

## Response to the Draft Environmental Statement

Volume 1, Volume 2, 27, CFA9 CoCP

# HYDE HEATH VILLAGE SOCIETY

## Introduction

Hyde Heath Village Society fully supports the CFA9 response to the environmental consultation.

Throughout the 'engagement' process we have been told that we will be able to comment on the draft ES. There has always been a reasonable expectation that this would be a close approximation to the final draft, particularly given the timing of the submission to Parliament. Instead, we are presented with a 'snapshot'. In fact, it is little more than a sketch. The public have a right to comment upon the impact of the proposed scheme and have the confidence that HS2 Ltd will provide an ES that gives an accurate picture of the impact of the proposed scheme.

Volume 1 describes the hybrid bill procedure. It states that the public can comment on the final ES. The preface to Volume 1 states that the public will be consulted. These are antithetical statements. Consultation implies an opportunity to shape outcomes. This will not be possible after the ES has been deposited.

The draft ES (DES) represents little more than a stage in a series of successive approximations. It does not have the level of detail to allow comment. It is based on incomplete surveys, modelling which is yet to take place and lack of analysis of cumulative impacts and constant reference to future activity. Essentially, it lacks rigour and is not fit for purpose.

HS2 Ltd has stated that they do not need to consult at this time. Nevertheless, they have gone ahead. This means that the consultation has to be meaningful.

The theme of minimising the environmental impact of the proposed scheme is consistent throughout the documents. Government spin, interlaced throughout the documents seriously undermines confidence in the independence of assessments and the resulting judgements.

Volume 2, 27 Section 2 is seriously misleading. It provides an inadequate picture of the major adverse impact on the AONB. A consistent refrain in forum meetings is reminding HS2 Ltd that this is a nationally protected landscape. As such, it is entitled to protection of the highest order along with the associated investment. The measures proposed in mitigation are inadequate. 'Avoid', 'reduce', have been ignored in favour of 'compensation'. This entails despoiling and artificially reshaping the landscape in perpetuity.

The only way to preserve this protected landscape is a fully bored tunnel throughout the AONB.

The Crag tunnel proposals, designed to minimise the impact of the proposed scheme on the AONB, are included in the DES. The DES provides very inadequate information on the environmental benefits of these tunnel proposals to offset construction costs.

## Hyde Heath Specific

The village is located around a common with one road running east to west and two minor lanes running south. The junction of these two roads forms the heart of the village with the shop and village hall located there along with the school.

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The village hall is in frequent and regular use during the day by local associations and fitness classes, as well as a wide range of other uses including Scouts, Brownies, Drama Groups, Old Tyme Music Hall, Line dancers and the hall is also let out for private functions.

Villagers and passing traffic use the shop, which is open 07.30 to 17.30 weekdays.

The village schools – infant and pre-school has approximately 90 pupils between the ages of 2 and 7. The school serves a large catchment area with a radius of two miles which requires parents to drive children to school, in addition to those who live in the village and are able to walk. The vast majority of the dwellings are located on the opposite side of the road to the school, which therefore results in parents and young children crossing the road at either end of the school day.

In addition school buses leave between the hours of 07.45 and 08.30 taking older children from the centre of the village at the above mentioned T junction. These buses return late afternoon between the hours of 15.30 and 16.20.

As previously highlighted there is a high level of through traffic from drivers avoiding the busy A413 throughout the day, but in particular at peak times.

## **Impact**

The junction is very congested between the hours of 07.45 and 09.00 and 15.00 and 16.30 with cars being parked by parents dropping off and picking up children and people visiting the shop. Unfortunately the village does not benefit from a School Crossing Patrol.

## **Major issue for Hyde Heath**

The stretch of A413 from its junction with Chesham Road at Great Missenden through to its junction with Keepers Lane has an accident history which includes a large number of accidents which are classified as serious and a considerable number of accidents which are classified as slight. When an accident occurs this stretch of A413 is often closed as it is two lanes and not very wide

## **Impact of closure**

When the A413 is closed even more drivers divert through Chesham Road, Chalk lane, Keepers Lane or the further turning along on the dual carriage way. The result is all vehicles coming off the A413 go through the centre of Hyde Heath. All the mentioned lanes are narrow and as result the village becomes grid locked. These roads are not suitable to accommodate the level of traffic which uses the A413

The DES ignores the AONB's contribution to the government's sustainable tourism and health agendas. A key function of the AONB is to provide opportunities for recreation and enjoyment within the countryside. The DES provides no consideration or evaluation of this function of the AONB. The contribution of the landscape along the route to health and well-being is simply not considered.

The proposed scheme, if it goes ahead, will result in a linear swathe of construction from Mantles Wood to Wendover for over three or four years. There will be multiple points of access to construction sites along the ridge. The construction phase will have a major impact on the village. The introduction in perpetuity of alien urban features into the landscape will result in a profound change of character of the AONB.

We totally reject the chief executives assertion that 'there will be no impact on Great Missenden because it is a kilometre from the line' and, given that there has been no assessment of multiple (in combination) effects on this or other communities along the ridge and thus by implication on the AONB, seriously question the basis of this assessment.

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We have seen no evidence that HS2 Ltd to carry out any analysis of the visitor economy and the potential impact of HS2 on the village and the AONB.

Also we have seen no evidence of any assessment of loss of reputational value to the AONB during the construction or operation phase. The socio-economic section is incomplete and inadequate.

One of the factors for rejecting alternative scenarios to HS2 is the disruption that will cause to railway users. Yet it is currently planned to build HS2 on the un-costed, hidden subsidy provided by individuals and businesses along the line as they suffer substantial prolonged disruption and loss of amenity.

## Structure of the Response

Volume 1 key points  
Volume 27  
CFA9  
CoCP

Direct quotes from documents are in italics.

## Response to Volume 1

### Key points

Volume 1 does not give a clear rationale for the proposed scheme. The considerations listed have been retrofitted and have changed over time. The link is not made between very high speed and regenerative growth. Similar assertions were made for HS1 (a very different proposal). No evidence is provided on the success or otherwise of that scheme.

Volume 1 asserts but does not articulate or provide the evidence that *there is a compelling case for delivering a step-change in the capacity and performance of Britain's inter-city rail network to support economic growth over the coming decades.*

In addition, it does not make the business case.

When the decision to proceed with the Project was announced in January 2012 the Secretary of State said, "*HS2 will be an important part of transport's low-carbon future*". There is no analysis presented to support this statement. The heavy power demands and implications for the power industry are not considered.

Volume 1 presents describes the analysis of various scenarios against the comparator, HS2. Scenarios are rejected even when they provide the capacity and a better BCR because they do not provide the *wider benefits*. These are not detailed for HS2.

Scenarios are considered singly. No combination of scenarios are considered. The impact of impact of broadband and associated technology is not assessed.

