



HS2 Phase One environmental statement consultation

Response Form

This consultation will close on 27 February at 23:45

On 25 November the High Speed Rail (London – West Midlands) Bill was introduced to Parliament seeking the powers necessary to construct and operate HS2 Phase One. In line with Parliamentary Standing Orders an Environmental Statement has been produced to accompany the Bill. A consultation is now being held on the Environmental Statement to ensure that the decision taken by Parliament at Second Reading of the Bill is informed by the public's views on the Bill's environmental impacts.

You can respond to this consultation by emailing your comments to:

HS2PhaseOneBillES@dialoguebydesign.com

Or writing to:

FREEPOST RTEC-AJUT-GGHH
HS2 Phase One Bill Environmental Statement
PO Box 70178
London
WC1A 9HS

You can also respond by downloading and saving this response form to your computer, completing it, and then attaching it to an email and emailing your comments to HS2PhaseOneBillES@dialoguebydesign.com. You can also print your form and send it to the address above.

Please only use the channels described above when responding to this consultation. We cannot guarantee that responses sent to other addresses will be included in this consultation.

For more information about the consultation please visit www.gov.uk or call the HS2 Public Enquiries Team on 020 7944 4908.

Please write your response clearly in black ink within the boxes and, if you require further space, please attach a further sheet to the response form.

Information about you

It is important to give us your name to ensure your response is included

First name: DAVID
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Are you responding on behalf of an organisation? If so, please state your organisation's name and your position below:

On Behalf of the Little Missenden Action Group Chairman
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Confidentiality and data protection

Anyone wishing to send comments should note that responses will be published on a publicly-accessible website in due course, but we will not publish names, addresses and signatures of individuals. As it is not possible for us to check whether the substance of responses contains other personal data, you should not include information in your response that could identify you unless you are happy for it to be made public.

If you do not want any of your response to be published you should clearly mark it as "Confidential" in the "subject" of the email or at the top of your letter. However, please note the following two paragraphs.

If you want the information you provide to be treated as confidential, you should be aware that all information provided in response to this consultation, including personal information, may be subject to disclosure in accordance with access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). Under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with our confidentiality obligations. In view of this it would be helpful if you could explain in your response why you regard the information you have provided as confidential. If we receive a request for disclosure of the information you provide we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department for Transport or HS2 Ltd.

Please note that all responses received, whether marked Confidential or not, will be passed on in full to the Houses of Parliament and their appointed Assessor, who will analyse the responses and make a report to Parliament. That report will not contain your personal data.

I wish my response to be treated as confidential (please write your reasons below)

The Environmental Statement is made up of a number of documents. The Non-Technical Summary provides a summary of all the information contained in the Environmental Statement.

Volume 1 provides an introduction to the Environmental Statement including an overview of the impact assessment process and consultation undertaken to date, and the main strategic, route-wide and local alternatives considered.

The line of route between London and the West Midlands is described in Volume 2, which has been divided into 26 smaller geographical sections called Community Forum Areas (CFAs) and each area is covered by its own separate report.

Volume 3: route wide effects described the likely route wide environmental effects of the construction and operation of Phase One of HS2.

Volume 4: off-route effects describes the likely significant environmental effects of Phase One of HS2 expected at locations beyond the route corridor, such as rail stations, rail depots and rail lines. This volume covers areas not included in the community forum area reports in volume 2.

Volume 5 contains technical appendices, including the response to the draft Environmental Statement consultation and the draft Code of Construction Practice, setting out baseline data and other technical information.

Please let us know your comments on the Environmental Statement in relation to the Non-Technical Summary and five volumes.

Question 1. Please let us know your comments on the Non-technical summary.

My comments on the Non-technical summary are:

Non-Technical Summary

Our comments on the NTS, as for the whole ES, are on a without prejudice basis as it is impossible to review the documents with numerous inconsistencies and errors in the limited timescale and so are unfair and prejudicial to an informed response

The non-technical summary is a key document. As it is a summary, it is likely to be the document that is referred to initially and may be, for many, the only document that is looked at. This is especially true given the short timescale to consider and respond to the ES. Therefore it carries a significant responsibility. A member of the public has every right to expect, albeit it in summary form, that the picture of the impact, particularly the total environmental impact, of the proposed scheme is accurate. This it fails to do. It consistently seeks to minimise the impact of the scheme.

This key non-technical summary document has been prepared by 'a group of independent engineering consultants on behalf of HS2.' The two consultants listed, Arup and URS respectively are described as being 'engineering, design, planning, project management and consultancy and 'engineering construction and technical services.'. Therefore it either dismisses the environmental impact of HS2 or, where it recognises impact, it seeks to downplay and minimise the effect. The description of the project is essentially engineering based and any serious attempt to reduce the environmental impact appears to have been lost to the expediency of cost, such as the proposed extended tunnel through the AONB.

A factor in the rejection of the conventional rail-based alternatives to the London to West Midlands high-speed line is the disruption to existing rail users. The very real disruption to communities by designing and building a high speed link has been totally ignored. Arguing that one scenario will cause disruption as a factor for rejection whilst ignoring the massive impact of construction of the other on communities is totally unacceptable. Nor is there any exploration of seeking to increase classic speeds. It is unclear how trains travelling at 225 mph will increase resilience and reliability *across the network*.

The impact on communities is minimised. The cumulative impacts such as across community forum areas are not assessed, yet within a linear project are key considerations. The very design of the EA in its segmentation and short period of consultation guarantees that no reader will gain an over-view of cumulative impact on the environment.

The Non Technical Summary, with significant omissions and errors many of which are recorded in this response, ignores the environmental impact of the proposed scheme and so is not fit for purpose.

Specific Comments:

6.5 Local alternatives

6.5 - HS2 Ltd notes mitigation which has been agreed for the residents of Northolt by making a previously open track section, a tunnel. The justification given for this tunnel is very similar to the arguments that exist for an extended tunnel in the Chilterns AONB tunnel viz. "This greatly reduces the extent of landscape and visual, sound, noise and vibration and traffic and transport effects"

As the impact on the environment for the Chilterns AONB is substantially worse than at Northolt – a built-up area - an extended tunnel cannot be dismissed for an area of such National importance.

Alternative proposals to extend the Chilterns tunnel to tunnel throughout the AONB have been made to HS2 who have admitted these alternatives are perfectly acceptable from an engineering perspective. However the proposals have been dismissed on grounds of cost without any supporting justification of costs being provided by HS2. Furthermore the effect of non market benefits (as set out in the Brett report supplied in evidence to support the alternatives) have been ignored in assessing the costs. This alternative would perform well on environmental grounds compared with the present proposal, as it avoids a range of impacts upon environmental receptors. This includes the reduction of landscape and visual, ecological, cultural heritage, noise, community and agricultural impacts within the AONB as well as damage to Grim's Ditch scheduled monument.

Other reasons beyond cost (para 2.6.8) have been given by HS2 but these are being challenged as invalid and this proposal will be subject of petitions.

The omission of any reference to the acknowledged practical proposal to mitigate the environment of the Chilterns AONB, one of the most popular protected landscapes in the world, by means of an extended tunnel from the Non Technical Summary of the Environmental Assessment is a fundamental omission that demonstrates the NTS and the whole of the ES is not fit for purpose.

7. Environmental Overview

7.1 Introduction

The socio-economics summary refers to the creation of approximately 14,600 full time construction jobs and a further 5,460 for suppliers and through the money that workers will spend in the area. The ES fails to point out the minimum 12,700 jobs that will not be created by reason of proposed specific developments halted by HS2. It also ignores any transfer of construction workers from Crossrail that is scheduled to be completed as HS2 might commence.

7.1.2 - Traffic and Transport. Three paragraphs extol the benefits that HS2 will bring for inter-urban travellers. The fourth paragraph refers to the draft CoCP including mitigation and measures to reduce and manage traffic impacts during construction. It acknowledges the increased congestion and journey times and the necessity to close, realign or divert certain roads and public rights of way. The paragraph effectively dismisses the significant problems that the proposed scheme will cause throughout the road network. It fails to consider the cumulative impact of the project along its length on the road transport network, such as the closures of the Birmingham road and motorway network and locally multiple adverse impacts on the A413 and the village of Little Missenden, such as impeded access to the nearest Accident and Emergency services.

7.4 Community

The local effects are not confined to one local community, South Heath, as the NTS indicates. The extent is far wider than effects on South Heath. HS2 Ltd knows but refuses to acknowledge that Hyde Heath, Potter Row, The Lee, Ballinger, Wendover and Great and Little Missenden, Prestwood and Little and Great Kingshill will all be very significantly affected as well. The impact of the construction will spread far wider than the immediate route, all along the line. The NTS fails to make this clear.

