are reasonable and I support them. My only concern will be that they are enforced. Unfortunately, our experience locally is that working hours can be agreed, but can then be flouted on a daily basis by some (not all) contractors. I would hope that the agreed working hours would be written into the contracts with all contractors and that monitoring and enforcement would take place.

4.3.2 I also note that tunnelling will be able to continue over a 24 hour period. I believe that this is another good reason for extra tunnelling to be considered so that work can move much faster. I would again ask for tunnels to be bored between Ingestre and Yarlet.

4.3.3 I would encourage HS2 to consider a more intensive working plan along the route. This would see a much more intensive amount of work over a smaller stretch of railway for a shorter period of time. This would mean that local residents would have a larger degree of inconvenience but for a shorter period of time. Having spoken with local residents, this is a much preferred option.

4.4 HS2 Services

4.4.1 Despite assurances regarding services to Stafford, I am concerned that there is no mention of services to Stafford in this section.

5.0 Preparation of the Environmental Statement

5.1 The Environmental Statement places a great emphasis on the impact of wildlife, which I agree is important, but very little, if any, emphasise on the impact on my constituents. One example locally, which I think sums up the current problem, is a farmer whose barns and home will be seriously impacted by HS2. Unless he is able to get planning permission soon and develop a new set of farm buildings, his business may not survive HS2. However, despite many attempts by him and his agent to get any movement from HS2 on the matter, he has been stonewalled by HS2. This is having a negative impact on his physical and emotional health and that of his family, yet HS2 do nothing. Meanwhile, his farm has received visits from HS2 in order that protections can be put in place for wildlife such as badgers and newts. I am left wondering how I can have my constituents, living near the proposed HS2 railway, registered as an endangered species in order than anything may be done for their welfare.

6.0 Strategic, Route-Wide and Local Alternatives

6.1 Strategic Alternatives to the Y Network Previously Studied

6.1.1 I would repeat again that none of the objectives set out for the HS2 project and repeated throughout the document are met by ultra-high speed rail. All of these objectives, with which I agree, can be met by other and much less damaging railway projects. Much mention is made of 'capacity', 'connectivity' and 'growth'. I agree that all these issues need to be addressed. Paragraph three of section 2.1 states the Government's view that 'a new railway is needed' but that does not mean it needs to be of ultra high speed. This requirement for ultra high speed has resulted in the line going straight through several communities in my constituency whereas a high speed railway could have been designed to bypass them.

6.2 Alternatives to the Proposed Scheme

6.2.1 High Speed UK is an organisation of engineering experts who have designed an alternative proposal to HS2. They have developed a manifesto which sets out the High Speed UK proposals, and compares and contrasts them with HS2 on 15 key criteria, including connectivity, capacity, CO2 reductions, cost and wider adherence to public policy. I believe that the High Speed UK proposals should be looked into seriously by the Government. More information can be found at www.highspeeduk.co.uk.

6.2.2 I would again emphasise, as I have done previously, that I believe that it would be much more cost effective and much better for our local communities if a standard high speed rail line was constructed and incorporated into the national rail network. Work could also be done to relieve pressure on the national rail network with projects such as the previously proposed Stafford bypass for the West Coast Main Line.

6.3 Route Corridor Alternatives

6.3.1 The focus on ultra high speed has always been a red herring, as the problem it is supposed to solve is capacity. The line could be designed around settlements, thus not destroying local communities and amenities.

6.4 Tunnelling

6.4.1 As I have previously stated, I am very disappointed that despite numerous requests, and the fact that the Stafford constituency will be, by many estimates, more impacted than most areas by the proposed line, there will be no tunnelling line as the proposed line passes through the Stafford area, as the plans currently stand.

6.4.2 There is a clear case for tunnelling (in part or full) between Ingestre and Yarlet. Tunnelling would be able to take place 24 hours a day according to the document, would produce much less spoil to be disposed of and would, most importantly, greatly improve the situation for a major local amenity, a large village that is being split into two and a school. It would also avoid major disruption to two or three major local roads. I would urge HS2 to look again at this.

6.5 Pasturefields Saltmarsh

6.5.1 Since the original announcement of the proposed HS2 route through my constituency, it has been immediately apparent that there was an oddity with the proposed alignment of the western leg of the Y in the Stafford area. Instead of following a straight line

up the River Trent valley, along an established transport corridor, the route was diverted to the south, away from the “logical” alignment. The diversion eased potential impacts on communities in the Trent valley such as Hixon, Weston and Salt but, instead, seriously affected Great Haywood, Ingestre, Tixall (Including Ingestre Park Golf Course), Hopton, Marston and Yarlet. The diverted route also seriously affected the Staffordshire County Showground. No attempt seems to have made to propose a route which would avoid all these settlements in the surroundings of the Trent Valley.

6.5.2 Work carried out during 2010 and 2011 had whittled the numerous route options down to a short list of three, (HSM01, HSM02 and HSM03). The best performing route was HSM03 (northern route, south of Weston variant). However, this route passed close to Pasturefields SAC and would require an Appropriate Assessment under the Habitats Regulations. In an attempt to avoid this, six further route options in the vicinity of Pasturefields SAC were developed and reviewed: three additional variations of HSM01 and three additional variations of HSM03.