Operational costs are not considered. The surplus in capacity on the conventional network as result of HS2 is not considered. Projected train utilisation figures indicate a cavalier attitude to value for money. The required operating subsidy is not presented. Essentially the MacNulty report and the questions raised within it has been ignored. HS2 is presented as a stand-alone solution.

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Natural England established clear tests, which needed to be met in order to justify the 'exceptional circumstances' to allow development in an AONB. They were not met in the AOS and neither are they included in Volume 2, 9 or 27 which specifically deals with the AONB.

The documents completely and utterly fail to consider what an AONB is, and fails to consider the effect as a whole on the AONB, by presenting individual mitigations. The effects must be taken as a whole.

The document provides absolute disregard for the importance of Mantles Wood. Mantles Wood is in the Greenbelt. It is in an AONB. And it is an Ancient Woodland. Any one of those should ensure it is protected at all costs.

Definitions included below.

The defined *applicable* purpose of the Greenbelt is:

- To assist in safeguarding the countryside from encroachment
  - To preserve the setting and special character of historic towns
- Once an area of land has been defined as green belt, the stated opportunities and benefits include:
- Providing opportunities for access to the open countryside for the urban population
  - Providing opportunities for outdoor sport and outdoor recreation near urban areas
  - The retention of attractive landscapes and the enhancement of landscapes, near to where people live
  - The securing of nature conservation interests
  - The retention of land in agricultural, forestry and related uses.

It is in an AONB, the *applicable* definition of which is as follows:

- An Area of Outstanding Natural Beauty (AONB) is exactly what it says it is: a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. Each AONB has been designated for special attention by reason of their high qualities. These include their flora, fauna, historical and cultural associations as well as scenic views. The Countryside and Rights of Way Act, 2000 (the "CRoW" Act) added further regulation and protection, ensuring the future of AONBs as important national resources.

And finally it is an Ancient Woodland, the definition of which is:

- Ancient woodland is land that has had a continuous woodland cover since at least 1600 AD, and may be ancient semi-natural woodland (ASNW), which retains a native tree and shrub cover that has not been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally; or plantation on ancient woodland sites (PAWS), where the original tree cover has been felled and replaced by planting, often with conifers, and usually over the last century.
- Ancient woodlands are particularly important because they are exceptionally rich in wildlife, including many rare species and habitats; are an integral part of England's historic landscapes; and act as reservoirs from which wildlife can spread into new woodlands.

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Given the above definition, and the fact that all three apply to Mantles Wood, it is absolutely, unacceptable, to destroy Mantles Wood.

The suggestion that there will be equivalent planting to compensate for the loss of Mantles Wood, makes a mockery of its designation as an ancient woodland. The very definition, is that an Ancient Woodland has not been planted.

Volume 1 does not provide convincing evidence of the need for development, nor the '*exceptional circumstances*' required to meet Natural England's test. Neither does it present a convincing case why this particular route has been chosen. In addition, it fails to state why the need cannot be met or moderated in some other way.

## Response to Volume 2, 27

### Introduction

Sections indicate what the formal ES will present, so that parts are incomplete, speculative but in tone always designed to reassure and minimise the impact of the project. Much surveying is incomplete. This means that there are significant gaps in Sections 3, 7, 8. The economic assessment and its associated modelling have not yet been done. From this modelling flow the output of the transport models for informing Section 13. This information should also underpin Section 5, which states little and should provide more detail for Section 11.

Consultation on Volume 27 is not fit for purpose.

The effect of the project on individuals and communities is not acknowledged nor is loss of local reputation or visitor-based economies. The disregard for the environment and ecology is reflected in the current or incompletely lacking field survey data available so that there is, as yet, no detailed knowledge of what is to be lost in perpetuity on which we might consult. Societal costs are presented solely in market terms so that the positive contributions that landscape and the environment make to the recreation, health and well-being are not even considered.

The response echoes the CF9 response. Section 2 is dealt with in some detail. The other sections are dealt with succinctly.

### Analysis of Section 2

#### 2.1 Introduction

The introduction recognises the existence and designation of the AONB and refers to the planning policies, which give its protection. Natural England's policy on transport states:

*Transport must ensure the highest levels of protection and enhancement for England's protected landscapes, habitats, sites and species...*

The effects of HS2 will be highly detrimental to a sensitive area. The section fails to acknowledge that everything should be done to preserve the AONB as a nationally protected landscape.

#### 2.3 Environmental baseline

The paragraphs use a definition of tranquillity defined in the scoping document. It describes some intrusive features to justify the judgement 'medium tranquillity.' The definition of the word tranquillity needs to be included in the text along with the methodology used to come to its

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conclusion of 'medium tranquillity. The lack of balance and selective choice of features is an attempt to minimise the impact of the scheme. Choice of words such as *infrastructure of roads* to describe a network of lanes can only be deliberate as part of this process of minimisation of impact. Regardless of the assessment, the immediate landscape and character remains protected. Paragraph 2.3.6 concludes that the resulting sensitivity of the AONB to change is high.

## **2.5 Assessment of impacts and mitigation during construction**

2.5.1 The CoCP is generic and contains no specific measures for the AONB. Although Volume 1 makes extensive use of the word 'ensure,' the reality in the CoCP identifies measures will be taken '*where reasonable practicable*'. The detailing of enforcement is weak in the CoCP. Paragraph 2.5.1 is therefore speculative.

2.5.3. Describes surface works of the tunnel portal works having '*a significant temporary local impact on the character and appearance of the landscape*'. The term 'local' is inappropriate in a nationally protected landscape and if construction takes three to five years this cannot be considered to be 'temporary'.

2.5.4. Comment as for 2.5.3

2.5.5 The list of features in 2.4.2 along with proposed mitigation in 2.5.5 merely emphasises the cumulative impact and despoilment of the landscape.

2.5.6. The word 'temporary' is totally inappropriate, as construction activity will lead to a permanent and detrimental alteration to the landscape. The removal of ancient woodland, tunnel portal, cuttings both very deep and shallow, the reshaping of the landscape, the visibility of pantographs and placement of associated buildings and equipment will be permanent and highly visible to residents and visitors alike.

2.5.7 This section shows total disregard to the communities in close proximity to the line. Those living in South Heath, Potter Row, the Lee and Ballinger will be severely affected by the construction of the green tunnel and cuttings north of the green tunnel. Hyde Heath will suffer from a huge increase in traffic along the Hyde Heath road and diverting Chesham Road B485 will increase journey times particular in the morning and evening when the schools buses parents use these routes. The noise and dust arising from construction activity will be high and have a huge adverse effect on these areas of high tranquillity. There is already significant stress to residents caused by HS2. To dismiss all this a just 'significant effect' shows total misunderstanding of the impact on this area and the feelings of residents.