The NTS makes extensive use of the word 'temporary'. According to Volume 1, features are either 'temporary' or 'permanent'. Road closures, diversion construction traffic on village roads will become a way of life for a three and a half year during the construction period and a two and a half year during the fitting out period. A total of at least 6 years with an additional gap between activities

for some affected areas is not temporary.

7.9 Landscape and Visual Assessment

The conclusion that “overall the special characteristics of the Chilterns AONB will not be significantly affected “ ignores the potential loss of the River Misbourne and Shardeloes Lake through damage to the aquifers, loss of ancient woodland and connected environment, and the visual effects of the route infrastructure through the centre of the AONB.

7.14 Water Resources and Flood Risk

The ES states HS2 has designed the project to avoid or reduce the adverse impacts of on rivers, streams and ponds, canals and groundwater. This statement is incorrect as to do so would have rerouted the scheme to higher ground along the top of a valley and not along the bottom of the valley, crossing the River Misbourne and its aquifer and under a grade 2 registered park and garden lake.

8 Summary of Environmental Effects by Area

8.9 Central Chilterns

The full potential traffic chaos becomes apparent. The NTS states that the A413 will experience congestion and delays in CF area 10 at several junctions (including B4009), CF Area 9 states the same at junctions with A 4123 and B 455 (in fact they are same junction) but further down the construction traffic route in CF area 8 at the first junction at Amersham it is stated there will be intermittent delays, even though there would be more sites and cumulatively increasing additional construction traffic. This cumulative effect will be greatest at the junction of the A355 and the A413 and this junction has been completely ignored.

The overview of the AONB makes no mention of the potential effect on the River Misbourne, Shardeloes lake and the aquifer that feeds not only the river but also the public water supply for Affinity Water that covers public water supply to parts of north west London. This is a fundamental omission.

The NTS has stated the aquifer is in ‘hydraulic connectivity’ with the river. No reference is made to any hydrological surveys being carried out by HS2 either for the tunnel route or the groundwater levels and flows. An independent survey was supplied to HS2 and this appears to have been ignored. This is another serious omission.

Question 2: Please let us know your comments on Volume 1: Introduction to the ES and Proposed Scheme.

My comments on Volume 1 are:

Volume 1 - Introduction to the Environmental Statement and the Proposed Scheme

Our comments on volume 1, as for all the ES are on a without prejudice basis as it is impossible to review and comment on documents with numerous inaccuracies and errors in the limited timescale and are so unfair and prejudicial to an informed response

Introduction

The Environmental Statement appears to have totally disregarded the submissions made to the draft environmental statement. Preservation of an AONB is paramount. The statutory requirement to preserve an AONB from development, unless no alternative is available (CROW Act. Section 85), has been totally disregarded. Practical alternatives to the proposed scheme have been submitted but have been ignored or dismissed without appropriate justification and explanation.

In 11.2.3 particularly in table 8, of local route alternatives, the extended tunnel proposals, that were accepted by HS2 as feasible from an engineering perspective and environmentally preferred, which would protect the Chilterns AONB have not even been listed and so deliberately have been omitted.

1.2 - The detailing of the Hybrid Bill procedure does not clarify lines of accountability post consent, should it be given, and the appointment of the principal undertaker. The Secretary of State establishes EMRs. The nominated undertaker will be required to comply with the EMRs. There is no description of the lines of accountability, or legal responsibilities of the nominated undertaker to comply with EMRs as the requirements sit alongside the provisions of the Bill and do not form part of it. This accountability, not only for the undertaker, but for Parliament must be included within the Hybrid Bill.

Parliament cannot devolve their ultimate responsibility but must remain accountable throughout the lifetime of the project. In the same way the CoCP which, it is claimed would include mitigation proposals, has to be included in the Hybrid bill in final form to have any actual effect on proposed mitigation. .

1.3.5 - The principal undertaker has significant powers of deviation. (*laterally upwards not exceeding three metres and vertically downwards to any extent and laterally to any extent within the limits of deviation for that work shown*) and only has to use *reasonable* endeavours to adopt measures to reduce adverse environmental effects reported in the ES, *provided that this does not add unreasonable cost or delay to the construction and operation of the proposed scheme*. Potentially, the powers of deviation will make significant differences to the impact of the scheme, especially, for example, where the scheme at South Heath has already raised the track height, to the detriment of the originally proposed mitigation. This is unacceptable, especially in a nationally designated protected area.

1.4 - The section on carbon emissions by diverting passengers and freight traffic from road and air to train from could be reduced is unsupported as reported on HS2's own website. The massive carbon emissions created by building the line will outweigh the carbon savings from modal shifts for at least 6 decades.

2 Background to High Speed 2

Section 2 provides the background to the government's decision to promote very high speed rail. It sets out the government's position in its 2012 Command Paper. This section, resorts to assertion and makes statements that have been legitimately questioned and remain unanswered.

As the ES points out, this is potentially the biggest construction in Europe. The corollary is of course that is therefore also likely to be the single most environmentally damaging project in Europe. **The environmental impact of the scheme is seriously and consistently underplayed and minimised throughout the documentation.**

An assessment of carbon emissions for HS2 stated the CO2 omissions created by building the new line will outweigh savings from modal shift in transport for 6 decades. Further, only 2% of long distance car journeys will transfer to HS2. Only 1% of journeys by air will transfer to HS2 and not until Phase 2 is in operation, as there is no air transport service between London and Birmingham.

2.1 The Need for High Speed Rail

We are fundamentally opposed to the proposal before Parliament for the building of the High Speed Rail (HS2) as proposed, on the grounds that:

- a) it has not been shown to be in the national interest, compared with investment into regional transport needs such as set out in the 51M alternative;
- b) the west coast mainline from Euston is far from reaching capacity; the ten most crowded rail services are those of the Great Western. HS2 will not provide sufficient capacity to meet long term demand for rail transport over the whole network, one of the Government's key objectives;
- c) the estimated projections of passengers are overstated, just as those for HS1 have proved to be;
- d) HS2 does not form part of an announced national transport strategy, or even a national rail strategy;
- e) there has been inadequate consideration of alternatives, especially upgrading the existing west coast mainline at 3 key pinch points and the alternative strategy proposed by 51M has been totally inadequate;
- f) no proper strategic environmental assessment has been carried out prior to making decisions about the preferred route;
- g) the business case for HS2 is fundamentally flawed with 44% of the benefit in the benefit cost ratio coming from the absurd assumption that people do not work on trains;
- h) the proposed scheme is not carbon neutral.

3. Approach to Consultation and Engagement

3.2.10 - is factually incorrect. In 2013 only two meetings were held locally, half the number of the stated bi-monthly meetings as HS2 claimed incorrectly. Furthermore they declined to hold community forums during local election periods that did not exist in this area.

Representatives from along the line met with MPs and HS2 Ltd. to discuss the many failings of the engagement process already experienced on the 13th September 2012. HS2 Ltd responded to the criticisms from MPs saying that they would review the Community Forum process in November 2012. No perceptible change took place, apart from fewer meetings being held.

3.2.13 – refers to the consultation on the draft ES, detailed in Volume 5 Appendix CT-008-000, but in doing so it fails to refer to the summary of responses to the Draft Environmental Statement reported by Dialogue by Design that

- overall comments contain expression of concern and dissatisfaction,
- comments on the quality or completeness of the draft ES were made,
- the accuracy of data, and
- mitigation was insufficient to counteract the impact and the visual blight, especially in the Chilterns AONB”

The same conclusions apply to the ES and, given the time-scale between the issuance of that independent report in September and final ES in November, little time was available to affect the

finalisation of the ES.

3.2.14 - states that a summary of the changes resulting from the consultation are provided in an appropriate Appendix to Volume 5. **This is not true.** No summary of changes is provided, simply a bland reassurance. Volume 5 merely confirms that the consultation on the draft ES was designed to identify weaknesses in the drafting rather than make any meaningful contribution to questions of route or mitigation. This is unacceptable.

6 Construction of the Proposed Scheme

Section 6 sets out the construction of the proposed scheme and, inter alia, the reliance on the draft CoCP. It notes that the statutory undertakings, imposed by current environmental legislation and environmental controls imposed by the Hybrid Bill, (except when they are dis-applied) will be followed and are therefore not included within the draft CoCP.

6.3.4 - states that the Draft CoCP sets out a series of proposed measures including much proposed mitigation. There is no explanation why the CoCP remains in draft. If the draft CoCP is to have any realistic effect on operation and mitigation then it has to be finalised before it can be part of the Hybrid Bill. Fundamental principles of mitigation have to go into the Hybrid Bill so that they are not subject to negotiation with the contractors

The conclusion is that the CoCP will be finalised by the principal undertaker. The draft CoCP is based on the Olympic legacy document. Unlike that document, however, the strict lines of accountability are removed. Volume 1 fails to clarify the principle undertaker's accountability. It defines what the undertaker is likely to expect of the contractors but not what is expected of the principal undertaker. The principal undertaker's accountability to Parliament is undefined. If Parliament makes the decision to proceed with HS2 then it too must remain accountable for that decision throughout the life of the project.

