

## **HS2 consultation on the draft Environmental Statement Response by Buckinghamshire Archaeological Society**

This response, consisting of six pages, is made on behalf of:  
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The Buckinghamshire Archaeological Society, founded in 1847, is one of the oldest in the country and is the senior body in the county of Buckinghamshire in archaeology, architecture and local history. We have over 400 members representing the archaeological and historical community across the county. We are not anti-HS2 in principle but are concerned to protect Buckinghamshire's historic environment and wish to ensure that the full impact of HS2 is understood before the Proposed Scheme is given final Parliamentary approval. To this end we have an active project researching the likely impact of HS2 on various heritage sites and buildings in Buckinghamshire. Our reports on the following places have been deposited in the Historic Environment Record, supplied to HS2 Ltd's archaeologists and published on our website [http://www.bucksas.org.uk/hbgprojects/2011\\_1.html](http://www.bucksas.org.uk/hbgprojects/2011_1.html)

**Twyford:**

**Chetwode**

**Potter Row, Great Missenden**

**Road Farm Barn, Wendover Dean**

**Doddershall**

We have also published a pamphlet on **Stoke Mandeville's deserted village** which has been widely distributed, including to HS2 Limited and its archaeologists.

Our report on **Doddershall Lodge**, due to be demolished as part of the Proposed Scheme, is in preparation.

We have had two "bilateral" meetings with HS2 Limited's archaeological consultants and have attended meetings of the various HS2 Community Forums for the county. We have responded to all the public consultations on HS2 including that on the Scoping and Methodology of the Environmental Statement.

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Our comments on this consultation are as follows:

### **The consultation process and documentation**

For a consultation involving such voluminous documentation and complex maps it is essential to be able to peruse hard copy versions. It is not reasonable to expect people to read the documents and maps on a screen, or to print off their own copies and HS2 Ltd should have allowed for this. The day after the consultation was announced we ordered a full set of documentation. The order-line was clearly not geared up to cope and we received only two documents. We know of others (including the County Museum) who had similar experiences. It was two weeks before we received the complete set. The schedule was already tight – with a consultation period of eight weeks (not the twelve weeks mooted at the outset of the project) – and effectively made shorter by HS2 Ltd’s shortcomings.

The map books are difficult to interpret, especially since they have no titles to indicate which layers they are intended to display. Profile maps are crucial but are only available online. The lack of printed profile maps is hard to understand when they have been provided throughout the project so far. Aerial photographs would have helped, as we have found in the Stoke Mandeville Community Forum where part of the route was superimposed on a combined aerial photograph and map to help elucidate suggested refinements to the scheme.

Briefing sessions at the consultation events were offered to Community Forum members. The one at Wendover amounted to a huddle of people standing in a corner of the busy main exhibition hall trying, and mostly failing, to hear a briefing by HS2’s representative amidst the general hubbub. This was clearly inadequate, a waste of time and something of an insult to those, like our representative, who had made a special journey to attend the “briefing”.

The consultation events were held too early in the consultation period for the public to have absorbed any of the documentation and there has been no later opportunity to ask questions or seek clarification. HS2 Limited’s decision to suspend the community forums for Buckinghamshire has meant there has been no opportunity for an informed discussion at community level about the draft which is essentially a technical document of a type not familiar to lay-people.

In the circumstances we believe the consultation should have been longer and the process could have been handled better.

### **General comments on the draft Environmental Statement (E**

Our area of interest and expertise is in the historic environment so we confine our comments to the **Cultural Heritage** topic.

#### **The Baseline**

First, we are surprised and disappointed at the paucity of information. The baseline is manifestly incomplete. We appreciate that the ES is a “work in progress” (para. 5.6.5 of Volume 1) but there is no sufficient explanation as to why the baseline information is so incomplete. We can only assume that this is mainly because of editing of the draft and/or the rush to get the document out in time to meet the government’s timetable for the scheme.

In particular we note the lack of information about undesignated heritage assets, data which we know have been supplied from the county’s Historic Environment Record. None at all are shown on the maps.

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We know that it has been difficult or impossible to obtain access to some private land – indeed we heard that access to only about half of the study area had been obtained. This is worrying since we understand that the High Speed (Preparation) Bill will not give powers of entry onto private land. So we can envisage a situation whereby the baseline for the Cultural Heritage topic of the final ES will still be inadequate because the appropriate surveys and archaeological investigations have not been done.