6.5.3 On 24 May 2012, the Project Board met and decided to proceed with a variant of HSM03, designated MR71, which diverted the route to the south of Pasturefields SAC. This later became the Initially Preferred Route (IPR) which was announced in January 2013. The Project Board reached its decision on the basis of the results of assessments against various criteria. The notes of the Project Board meeting tabulate the assessment results for each route.

6.5.4 For reasons that are not given in the Project Board meeting notes, the need to avoid an Appropriate Assessment of Pasturefields SAC appears to have been an overriding consideration. This resulted in the elimination of the best performing route, HSM03, in favour of MR71, in spite of the fact that HSM03 would cost £154m less than MR71.

6.5.5 The penalty of £154m for using MR71 is almost certainly an underestimate. This is because MR71 has been costed on a more favourable basis than HSM03 – MR71 incorporates cost-reducing refinements to sections of the route remote from Pasturefields (where the two routes should be identical), which have not been applied to HSM03.

6.5.6 It is known that HS2 Ltd has prepared conceptual engineering designs for HSM03 to deal with any ground-specific challenges revealed by an Appropriate Assessment of Pasturefields SAC. While such measures cannot be costed reliably in advance of detailed ground investigations, the added cost of such measures, plus that of the Appropriate Assessment, is unlikely to approach £154m.

6.5.7 Separate communication from HS2 Ltd indicates that it is concern about the time needed to carry out an Appropriate Assessment of Pasturefields SAC that is the motivation. In spite of this, the Project Board did not consider the cost/time relationship (the need to avoid an Appropriate Assessment seems to have been taken as a given).

6.5.8 The full reasons for wanting to avoid an Appropriate Assessment of Pasturefields SAC are not known. However, £154m seems to be a high price to pay for doing so.

6.5.9 Work during 2010 and 2011 examined numerous route alternatives for HS2, Phase 2. In March 2012, HS2 Ltd produced a report detailing the short-listed options¹.

6.5.10 In the vicinity of Pasturefields Special Area of Conservation (SAC), three route options were proposed: HSM01 – a route to the south of the SAC that passed through Ingestre and Tixall; HSM02 – a route to the north of the SAC that passed to the north of Weston and HSM03 -- a route to the north of the SAC that passed to the south of Weston.

6.5.11 In January 2013, the Government announced the Initially Preferred Route (IPR) for Phase 2². This was based on HSM03 but with a diversion to the south of Pasturefields SAC. The diversion commenced near Colton, swung south to pass through Ingestre, Tixall, Hopton and Marston, before rejoining the original HSM03 route alignment near Pirehill (just to the west of the A34, between Whitgreave and Stone).

6.5.12 Documents released at the time (Jan 2013) indicated that the primary driver for the diversion was a desire to avoid potential impacts on Pasturefields Salt Marsh. This is a site of biological importance which is protected both as a SSSI and, under European law, as a Special Area of Conservation (SAC). HS2 Ltd has said that the diversion is necessary so that Pasturefields SAC can be screened out of requiring an Appropriate Assessment under the Habitats Regulations. Ingestre with Tixall Parish Council has been challenging this decision. Eventually, this led to a meeting with HS2 Ltd, which was held at Eland House, London, on 04 November 2013.

6.5.13 From the outset, the reasons for the diversion was considered questionable. As a result, in June 2013, Ingestre with Tixall Parish Council (with the support of both Colwich and Hopton Parish Councils) submitted a report to HS2 Ltd, critiquing the decision to divert the route and making the case for the route to revert to a more northerly direct alignment.

6.5.14 The report was backed up by FOI request for full details of the assessment criteria, minutes of meetings and technical surveys etc that underpinned the decision to divert the route. HS2 Ltd assigned the request ref FOI (P2) 13-41 and responded to it in July 2013.

6.5.15 Thus began a series of increasingly intense exchanges of documents between some of my constituents and HS2, at the centre of which were concerns about the accuracy of their initial screening of the impacts on Pasturefields SAC, together with errors and omissions in the assessment of other impacts – the most significant being that, in diverting the route to the south, to avoid a potential risk to one inland salt marsh, they had, without recognising it, realigned the route to pass through the centre of another salt marsh, in Ingestre/Tixall.

6.5.16 A key element of the debate was a call by the affected communities for HS2 Ltd to carry out an Appropriate Assessment of Pasturefields SAC, under the Habitats Regulations, to find the extent, if any, of threat to the SAC. HS2 declined to do this work, even though, as my constituents pointed out, this information was essential to inform the process of determining the route.

6.5.17 The exchanges led eventually to the face-to-face meeting with HS2 Ltd representatives (also of Natural England and the Environment Agency) in London in Nov

1 Options for Phase Two of the high speed rail network, HS2 Ltd., March 2012, published January 2013.

2 High Speed Rail: Investing in Britain's Future – Phase Two: The route to Leeds, Manchester and beyond, DfT, January 2013

2013 at which the differing opinions of the two sides were aired. The meeting reached no conclusion, with both sides agreeing to disagree about key aspects of the debate.