On the assumption that, the tunnel portal and cutting remains at Mantles Wood unchanged then an alternative route must be sought for the removal construction material that is believed to be necessary. This should be either via a direct link to the A413, or via Annie Baileys. In addition, a separate haul road should be constructed, inside the site, alongside Hyde Heath Road, as this road is neither wide enough nor suitable for construction traffic. HS2 should consider direct access to Mantles Wood via the bottom of Chalk Lane via the old Forestry track along what is current right of way footpath (access still possible from a right of way footpath from Little Missenden)

2.5.8 Changes to the AONB landscape will be permanent and adverse. The magnitude of the change must be considered as major adverse, using the jargon of the scoping document. This section is a complete misrepresentation of the situation. Again the term 'local' is inappropriate. The construction and operation will lead to urbanisation along the route and leads to a major adverse magnitude of change in the character and nature of this part of the AONB.

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2.5.9 This section is a complete misrepresentation of the situation. The magnitude of change to the AONB will be severe and highly detrimental to the high sensitivity of the Chilterns AONB. The term 'moderate significant' is not an agreed definition in the published Scoping and Methodology report. Correct application of the criteria issued in that document results in a judgement of 'major adverse' to describe the impact of the route.

## **2.6 Assessment of impacts and mitigation during operation**

It is clear that the list given below in the DES in no way fulfils the requirements of mitigation of Avoid, Reduce, Abate, or Repair. It is very doubtful that they even fulfil the requirements of Compensate. In general, the items listed are superficial and lack detail. Mitigation measures comprise artificially recreating the landscape, replacement of hedgerows, replacement of woodlands and introduction of screening. It assumes that ancient woodlands can be replaced. There is no explanation or description of the ponds which appear dotted through the landscape or of the roads to them.

2.6.2 Another totally misleading and incorrect statement. By nature of the fact that extensive construction works will be undertaken the character of the landscape and visual appearance will be extensively altered. This section, yet again, fails to acknowledge the protection requirements of an AONB.

2.6.3 Without details of the proposed design this is a meaningless statement and does not allow consultation on this point. The vent shaft pictured is industrial in design, totally out of keeping. The negative impact on this area will be extensive and not simply local in nature.

Section 2.6.3 through to 2.6.17 discuss the option of extending this tunnel. However, 2.6.16 dismisses this option, by claiming that landscaping and new planting have been proposed. As already identified, this is absolutely not an acceptable conclusion to reach. Ultimately, it is our belief that the extended tunnel options highlighted in 2.6.8 have been dismissed, simply down to cost, and this is simply unacceptable. As identified in 2.6.14, Option C is the best solution

2.6.4 Without details of the proposed design this is a meaningless statement and does not allow consultation on this point.

2.6.6 Detailed comments are given CFA report 9.

2.6.7 This statement is demonstrably incorrect. As the route of HS2 passes over-ground, requires extensive works to build green tunnels and viaducts, the impact on the landscape to be considerable and permanent.

2.6.8 This statement disregards the negative impact of both construction and operation of the proposed railway. Even within the villages tranquillity is high, traffic noise levels are low and the presence of existing structures whilst sometimes unwelcome cannot be considered to have a current negative impact. To describe the A413 and country lanes as *transport corridors* is fatuous. The Hyde Heath road that will serve the mantles Wood portal is only 5.9 metres wide; making it impossible for two HGV's to pass each other.

To suggest that construction work and operation noise will not significantly erode the tranquillity of the ridge area is outrageous. Peak pass-by noise level noise contours have not been published. HS2 Ltd is reported to be working to reduce pantograph noise. The statements therefore are totally speculative and again designed to minimise the impact of the line.



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2.6.9 See comment above for 2.6.8. The term ‘moderate significant’ is not an agreed definition in the published Scoping and Methodology report. Application of the criteria issued in that document results in a judgement of ‘major adverse’ to describe the impact of the route. This is a serious misrepresentation.

## Section 3 Agriculture forestry and soils

Section 3 is inadequate. It is selective in what it covers. The cumulative impact of severance and fragmentation on farms along the route is not assessed although the statistics supplied on loss of agricultural land are designed to minimise the impact. There is no analysis of loss of specific land grades.

Impact on ancient woodlands is not assessed. Twenty one ancient woodlands are at risk because of the route. There is no assessment of loss. There is no analysis or survey details of specific species at risk or link to planting proposals.

## Section 4 Air Quality

Section 4 is incomplete. The CoCP is used as a screen to reassure that the impacts will be locally slight. The HS1 experience was very different. There are no air quality triggers published in the CoCP. In addition, though the *‘relevant local authorities will be consulted regarding the monitoring procedures to be implemented,’* crucially there is no allowance for the rigour of independent monitoring and enforcement required to safeguard the local communities along the line. Dust will be a problem along the line. There is no mention of pollen release.

## Section 5 Climate

Section 5 is inadequate. The AOS was superficial. *The GHG assessment is being carried out. The resilience of the scheme to climate change effects is being considered.* Given that HS2 Ltd has always been touted as a green project amidst some scepticism, then detailed analysis should be presented for scrutiny. The section deliberately obfuscates the issues.

Some of the aspects that the public seek reassurance include: the massive power requirements to operate 36 trains an hour and where that supply is to be generated and by what means; the high percentage of leisure users in HS2 Ltd calculation – using the train because it is there; the implications for out of town stations; the low value attached to the construction phase; the use of average emissions rather than operating emissions; proposed modal shift; projections of electric car use.

It is not acceptable that major modelling is incomplete and hence unable to inform this section.

## Section 6 Community

The claim that community impacts arising from both construction and operation of the project are considered to be no more than local significance minimise the impact of the project on the ridge villages. It assumes that there is no cumulative effect region or route-wide.

Neither here nor in the socio-economic section is there any appraisal of the impact of reputational loss and the impact on communities of the loss of visitor economy.

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Additionally, there is no consideration of loss of national resources such as landscape and amenity to the region. The benefits derived from the countryside including the recreational opportunities and the contribution these benefits make to health and well-being are not considered.

The cumulative effects along the line are not considered. Urbanisation will bring with it a change of character of the local area that extends beyond the boundaries of the CFAs. Whilst for example, Volume 27 explores loss of agricultural land it does not indicate the number of farms lost or severely restricted within a particular region or county. It is therefore impossible to consider the community, social and cultural impact within that region on the potential loss of a number of significant employers. The issue is not whether there is a critical mass of farms at risk within the community as a result of the project. The issue is that HS2 Ltd has no idea whether there is or not.

There is no assessment of loss to individuals and communities through property blight.

The health and wellbeing of residents in the communities all along the proposed HS2 route should be of paramount concern. HS2 Ltd has a duty of care. There should be a section in the draft ES that dealt specifically with health, wellbeing and safety.

