

# **Chiltern Countryside Group**

[www.chilterncountrysidegroup.org](http://www.chilterncountrysidegroup.org)

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9 December 2012

Ms Alison Munro  
Chief Executive HS2 Ltd.

Dear Ms Munro,

## **HS2: AONB Status, Government Tourism Policy and Annoyance from High Speed Rail Noise**

We would firstly like to place on record our concerns over the HS2 engagement process. These centre on the questions the Chiltern Countryside Group submitted as part of a Central Chilterns Community Forum document, Chiltern Design Issues.

Following submission of our questions on 12 July, we have waited almost four and a half months for a reply. HS2 Ltd was reminded by email by the forum spokesperson (14 August), by copy letter to Douglas Oakervee (18 September), and at the 25 September Central Chilterns Community Forum meeting. On the 18 September the group had to contact Cheryl Gillan MP, to ask Mr Oakervee why we had not received a response.

HS2 Ltd has finally written (22 November). Although it has apologised, we believe the company's behaviour impeded the community engagement process. If the forum had received a timely response, it could have submitted further questions generated from HS2 Ltd's response and discussed the responses at the September forum meeting. As it is, we did not receive a response until 3 days before the November forum meeting. In the meantime, an impression has been created in the forum that as HS2 Ltd could not answer our initial questions, what was the point in generating any further written questions?

We find it disturbing that apparently the only way we elicited a response was through my MP. Cheryl Gillan said in her 28 September letter to Mr Oakervee that HS2 Ltd's behaviour was unacceptable and made a mockery of the engagement process.

The CCG would now like to draw HS2 Ltd's attention to the following which I raised at the 25 November Central Chilterns Community Forum meeting:

### **1. Department for Transport's WebTAG - The Noise Sub-objective August 2012**

*"The current relationships" (i.e. the relationships between noise and the annoyance it causes) "are based on data gathered in past decades and further research is needed to assess the annoyance response to different sources of transport noise such as high speed rail." (paragraph 1.4.7)<sup>1</sup>*

### **2. Government Tourism Policy 2011**

*It is "imperative that we protect our communities from being blighted by inappropriate or ugly developments and to preserve important and nationally significant historic buildings and landscapes – which are a vital part of our tourism industry." (paragraph 6.5)<sup>2</sup>*

Would you agree that it is reasonable for HS2 Ltd to comment on these in relation to its proposals within one calendar month? This would allow the Central Chilterns Community Forum time to consider your response well before the next forum meeting.

### **3. The Government Says AONBs Are National Treasures**

At the 27 November Central Chilterns Community Forum meeting I drew attention to Action Point 20 – *"For HS2 Ltd to provide an outline of how the AONB status of the Chilterns was taken into account when developing the design of the route."*

I read out HS2 Ltd's commentary to forum members:

*"As described during the meeting, a number of measures have been adopted in recognition of the AONB status of the area. These include lowering of route alignment near Wendover and South Heath Green Tunnels."*

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3657/hs2-review-of-possible-route-refinements.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3657/hs2-review-of-possible-route-refinements.pdf)

I reminded the forum the Government says AONBs are national treasures citing the Natural Environment White Paper paragraph 4.35 (2011). I invited HS2 Ltd to comment. The Chairman asked HS2 Ltd to respond to this later in the meeting. Although I had my hand up to remind HS2 Ltd to do this, he indicated there was no further time at the meeting.

Accordingly, I am inviting HS2 Ltd to comment now on the national treasure status of the Chilterns AONB in the light of the fact that more than half the 20.8kms route through the AONB is on the surface, and, of the 11.4kms surface route, 9kms is in the open.

In addition, I think you would agree that the status of the AONB is described in the Government Tourism Policy as land that is imperative to preserve (see citation above)? Again, please comment so that forum members have the opportunity to discuss this at the next community forum meeting should they wish to do so.