6.5.18 In response, Ingestre with Tixall PC, with financial contributions from Colwich PC and Hopton PC, commissioned the British Geological Survey (BGS) to review the various documents involved in the exchanges. Their expert opinion was that there was insufficient geohydrological evidence to support **any** of the routes proposed by HS2 Ltd.

6.5.19 The BGS report, together with copies of all other relevant documentation that had been exchanged with HS2 Ltd on the matter, were included as appendices to a comprehensive response to the Phase 2 route consultation. The consultation ran from July 2013 to the end of January 2014. The various documents had been shared with numerous groups and individuals who submitted responses to the route consultation before the closing date.

6.5.20 One key element of the meeting with HS2 Ltd in London, in Nov 2013, was disclosure by HS2 Ltd of more detail of the route option assessments they had conducted prior to deciding on the IPR. It was only when copies of the reference material were released after the meeting that it became apparent that, contained within this information, was comparison of costs. This showed that the chosen, diverted, route would cost £154m extra to build.

6.5.21 There was, however, no recorded debate on the balance between incurring this large charge against the scheme versus the cost of carrying out an Appropriate Assessment, plus any special design/construction costs that might be incurred if a potential impact on Pasturefields SAC was identified.

6.5.22 This, and latterly, the conclusions of the BGS report, ensured that, in addition to the formal consultation responses, important parallel paths of communication with HS2 Ltd, via e-mail, were kept open for some time (up to April 2014). These eventually petered out without satisfactory resolution, with HS2 Ltd saying that all points would be taken account of in the formal analysis of the consultation responses. This proved not to be the case.

6.5.23 At the time, the Government was indicating a decision on the Phase 2 route would be made by the end of 2014. This did not happen. It was not until 30 Nov 2015 that an announcement was made and then it was only a partial decision: only that part of the western leg between Fradley and Crewe (which passes through the Stafford constituency) was confirmed. This was designated Phase 2a and was to be built on an accelerated time-scale that will see it complete by the end of 2027, six years earlier than originally proposed.

6.5.24 The confirmed Phase 2a route is no different from the IPR, except for some adjustment to vertical alignment. More significantly, the supporting documentation failed to show that any of the issues previously raised had received any proper consideration. This prompted an immediate (04/12/15) FOI request to HS2 Ltd for documentary evidence of the post-consultation process steps and the records of discussion about, and reasons for rejection of, the well-documented arguments for reconsideration of the original northern route, HSM03.

6.5.25 A response was received on 15/01/16 under reference: FOI 15-1452. This was an incomplete response which required a further FOI request, which was answered 11/02/16 under reference: FOI 16-1472. While these show that some consideration was given to three minor alternatives to the IPR, the key demand for examination of and justification for rejection of original route HSM03 is not even mentioned; the justification for retaining the original IPR alignment simply being reference back to the original work undertaken on route alternatives in the area – i.e. the very work that has been the subject of major challenge.

6.5.26 For reasons that are unknown, important information raised at consultation has been set aside or ignored, as a result, the Route refinement Review Panel has been deprived of important data that ought to have been part of the decision-making process.

6.6 Alternative Hopton Tunnel Proposal

6.6.1 Prior to November 2015 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 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.

6.6.2 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. The brook in question rarely reaches a depth greater than 15cm, I would suggest that the height of the proposed embankment/culvert at the crossing is somewhat 'over designed' and does not need to be 30 times higher than the depth of water.

6.6.3 I would most strongly request that priority consideration is 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.

6.6.4 The Initially Preferred Route proposed by HS2 Ltd in January 2013 is particularly damaging to property and the rural environment in and around villages near Stafford, namely Ingestre, Hopton, Marston and Yarlet due to the planned series of deep cuttings scarring the landscape and blighting properties. This will cause the permanent loss of property including 7 farms; partial loss of Staffordshire County Showground; prolonged periods of property blight for hundreds of residents; years of noise and disruption during the construction phase; loss of habitat and landscape views; a greatly increased noise level when service operation begins.

6.6.5 An alternative proposal is that the series of cuttings between the villages of Ingestre and Yarlet on the IPR should be replaced by a tunnel. The financial and environmental benefits of a tunnel should be taken into account to re-evaluate the perceived additional costs and push this proposal forward as a viable and cost effective solution. The depth of the cuttings near Hopton are on the limit of the tunnelling threshold, where tunnelling would become the preferred method. HS2 has avoided proposing a tunnelling methodology by taking a conservative approach in estimating tunnelling costs with rates based on TBM techniques. Alternate methods suitable for the local geology include SCL (Sprayed Concrete Lining) which utilises fairly standard plant and equipment and therefore an associated cost advantage over TBM.

6.6.6 Other benefits of tunnelling are: -

- a) Considerably **reduced costs of spoil disposal** (2.5 million cubic metres of spoil from cuttings).
- b) **Increased safety**, cuttings are a potential environment for derailment and the worst case scenario accident of head-on collision. This cannot happen in twin bore tunnel construction.