### **Potential Benefits – “knowledge gain”**

It has been said that for Buckinghamshire HS2 is “all pain and no gain.” It seems to us that one (perhaps the only) potential benefit for the county is the wealth of information about its past which could be obtained from a proper programme of historical research and archaeological investigation, involving excavations where appropriate. This should bring opportunities for community engagement and an exciting educational programme. Enough resource needs to be earmarked within the HS2 project for this as well as for the publishing of results and curation of finds. Our Society is closely connected to the County Museum. We founded the Museum (now run by Buckinghamshire County Council) and still own the museum building and a substantial part of the collection. These are points we have mentioned to HS2 Ltd’s archaeological contractors and we know they have also been raised by the County Archaeologist. It is disappointing to see little or no mention of this aspect in the draft ES.

### **Interoperability**

The whole of the British landscape is cultural; it has been shaped by man working both with and against the natural environment. Planning guidance recognises that the historic environment is all around us so it is not just relevant to the Cultural Heritage chapter. The overlap with other topics such as ecology, landscape, noise/vibration and water is mentioned in the assumptions set out in para. 8.7.2 of the Scope & Methodology Report (SMR) but we could see no recognition of this in the Cultural Heritage chapters. Historic landscapes are included in the list of heritage assets but receive scant coverage in the Cultural Heritage topic which could be expected to cover field-patterns, historic lanes/routeways and hedgerows. Has the potential for vibration damage to historic buildings with no foundations been properly considered? We could see no corresponding coverage under the other topics, as envisaged in the SMR. It seems that these matters have “fallen through the gaps” in the draft ES. If they are not adequately covered in the Cultural Heritage chapter in the final ES they should be dealt with elsewhere and cross-referenced.

### **Assessment**

We had expected to see some sort of matrix showing the assessment of both heritage significance and magnitude of impact for each heritage asset, as per Table 13 of the SMR. Not only is the identification of assets for the baseline incomplete but we can find no consistent assessment of either significance or impact leading to an overall significance of effect. In these circumstances it is really not possible to comment on the findings of the draft ES.

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### **Mitigation**

Again there are few site-specific details of proposed mitigation measures in the CF area reports, presumably stemming from the inadequacy of the baseline. In the absence of an adequate baseline the draft Code of Construction has more detailed provisions and we give our comments on this later. The potential for mitigation measures, such as planting or earth bunds, to damage archaeological remains is hardly mentioned. The draft ES reveals how existing watercourses may be changed and new ones created, again giving rise to the potential to affect buried archaeological remains.

### **The Chilterns tunnel option**

Even without an adequate baseline the extent of the loss and/or damage in the Chilterns is evidently extensive and particularly unacceptable in an AONB. Most of the adverse impacts could be avoided by a bored tunnel throughout the Chilterns (from Colne Valley to Wendover); in particular the severe residual impacts at Hyde Lane (an example of a typical Chilterns dispersed settlement) and the need for a viaduct at Wendover Dean, which, on the strength of the photomontage, can only be described as an eyesore. We assume that the concrete balancing ponds, which with the best will in the world will never look natural, features uncharacteristic of the dry Chiltern valleys, would also be unnecessary. Such a tunnel would in any case appear to be the common-sense solution rather than the Proposed Scheme with the line rising through a tunnel which emerges at the high point of the line.

### **Design**

Good design will be an important element in mitigating the visual impact of the scheme. Many Victorian railway structures have blended well into the historic landscape unlike the urban looking concrete bridges, viaducts and other structures currently envisaged by HS2 Ltd.

### **Volume 2: Route Wide Effects**

Para 7: We do not accept that impacts on nationally designated assets should be deemed to be of only local significance. The setting of non-designated assets has been ignored contrary to the Scope and Methodology Report (SMR) para 8.2.21. Grims Ditch is a scheduled monument in its own right and so the whole asset, not part, will be lost.

### **Noise**

Noise from construction and operation has the potential to impact heritage assets and their setting. We note that the night-time noise levels are shown in all cases as being lower than those during the day because there will be fewer trains. This is clearly counter-intuitive when viewed from the perspective of the people on whom the noise is inflicted because noise is more noticeable and potentially more disturbing during the night when ambient noise is reduced.

### **Comments on Community Forum Area Reports**

We would welcome the opportunity to have further discussions with HS2 Ltd's archaeological contractors about these and other matters. These are just some of the issues which we feel need to be addressed before the final ES is prepared.

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### **Area 7: Colne Valley**

We think the significance of the heritage value of the complex at The Savay (said to be the oldest secular building in the county) and the scheduled monument have been underestimated. The proposed move of the viaduct a little farther away is welcome but the magnitude of the impact on setting will remain high. Therefore we do not agree with the conclusion that there will be no residual effects. The potted history ignores the importance of the canal in the history of the area. There appears to be a mistake in the labelling of one of the lakes as “Kroda”. This must be “Korda” named after the famous film producer/director, Sir Alexander Korda, who lived at the Fisheries, now demolished. The role of the film industry in the history of the area, which also accounts for the listed former Rank laboratory at Denham, has also been omitted.