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<sup>1</sup> Department for Transport WebTAG Noise [http://www.dft.gov.uk/webtag/documents/expert/pdf/U3\\_3\\_2noise-120807.pdf](http://www.dft.gov.uk/webtag/documents/expert/pdf/U3_3_2noise-120807.pdf)

<sup>2</sup> Government Tourism Policy [http://www.culture.gov.uk/images/publications/Government2\\_Tourism\\_Policy\\_2011.pdf](http://www.culture.gov.uk/images/publications/Government2_Tourism_Policy_2011.pdf)

In addition HS2 has apparently not responded in its 22 November letter to the Chiltern Countryside Group's first question in the 12 July forum document:

### **CCG Question: National Treasure**

*The Government – in its 2011 Natural Environment White Paper – says that Areas of Outstanding Natural Beauty (AONBs) are “national treasures”. Please explain how your proposals are commensurate with this status.<sup>3</sup>*

We believe it is more than reasonable for us to expect an answer within four weeks considering the four and a half months we have had to wait for HS2 Ltd's response to this question so far. In replying we invite you to look at the Chilterns Conservation Board's panorama photo tour.<sup>4</sup>

Our considered opinion is that HS2 Ltd's proposals are not commensurate with the national treasure status, specifically the following:

- a) Wendover Dean Viaduct up to 17m high in a currently tranquil valley apparently affecting noise levels up and down the Misbourne Valley.
- b) HS2 will be heard - if not seen due to tree planting - from the Chilterns escarpment. This is a national landmark made popular in particular at the National Trust's Coombe Hill. The route travels directly beneath the escarpment in the AONB. Government tells us such landmarks are important to UK Tourism.<sup>5</sup>
- c) As far as we can see HS2 will be heard - if not seen due to tree planting - from a total of 12 nationally and regionally important trails in the AONB overlooking/crossing the surface route.<sup>6</sup>
- d) HS2 will directly impact on a 2.5km long irregular bowl-like landform south of Wendover in the AONB. This bowl-like landform is impacted by the two 500m long viaducts and a 1km embankment up to 9.8m high, with a mean height 6.9m. This will affect the public's enjoyment of 10 of the above nationally and regionally important trails. The 10 trails are located on the rim/sides of the bowl. Has HS2 Ltd fully appreciated the impact of the scheme here?<sup>7</sup>

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<sup>3</sup> Natural Environment White Paper - The Natural Choice: Securing the Value of Nature Paragraph 4.35.  
<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

<sup>4</sup> Chilterns Conservation Board Panorama Photo Tour of the February 2011 design  
[http://www.chilternsaonb.org/uploads/files/high\\_speed\\_2/panorama-photo-tour.pdf](http://www.chilternsaonb.org/uploads/files/high_speed_2/panorama-photo-tour.pdf)

<sup>5</sup> Government Tourism Policy [http://www.culture.gov.uk/images/publications/Government2\\_Tourism\\_Policy\\_2011.pdf](http://www.culture.gov.uk/images/publications/Government2_Tourism_Policy_2011.pdf)  
Foreword by the Chancellor of the Exchequer.

<sup>6</sup> The Ridgeway, Icknield Way, Chiltern Way, Chiltern Link, South Bucks Way, Aylesbury Ring, Chiltern Cycleway, Chiltern Heritage Trail, National Cycle Network Route 57, National Cycle Route 576, Regional Route 30, Regional Route 3 (note some routes are shared).

<sup>7</sup> HS2 Ltd says “only 1.5 miles of the route will be visible” Review of Possible Refinements to the Proposed HS2 London to West Midlands Route Page 33 paragraph 4.3.11 January 2012

- e) A cutting - more than 2kms long - which in places is only 2-3m deep. Here large bunds will need to be built making the Misbourne valley side-wall smoother.
- f) The wholesale destruction arising from the portal of the bored tunnel at Mantle's Wood, and the route section north from the portal. As you know, tree planting will not make up for the loss of irreplaceable ancient woodland habitat.
- g) A route so destructive to wildlife in the AONB: to ancient woodland,<sup>8</sup> to large trees not in woodland,<sup>9</sup> and to species-rich hedgerows<sup>10</sup> (details below), considering the importance placed on these by Government.<sup>11</sup>
- h) The effect of Wendover Viaduct (Small Dean) up to 12m high on the public's enjoyment of the AONB (see panorama photo tour above).
- i) The division of Grims Ditch Scheduled Monument.
- j) The effect on the historic landscape including sunken lanes and substantial trees.
- k) The scheme's effect on the socio-economic well-being of communities that help support the AONB. Their importance to the AONB is recognised in law.<sup>12</sup>
- l) The effect on a readily accessible national resource. Government tells us - in the 2011 Natural Environment White Paper - it wants "everyone to have fair access to a good quality natural environment" as a means of tackling concerns over social well-being and big public health issues. The White Paper gives high blood pressure, high cholesterol levels and mental health as examples.<sup>13</sup> I think you would agree the affected area of the Chilterns AONB is one of the best examples of such natural