- c) Preventing the loss of nearly 200 ha good farming land and its potential for **food production**.
- d) Preventing major disruption to the Weston Road, Sandon Road and possibly the A34.
- e) **Avoiding additional costs** of re-instating public footpaths, bridleways and farm tracks which would each require bridges to be constructed across the proposed cuttings.
- f) The proposed tunnel assumes the same horizontal alignment as the IPR to make best use of the data provided by HS2 Ltd. There is of course no reason why the tunnel should not be re-aligned horizontally to minimize curvature in the track and length of tunnelling.

6.7 Trent Valley Viaduct

6.7.1 Previous reports have identified 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.

6.7.2 The previous Environmental Impact Assessment set out three possible methods of constructing viaducts. 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 was not included in the list of considerations. Construction of the Trent Viaduct will cause significant environmental impacts locally, especially visual. The communities of Great Haywood and Ingestre will be particularly affected. 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.

6.7.3 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.

6.7.4 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.

6.7.5 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. Bridges over the Trent in the Stafford area are mainly red and blue brick, some with listings to preserve them for posterity. Any concrete-faced structure would be highly detrimental to the surroundings. It is essential that the proposed viaduct is designed to enhance, as much as possible, the landscape and fit in with its surroundings.

7.0 Approach to Environmental Mitigation and Monitoring

7.1 Cultural Heritage

7.1.1 I am disappointed that the section on Cultural Heritage makes no mention of the National Trust's Shugborough Hall or Cannock Chase AONB. These are very important pieces of local and national Cultural Heritage and they should be considered.

7.2 Health

7.2.1 The section on health says that the route has been selected to avoid residential properties. That may be the case in other areas, but in Stafford, the route that went straight through two villages and badly impacted other areas was selected over others that would have had less impact. I can understand why many of my constituents feel that other areas are being prioritised over them.

7.2.2 The whole HS2 project has had a very serious impact on many of my constituents. Very sadly, I can highlight a number of cases of mental and physical health issues caused by the stress of these proposals. I can also honestly say that I have witnessed some of my constituents age well beyond their years since the announcement of these proposals. I also have to report that the behaviour of HS2 when purchasing a property is not of a standard which I would expect. I could give you numerous examples of constituents, put into this situation by HS2, unable then to sell their homes, then treated aggressively by HS2 as they try to reduce the purchase price. Some of my constituents have eventually agreed to HS2's demands simply so they will never have to deal with them again. HS2's treatment of some of my constituents, some of them elderly and vulnerable, is simply unacceptable.

7.2.3 An emerging health and well-being issue in some villages is now the amount of properties that have been purchased by HS2. Many of these are now rented out. It has been mentioned to me that the previous community spirit, especially in some more rural areas, has been eroded. This is especially a concern in those areas where elderly residents have decided to stay. This situation is understandable as those residents on short term rental agreements will not see the need to involve themselves in the community as much as someone who is planning on making a life there. I am aware of local young families who are very interested in moving to the areas near the HS2 line. They would not otherwise be able to afford properties in those villages, but wish to make a home there and are prepared to tolerate the construction of HS2. They are also aware that they would be entitled to no compensation. I would propose that HS2 put at least some of the properties purchased back onto the market at a lower price in order that young families and other individuals can purchase them and begin to build local communities back up.

7.3 Landscape & Visual

7.3.1 I welcome the proposals by HS2 to plant trees and to landscape along the route. I would urge HS2 to start the planting, where possible, as soon as is practicable, in order that trees can become established and start growing.

7.3.2 In some parts of my constituency, a great amount of spoil will need to be removed and I welcome HS2's plans to try to use as much of this as possible within the project. However, having spoken to HS2 staff throughout the process, it is clear that there will still be possibly thousands of tonnes of spoil to be removed and I am concerned about the impact that this will have on the local road network. I would like to draw HS2's attention to the Prime Point Business Park in Stafford. The park is near to Junction 14 of the M6 and very close to where the HS2 line will travel. When it was constructed, a great deal of spoil was required to be removed. Rather than being taken off site, a nearby field was increased in height by approximately one metre. All spoil was taken over an existing motorway bridge and then the top soil put back on. The field was returned to agriculture and now you would not know that anything had ever happened. I would strongly suggest that HS2 investigate this possibility. Raising the level of some fields would use up spoil and help to disguise the line in some places. I am also aware of local farmers who would welcome such a proposal.

7.3.3 I would also refer to my previous comments about tunnelling. There will also be significant amounts of spoil dug out of the local landscape due to the fact that there will be

no tunnelling around Stafford. I would urge HS2 to reconsider tunnelling between Ingestre and Yarlet. This would reduce spoil and greatly improve the impact that this project would have on the local landscape.

7.4 Traffic & Transport

7.4.1 I welcome the proposals for Travel Plans and the plans to put measures in place to reduce construction traffic as much as possible. However, I would highlight that Stafford already suffers from severe traffic congestion on a regular basis. This is often, although not exclusively, due to some main national traffic routes going through our area. If the M6 is closed, then all of our local roads will quickly become severely congested as traffic tries to use the A34 and other routes between the north and the south of the country.