The role of local authorities remains invisible. The Hybrid Bill must make clear where local authorities have power to exert control the principal undertaker.

6.3.19 - Outlines the construction hours. Effectively these are increased to 12 hours per day for various reasons. This is unacceptable in the tranquil, protected nature of an area of national importance.

7 Environmental Impact Assessment

7.1.4 - states that baseline studies have comprised a desk-top approach. This limited approach has resulted in numerous factual errors in the ES, leading to unsubstantiated conclusions. For example, evidence was provided to HS2 Ltd. of the impact of the line on businesses in Great Missenden. This has been ignored. In addition the ES fails to identify some local schools as *notable features* which raises serious safety concerns that have been ignored.

7.3.3. - Is seriously misleading because it applies combined assumptions about the benefits derived from consideration of phase 1 and phase 2. There are no regional socio-economic benefits attributable to the scheme in the area north between Old Oak common and south of Birmingham. The local modal shift from car to rail between these two points will be associated with the Chiltern line. There will be no reduction in aircraft movements because there are no direct flights from Birmingham to London. There will be no benefit to passenger access to and from stations and interchanges between these destinations as there are no intermediate stations. This paragraph further seriously misleads because it does not detail the dis-benefits of the phase 1 route.

The classification criteria to describe environmental impact give insufficient weight to nationally/internationally recognised landscapes.

8 Scope and Methodology Summary

8.2.7 describes the scope and methodology approach in respect of communities and makes questionable assumptions; that land required for temporary purposes will be restored to its pre-existing quality. Given the compaction resulting from haul roads and heavy plant, this is an optimistic assumption. Furthermore the Hybrid bill states that development may be granted to areas along the route. This is totally unacceptable in the AONB.

8.2.8 – Initially makes no sense as no conclusion is reached but the overall premise is that ancient woodland and other woodland soil will be relocated successfully. This is unproven. Elsewhere in the ES (Vol 3 2.1.15) Ancient Woodland is described as ‘irreplaceable’ but this has not been sufficiently taken into account.

It further assumes that severed land will continue to be used; an assumption that is fundamentally flawed, especially for smaller areas no longer viable for further use.

8.3.1 - lists examples of many important local issues, raised at the community forum where HS2 Ltd stated they would be addressed in the ES. They have not been answered. Thus important issues have not been discussed but have been ignored. This is in direct conflict with paragraph 3.2.9, namely: *to consider local issues and discuss possible ways to avoid or mitigate the potential impacts*

8.3.2 - The scope for assessing community impact includes: land use; real or perceived isolation of residential or community properties; changes in amenity from such effects from air quality, noise, views or construction traffic. The methodology is largely qualitative, relying on professional judgement. It does not include the intangible loss of amenity derived from living in the AONB. At the other end of this spectrum it does not include the socio-economic impact resulting from loss of asset value or tourism both of which are largely determined and derived from the AONB. Tourism has been totally ignored.

8.5 - The ecology section makes the assumption in coming to its judgements that the operator will ensure provision for on-going management of all mitigation and compensatory habitat creation and will continue to monitor both habitats and species in order to ensure that predictions of effects are accurate. There is no mention of legislative or contractual accountability. Without this accountability, the assumptions are worthless. Nor is there an identified strategy to redress failed habitats should the predictions prove to be incorrect.

8.8.7 The basis of estimating the number of businesses likely to be lost, based on the London area, is flawed for the rest of the country, particularly in a rural area where the loss of any business will be disproportionately higher.

8.12.16 states there are limited borehole records available from which to understand the geological and hydrological conditions. No new boreholes have been drilled and groundwater flow is based on assumptions. This is unacceptable. Nowhere in the ES is the underlying geology discussed in any detail even though tunneling is going through geology that will disrupt the groundwater flow in an AONB, a fundamental flaw in the ES. Desktop studies carried out to date are totally inadequate.

9 Approach to Mitigation

9.1 The overview of the approach to mitigation commences with a process of avoiding, then reducing the adverse effects on the environment. This approach fails totally in respect of the AONB where, and as accepted by HS2 Ltd, a feasible engineering mitigation of an extended tunnel through the AONB, has been dismissed on the grounds of cost without taking into account any important benefits, especially the significant environmental benefits.

9.11 – Socioeconomics

The assumptions made for successful business relocations in this section are based on London Development Agency figures based on the London Olympics. To apply these statistics to the south of England and to rural areas is inappropriate. Losses of employment in a rural area are proportionately much greater.

The absence of the impact on Tourism from the scoping report for this section is startling in its **omission**.

There are 55 million visitors a year to the AONB bringing in some £471.6 million of expenditure associated with leisure visits to Chilterns and sustaining an estimated 12,000 FTE jobs. There is no assessment of loss of reputational value or the other disbenefits of this scheme on the communities affected.

9.15 – Water Resources and Flood Risk

This section fails to mention the potential effects on surface water flows by tunnelling under watercourses such as the River Misbourne, a valuable resource in its own right and an ancient chalk stream as one of only three rivers in the country to sustain breeding of wild Rainbow Trout and along with the Chilterns aquifer is an important source of drinking water for the population of London. No clear mitigation for damage by the scheme to the river flow or the water quality is provided in the ES. Any consultation following loss of water flow, as proposed in the ES, would be too late to produce any action or effective remedies.

10 Strategic and route-wide alternatives

Section 10 - gives a brief over-view of strategic and route-wide alternatives. In doing so it is apparent that HS2Ltd have not examined ways of managing demand. It has adopted an approach of predict and provide, discredited by the Eddington Transport Study, December 2006. The effect of price structure on demand growth has been ignored.

10.3.6 – the statement that the proposed scheme is a discrete project that can be justified on its own merits, as it has been conceived as part of a long-term strategy for a network of high speed lines connecting major conurbations is fundamentally inaccurate. If it is a discrete project it cannot be part of a national strategy as claimed. No strategy for a network of high speed lines beyond HS 2 has been announced or debated. The ES is focused on the impact of Phase 1 London to West Midlands. There is an element of duplicity. It is apparent from the ES that it requires the combined benefits of phase 1 **and** phase 2 to justify the benefits of Phase 1. This is totally inappropriate.

10.3.26 - outlines the government's approach to the 51M and other upgrade options. The benefits of these options are listed. It concedes that the appraisals showed a strong BCR, significantly lower capital costs and less environmental impact. Nevertheless the conclusion was that the package of upgrades would not: *address demand, capacity and crowding in the long term* - without explanation.

Claims for long-term demand growth are unsupported. The government remains coy when discussing capacity. Maximising train utilisation is not considered, nor over-capacity. To forecast HS2 train loading of little over half and for classic trains at a third by 2043 eschews any value for money argument. The discussion has always focused on 'classic' or very high speed. Advanced signaling to increase train path has not been considered. The comparator is always the 'do nothing' strategy. HS2 is an inter-urban solution. It certainly does not provide a quick solution to tackle the overcrowding in the 50 or so miles out of London.

In describing the proposed scheme, there is no account taken by the years of delay, vast environmental damage, loss of personal equity, business, heritage, amenity, health and wellbeing that the construction and operation will cause along the route. There would be no business or transport case if these assets had a direct value attached to them.

11.2.3 sets out large local alternatives but totally ignores any reference to the extended tunnel proposal presented to and discussed with HS2 and its consultants. This is a fundamental omission.

Question 3: Please let us know your comments on Volume 2: Community Forum Area reports.

You are welcome to comment on one, a number or all the reports listed below. Please tick the reports described below that your comments apply to. If making comment on more than one report, please indicate clearly in your response the report to which your comments relate.

Please tick those reports you wish to comment on below:

CFA 8 The Chalfonts and Amersham CFA 9 Central Chilterns

My comments with regard to the reports ticked above are:

Volume 2 CFA 09 Report

These comments are made on a without prejudice basis as it is impossible to review the documents with numerous omissions and errors in a limited timescale and are so unfair and prejudicial to an informed response

1. Structure of this Report

1.3.6 – the allowed flexibility in vertical and horizontal alignment in the design is NOT acceptable within the Chilterns AONB. Any change in vertical alignment (upwards) will dramatically increase light and noise pollution, increase the need for further mitigation and any change in horizontal alignment will increase the already substantial damage to Grimm’s Ditch National Monument.