## Section 7 Cultural Heritage

This section is inadequate. There is no identification of strategies to fund investigation of what is not known. Volume 1 refers to range of research that has been carried out but this has not been published. Baseline survey work is still ongoing as is discussions with English Heritage and local planning authority archaeologists and conservation officers. Why is a consultation taking place on a draft Environment Statement that is incomplete? It is not possible to comment properly on the archaeological impacts of the proposed scheme when so much work is yet to be done.

The statement that *These effects are considered to be of no more than local significance and have accordingly been assessed in the CFA reports* is astonishing in the light of the destruction of a substantial portion Grim's Ditch - a scheduled monument and so by definition a heritage asset of national significance.

Volume 27 seriously underplays the cultural and heritage aspects of landscape along the route. Stokenchurch, where the M40 blasts through the Chilterns resulting in landscape carnage provides a very stark reminder of DfT priorities.

## Section 8 Ecology

The section is incomplete and lacking in specifics on which to comment. It is therefore inadequate.

## Section 9 Land Quality

No comment

## Section 10 Landscape

How anyone is expected to believe that the construction and operation of a railway through virgin countryside will not have '*any significant route-wide effects on landscape and visual receptors*' is beyond belief.' It is a transparent attempt to minimise the impact of the project.

Volume 27 fails to assess the impact of light pollution on the landscape.

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The impact of night-time working for maintenance is not assessed.

The incursion into designated green belts is not assessed. There is no assessment of the impact of HS2 on the fragile green belt separating Coventry and Birmingham. The potential for ribbon development not explored.

Precedents and incursions into the green belt only make it far harder to protect what is left. Paragraph Volume 2, 27, 2.3.5 is symptomatic. This paragraph cites various pre-existing incursions, such as power lines into the landscape, in this case the landscape of an AONB, to minimise the impact and justify a far worse incursion.

There is no statement regarding the long term responsibility for the management of the artificially created woodlands.

There is no assessment of resultant fragmented parcels of land and who assumes responsibility for them.

## **Section 11 Socio-economics**

The loss in perpetuity of part of the nation's highest value landscape and the value of other landscape along the line is not valued.

HS2 Ltd cannot maintain a myopic view that it is only concerned with 100 metres distance from the line. The proposal, implementation, construction and operation has and will have a profound major adverse impact on peoples' lives along the line. Loss of amenity is not valued. This is not explored at all within the business case.

The section concentrates on a narrow view of the socio-economics, that of the labour market. There is no quantification of loss of equity because of falling house prices as a result of property blight. This too is a major omission.

There is no analysis of the potential drop in farm productivity as a result of land-take or severance and there is an inbuilt assumption about capacity to adapt.

There is no assessment of the impact on the tourist industry. This is a startling omission. The apparent precision of job losses as being 2190 during Phase 1 is based solely on very limited criteria. It is a summation of job losses from the CFA's of those businesses directly affected by the line's construction. There has been no broader view and doubtless local jobs loss totals will be challenged for each CFA.

The economic case is strong on assertion but weak on evidence preventing analysis or comment.

## **Section 12 Noise and vibration**

This section reaches an inappropriate conclusion that is seriously misleading. This section is inadequate.

Given that the CFA report states that further assessment is being undertaken to confirm operational sound and vibration significant effects is still being undertaken and will be reported in the formal ES, it is difficult how this section comes to its conclusion in 12.2.3.

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There is no section in volume 27 dealing with Electromagnetic Interference. (EMI) The potential for route-wide impact of EMI is not assessed. Mobile phone 4G developments have caused local problems for TV interference and certainly the combination of 4G and ERTMS is known to cause communication black spots on high speed rail in Holland. The potential for impact on digital reception for local communities is not assessed.

There are no statements to assuage public concern about health issues relating to EMI.

## **Section 13 Traffic and transport**

This section is incomplete and therefore inadequate.

This traffic and transport section is not yet complete by HS2 Ltd so that informed comment is impossible. Paragraph 13.1.2 states that the assessment of traffic and transport impacts at regional and route-wide levels is to a large extent based upon the output from transport models which themselves flow from the economic assessment and its associated modelling.

Detailed information with regard to HS2 operation would seem to be an essential requirement within the consultation because aspects such as modal shift, loading, impact of increased capacity, reduction in services on non HS2 lines, effects on London Underground are basic. These are not included.

## **Section 14 Waste and material resources**

No comment

## **Response to Volume 2 Community Forum Area Report 9**

### **Section 2**

Paragraph 2.5.4 gives on a bland understated view of the issues raised consistently within forum meetings. This can only be viewed as a deliberate misrepresentation.

Thirty or so people, passionate about the surroundings and the locally protected landscape of the AONB have spent considerable time arguing and fighting to preserve it. Not only are they presented in the DES with the evidence that they have wasted their time but also that their views have been totally misrepresented.

The forum have always been consistent that the proposed scheme should not be seen, felt or heard within the AONB and that the only proper mitigation is a fully bored tunnel throughout the length of the AONB. 2.5.4 is a bland misrepresentation of the forum's views.

Volume 1 in 2.7.1 states *..HS2Ltd has sought to reduce such impacts as far as reasonably practicable. This has been taken into account by ensuring that environmental assessment has been integral to route development and design, initially by way of the AOS and currently as part of the draft ES.* This is self-delusion and spin taken to the point of mendacity.

The design requirements are for a railway capable of travelling at 400 km per hour and thus in a straight line. Variations on that theme have been impossible to argue because of the insistence that discussion be totally focused on the route as published in January 2012.

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Variations in the route design from the AOS locally have been brought about because of the EA pointing out that the original preferred route in the AOS trammelled through a major aquifer and because HS2 Ltd got their sums wrong in the amount of spoil that the original deep cuttings were going to produce. Changes to the design since 2012 have been because HS2 Ltd had not carried out any original assessment of the impact. They still do not appreciate the impact because so much of the surveying and modelling is incomplete.

One now understands completely how the term 'railroading' entered the language.

2.5.1 states that the approach to engagement on the proposed scheme is set out in Volume 1. It is at 4.1.7. This states: *that engagement and public consultation has taken place throughout the process of design and preparation of the DES, formerly through HS2 Ltd's Environment, Planning and Community Forums, and more informally as appropriate.*

Despite repeated requests to be engaged in the design process, to help shape outcomes, engagement means being told what will happen or HS2 Ltd responding to a specific suggestion '*that there are no gains for us*' or to another '*if we do that here we will have to do it up the line.*' The DES is evident testimony to HS2 Ltd lack of concern for the environmental impact on the AONB.