7.4.2 As an area of significant development, Stafford also has various major housing and employment development projects underway. Also, as I write this response, two major outline planning applications have been submitted for 700 and 2000 houses respectively in the Marston area of Stafford. If permitted, these are proposed to be in the process of construction as HS2 is being built and highlights the possibility that the whole of north Stafford could feel like a building site during this time. It is vital that serious thought is given to how HS2 will impact the local road network during its construction and how the various developments will work together. If not, it is a very real possibility that parts of Stafford will literally grind to a halt during the construction of HS2.

8.0 Summary of Environmental Effects by Community Area (8.3 – CA2 Colwich to Yarlet)

8.1 CA2 Colwich to Yarlet Map – Page 68

This map is misleading in the extreme. It fails to show the Great Haywood Marina, Cannock Chase AONB, Shugborough Hall and Park, Staffordshire County Showground, Yarlet School or the new developments constructed, currently under construction and those proposed in the north of Stafford. The question arises as to whether HS2 is aware of some of the major proposed development adjacent to the proposed route.

8.2 The Proposed Scheme

8.2.1 I welcome the fact that various parts of my constituency are noted in this section but would again highlight the omission of the Great Haywood Marina & Yarlet School.

8.3 Community

8.3.1 I welcome the reference to the 'proposed homes at Stafford North', but would again emphasise that over 300 are currently in the process of being constructed and proposals for 700 and 2000 homes respectively have recently been submitted to the planning department.

8.3.2 This section again fails to mention Great Haywood Marina, Tixall, Ingestre village and Yarlet School. Again, I welcome the inclusion of Ingestre Park Golf Club and encourage HS2 to generously compensate the club for the loss of their eminence. However, I must again question why Yarlet School, which will be seriously affected by this proposed line, is missing?

8.4 Ecology and Biodiversity

8.4.1 I note that '**1.5ha of inland saltmarsh habitat at Lionlodge Covert Local Wildlife Site will also be lost**' I am interested to know why this saltmarsh can be lost, but the route

can be moved to avoid the Pasturefields Saltmarsh, thus taking the proposed line through two villages and causing a host of other problems for my constituents.

8.5 Landscape and Visual

8.5.1 I note the photo on page 73 of the document showing the proposed Great Haywood viaduct in year 15 of operation. There appears to be no noticeable gantries or wires above the train line, which we are told will need to be in place for this railway. These will add considerably to the visual impact and should be clearly shown.

8.5.2 I would also refer back to my previous points about the proposed Great Haywood viaduct. I would urge HS2 to revisit the design of this viaduct so that it is more in keeping with the local landscape.

8.6 Socio-economics

8.6.1 I welcome the fact that the Great Haywood Marina is finally mentioned in this section and that it is acknowledged that the construction works will have a major impact on the business, as will the ongoing operation of the line. I would urge HS2 to work with the Marina to ensure that their operations are impacted as little as possible, whilst also ensuring that they, and all businesses impacted by the project are generously compensated.

8.7 Water Resources and Flood Risk

8.7.1 This section again acknowledges that there will be the loss of saltmarsh at Lionlodge Covert. I would again, as I have done earlier, ask why the line has been moved, to the detriment of my constituents, to avoid the saltmarsh at Pasturefields, when it has been perfectly acceptable to go through the saltmarsh at Lionlodge Covert.

8.8 Moreton

8.8.1 At Moreton, as the line enters my constituency, it goes through what is currently referred to as the Coley Cutting. This is a deep cutting with farms and an elderly care 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 improved compensation for those residents who at the moment are being told that they can stay next to a very deep cutting through their community. I would also raise the specific case of Moreton Farm. The owners of the business and their agent have been trying to agree a new location for the farmhouse with HS2 so that they can get on with the planning process. Failure to reach an agreement very soon will mean that the family face living on the edge of a deep cutting as it is constructed. There will be many other issues created by no action. *I would urge HS2 to speak with the owners and agree arrangements as soon as possible.*

8.9 Great Haywood

8.9.1 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. The 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.

8.9.2 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 overhead line equipment (OLE). The addition of the OLE makes 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.

8.9.3 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 which potentially involves access past the main visitor entrance to Shugborough.

8.10 Toldish Lane

8.10.1 Colwich footpath 55 south of Toldish Lane will be stopped up. This provides a link between footpath 54 and Toldish Lane. The stopping up of this route will reduce access. 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. It may therefore be visible from parts of the park at Shugborough and by local communities. The sensitivity of its design and detailed positioning is important. I refer you to the comments that I made about the design of the Trent Valley Viaduct.

8.11 Hoo Mill Lane

8.11.1 The Hoo Mill Lane compound appears to pose problems for access 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. We need detailed information on the likely traffic associated with this compound to be made available alongside details of how it will be controlled.

8.12 Ingestre & Tixall

8.12.1 Tixall and Ingestre are rural parishes, set in tranquil estate parkland, located approximately 5km east of the town of Stafford. They have a combined resident population of approximately 400.

8.12.2 The Parish Council advises me that it is opposed to HS2. However it wishes to make sure that, should it proceed, the impacts of construction and operation of HS2 are minimised and that residents who are adversely affected are properly and fairly compensated.