2.1 Overview of the area and description of the Proposed scheme.

2.1.7 As with the DES, the stated ‘notable communities facilities’ is inconsistent and inaccurate in respect of Little Missenden Hyde Heath and other local villages within 1Km of the proposed scheme. The Little Misenden school - for children aged 4-7, not 3-9-, and an infants’ school, will suffer considerable disruption during the construction of HS2 because of the broad catchment area and impeded access to the village and hence should be included and considered. Little Missenden has a number of other amenities, details of which are omitted from section 5.3.5

2.1.8 - Great and Little Missenden and the other adjacent villages rely on the A413, for access (including emergency vehicles) Access to the villages will be jeopardised by the increased traffic on the A413 to the north west to Wendover and Aylesbury, as well as the towns listed, and in particular to the only local A&E Unit at Stoke Mandeville Hospital.

2.1.10 - leisure and open spaces omits reference to the facilities of Little Missenden and Hyde Heath. In addition the ES ignores the effect of tourism completely; tourism is attracted by the many open spaces in the AONB.

2.1.12 - There is no reference to the Chilterns Conservation Board Management Plan in the list of local policies and key planning designations. Clearly HS2 Ltd has not referred to them in preparing the ES. The CROW Act places a duty on the 13 local authorities within the AONB, and Conservation Boards, where they exist, to produce a plan which outlines their policies for the management of the

AONB and how they will carry out their functions in relation to it. This is a serious omission. 'AONB' is tagged onto a list of key planning designations, evidently an afterthought and there is no reference to or evidence of the management plan being considered in the assessment of the impact of the project.

2.2 Description of the Proposed Scheme

2.2.1 states the description of the proposed scheme "including the main environmental mitigation measures". See also bullet point 3 of 2.2.4. This section only gives an outline of the proposed scheme, omits reference to the extended tunnel proposals, dismissed on grounds of cost and therefore does not include the only mitigation that is acceptable in the Chilterns AONB.

2.2.4 Although this refers to a roundabout proposed to access the B455 but this has not been discussed with the community. Roundabouts are land hungry, and so inappropriate in an AONB.

2.2.6 - states: *a land drainage area to the west of the landscape earthworks, just east of Mantle's Farm, with an associated access track.* In other ES documents, this track has been described as temporary. The term 'track' implies that it is neither reinforced nor surfaced. The function of the 'track' is unclear in this paragraph. The use of the word *associated* deliberately implies its function is related to the land drainage area.

2.2.8 *The Little Missenden vent shaft, which is required to provide pressure relief from the tunnels and a dedicated intervention point and access for emergency services, will be located south of Keeper's Lane.* It is unclear the extent of noise issues emanating from the vent shaft giving rise to a double boom for example (from the vent shaft and tunnel portal which is relatively close.). There is no reference or consideration to the houses alongside, or opposite, this site or mention in section 11 to the noise from this site. This is a fundamental omission

That access to the Vent shaft construction site for HGV which would have to be across a fast-flowing dual carriageway for traffic from Amersham direction has not been considered and is a major omission.

Should the solution to this issue, which has major safety implications with recent fatalities at the junction of the A413 and Little Missenden Village road be a roundabout, this would enable the 2 other access points to Little Missenden to be temporarily closed, to prevent 'rat-running' traffic through the village, as will inevitably occur when delays on the A413 happen.

Further: *an auto-transformer station which will be approximately 45m by 25m and approximately 5m high.* It is unclear why this structure is required to be this high and clearly considerations of visual impact have not been considered other than screening. Evidently the design will be generic, off-the-shelf without reference to the unique features of the area.

2.3.30 states that there are no watercourse realignments required for this construction but there is no reference to the treatment of water from the vent shaft construction being removed.

2.3.86 refers to an assessment made of the significant environmental effects of waste and spoil and offsite disposal in the area but there is no reference to the possible effect of pollution on the river or the drainage from the Little Missenden ventshaft close to the River Misbourne. This should have been made.

Construction traffic and access

2.3.3 states: *Key temporary construction features are illustrated on the construction Map Series CT-*

05 (Volume 2, CFA9 Map Book). The individual maps are not referenced anywhere in the document. In particular, Map CT-05-032-L1 shows an access road from the A413 to Mantles Wood and also an access route from the A413 via Hyde Lane, with no mention of their purpose in the construction period. As both of these access points on the A413 are in locations with poor sight lines and on a busy single carriageway section of the A413, it is important that some very limited measure of the construction traffic using these locations is provided. HS2 Ltd. informed the CF9 community forum that there would be no access from the A413 in this manner.

2.3.17 The following lorry routes, which would commence at either the M25 (via the M40 and A412 Denham to Watford) and/or the M40 (via the A355 Amersham to Beaconsfield), are currently proposed to access each of the site compounds. There has been no consideration either in CF8 or area CF9 of the cumulative effects of the traffic on the A413 and in CF 8 the junction with A 355 has been ignored for any affect on traffic, it is only been considered for non motorised traffic. This is a fundamental error in the ES.

In addition the traffic movement summary, provided by HS2, are fictitious as the numbers of movements do not add up.

2.3.27 The ES and the maps fail to describe the construction route to and from the LM Vent Shaft or to recognise that the construction route for the accessing the Little Missenden Vent shaft is across a dual carriageway. This will have consequential severe impact on the access out of Little Missenden

2.3.39 A major PRow impact is that LM17 and LM 21 have been merged and a 1500 meter diversion proposed along the tunnel routes has been omitted..

2.6 Route section main alternatives

The overarching principle of an environmental assessment should be to protect the environment, and the AONB, and in particular to remove the threat of destruction of ancient woodland at Mantles Wood, Sibleys Coppice and other woodland at the heart of the AONB.

All the extended tunnel options described in the ES perform better on environmental grounds compared with the present proposals. It is a fundamental omission to ignore this in an ES.

2.6.5 / 2.6.17 The alternative proposals to tunnel through the AONB have been dismissed solely on grounds of cost without any supporting justification of costs being provided. Furthermore the effect of non market benefits (as set out in the Brett report supplied in evidence to support the alternatives).of an extended tunnel have not been taken into account

This dismissal is totally inconsistent with the decision recorded in the statement in the NTS (Section 6.5 Page 41) about the decision to build a tunnel at Northolt but not to do so for an area of recognised area of National Importance. At 6.5 HS2 Ltd notes mitigation which has been agreed for the residents of Northolt by making a previously open track section, a tunnel. The reasoning given for this tunnel is very similar to the reasons that has been provided to HS2 for the mitigation of an extended tunnel in the Chilterns AONB tunnel viz. "This greatly reduces the extent of landscape and visual, sound, noise and vibration and traffic and transport effects"

As the impact on the environment for the Chilterns is substantially worse than at Northolt – a built-up area - an extended tunnel cannot be dismissed for an area of such National importance.

Extended Chiltern Tunnel to the end of the AONB

Sections 2.6.5 – 2.6.16

A fully bored tunnel throughout the AONB would reduce the adverse landscape and visual effects on the AONB as well lessen the severance of agricultural land, fewer properties would be demolished and have benefits for both designated ecological and archaeological features, providing protection to areas of ancient woodland. The Chilterns AONB relies on tourism for present and future prosperity. Many local jobs will be lost as a consequence of HS2 and this must also be taken into account when considering a fully bored tunnel.

HS2 list as other objections than cost as including Environmental damage to Durham Farm, and a construction site at Wendover. These objections of HS2 are being challenged as, inter alia, there is already a construction site proposed at Durham Farm, there is a construction site at Mantles Wood where the environmental damage to an ancient woodland is very much greater, as well as 10 Construction sites between there and Wendover and removal of spoil from an extended tunnel from Wendover could be easily managed by rail.

2.6.11 ignores the essential nature that would be preserved, there would be much less disruption and fewer loss of visitors to the area.

2.6.57 Mantles Wood Access Track: We are concerned about ANY additional access directly from Mantles Wood to the A413 because of (a) additional damage to the AONB which would be visually unacceptable and (b) impact on the traffic flow on the A413 at it's narrowest point, by slow moving and turning HGV traffic.

2.6.69 The Hunts Green Farm 'Sustainable Placement Area' is totally unacceptable in an AONB, particularly as the proposal includes the IMPORTATION of foreign soils INTO the AONB.

3 Agriculture

3.3.23 Woodland Comparing the percentage of woodland lost in the AONB with the percentage in the UK without referring to the need for the UK to increase the existing low woodland levels when a greater density is needed to help reduce the national CO2 emissions is disingenuous.

3.4.23 The assumption that all agricultural land will be reinstated to its former use is invalid considering the damage caused by construction and the severing of economic units.

3.4.25 Table 5 refers to the number of affected holdings but only 6 owners of the 21 listed have been spoken to and Elwis Field Farm, Mulberry Park Hill and 94 Kings Lane, where 100% of the land will be taken and all of which will cease to operate, have been assessed as 'moderately adverse.' This assessment is fundamentally incorrect. 4 properties that will be left within 25 meters of the cutting were classified as moderately adverse. All these assessments are unbelievably inaccurate.