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3657/hs2-review-of-possible-route-refinements.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3657/hs2-review-of-possible-route-refinements.pdf)

<sup>8</sup> Four ancient woodlands will be severely damaged by the route in the AONB. The affected AONB area contains a relatively small amount of this habitat in contrast to some other Chilterns areas. If the current plans went ahead the surface route would severely damage 40% of ancient woodland sites on the east side of the Misbourne Valley.

<sup>9</sup> A Chilterns Conservation Board Survey of the February 2011 design found that between Mantle's Wood and Leather Lane (i.e. less than half the surface AONB route length) there would be 59 truly ancient, valuable and potentially interesting trees not in woodland that would be destroyed within 30m of the route (Defra classification). Due to the standards imposed by the Defra classification, many further trees that the general public would recognise as large and impressive were not recorded.

<sup>10</sup> A Chilterns Conservation Board Survey of the February 2011 design indicates the level of damage that would be done to ecological networks by the current design. The Board found that a total of 98 hedgerows would be severed between Mantle's Wood and Leather Lane alone (i.e. less than half the surface AONB route length) within a 30m corridor of the route. It found that of the 5kms of hedgerow destroyed, 3kms were pre-1840 species rich hedgerow (simplified Defra criteria)).

<sup>11</sup> Natural Environment White Paper chapter 2 <http://www.defra.gov.uk/environment/natural/whitepaper/>

<sup>12</sup> Countryside and Rights of Way Act 2000 s 87

<sup>13</sup> Natural Environment White Paper chapter 4 <http://www.defra.gov.uk/environment/natural/whitepaper/>

environment considering its proximity to, and accessibility from, London and other agglomerations? As you may know, it is the only AONB between London and Birmingham.

We will reply with more questions in due course to HS2 Ltd's 22 November letter, either in a further letter, or during the course of the forum meetings, whichever is most appropriate.

We remain firmly convinced HS2 is not in the nation's best interest taking into account its business case, its cost and its environmental case including the route. These points have been made many times but we have yet to receive a considered response. If the Government decides to continue with the scheme we believe the following scenarios should be fully explored:

- A bored tunnel through the Chilterns AONB.
- A full AONB tunnel with a "gap" as referred to in the EU Technical Specification for Interoperability.<sup>14</sup> Should such a "gap" be found necessary then its location should minimise HS2's effect on the nationally designated AONB and its communities.

We look forward to your early reply.

Considering the public interest in this matter we shall be distributing this letter widely.

Yours sincerely,

Marilyn Fletcher B.Sc. Ph.D.  
On behalf of the Chiltern Countryside Group

cc.

Patrick McLoughlin, Secretary of State

Simon Burns, Minister of State

Maria Eagle, Shadow Secretary of State

Cheryl Gillan MP

David Lidington MP

Dominic Grieve MP

David Gauke MP

Steve Baker MP

Mike Penning MP

Peter Lilley MP

Andrea Leadsom MP

Cllr Martin Tett, Chair 51m

Nicholas Rose, Leader, Chiltern District Council

David Davies, Transport Specialist, Transport Select Committee

Douglas Oakervee, Chair HS2 Ltd

Martin Wells, Community and Stakeholder Manager Country South HS2 Ltd

Charlotte Brewster, Stakeholder Advisor Country South HS2 Ltd

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<sup>14</sup> TSI paragraph 1.1.2 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:064:0001:0071:EN:PDF>