8.12.3 The low-lying areas of Ingestre and Tixall, though not having a history of flood inundation, are nevertheless precariously located on the edge of the River Trent/River Sow flood-plains. They do not want to see any activity during the construction or operation of HS2 (taking into account the effects of climate change on the frequency and intensity of extreme weather events) that raises the risk of flooding by any amount above that which would have occurred naturally had the Proposed Scheme not been built.

8.12.4 While consideration of the effects of noise on heritage is mentioned, there is no further detail 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. These are at risk from both construction noise and operational noise. Tranquillity is a key part of the design and heritage significance of Shugborough. I would ask that this be addressed.

8.12.6 The draft EIA contains no discussion of possible construction or operational 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.

8.12.8 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.

8.12.9 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.

8.12.10 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. These included the creation of a Broad Water combined with tree planting along the former, and tunnelling and the creation of distinctive, carefully designed, and locally relevant bridges and tunnel mouths to the latter. These must be seen as a precedent for how HS2 could be mitigated in the area.

8.12.11 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.

8.12.12 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 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. I consider that this may give rise to significant landscape impacts at a level wider than identified. This should be addressed and appropriate measures taken to avoid, minimise or mitigate such impacts.

8.12.13 The National Trust advises me 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 advises 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.

8.12.14 The Trent and its tributary the Sow are of ecological importance. 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). I 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. I 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.

8.12.15 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. Early implementation of the permanent replacement floodplain storage would provide additional mitigation of construction impacts and I wish to see this happen. 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.

8.12.16 At Ingestre, the proposed route and all associated features 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.

8.13 Hopton

8.13.1 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. Although the route through Hopton makes no sense to me, this at least gave some hope to residents of screening from the ultra high speed train operational noise and visual impact. 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.

8.13.2 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. However 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. The removal of the green tunnel is entirely unacceptable. The barrier/bund proposed gives little or no protection to residents in parts of Hopton which lie well above it.

8.13.3 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 as I have proposed and a vertical alignment affording the maximum possible noise and visual mitigation.

8.14 Marston

8.14.1 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, such as that proposed for Buckinghamshire, is not matched in these areas.

8.14.2 It is perfectly possible to tunnel under Hopton and Marston, saving villages and beautiful countryside. I would urge HS2 to consider this again.

8.14.3 I am equally astonished with the attitude that HS2 takes with regard to compensating my constituents along the route. The time which my constituents, my staff and I have lost in arguing with HS2 over the amount of compensation they will receive is extraordinary. In many cases, it is clear to me that HS2 are attempting to save money by cutting back on the compensation that my constituents should receive.

8.14.4 I welcome the fact that HS2 is proposing some planting schemes along the line through Marston, especially between Yarlet Lane and the proposed HS2 line. However, this scheme should 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. Concerns have been also 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.

8.15 Yarlet and Yarlet School

8.15.1 Yarlet School is an excellent independent preparatory school for boys and girls aged 2 to 13. It is set in beautiful countryside and located beside the A34 between Stafford and Stone. The school is renowned for its values, small class sizes, high academic standards, unrivalled facilities and excellence in art, sport and music, which it readily shares with local schools and other groups in the community.

8.15.2 Over the past few years, the school is currently coming to terms with the impact that the railway will have upon them. They are in a unique position in that they take boarders and will feel the impact 24/7 rather than just in normal school hours. The school's leadership and governors have made it clear that they wish to stay in their buildings, which date back to 1873 and seek to mitigate the impact of the line upon them as much as possible.

8.15.3 The school has been proactive in their approach to HS2, but there are two key issues which now need to be resolved. Firstly, the design of the line as it goes under the A34 leaves the school exposed to noise and various impact from the line. Secondly, the school's only entrance and exit is onto the A34. It is clear that during the construction of HS2, this main road will be restricted or blocked for an extended period of time. Given that parents currently considering sending their children to the school will be also taking into account the possible inconveniences in the future, an urgent solution to this problem is needed in order that the school do not see a fall in their roll now, let alone in the future.

8.15.4 A sensible proposal has been put forward for a new entrance to the school to be built onto the nearby Enson Lane. This would require the use of some of the school's land, which they are willing to contribute, and also a small amount of Staffordshire County Council farm land. Securing an agreement for this entrance will be vital in order that the school can show potential parents that solutions are being put in place in preparation for the construction works. I would also suggest that this new entrance be made permanent. The A34 trunk road is now a very busy road and a new entrance onto Enson Lane would enhance the facilities of the school, thus providing them with a benefit for the inconvenience they will be experiencing.

8.15.5 The School has already advised HS2 of concerns, which have led to the identification of the most vulnerable facilities on the campus and to the costing, at HS2's request, of the replacement of these facilities in other, less exposed areas of the campus.

8.15.6 The facilities in question are the swimming pool, the art and music school and adjacent classrooms and the boarding accommodation. It is considered that other facilities in the School, for example the School Chapel, the food preparation area and the headmaster's accommodation in the main building, will also need remedial attention.

8.15.7 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. 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.

8.15.8 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.