5. Community

5.3.1 - states that the baseline data only covers 1km from the Proposed Scheme. However this underestimates the impact on the surrounding communities as the communities in the Misbourne Valley are all closely inter-connected.

5.4.2 The mitigation referred to in the Draft COCP has no value unless it is included in the hybrid bill.

5.3.5 Little Missenden is dismissed as a linear settlement. This is totally incorrect as it has similar, and in one instance, more community facilities than Hyde Heath

5.4.4 - The conclusion that there is no temporary or permanent effect on Hyde Heath and Little

Missenden is seriously misleading. The impact on Little Missenden will be severely affected by the proposed scheme by having two construction sites; the Ventilation shaft and transformer construction site to the south east and a further one at Mantles Wood, to the north west of the Village.

As well as noise, light and dust pollution, traffic flow will be adversely affected on the A413 severely impeding access to and from the village at key times of the day. The construction will impact connectivity, access to Schools in Amersham, Chesham and Great Missenden, stations in Great Missenden and Amersham and all local services in Amersham and Great Missenden

The placement of a construction site for the Little Missenden Vent Shaft and Transformer, opposite the listed Walled Garden cannot in any way be described as sensitive. Tall screening is an inadequate mitigation. The lives of the residents in Piper's Wood Cottages, Kennel Farm, Park View Cottages and the whole of Little Missenden will be severely impacted throughout both construction and fitting out phase. Yet again this was raised at community forums and ignored.

It is an understatement that a substantial number of local people will not be significantly affected by the construction of the project. Little Missenden will be affected by noise, dust and light pollution throughout the construction phase and there will be substantial visual impairment and light pollution at the West end of the village during the construction and operational phases.

This section completely understates the disruption that will be caused by construction and construction traffic in and around Little Missenden.

There is no reference in the ES to the Health Impact Assessment that has been prepared in connection with the proposed scheme when the health of the community is already suffering. This is another notable omission.

5.4.11 - to conclude that there are no temporary impacts on Hyde End is wholly incorrect for similar reasons

5.4.34 – stating there are no significant effects on Great Missenden is inaccurate, no doubt due to the omission of the effect on tourism to the area, a substantial source of revenue in the Chilterns AONB. As example the small Roald Dahl Museum in Great Missenden has 60,000 visitors annually, many of whom are school parties coming by bus on the A413. It also ignores the evidence of the Great Missenden business survey presented to HS2 but obviously ignored.

5.5.1 - The effects of the road delays on all access to Little Missenden have been totally ignored

6 Cultural Heritage

6.2.2 - All designated cultural assets within the Zone of Technical Visibility have been assessed from a desk top approach.

6.4.15 concludes there will not be any cumulative effects from temporary impacts on heritage assets within the study area. This statement from a desk top approach is incorrect and unjustified as mediaeval wall paintings in Little Missenden church and close to the construction site will be damaged by dust over a 7 year construction period. Missenden Abbey and the Church of St Peter and St Paul will be affected during construction especially with St Peter and St Paul fabric by dust and pollution

6.4.27 - To conclude that the impact on the setting of 2 Grade 11 listed buildings is moderately

adverse when they are within 25 meters of the track is wrong and unacceptable.

7. Ecology

7.2.2 Although there is reference to a water directive assessment having been made, no hydrological survey has been carried out by HS2. This is critical in order to assess the effect on ecology in an area that includes the important chalk river Misbourne and a lake that forms a part of a grade 11* listed park and gardens. An independent survey, provided to HS2, concluded that there was significant risk of adverse effects on the flow and characteristics of the River Misbourne and Shardeloes Lake. This has been ignored.

7.2.4 Refers to improving the connectivity between areas of ancient woodland. Such an unjustified statement is wrong and unfounded nonsense.

7.2.5 states that there are no watercourses that are relevant. As the River Misbourne, an ancient chalk stream, is one of only three rivers in the United Kingdom which rainbow trout breed in the wild within this CF area this is a serious omission and so is incorrect .

7.3.16 referring to fish being of negligible value and limited to ponds is incorrect, see 7.2.5

7.4.9 the unlikely effects of habitat loss other than at a local /parish level is totally unjustified for Shardeloes lake, a key part of the grade 11* Registered Park and Garden. With the tunnelling under the river north of Shardeloes Lake, there is a recognised risk that the flow of water through the aquifer could be changed, which would risk the whole habitat of the upper Misbourne
The ES should contain a complete analysis of the river environment, a survey that HS2 have acknowledged could have been carried out but HS2 the lost permissions to conduct surveys in time.

7.4.22 - admits that that ancient woodland is irreplaceable but the loss thereof has been minimised throughout the ES. Ancient woodland is a national asset.

7.4.26 – whilst recognising that it will take 50 years at least for these replaced woods to mature without any detail of replacement of failures and detailed long-term management plans is unjustified and unacceptable.

8 Land

8.2.3 That there have been access constraints on areas of greatest exposure to contamination in an AONB is not acceptable and 8.4.10 fails to refer to tunnelling as a source of pollution of the land

9. Landscape and Visual Assessment

9.2.2 - describes the Zone of Theoretical Visibility (ZTV), but then excludes the temporary impacts of cranes and other large construction equipment and more importantly excludes the impacts of the overhead line equipment on the view from Little Missenden. The former is understandable, the latter is considered to be direct obfuscation. With the raising of the line by 3m in many of the cuttings, the catenary towers will be visually objectionable and at night there will be the light pollution effect of light flashes every few minutes as the train passes.

9.2.4 states that several PROW's were inaccessible is incorrect. By their definition the public have an access to these rights of way. This statement indicates the total totaly inadequate quality of the consultancy work carried out.

9.4.1 states that the scale of the construction activities means that works will be visible in many locations and will have the potential to give rise to significant temporary effects which cannot be

mitigated practicably – This is unacceptable

The ES concludes that there will be a moderate adverse effect in operation on Little Missenden in Year 1. This is a complete underestimate of the change in the landscape with deep cuttings from Mantles Wood to the south of Chilterns Tunnel portal and loss of considerable woodland. The change is considered to be a major adverse impact. Even in year 15 and year 60 there will be a substantial adverse impact, through creating a large cutting. In addition the almost constant noise of trains night and day will reduce the level of tranquillity substantially.

10 Socio-economics

The baseline consideration on socio-economic affects is wholly inadequate as by overlooking the effects of tourism in the area, the assessment is flawed. Taking the analysis of businesses in the area, over 33% are involved in businesses that involve and depend on tourism in Great and Little Missenden. It is estimated that there 55 million tourists visit the Chilterns AONB with substantial income generated for the area.

10.1.5 states the operation of the proposed scheme will have relevance in relation to the potential employment opportunities created by new business opportunities. This statement is unjustified and incorrect for this to give benefits to area of HS2 and totally ignores reference to the many disbenefits is fundamentally flawed.

10.4.3 –stating that No non-agricultural businesses identified as affected, completely ignores tourism, including the Raold Dahl Museum who receive 60,000 visitors annually, and the evidence provided from the survey of businesses in Great Missenden.. Accordingly the conclusion in 10.4.19 is incorrect .

11. Sound, Noise and Vibration

11.3.3 - States that some tunnelling north of Chilterns tunnel north will be needed to be undertaken during evenings and night time for engineering practicability. Such general expectation is totally unacceptable and has to be controlled by powers in the hybrid bill

11.3.10 – This section completely omits to mention the Noise, dust and light pollution in Little Missenden due to the cumulated effects of construction activities at both ends of the village, construction traffic including movements of spoil at Mantles Wood and at the Vent shaft construction site.

During the construction phase there will be severe noise pollution at Pipers Wood Cottages, next to the ventshaft construction site, and Park View cottages directly opposite it. Tall screening will be an inadequate mitigation The vent shaft should be built no higher than ground level and be designed in keeping with the local agricultural buildings as promised during the Community Forums so as to fit in with this sensitive environment.

Noise and light pollution at the West end of the village from evening and night working at the Mantles Wood tunnel portal and during operation will be substantial.

11.4.13 – The ES avoids adhering to the interim target of WHO night noise. This is unacceptable to the residents of Little Missenden who will be adversely affected by noise pollution from the scheme in operation and from the night working during the construction phase at the Chilterns tunnel portal.

11.4.17 - states the mitigation measures will avoid airborne noise adverse effects on the majority of receptors in Little Missenden amongst other communities. Without any reference to noise levels

having been checked at tunnel exits this is an unsubstantiated and unjustified statement in a critical area for Little Missenden.