## The scheme as indicated in Map Book 9

Construction Phase	Proposed scheme	Observations
CT-06-030	CT-06-030	Little Missenden Vent Shaft & Auto transformer station. Placed adjacent to A413, with screening by earthworks and new planting. <a href="#">Re-instatement of footpath LMI/40/2 that is now within new planting is required.</a>
CT-05-031	CT-06-031	<a href="#">Bull Baiter lane (in text) is quoted to be upgraded as an access point to Mantles Wood for emergency vehicles and contractors to the portal building. Yet the existing and haulage road is shown as a new construction road from Hyde Heath Road to Mantles Wood. Extensive cutting and earth works (Material stockpile). There is no explanation as to the purpose of the construction boundaries behind Mantles Green Cottages, opposite the proposed exit onto Hyde Heath Road, or between the two material stock piles. There is no recognition that Hyde Heath road is not wide enough to take HGV's or continue to serve as a cycle way to avoid the A413. Re-instatement of footpaths LMI/17/1 LMI/21/1 is not included. New planting alongside construction road (North West) and on land to South West of the line. No consultation with owner. What is the purpose of the latter? A large swathe of new planting on agricultural land that contains 2 balancing ponds is inappropriate and does not represent mitigation. In total there are 4 balancing pond on this map. No explanation, description, depth? Fenced? Ponds are not a common feature of the Ridge landscape. Impact of drainage on agriculture?</a>
CT-05-032	CT-06-032	<a href="#">Mantles Wood to South Heath. B485 diversion is shown but not marked as a construction road nor is the diverted Kings Lane. The existing B485 and original Kings Lane are marked as the construction roads. Footpath and road diversions are scheduled for 3<sup>rd</sup> quarter 2017 (CFA report 9 page 26). Green tunnels are scheduled to start 1<sup>st</sup> quarter 2018. This does not make sense. You can't divert the road over the green tunnel until you have built it. Conversely if you have diverted the B485 according to schedule then it has to become a construction road. New road to service Green tunnel portal. Hyde Lane re-instated over the track. Footpaths GM1/33/5, GM1/33/1, GM1/33/2 appear to have been lost. GM1/27/1 has probably</a>

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		been re-instated (over bridge) onto new embankment, but this is not shown on the map. There are massive earth works with very large new embankment to both side if the line. 5 balancing ponds (not shown on CT-06-031). New planting in Sibleys Coppice and behind Wood Lane (presumably to act as a sound barrier). Loss of RoW in Sibley's Coppice Overall the landscape will be altered dramatically. Without a 3D image it is impossible to ascertain the extent of the violation of this part of the landscape.
CT-05-032-02	CT-06-032-02	Hyde Heath Road and new construction road to Chilterns tunnel exit. Only feature not shown on CT-06-032 (above) is new planting on North side of Hyde Heath Lane close to new road entrance. There is no explanation or rationale for this new planting
CT-05-032-03	CT-06-032-03	Detail to south west of line (CT-06-032). Shows extensive 'mitigation planting' to south west of line with large balancing pond close to Chiltern line track. The large pond in the newly planted area close to the Chiltern line is in an area known to flood. Albeit in the 1920s with heavy winter rains and extra water from the track/tunnel this could endanger the Chiltern line by causing destruction of the embankment.
CT-05-033	CT-06-033	South Heath green tunnel and ~0.7km onwards north. Construction roads shown (Frith Hill South Heath leg is included as well as Kings Lane. Why both? The turn onto Frith Hill is very steep and dangerous! ) New construction road from Frith Hill to green tunnel exit to service construction and Auto-transformer station and portal building. 2 balancing ponds. Large Materials Stockpile on Frith Hill Farm. This appears to be temporary as not shown on CT-06-033 but with its very close proximity to Cudsdens Court will be a source of excessive noise and dust, constituting a severe health hazard. The size of this stockpile is such that it will be impossible to sheet or water it effectively. Cuttings to north of tunnel and new planting area to south west of the line. Why is this here? Footpaths – Those in Sibley's coppice GMI/79/1&2, GMI/80/1&2, GMI/81/1and GMI/28/1 not shown so apparently lost forever. GMI/13/3 is assumed to be diverted alongside track to join GMI12/1which has bridge across the line. We specifically stated that running a PRoW alongside the track was unacceptable. This is just a cost saving by not building a bridge.
CT-05-34	CT-06-034	Centred on Leather Lane. Extensive (shallow) cutting all across this map. Leather Lane diverted (over bridge) and satellite compound sited north of track of Leather Lane. Liberty Lane (PRoW) to south of Leather Lane is also diverted with an over-bridge. Access to Cottage farm is by diverted bridge (over the line of the track). There are numerous material stockpiles on north side of track, which appear to be made into new embankments to north side of track and new planting to the south side. Are these new structures here as noise mitigation? Yet again inadequate information is provided. 5 new balancing ponds are shown with no explanation of their purpose or impact on the environment.

Footpath re-instatement has been ignored on the evidence of the maps although apparently there have been verbal reassurances that they will appear in the formal ES. Comment is therefore impossible.

Nevertheless the reinstatement of the network of paths in Subley's Coppice are not mentioned. The footpaths from Great Missenden and the A413 towards the ridge are particularly important for visitor access to the ridge. The proposed closure of Frith Hill (presumably Frith Hill South Heath leg) must not result in the closure of RoW from South Heath to Great Missenden.

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There is no explanation or description of the ponds or why roads are being constructed to service them. The implications for agricultural land because of this extensive drainage is not assessed.

**Mitigation is based on changing the landscape and planting to attempt to mask alien features, thereby creating an alien landscape. It makes a mockery of the concept of an AONB.**

Tunnel proposals are rejected on the grounds of cost. There is no reference to the 'value of the environment' to off-set increased engineering cost. The draft ES provides totally inadequate information on the environmental benefits of a full tunnel.

## Section 3 Agriculture forestry and soils

The significance criteria used in this section are not defined. The terms used are 'significant' or 'not significant' and they successfully minimise the scale of impact.

Nine farms are identified. The list of farms is incomplete. Seven of those listed have been identified as being affected by construction of the project, mainly due to severance and the proportion of land removed temporarily. According to the figures supplied, of the seven listed, one is likely to cease operation according to the survey and five others *will suffer significant residual impact*. There is no assessment of cumulative impact of farming along the ridge nor any suggestion of the feasibility of the continuing farming during construction nor indication when decisions will be made to allow for long term farm planning. The feasibility of farms surviving the construction phase is not evaluated nor is the long term viability of farms suffering residual impact considered.

This section does not even approach the rigour of assessment described in the Scoping and methodology document.

Much emphasis is placed on the draft CoCP for the long term protection of soil. The reassurance given in Section 3 by the emphasis on using the word '*ensure*' is not matched in the CoCP. In that document the rider '*where reasonably practicable*' is constantly added and the word *ensure* only appears once in this section. Since the contractors will determine what is reasonably practicable the bland reassurance of Section 3 is misleading. However much soil is replaced, the judgement remains that overall, *the loss of the best and most versatile land in the Central Chilterns area is considered to be significant*.