9.0 Summary of Route-Wide Environmental Effects

9.1 Noise

9.1.1 As many of the areas in my constituency, affected by the proposed route, are located in tranquil farmland and estate parkland and many residential properties lie within 1km of the proposed route, noise has been a particular concern to me. As a result, I have taken a close interest in the assessment of noise from HS2; initially as outlined in the documentation for Phase Two but, following completion of the Phase Two Route consultation at the end of January 2014, also to the more detailed description contained in Annex D2 of Appendix SV-001-000 of the Environmental Statement (ES) for Phase One (Volume 5).

9.1.2 It seems to me that HS2 Ltd has made questionable assumptions about noise. This means that Parliament, and the public-at-large, have possibly been presented with an overly optimistic view of the environmental impact of noise on affected communities.

9.1.3 Noise is a complex and highly technical subject. Those who advise me on this have reservations about the noise limits used by HS2 Ltd to indicate the likely impact of HS2 but have chosen to examine, in detail, only the sound source model and propagation characteristics that have been used for the route-wide studies.

9.1.4 As will be appreciated, discrepancy at the level of noise source representation will produce erroneous and misleading results for every affected property and community along the whole route.

9.2 Health & Wellbeing

9.2.1 As I have stated earlier in this submission, a direct consequence of the announcement of the Initial Preferred Route for Phase 2, in January 2013, has been the generation of considerable anxiety and distress amongst the residents of my constituency. For some, it is understood to be negatively affecting their health and wellbeing. This mirrors the reported experience of communities along the full length of the route.

9.2.2 I have repeatedly asked for this to be taken seriously. Funding should be made available to the local general practices so that they provide additional assistance to patients affected by the plans for and construction of HS2. I have several examples of constituents who have been adversely affected by this proposed railway and a number of these cases have been caused, as I stated earlier, by the adversarial tactics of HS2 valuers and lawyers.

9.2.3 I am therefore astonished to see that HS2 claim that the proposed scheme has been **'designed to reduce adverse impacts on health, however, health impacts may still occur'**. May I please make it clear that HS2 has been designed to go straight through two villages in my constituency. It has devastated communities, farms and businesses and then has in several cases to deny fair compensation to those people whose lives it has already

upended and in some cases, ruined. Marriages have collapsed, local community relations have become strained and in some cases broken down, and people's mental and physical health has deteriorated. My staff have to deal with these issues on a daily basis. To state that HS2 has been 'designed to reduce adverse impacts on health' is clearly inaccurate. So much more could have been done in this respect.

9.3 Transport

9.3.1 The impacts of HS2 on property and affected communities are likely to be significant, not just during operation but also through many years of construction. The impact on the local road network is likely to be felt most during construction, with delays caused by constructing road diversions and increased construction traffic on local roads. It is vital that HS2 consults widely with the Highways Agency and Staffordshire County Council to ensure that any road closures or restrictions are co-ordinated to keep disruption to a minimum.

9.3.2 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.

9.3.3 I strongly recommend that the regional road infrastructure is improved prior to the start of work on HS2 Phase 2a. For instance, I ask that HS2 immediately consult with Staffordshire County Council, South Staffordshire District and Stafford Borough on the construction of a link road between the A34 South of Stafford and Junction 13 on the M6 (which forms the Stafford Western Bypass). This link was proposed many years ago as part of the (unbuilt) Stafford Eastern Distributor Road. It would provide an alternative route for traffic travelling between the West Midlands and places North of Stafford.

9.3.4 I also recommend that all possible work in preparation for the HS2 bridge over the M6 is carried out while the M6 Smart Motorway construction takes place from April 2018. It makes sense to have major disruption on this – one of the busiest roads in Europe – only once and not twice. A good example of such forethought is the construction of the Lichfield Canal Aqueduct over the M6 Toll even though the canal has not yet been constructed.

9.3.5 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.

9.4 Ecology

9.4.1 It is disappointing that so little consideration is made 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. 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.

9.4.2 In previous HS2 documents, there has been the statement that there would be no significant route-wide landscape or visual effects from the introduction of 60km of railway,

including 5.6km of viaduct, 22.7km of embankment and 26km of cutting, very little of which is alongside existing similar features. This 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.

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

9.4.4 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.

9.4.5 However I am 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.

9.4.6 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 Staffordshire County Showground, the village of Hopton and Yarlet School. There is almost no tunnelling in Staffordshire, despite the hilly terrain.

9.4.7 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 also rank behind battlefields.

9.4.8 I would make the point again that I also find it perplexing that 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.

9.5 Cannock Chase Area of Outstanding Natural Beauty

9.5.1 I would strongly challenge the conclusion of the authors of this report that Cannock Chase AONB will not be impacted by the HS2 project. It stands to reason that such a large construction project, followed by the operation of an ultra-high speed railway, on the doorstep of an AONB, will have a serious impact.

9.5.2 I am also flabbergasted that the report states that Shugborough Hall and Park, both operated by the National Trust will not be affected. I have myself seen documents from the National Trust which were sent to HS2, which make it quite clear that Shugborough will be affected in many ways. I would urge HS2 to speak with the National Trust urgently, in order that these issues can be addressed.

9.6 Property Compensation

9.6.1 The issues regarding property compensation are numerous. My constituents have had to deal with the bureaucracy of HS2.