12 Traffic and Transport

12.2.3 - The assessment is wholly inadequate, incorrect and incomplete. The rush hour is defined at 08.00 to 09.00 and 17.00 to 18.00 in CFA 9. As recognised in the Community analysis of the ES a substantial proportion of people in the area and Little Missenden commute to work, so this analysis is illogical. Many of the commuters use their cars either to get to Great Missenden or Amersham stations, or to drive to work. So in practice the A413 and B355 are very busy from 7.00 onwards to 09.00 and from 17.00-19.00.

12.2.4 - fails to consider school buses which are much more numerous and important in the area for the community than the twice weekly bus service in Little Missenden.

12.3.4 - Fails to take account of the affect of pressure on Little Missenden and the access to and from the only strategic road to leave the village caused by construction traffic and resultant congestion on the A413. Cumulative traffic movements on the key junctions on the A 413 are incorrect.

12.4.1 - States "The following measures (as described in Section 2.3) have been included as part of the engineering design of the Proposed Scheme and will avoid or reduce effects on transport users:

- transporting construction materials and equipment along haul roads within and adjacent to the route of Proposed Scheme alignment, where reasonably practicable, to reduce lorry movements on the public highway;
- HGV routing as far as reasonably practicable along the strategic road network and using designated access roads, as shown in Map TR-03-053 (Volume 5, Traffic and Transport Map Book);
- excavated material will be reused where practicable along the alignment of the Proposed Scheme which will reduce the effects of construction vehicles movements on the public highway"

These measures are totally unacceptable as the chief access roads (haul roads in TR-03-054) in this area are minor lanes unsuitable to accommodate passing construction traffic.

Furthermore there has been no reference to any proposals to prevent traffic leaving the A 413 and taking minor roads to try to avoid congestion. This is critical for Little Missenden which already suffers from rat run traffic through the village when there is congestion on the A413. Similar action is necessary to prefer traffic leaving A413 to go through Great Missenden.

12.4.2 - The draft CoCP (see Volume 5: Appendix CT-003-000) includes measures which seek to reduce the impacts and effects of deliveries of construction materials and equipment, including construction lorry trips during peak background traffic periods. The draft CoCP includes HGV management and control measures. These are invalid without the COCP being included in the Hybrid Bill

12.4.13 - Changes in traffic flows are expected to lead to significant changes in delay and congestion to vehicle occupants at the following junctions:

A413 London Road with A4128 Link Road (moderate adverse effect);

A413 London Road with B485 Frith Hill (major adverse effect due to HGV flow);

These conclusions made must have been made in isolation as the same assessments are made further along the road even though more traffic joins at each successive junction

In CF area 8 further junctions are considered

12.4.13 A 413 School lane Roundabout (moderate adverse effect)

A413 Amersham Bypass with Whielden Street and A 404 (moderate adverse effect)

The next, last junction before a construction route leaves the A413 has been completely ignored (apart from non motorized users) as there are no figures for the A413 link to London Road east nor for A355 Gore Hill. This is totally unacceptable and renders all traffic judgements made incorrect, especially as the figures in Vol 6 part 6 are invalid

This omission where there will be increasing cumulative traffic from additional construction traffic is fundamentally flawed. All these junctions are critical junctions for the inhabitants of Little Missenden leaving or returning to the village and for all users of A413

In short these assessments are totally illogical and must have been assessed individually. Traffic increases from each construction site along with another construction site at the junction of A413/404 means that each assessment has to be greater along the construction route

No reference is made to the traffic on the Hyde Lane construction route that emerges onto the A413 on a blind bend at a narrow railway bridge where turning right has already been prohibited. This is unsuitable and will causing further delays on the A413 access to and from Great Missenden, Aylesbury and Wendover

12.4.19 - maintains that the effect on accident and safety risk is not significant as there are no locations where there are an existing cluster of accidents and where there substantial increase in traffic during construction is anticipated, it fails to define clusters of accidents or substantial increase in traffic and so is not justified. A413 opposite Little Missenden has experienced several fatal accidents and the traffic will increase with several construction sites in the vicinity and using A413 all of which belies the statement.

The A 413 provides the only route for ambulance services to the only local Accident and Emergency Hospital for the whole of Amersham, Chesham and local area. Already the response times for this area are the lowest in the county due to the limited roads and the increased traffic from the proposed scheme would result in even greater risks of fatalities occurring.

13 Water resources and Flood Risk

13.1.2 The statement that the River Misbourne has a history of low flows and some sections in the upper reaches only flow periodically is incorrect as certain reaches have flowed continuously for the last 20 years.

13.1.19 refers to ongoing discussions with the Environment Agency and Affinity Water. These discussions must be concluded to protect the public water supply prior to the Hybrid bill enactment.

13.2.6 as the tunneling method has not been selected, the conclusion minimizing the requirements for dewatering and drainage that are based on an assumption are worthless.

13.4.9 states how the tunnel boring machine will operate but as 13.2.6 states the tunneling method has not been selected, the conclusion minimizing the dewatering and drainage requirements are

based on an assumption and so again are worthless.

13.4.12 without any hydrological survey being carried out, there remains a risk that public water supplies will be contaminated.

13.4.18 Specific monitoring of the potential impact on the Public Water supplies would be useless as if affected, the damage would have taken place. Similarly monitoring of groundwater levels and ground settlement referred to in CF8 13.4.21 and 22 will similarly be useless as monitoring cannot replace loss of water flow and inhabitants of the river and lake.

13.4.43 the conclusion that no significant effects on surface water, groundwater and flood risk is totally invalid without any hydrological surveys being carried out.

13.5.2 No generic design measures appear in vol 1 section 9 in respect of surface water flows and groundwater bodies.

13.5.5 this conclusion cannot be correctly made in the absence of any hydrological surveys of the area for which local approval had been obtained within the time limit.

13.4.1 It is incorrect to state that the lake bed would prevent significant outflows to the chalk as the lake bed is silt, a porous material.

13.4.3 the conclusions of the temporary effects on the River Misbourne and lake will be negligible is unfounded without proper hydrological surveys having been carried out.

As most of the assessment of the River Misbourne and Shardeloes lake is made in CF8 area, our response takes account of matters affecting the River Misbourne in that area report.

Question 4: Please let us know your comments on Volume 3: Route-wide effects.

My comments on Volume 3 are:

Volume 3 – Route-Wide Effects

The comments are made on a without prejudice basis as it is impossible to review these documents, with numerous missions and errors in the limited timescale and so are unfair and prejudicial to an informed response

2. Chilterns Area of Outstanding Natural Beauty

2.1.1 Sets out the basis for the existence of AONB and then limits the analysis entirely to the landscape baselines without considering the economic value.

2.1.3 incorrectly states the basis for an AONB as it omits the words an AONB “which should have the highest status of protection in relation to landscape and scenic beauty.” In doing so the ES fails to consider a key reason for the creation of AONBs, namely the enjoyment thereof by the public. As the ES considers socioeconomic issues, the omission of any reference to tourism is an inconsistent and fundamental error.

2.1.3. - This section correctly states that: “planning permission should be refused for major developments within an AONB except in exceptional circumstances where a demonstrable need in the public interest must be presented”. HS2 Ltd and the DfT have consistently failed to demonstrate that HS2 and the route through the Chilterns AONB in particular, are in the public interest, nor that they have fulfilled their statutory duty to properly identify and objectively rule out ALL viable alternatives. The BCR, despite 5 revisions, remains at such a low level that by all assessment standards, including the DfT’s own criteria and the Treasury, the project cannot be considered in the national interest on these grounds alone and so should not proceed.

Landscape baseline

2.3.5 - states major roads and railway mainlines are established features of the AONB. This is **incorrect** as the landscape baseline descriptive map of the AONB, in addressing the route wide effects, figure 2 (on page 7), clearly shows that the HS2 has been planned to cross the AONB at almost the widest part of the AONB. Further, it **incorrectly** refers to the M1 and M25. As can be seen in figure 2 the M1 avoids the AONB entirely and the M25 only skirts a corner for a mile across the lower Chess valley. Furthermore the M40 and the west coast main line cross the AONB at very significantly narrower points. The other major road listed, the A41, is not even shown on the figure, no doubt as it crosses the AONB at the same narrowest point as the west coast mainline.

Woodlands

Fig 4 Page 10 – Penn wood is not an appropriate illustration of the AONB affected as is not near the project and won’t be so affected by it. The area of woodland and valley, such as Mantles Wood that is likely to be damaged should have been used and not to do so is disingenuous.

2.3.10 – the section completely dismisses the valuable ancient woodland which will be lost as a result of the scheme in the Misbourne Valley at Mantles Wood

Commons, Heaths and Greens

2.3.11 – This is incorrect, the nearest village green to the scheme is in **Little Missenden**

Historic Settlement and Environment

2.3.12 – There is NO mention of the ancient settlements of Little Missenden or Great Missenden,

both historic conservation areas, that will be seriously affected by the proposed scheme.