### **Area 8: The Chalfonts and Amersham**

We are concerned about the possibility for harm from noise and vibration during construction and operation, particularly on listed buildings including the walled garden at Shardeloes and possible changes in water level affecting Shardeloes lake. We could find no mention of the Chiltern Open Air Museum whose operation may well be affected during construction because of traffic and road changes.

### **Area 9: Central Chilterns and Area 10: Dunsmore, Wendover and Halton**

More attention needs to be paid to the heritage of Potter Row which we believe could merit designation as a conservation area. Apart from that we make no comment here in view of our observations and preference (stated earlier) for a full bored tunnel.

### **Area 11: Stoke Mandeville and Aylesbury**

We were pleased to note that the site of Stoke Mandeville old church and deserted village has been given high value. The results of our research are known to HS2 Ltd so we are disappointed about the lack of information to support the assessment and about site-specific mitigation measures. We estimate that there may be about 3,900 burials in the churchyard. The proposed maintenance loops will clearly destroy even more of the site, and introduce an industrial character to this tranquil rural place. The impact on the setting of Stoke House will be greater too.

The site is maintained as a nature reserve by the Parish Council and is a popular route for walkers. It is an asset for the community which appears not to be fully recognised in the Community topic of the draft ES. There are bound to be local people whose ancestors' remains would have to be exhumed and we are not at all sure that HS2 Ltd has grasped the technical and cost implications arising from the archaeological challenges – with associated lengthy and expensive investigations – or the potential for impacts on the community.

### **Area 12: Waddesdon and Quainton**

The focus for our research in this area has been Doddershall and we are pleased to note that mitigation measures are still being considered. It is unusual for an historic estate to continue as a working farm in the hands of the same family over such a long period. We would be happy to share our information to assist in this process. We have surveyed the Lodge which would be demolished and our report is in course of preparation. There is little or no recognition of the importance of the heritage of the Great Central Railway much of which would presumably be destroyed.

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### **Area 13: Calvert, Steeple Claydon, Twyford & Chetwode**

We provided copies of our reports on Twyford and Chetwode to HS2 Ltd's archaeologists so are disappointed to see so little baseline information. As with the other reports the potted history lacks detail and breadth to give a proper understanding of the area. Non-designated assets have not been covered. In particular there is no recognition of the significance of buildings at Portway Farm, which probably have sufficient interest to merit listing. The potential loss of a listed building at Calvert Shepherd's Furze farmhouse which has important historical connections to the Verney estate is deeply regrettable but it was probably already "at risk" thanks to its proximity to the IMD. The feasibility of moving the building to another site should be considered. A minimum English Heritage Level 5 recording should be done before any dismantling or demolition. The effect on the setting of non-designated assets has not been mentioned (as required by the SMR (para.8.2.21)). As in other areas we are also concerned at the lack of consideration about the potential damage to archaeological remains from mitigation measures such as bunds and ponds.

### **Draft Code of Construction Practice (CoCP)**

Our main concern is over accountability and enforcement since it seems that HS2 Ltd (a government backed organisation) seeks to delegate responsibility to its nominated undertaker (presumably a commercial enterprise as yet unknown). We believe this is not standard practice for large infrastructure projects such as Crossrail and the Olympics where Crossrail and the ODA respectively remained responsible under the CoCP.

The CoCP should clearly state that that it covers not only the area affected by construction of the line itself, but also disturbances caused by ancillary works e.g. bunds, noise barriers, road construction, haulways, pipelines, and contractors' compounds. It must cover ALL works.

Certain statutory undertakers and other bodies who will need to carry out work arising from the scheme may not be bound by the CoCP since they would not be directly contracted to the Nominated Undertaker. This situation needs clarification, perhaps in the mitigation measures which would ultimately be approved by Parliament.

The proposed line would cross three areas of Buckinghamshire which are known to have produced the remains of Pleistocene (Ice Age) mammals. . This is a time zone which can fall uncomfortably between a number of bodies on occasion, the concerns of archaeologists (represented broadly by English Heritage), that of quaternary scientists (the British Geological Survey) and countryside sites in general (Natural England).

Advance investigation of these areas (and potentially others) would be important whether or not they can be demonstrated at this point in time to be directly connected with the early activities of man. This will undoubtedly be relevant also to other counties. It would be helpful if there was evidence of 'joined-up thinking' in this area.