The assessment of the impact on woodlands is very weak. The identification of which ancient woodlands will be lost as a result of the project is incomplete. The national importance of ancient woodlands is not recognised. There is no total assessment of area (ha) lost. Other woodland loss is not identified. There is no data relating to tree species. The section states that the intention is to mitigate this loss by replanting. There is no identification with what. HS2 Ltd identifies planting a 20ha area to the south of Mantle's Wood and '*areas of agricultural land elsewhere that would not be viable for agricultural use as a result of severance*'. There is no identification who assumes responsibility for the management of these woodlands or indeed who would own them. Indeed there has been no discussion with the owners about these plans. There are no footpaths shown through the newly planted areas. Is that an omission or does it reflect new ownership? On what basis do we comment? '*Woodland soils could be re-used in woodland planting*' yet the the CoCP reassurances within the landscape section are undermined given that appropriate inspection will be undertaken by contractors.

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## Community

The **key issue** for communities along the line is how the combination of effects impact. An area or a community will experience multiple (in combination) community effects. **These are not evaluated and reported.**

According to 5.6.2 they *will be considered*, (presumably by HS2Ltd) and *where significant* (judged by HS2 Ltd) reported in the formal ES. This is unacceptable.

Volume 27 has already decided that *impacts will be of no more than local significance* even prior to the assessment of multiple impacts on communities. Multiple regional impacts leading to reputational loss within a specific region or area are not even considered. For example, during the construction period, Great Missenden is likely to experience significant drop in visitor numbers particularly as the visual impact on all the listed recreational receptors are described as *major adverse* during construction.

The section does not review reputational damage neither in this section nor in the socio-economic section caused by the operation of the line.

The exceptional network of RoW provides multiplicity of walks. The area attracts large numbers of visitors, individuals families and larger groups such as DoE candidates. They come to walk, cycle, visit local attractions and enjoy local amenities. While many spend money on meals and snacks, there are others who spend very little but are able to enjoy the countryside. One of the purposes of the AONB, as part of the government's sustainable and health agendas, is to provide opportunities for recreation and enjoyment. This is completely overlooked in the DES and in the evaluation of the AONB in 27 section 2.

There is no section on Well-being, health or indeed safety contained within CFA9 or 27. There is already substantial anecdotal evidence of stress-related illness suffered by residents locally who stand to lose their homes and businesses through compulsory purchase, who are suffering property blight, or those away from the route who cannot sell properties that are significantly devalued.

Loss of personal equity is not considered, here or in the socio-economic section.

## Section 6 Cultural Heritage

Volume 1 also states that baseline activities have been carried out but this research has not been made available. It is ongoing. It raises the question why we are being consulted when key information is not available. It is not possible to comment properly on the archaeological impacts of the proposed scheme when so much work is yet to be done.

Assessment within 500m is inadequate. Volume 1 identifies a baseline of 5 kilometres, narrowing down to a study area of three kilometres. This is too limited. The 'zone of theoretical visibility' is an unacceptable concept. It is perfectly feasible to map the visibility of HS2, as the Chilterns Conservation Board has done for the area of the Chilterns AONB. HS2 Ltd should have produced visibility and noise contour maps as a starting point and assessed the impact of HS2 on all heritage assets within sight and sound of the route.

The list of designated and non-designated assets is incomplete.



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As with other sections, the CoCP is used to provide a false reassurance. Despite the describing how the principal undertaker and contractors will manage the impact of construction works on cultural heritage assets there is very little on how these approaches are to be monitored or enforced.

It is essential that the principle undertaker (HS2 Ltd) should pay local authorities to employ, or retain the services of, well-qualified and experienced archaeologists and field officers who will monitor the construction works on a regular and frequent basis to ensure that the CoCP is adhered to. The Local Authority must have the power to order work to stop so that finds can be investigated and if they consider that the contractor is not abiding by the provisions of the CoCP in relation to heritage assets.

Given that the zone of theoretical visibility is theoretical rather than actual there has been no assessment on individual sites it is unclear how the judgement of 6.5.7 is reached.

The section minimises the impact of the loss of ancient woodlands although acknowledged in residual effects.

*Limitations to the landscape earthworks at Mantle's Wood to reduce impacts on the ancient woodland and potential medieval archaeological remains... Mantle's Wood, Farthings Wood and Sibley's Coppice ancient woodlands are assets of high heritage value and would be **partly** removed.*

The impacts on Mantles Wood are such that it will disappear. The fragments that will not be grubbed up during construction will be undermined as a result of changes to ground water levels resulting from the digging of a very large ditch. It is questionable how far any remaining part would be protected from the impacts of construction, given the weaknesses of the CoCP. What remains of the three woodlands is unlikely to survive in the changed topographical circumstances.

## Section 11 Sound, noise and vibration

A sound study area of 3km either side of the proposed route was used in the AoS as it was considered sufficient to encompass all areas subject to potential airborne noise impacts – Appendix 5 AoS Technical Report section 5.2.1.

However the study limit in the draft ES was reduced to 1km and it does not take into account the effect of the local topography such as the transmission of sound across the Misbourne valley towards Prestwood and Little Kingshill approximately 1.5 to 2kms away.

Paragraph 11.4.1 states: *The baseline sound environment for the area as a whole is typical for a rural 'market town' area. All roads in the area are quite busy, especially during the day, with the most notable source being the A413, which is a particularly dominant source close to the ventilation shaft at Little Missenden. Baseline levels are also elevated at receptors in close proximity to the existing Marylebone to Aylesbury line.*

The areas through Hyde Lane, South Heath and Potter Row cannot be described as having noise levels similar to a 'rural market town'.

No baseline ambient sound data has been published in the draft ES to support the sound contour maps.

Measurements to produce the baseline data were one hour samples and taken during the day on the grass verges of local roads and in some instances close to fences. The baseline data will be

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strongly influenced by the traffic noise both directly and by reflection off any fence. The data is not representative of noise by a dwelling; certainly not representative of sound levels in a tranquil area and was not carried out long enough for a viable measurement to be produced.

It had been accepted previously by HS2 that peak noise levels would also be assessed and published; they have not been included in the draft ES. It is peak pass-by noise that will have the most impact on individuals and communities.

The WHO states that most countries in Europe have adopted 40dB as the maximum allowable daytime level and therefore sound contour maps should include a further band 50 to 40dB daytime.

Where HS2 consider there is an equivalent continuous sound level of  $\geq 65$ dB daytime, it will be regarded as significant and qualify for an insulation grant – in the CCAF9 report section 11.6.10 there is one dwelling in Hyde lane which qualifies in the draft ES.

The WHO guidelines for community noise advise that 55dB should not be exceeded to protect people from being seriously annoyed in outdoors areas.

There is no assessment of night time noise through ongoing maintenance.

The operating hours of the railway have increased since first consultation.

Noise issues will result in a significant impact on the character of the AONB along the ridge , across and up and down the valley. This in turn is likely to have a long-term impact on leisure tourists to the area.