2.3.13 – The adverse effects from the construction site for the Little Missenden Vent shaft and Transformer are omitted. Additionally, the National walking route – the South Bucks Way – will be interrupted by the construction phase at Shardeloes Park.

Network of PRow and Ancient Routes

2.3.14 – There is no mention of the adverse effects of the scheme on these footpaths throughout the area that the route crosses the AONB as the area crossed by the route probably has the greatest concentration of footpaths anywhere in the AONB. Particularly damaging will be the permanent closure/joining of LM 17 and LM 21 in the vicinity of the tunnel exit, their diversion along the track, the rerouting along Hyde Heath road, which will be a construction route as well and the temporary closure of the South Bucks Way at Shardeloes Park.

Chalk Streams

2.3.15 – There is no mention of the adverse effects the scheme will have on the flow and water quality of the river Misbourne and the aquifer that is a source of water for the public water supplies to the area and to north west London. There is no reference to hydrological surveys having been carried out by HS2 either for groundwater levels and flows. These are serious omissions.

Tranquil Valleys

2.3.16 – The description of the Misbourne valley as ‘Relatively quiet and rural compared to the surrounding towns’ conflicts with the stated sound limit for the scheme stated elsewhere, which is based on a sound level comparable to a small market town.

There is NO mention of the effect of the scheme on the ‘higher level of tranquillity and sense of seclusion’ at Mantles Wood – which the scheme will destroy forever.

2.3.17 - describes the AONB of national value given the statutory national designation. As the assessment scope and the landscape baseline includes many fundamental errors about the AONB, the material impact of the temporary and permanent effects have been incorrectly assessed. For example (para 2.3.20) the ES refers to the M25 in the context of influencing the tranquillity of the area in the vicinity of the proposed scheme. As this **is factually incorrect**, it results in an incorrect and illogical conclusion of the low to medium effect on the tranquillity of the AONB near the proposed scheme.

2.3.20 As the M25 only crosses the AONB for about a mile in a corner, to refer to it in discussing tranquillity is wrong and so this conclusion is invalid anywhere near the area of the AONB.

Value

2.3.21 - This statement is of great importance: ‘As the landscape of the AONB contains large blocks of ancient woodland, many areas of registered common land, RPG, National Trust properties and National Trails, and given the statutory national designation, this landscape is of national value’. The Scheme crosses the AONB at widest point, so causing causing the greatest destruction to this valuable area.

There is no mention of valuing this area of the countryside for any disbenefits of the projected route, as considered in a specific report by Peter Brett Associates given to HS2 .

Sensitivity

2.3.22 - ‘Given that the landscape condition is good, the tranquillity is medium, and the

character is of national value, the resulting sensitivity to change of the AONB is considered to be high'. So, given this conclusion, it is clear that the scheme is being proposed in the wrong place and the route should be reconsidered.

2.5 Temporary Effects Arising during Construction

2.5.4 – This section seeks to diminish or conceal the impact which will arise from 'Other satellite compounds' covering both civil engineering and rail systems installation work, located within the AONB for particular aspects of the construction, which, in the case of the site at South Heath will cause substantial and long term disruption, noise light and dust pollution to the residents of Little Missenden and, in the case of Mantles Wood, permanent destruction of ancient woodland and loss of visual amenity. Effects arising for periods of up to 7 years can hardly be called temporary, in the normal sense of the word.

Avoidance and Mitigation Measures

2.5.7 – It has been pointed out elsewhere that the Code of Construction described here is DRAFT only. It is unacceptable to refer to a draft (and so is unenforceable) code as constituting any form of mitigation.

Description of Effects

Overview

2.5.11 – It is disingenuous to state that damage will mainly be limited to the NW of the Misbourne valley.

There is No mention of permanent damage to Mantles Wood.

There is No mention of the temporary and permanent damage to Piper's Wood for the construction of the Little Missenden Vent Shaft and Transformer Station.

Woodlands

2.5.14 - Although the loss of woodland described represent a small proportion of the ancient woodland in the AONB, this is nonetheless a characteristic feature and, as stated, in the case of ancient woodland, irreplaceable. Nothing can mitigate for the loss of some of our most important biodiversity and cultural habitats. Any loss should be recognised as a significant national loss. This the ES singularly fails to do.

The statement that losses of such woodland will not be perceived beyond the confines of the Misbourne valley due to the enclosed nature of the valley is totally without foundation. That the character of the AONB will remain as one of the key characteristics, and the overall change will be imperceptible in the majority of locations, is a statement made only to minimise the scale of the destruction and is not acceptable.

Historic settlement and environment

2.5.17 – There is no mention of Little Missenden or Great Missenden both of which 'will also be perceptibly impacted by the presence of additional vehicle movements in the landscape associated with the construction phase', due to traffic congestion, dust and noise and light pollution.

2.5.18 – It is inaccurate to state that the construction activities will be 'perceptible' at Shardloes RPG. The tranquil setting, including the South Bucks Way National footpath which traverses Shardloes RPG will be adversely affected throughout the whole construction phase.

2.5.19 – This conclusion is wholly unacceptable! It suggests that as the effects in the AONB are limited to the Misbourne Valley, then the impacts of the wider scheme are acceptable to the AONB

as a whole. This is **not** the case. It is not acceptable to ‘sacrifice’ the Misbourne Valley and its ancient woodlands and then to suggest that this makes the scheme environmentally sustainable.

Chalk Streams

2.5.21 –this refers to the construction impact and it has incorrectly only been made “in landscape terms..” The conclusion the overall character of the chalk streams will remain unchanged is totally unjustified without any evidence of hydrology analysis.

Tranquil Valleys

2.5.22 – There is no mention of the Little Missenden Vent Shaft and transformer construction. Nor of the tunnel portal construction at the North end of the Chilterns Tunnel in Mantles Wood. This is a gross omission as both will have a considerable effect on the tranquillity of the Misbourne Valley and on the residents of Little Missenden.

Assessment of Effects during construction

2.5.25 – It is inappropriate to compare the local devastating effects of the construction with the overall effects on the Chilterns AONB. The damage in the Misbourne Valley is an integral part of the AONB as a whole and as such the destruction in the Misbourne Valley irrevocably damages the WHOLE of the AONB.

Furthermore to omit any reference to the creation of substantial spoil heaps within the AONB is deliberately misleading. This is a fundamentally unacceptable proposal, especially as these heaps will not only comprise material from within the area but also, as stated in volume 5 waste materials para 11.2.6 that “excess excavated materials are expected to be transported from Stoke Manderville, Aylesbury, Waddesdon and Quinton southwards to the Dunsmore area”, ie from outside the AONB . That this would be different soil structure is even more damaging to the AONB

2.5.28 – Similarly, it is inappropriate to suggest that overall the impact on the AONB is medium, when several parts of the AONB are destroyed or severely impacted. This is similar to suggesting that a person with his head in the oven and his feet in the fridge is ‘on average’ OK.

Description of Permanent Effects

Overview

2.6.3. The ES refers to 3 sq KM of the AONB as being damaged whereas the Chiltern Conservation Board, responsible for managing the AONB, estimate that the construction effect will be 55 sq KMs and the operational effect will be 45 sq KMs. The estimate by HS2 is totally inaccurate, as is the statement that ‘the noticeable loss of vegetation in particular at Mantles Wood, Sibley’s Coppice and Jones’ Hill Wood altering the vegetation pattern’ will substantially alter the setting of a considerably larger area including Little Missenden and the woodland settings to the North West.

2.6.4 – ‘These impacts will be limited to the Misbourne Valley’ It is wholly unacceptable to dismiss the severe impacts on Little Missenden and the rest of the Misbourne valley, at the centre of the AONB, as somehow being reasonable in exchange for less damage in the remainder of the AONB. The damage by the scheme, both temporary and permanent remains wholly unacceptable to the AONB as a whole.

Settlement and Historic Development

2.6.14 – Little Missenden will be affected by the construction of the vent shaft adjacent to the village, dominating the village and landscape to one side and the tunnel portal will be visible in the landscape from the village on the other side, as referred to in the statement, the loss of ancient woodland and the presence of the proposed scheme will partially alter the composition of the

landscape in the vicinity of the Misbourne Valley and FURTHER ERODE the historic landscape'

2.6.29

Section 13.3 Effects arising during construction- Traffic and Transport

13.2 refers solely to the affects on rail whereas in practice there will be significant affects on road network , especially in the Birmingham area (closures of motorways) that have being ignored. This is a gross omission on the effect of the project.