9.6.2 For example, many constituents, many of them elderly - who have been impacted by these proposals through no fault of their own - have had to deal with difficult valuers, who use many means in order to have money knocked off the value of their home. One example in my constituency is an elderly couple who had been planning to sell their home and move to live with one of their children when the initial HS2 proposed route was announced. Their property had become too large for them and their failing health made it almost impossible for the house-proud couple to maintain properly. After a wait of nearly two years, they were finally accepted onto the 'Exceptional Hardship Scheme' and were visited by a valuer. They were then given a blow by blow critique of their property and its upkeep, with the conclusion being that HS2 wished to reduce the value of the property by approximately £20,000 in order that it could be brought up to standard for rental. This was devastating for the couple in question and, despite advice from my office and others to take it further, they accepted on the basis that they wanted to get the whole distressing ordeal over. To leave an elderly couple, who had raised a family and lived their life in their home, wanting to leave as quickly as they could just to get the HS2 nightmare over, is a disgrace and one which we should all be ashamed of.

9.6.3 Furthermore, this sadly is not an isolated case and has continued. Only this month, another case has been highlighted to me where HS2 wish to write off a significant sum from the value of a property. The only explanation that can be gleaned from the items that they wish to be remedied is that they are preparing the property for rental and want the home owners to pay for it. However, were I to buy a property to rent out, I would have to then make any alterations necessary. I do not see why the current homeowners should.

9.6.4 This gets us to the crux of the problem that currently exists regarding HS2 compensation. HS2 do not yet seem to have grasped the fact that no-one in the path of the HS2 route wanted it to go through their communities, or in some cases through their house. Therefore, giving them compensation and/or buying their property is not doing them a favour; it is giving them what they are rightfully entitled to. In many cases, my constituents are left feeling depressed and upset by the whole compensation experience.

9.6.5 However, HS2's reach has extended beyond the proposed route and into the local housing market in my constituency. A number of house purchases have been put in jeopardy as those residents whose houses are being purchased by HS2 try to move into town or into nearby villages. A number of chains have been disrupted and local estate agents have themselves said that they steer clear of individuals whose homes are being purchased by HS2. Their reasons, and I have seen this time and again, is that HS2 are slow and difficult to work with. This has led to a number of HS2 affected residents not only losing their home to the railway, but also then losing the house they wanted to buy as the whole conveyancing process took far too long.

9.6.6 When I review the many contacts I have had from constituents regarding HS2 through my constituency, a vast majority of them are relating to compensation or more

specifically, the way that individual homeowners are being treated. If only HS2 could sort out their compensation system and make it more efficient, faster and frankly, kinder - paying people what they are entitled to, not the amount that HS2 think they can get away with. This railway should not be built on the backs of my constituents, but that is how many of them feel.

10.0 Summary of Off-Route Environmental Effects

10.1 Off Route Railway Stations

10.1.1 I am astonished and concerned that there is no mention of Stafford Station or Stoke-on-Trent in this section. Even by independent estimates, Stafford will have a more than 10% increase in their number of passengers based on the train services that have been promised. It is therefore, very concerning that it does not appear.

10.1.2 The assessment of route-wide effects includes the effects of consequential changes to rail traffic on other lines, especially on the West Coast Main Line 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 Scope & Methodology Report 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 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.

10.2 Maintenance of national, regional and local transport links

10.2.1 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 moving.

10.2.2 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.

10.2.3 Highways England are currently planning the next phase of their 'Smart Motorway' project in the midlands. This will involve, over the next few years, overnight closures of the M6 north of Stafford. I would urge HS2 and the Highways Agency to work together to find out how HS2 Foundation work can be done where HS2 will have to cross the M6 north of Stafford at the same time as the Smart Motorway work. This would mean that road closures could be shared and reduced, and disruption kept to a minimum.

11.0 Conclusion

11.1.1 One issue of concern to me as I have gone through the various documents issued as this process has gone on is the fact that HS2 look solely at the impacts that they consider to be significant. Although the impacts considered are clearly 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.

11.1.2 I would again emphasise that I believe that HS2 should look again at proposals to tunnel between Ingestre and Yarlet. I would also urge them to look again at the Pasturefields Salt Marsh. The HS2 line has been moved to avoid the Salt Marsh there, which means it goes straight through two villages, yet another Salt Marsh is built over. This contradiction needs to be examined.

11.1.3 It is essential that whilst HS2 is being constructed that the people of my constituency are able to continue with their daily lives. I welcome some of the proposals to keep construction traffic off the roads and would encourage as much work as is possible to ensure that the road network keeps moving during the works.

11.1.4 However, what I want to again emphasise is the unacceptable treatment of many constituents by HS2. Many of my constituents have said to me that they have learnt to live with the railway and the fact that they will have to move. What they cannot accept is the way they are treated by HS2. This must stop.

11.1.5 I am ashamed at the way people are forced to accept low property valuations, and also the way that purchases go through such a painfully slow process resulting in people losing the property they wish to buy.

11.1.5 Again, I am grateful for the opportunity to take part in this consultation. I hope I have made clear the impact that this project will have on my constituents and the permanent changes that will be made to my constituency. If the project goes ahead, it is vital that HS2 ensures that HS2's legacy is a positive one for the many people that are already and will feel the impact of this line.