## 12. Traffic and Transport

The transport section concludes that there are no significant transport related effects during operation. We strongly dispute that assertion. The transport infrastructure associated with the project results in a dissonant urbanisation completely out of character with the environment and, in combination with other effects, effectively despoils this part of the AONB.

Volume 1 Paragraph 7.3.40 states that the benefits of three schemes under consideration would be delivered at the expense of substantial and prolonged disruption to existing rail users. It is currently planned to build HS2 on the un-costed, hidden subsidy provided by individuals and businesses along the line as they suffer substantial and prolonged disruption caused by traffic problems.

Much of the commentary within the consultation document is associated with construction. We note the comments with reference to the draft CoCP and the defined good practice. We also note that the policing of such policies as laid down will be by the principal contractors and independent scrutiny is undefined. There is insufficient stress on the independent role of the local authority to monitor transport planning or activities in this section or in the draft CoCP. This is a serious omission.

Time and cost will be principal drivers of the scheme. It is difficult to provide detailed comment because aspects of the scheme have not yet been assessed, e.g. capacity of junctions, or, still being developed e.g. mass haul strategy.

The separation into two forum areas disguises the significant HGV and LGV movements. Essentially there is a construction site from Mantle's Wood to Wendover with multiple access points. However,

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all access points are dependent on the A413 and then often use the same core of roads as routes to gain access to different compounds.

A conservative estimate using figures from the documents suggests that there will be in excess of 800 two-trips per day using the A413 to service the sites in the two Central and Wendover forum areas. The A413 is also under pressure from the construction work in the Chalfont area of the route (CFA8) and possibly from some site access in the Stoke Mandeville area (CFA11). The cumulative effect on residents is not identified. The proposed scheme will be subsidised by the un-costed delays and frustrations of residents trying to travel along the A 413 and the loss of amenity during construction.

The A413 is not a major transport corridor as described in Volume 27. There are stretches of dual carriageway but also long stretches of single carriageway. Apart from peak times in morning where there is a significant traffic flow towards London and the reverse in the evening, the road serves to provide links to local villages and towns along the valley and environs.

We welcome the statement at 12.5.9 regarding reduction of lorry trip generation at peak traffic periods. Within CFA9 there is intense local traffic into Great Missenden from outlying villages, delivering pupils to schools, including coaches from about 7.30 to 9.00 and similarly around 15.30.

We wish to reinforce the point that transport activities should be at a minimum at this time. Transport to and from the sites should also be avoided at this time.

On occasion, the A413 has been blocked because of traffic accidents. Locally, diversions for light vehicles have been established, often through Great Missenden and Little Missenden; such diversions are not suitable for HGVs.

The text states that construction traffic will be spread over a number of roads. This is misleading in that the A413 will be used by all construction traffic in this area. The B485 will be used heavily both for traffic feeding into Kings Lane and Hyde Heath Road. Hyde Heath road is used extensively in the early morning and evening by drivers avoiding congestion on the A413.

These are rural lanes. Hyde Heath Road Frith Hill, Frith Hill South Heath Leg, Kings Lane and Potters Row are part of established, published cycle ways. Potters Row and Hyde Heath Road do not have pedestrian pathways but are used by walkers, horse riders and farm equipment. The text states that '*Congestion may occur to users of King's Lane (level of effect to be determined)*'. Kings Lane is residential and served by a bus route.

Bucks CC will be able to advise whether these rural lanes have foundations sufficient to cope with the pounding they will receive. It is a local concern. Kings Lane has 30mph limit. Hyde Heath Road has a 60mph limit to the start of the village and Potters Row has a 40mph limit. In conjunction with Bucks CC consideration should be given to lowering the speed limit along these lanes for the duration of construction.

HGV access into Frith Hill South Heath Leg is ill advised. It is potentially dangerous and would require a truck to move well over into oncoming lane in order to make the turn. The turn is very steep and when wet and covered with leaves is very slippery. This has been raised at the forum and indeed at the consultation road show.

Access from Hyde Heath Road onto B485 is a local accident spot. There are deceptive sight lines to the right. It is also a school coach drop off point. Other accident black spots are the junctions with

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the A413 at Deep Mill, Chalk Lane and Keepers Lane. The cross roads in South Heath are a school pick-up and drop off point and has limited sight lines. School coaches drop children off at various points along Potters Row.

Closure of Frith Hill South Heath Leg for vehicles and pedestrians would sever PRoW links to Great Missenden used by local residents, including children and students to walk to school. The proposed deviation is not suitable for pedestrians.

Road closures, traffic diversions and the huge increase of traffic due to construction will affect communities a number of miles away from the proposed construction trace. Chesham is accessed via the B485 and could be affected in a number of ways. Firstly, it is totally unsuitable for construction traffic and if any was to use it there is a very high likelihood that Old Chesham (Church Street) would become blocked. Second, heavy traffic loads will restrict access from the Chilterns villages area to Chesham and have a negative effect on trade.

There is little information about haul roads. Clearly they will be used for the safe operation of the site. Hopefully effective programming will ensure that plant equipment crossing public roads and for example the use of traffic lights will be kept to a minimum especially at times of peak traffic flows and especially but not exclusively any crossing of the B485.

There are references to diversions and permanent re-routing of PRoW in this section. They are not shown on maps.

Advance notice of road closures should be publicised well away from the actual closure. Advertisements in Specialist magazines for Riders/Walkers/Cyclists and bodies such as Sustrans should be informed of the fact that heavy plant will be in operation along the HS2 proposed route. The information sessions in local schools regarding safety during the construction period identified in CoCP is helpful. The document focuses on potential traffic disruption. Safeguarding of pedestrians is insufficiently stressed. Information regarding possible deviation of PRoW's should be provided at key points on the PRoWs.

At the bilateral meeting with LMPC the provision of cycleway/footpaths alongside the A413 where there was no immediate parallel route was requested. It is noted that no notice has been taken of this request.

There should be ongoing protocols established with emergency services to reflect changing circumstances. The A413 is key to accessing Stoke Mandeville hospital emergency department.

## Response to CoCP

The CoCP is used throughout the DES to provide reassurance and to minimise the impact of the project. The language used throughout the DES, for example the frequent use of the word '*ensure*' indicates a degree of certainty that important concerns will be mitigated by the CoCP. The reality of the CoCP is very different. '*Ensure*' becomes when '*reasonably practicable*.'

The main thrust of the responsibility for delivering the requirements of the Code has been placed on the contractors. There is little or no reference to enforcement or the role of HS2 Ltd in this. Neither is there any reference to the County and District Councils and the exercise of their statutory duties and obligations. This means that enforcement of the Code's provisions is weak and it appears that there will be no one who has responsibility for ensuring that contractors adhere to it.