Section 14 Waste and materials

The dumping of 12 million tonnes of spoil in an AONB is totally unacceptable, particularly as some will be imported from outside the area, increasing unnecessarily the damage to the AONB, is a gross omission from the review of the effect of the project on the AONB.

Section 15 Water

The consideration of the effects on the water supply in the absence of hydrological survey evidence is another omission

Network of PRoW and ancient routes

2.6.17 – There is no mention of the permanent loss of one PRoWs and inappropriate diversion of others in this section, which makes it inaccurate and incomplete.

Chalk Streams

2.6.19 – This statement: 'During year 1 there will be no impacts on Chalk Streams within the AONB' is totally unjustified and cannot be made without evidence of professional surveying or hydrology analysis having been carried out. There will be impact then and thereafter.

Assessment of Effects During Operation

2.6.25 – The Statement: 'Impacts arising during year 1 of operation of the proposed scheme will be limited to the landscape in the vicinity of the Misbourne Valley' once again seeks to localise and diminish the impact of the scheme but the Misbourne valley is an integral part of the AONB as a whole and as such the scheme severely damages the AONB as a whole by it's destruction of the Misbourne valley.

2.6.27 – The extensive list of specific impacts in this section undermines the conclusions in para 2.6.31 and 2.6.33

2.6.28 - Whilst the impacts of operation will substantially alter the character of the AONB in the immediate vicinity of the proposed scheme, the impacts on the special landscape and natural beauty of the central area of the AONB have not been "avoided and reduced where practical" when an extended tunnel could have done so. Therefore this a wholly unjustified statement as only minor direct and indirect impacts would remain.

2.6.29 to conclude that the magnitude of change is medium without commenting that it would be minor with the proposed extended tunnel is disengenous. To conclude that impacts on the centre, and widest part of the AONB, incorrectly only referring to the Misbourne valley when the impacts are on the top of the chalk escarpment.. It is unacceptable to suggest some form of 'average impact' over the whole AONB is an acceptable conclusion.

Furthermore there is no reference to remove and then permanent placement of spoil over 1million m³ within the AONB. This is another gross omission in assessing the impacts on the AONB. Area CFA09 will be blighted by dumping 1million m³ of spoil on a farm within the AONB, which is

disingenuously called a 'sustainable placement' By implication all soil will unnecessarily be moved on roads. This section then suggests that spoil will be dumped or used as close to the site of excavation as possible, this is not correct as spoil is to be brought into the AONB from as far away as Quainton.

This will result in the loss of a considerable area of productive agricultural land and unnecessarily alter the look of the AONB. Yet again the environment is disregarded

2.3.30 - Concludes that the overall impact is 'medium'. Once again the ES fails to record that the impact on the Misbourne valley impacts on the AONB as a whole. Thus it is unacceptable to suggest some form of 'average impact' over the whole AONB maybe an acceptable conclusion.

2.3.31 After 15 years the impact would still be high as it would still be affecting a national asset. The effect would still be high after 60 years.

2.3.33 The conclusion "taking account of the above effect in year 60 on the special qualities, natural beauty and landscape character, made in the context of the wider AONB, will reduce such that it is not considered to be significant" is totally unacceptable for an area with National significance. AONB. This proposal is unnecessary, comprises additional damage to the AONB and is totally unacceptable.

The ES in providing a specific section considering the impact on the Chilterns AONB has singularly failed to include many of the significant detrimental impacts which will occur during and after construction. The ES has also failed to refer to the obvious mitigation provided by further tunnelling nor even considered simple extra mitigation, such as burying power lines in the AONB.

Question 5: Please let us know your comments on Volume 4: Off-route effects.

My comments on Volume 4 are:

Volume 4 – Off-Route Effects

Appendix 4 at 4.11.3 states that soils from woodland areas will also be conserved for beneficial use, a highly sensitive proposal, the nominated undertaker is not committed to be responsible for the reinstatement of all woodland and forestry areas affected by the proposed scheme, without that commitment in the Hybrid bill, such a proposal is valueless, even if it were possible to retain the special qualities of the soil that had been removed.

Question 6: Please let us know your comments on Volume 5: Appendices and map books. You are welcome to comment on one, a number, or all the appendices. Please indicate in your response which report(s) your comments apply to (e.g. the draft Code of Construction Practice).

My comments on Volume 5 are:

Volume 5 – Maps and Appendices

CT-003-000. Draft Code of Construction Practice.

It is quite unacceptable that this code is only in draft. As it will be an important part of the hybrid bill it vital that it is correct and enforceable by Parliament. Currently it is vague and by and large gives constructors free range to do what they wish.

Monitoring appears to be self-regulation by the contractor and does not state that penalties will be incurred for non-compliance with the code. Effectively the contractor can get away with any contravention of the code and there is no redress. There is no safeguard for local communities as to how traffic will operate. This again will have a huge negative impact both on the environment and the lives of the residents

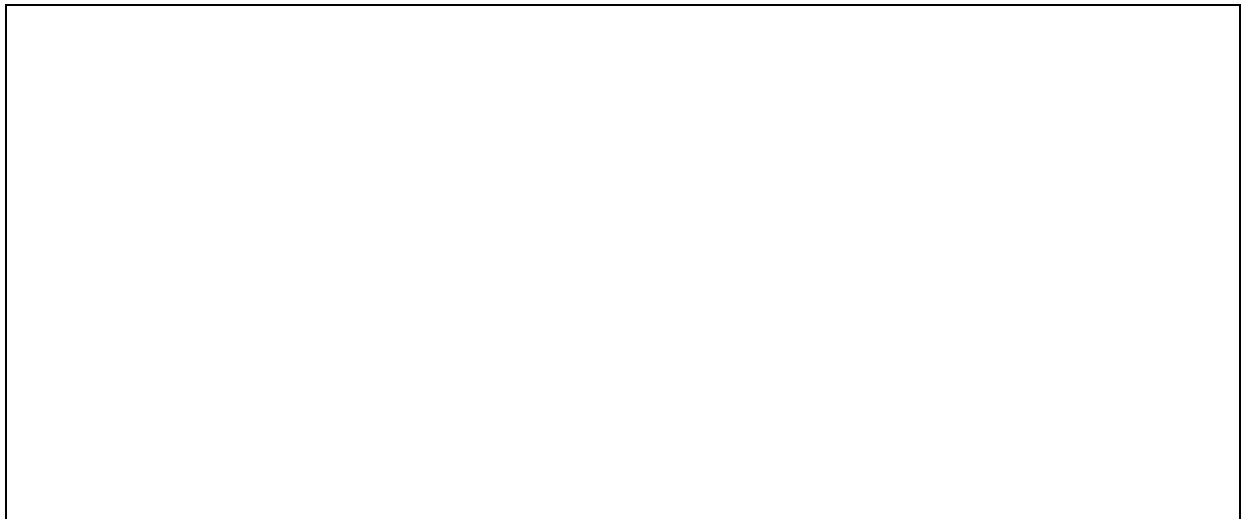
Fundamental principles of mitigation have to be included in the Hybrid Bill so that they cannot be removed in negotiation with contractors.

Vol 5 part 6 tables 7-30 and 7-32 on the Chalfont and Amersham strategic network show construction traffic flows for A413/A404 of 122 more vehicles and 62 heavy goods vehicles entering than leaving the junction in the morning and 294 more leaving than entering in the evening. This defies belief and makes all assessment made valueless

Examination of Volume 5 Map book Transport and Traffic page 76 map TR-03-053 shows the A413 and village roads through Hyde End, into Hyde Heath and South Heath and Potter Row as construction lorry routes. It is clear from the CFA09 report that no consideration has been given to the impact of using these routes on the residents of the villages concerned. Access to and from the villages for work school, emergency services have been totally disregarded. The map shows both adverse temporary and permanent effects. However, there is no key to the adverse-temporary items so it is not possible to judge the negative impact on the environment or the residents.

Volume 5 Route Wide Appendices: Traffic and Transport part 6 Country Assessment section 7.5 covers Central Chilterns (CFA 09). 7.5.14 states that: The assessment covers the AM (08:00-09:00) and PM (17:00-18:00) peak periods for an average weekday. This is fundamentally flawed as village roads are at their busiest at these times, as the ES recognizes the area as a commuter area, whilst between there is very little traffic. Undoubtedly this will have lead to under estimate of percentage increase in traffic (see tables 7-47 and 48) on village road when construction is in progress. Overall baseline figures do not reflect the likely traffic increases on roads such as Kings Lane, Frith Hill and Potter Row.

EC-02-17 and EC-01-017 appear to be inconsistent as the former fails to show the River Misbourne as running water for part of its length through Little Missenden whereas Doctors Meadows are designated as water course sites. running water



Thank you for completing the consultation response form. Responses to the consultation will be analysed and used to produce a summary report which will help inform Parliament's consideration of the scheme.