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HS2 Ltd will take '*reasonable steps*' to engage with the community. Past experience of '*engagement*' with HS2 Ltd shows that little notice is taken of community representative's views. It leaves the question of what the alternative unreasonable steps would be and who or which organisation decides on this. What are the tests for reasonableness?

The Local Environment Plan site controls will be provided after the Bill Submission has been made in support of the Hybrid Bill. Any comment, which local authorities, other organisations and the community wish to make on this, will have to wait until then. Commenting at that stage will be an expensive and difficult task and may well prove to be too late.

*Best Practicable Means (BPM) will be applied during construction' defined as 'those measures that are reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to financial implications'*

Best Practicable Means appears to be decided by HS2, not independent assessors and is limited by commercial considerations.

## Working Hours

Most of the major activities associated with the construction phase of a train line, such as earthworks, concrete pours are not limited to core working hours.

In addition, the contractor must conform to core working hours for other construction activities '*as far as reasonably practicable or unless otherwise permitted*' presumably these are judged by HS2 Ltd.

This clause does not provide the rigour and independent monitoring and enforcement required to safeguard the local community and ensure the majority of the works are indeed carried out within the core hours.

## Noise

There is no provision in the COCP for failure to reach agreement with the local authority. Nor does the COCP define actions to be taken if the agreed s.61 levels are breached and does not include for independent monitoring, control and enforcement, to safeguard the local community.

In reality, noise emissions will be significant and unavoidable and the only way to reduce the impact on the community is to rigidly apply limits to working hours for all activities near premises, which is at odds with Section 5 of the COCP.

## Dust

HS1 produced a lot of dust. HS1 was an exemplar project and construction of HS2 will largely employ the same designers, contractors and technology used on HS1, so the impact on the community will be similar.

With regard to Section 7 of the COCP,

- '*Erection of hoardings or other barriers along the site boundary*' will not mitigate to any significant degree, dust arising from earthworks and transportation of spoil

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- Dump trucks operating within the site boundary will not be sheeted
- Stockpiles are located near the site boundary in the Draft Environmental Statement
- Spoil material stockpiles are too large to be adequately watered or sheeted
- Even haul roads surfaced with granular material will generate dust under heavy trafficking
- Excavation and depositing of spoil in live working areas will not be on hard standing.

In reality, significant emissions of dust are a natural consequence of major earthworks and the extent of emissions may be reduced by watering but never eliminated.

**No trigger levels for dust emissions have been included in the COCP.** In addition, though the *'relevant local authorities will be consulted regarding the monitoring procedures to be implemented,'* there is no allowance for the rigour of independent monitoring and enforcement required to safeguard the local community.

The CoCP makes no mention of site-specific dust assessment. This is essential given the proximity of the route locally to hospitals, schools, residential homes and farm land. The National Planning Policy Framework makes it clear that a dust assessment study should be undertaken by a competent person/organisation with acknowledged experience of undertaking this type of work. The scope of a dust assessment study should be agreed with the contractor and local planning authority.

## Visual Intrusion

The major earthworks and construction of large structures cannot in reality be disguised by anything other than the natural topography of the land – except where unsightly spoil heaps are located between the worksites and public areas.

*Relevant local authorities.....will be consulted, as appropriate'* does not provide for agreement with local authorities to locate compounds away from public view and therefore does not safeguard the local community.

## Traffic

The Traffic Management Plan will be compiled and monitored by the contractor, with no provision for independent monitoring, control or enforcement.

Important aspects of the implications for traffic are incomplete.

- The COCP traffic management states *'procedures'* and *'measures'* will be put in place to mitigate traffic impact, which is meaningless without some description or examples of what these measures and procedures will be
- *'public access is maintained where practicable'* presumably means that access will not be maintained if considered not practicable by HS2
- The construction works will require road closures and diversions which will impact the local community
- Vehicle sharing by the workforce has historically not been achieved to any significant scale
- HS2 workforce will be trying to get to work at the same time as local commuters and when school bus trips are taking place, resulting in significant peaks.
- *'Phasing of the works'* to reduce traffic congestion is unlikely though deliveries are not restricted to core working hours
- It is likely that traffic control will be required where 'B' roads intersect, such as the B485, to allow construction traffic to cross, which will impact on local road users

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## Heritage concerns

Despite the assurances describing how the principal undertaker and contractors will manage the impact of construction works on cultural heritage assets there is very little on how these approaches are to be monitored or enforced.

The reality is that HS2 Ltd manager's construction companies will be incentivised by bonus schemes that reward completion of the line at least on time and on budget. They will regard considerations about the historic environment and heritage assets as an impediment. They will have no incentive to take account of them during the course of normal working and every incentive to disregard them wherever possible. It is therefore essential that strong enforcement provisions be written into the CoCP to ensure that it is adhered to.

The principle undertaker (HS2 Ltd) should pay local authorities to employ, or retain the services of, well-qualified and experienced archaeologists and field officers who will monitor the construction works on a regular and frequent basis to ensure that the CoCP is adhered to. The Local Authority must have the power to order work to stop so that finds can be investigated and if they consider that the contractor is not abiding by the provisions of the CoCP in relation to heritage assets.

## Conclusion

There are insufficient independent controls in place to safeguard the local community from the adverse impact of HS2. Appropriate '*procedures*' and control '*measures*' should be agreed with local authorities before implementation.

Requirements for Noise and Dust Emissions should be based on the NPPF Technical Guidance for Minerals issued by the Department for Communities and Local Government in March 2012, which should be regarded as the minimum acceptable.

As happens on other projects, HS2 limited should pay the local authorities to employ additional, project-dedicated Environmental Health Officers (EHO's), to monitor and ensure that these agreed '*procedures*' and control '*measures*' are in place and are being complied with.

The local authority EHO's should also have the powers to suspend the works should the agreed control measures be breached, until more rigorous measures have been put in place.

Apart from works that have to be carried out on a 24/7 basis, e.g. tunnelling, no work should be permitted on Sundays except with the prior agreement of the local authority. Applications must be made 14 days in advance and the work to be done specified in detail. Bank Holidays hours should be the same as Saturdays.

Bearing in mind that half the archaeological sites excavated during the construction of HS1 were unknown before work started, HS2 Ltd should also pay for local authorities to employ dedicated archaeologists to maintain an effective watching brief. The principals of Planning Policy Statement 5, issued in 2010, should be applied to sites affected by any aspect of work on HS2.

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Forestry haulage route HS2 plan shows as access to Mantles Wood which is not Bull Baiters



Hyde Heath Road which is unsuitable for HGV traffic



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Junction of Hyde Heath Road and Chesham Road a recognised accident black spot



Hyde Heath Road has a 60 mph speed limit which means vehicles enter Hyde Heath at speed around a blind bend.



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Chalk Lane Bridge under the Chiltern Line



Forestry track off Chalk Lane to Mantles Wood.