

Response to the HS2 London – West Midlands Environmental Statement Dated November 2013

By Little Missenden Parish Council

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. Therefore it carries a significant responsibility. A member of the public has every right to expect, albeit 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.

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.

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

The Non Technical Summary, with its significant omissions and errors, 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 reasoning given for this tunnel is very similar to the reasons that have been provided 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”*

Alternative proposals to extend the Chilterns tunnel to tunnel throughout 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 about the decision to build a tunnel at Northolt but not to do so for an area of National Importance. As the impact on the environment for the Chilterns AONB is substantially worse than at Northolt, where an existing rail route in a built up area was to be upgraded, the dismissal of an extended tunnel in the much more peaceful AONB where the reduction in “visual, sound, noise and vibration and traffic and transport effects” would be much more significant is not acceptable.

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.

This ignores any transfer of construction workers from Crossrail, that is scheduled to be completed as HS2 might commence, which are thus not new jobs and also fails to point out the jobs that will not be created because of specific developments halted by the threat of HS2.

7.12. - 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 linear nature of the project and its impact along its length on road transport.

Nowhere in the NTS is there any consideration of the risks to other road users, including cyclists and pedestrians, arising from the traffic generated by the construction of HS2. It is clear from recent deaths of cyclists in London from HGVs, that this is a serious risk. The NTS should include an estimate of the increase in deaths and serious injuries arising throughout the route.

The issue is noted in the Health Impact Assessment but no conclusions are reached or mitigation proposed. The associated evidence base which is calculated on a national basis, where HGVs do most of their journey's on motorways is also skewed to minimise the effects.

LMPC believes, as previously requested, that a Cycleway/footway must be provided along the A413 to minimise the chances of accidents affecting these users.

7.4 Community

The local effects are not confined to one community as the NTS suggests. The extent is far wider than effects on South Heath. HS2 Ltd know but refuses to acknowledge, that Hyde Heath, Potter's Row, The Lee, Ballinger, Wendover and Great and Little Missenden, Prestwood and Little 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'. The dictionary definition of temporary is "lasting for only a limited period of time". The road closures, traffic jams and diversions, due to construction traffic on the access routes, and the noise and dust will become a way of life for three and a half years during the construction period and a further two and a half years during the fitting out period; a total of at least 6 years. This to most of our residents will feel like a lifetime.

8 Summary of Environmental Effects by Area

8.8 The Chalfonts and Amersham and 8.9 Central Chilterns

The potential traffic chaos in the construction period is recognised in the NTS where it states that the A413 will experience congestion and delays in CF area 10 at several junction (including B4009); CF Area 9 states the same at junctions with A 4123 and B 455 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, even though it is already the busiest junction on the A413 in this area.

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 totally disregards our submissions for changes in the design and implementation of HS2 as set out in the draft environmental statement and they are not identified as having been considered in Volume 5; Draft Environmental Statement Consultation Summary Report (CT-008-000).

Preservation of the Chiltern AONB is paramount. The 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 examination.

In 11.2.3 Table 8, a list of local route alternatives is provided. The extended tunnel proposals from Mantles Wood to Wendover that were accepted by HS2 Ltd as feasible from an engineering perspective and environmentally preferred and which would protect the Chilterns AONB have not even been listed. As they are mentioned in Volume 2 CFA 09 this omission is presumably deliberate.

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 draft CoCP, which it is claimed includes mitigation proposals must be included in the Hybrid bill to ensure suggested mitigation is implemented.

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.

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 Main Line 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 likely to be overstated, just as those for HS1 were proved to be
- d) HS2 does not form part of a national transport strategy, or even a national rail strategy
- e) no proper strategic environmental assessment has been carried out prior to making decisions about the preferred route
- f) 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
- g) the proposed scheme is not carbon neutral.

3. Approach to Consultation and Engagement

3.2.10 - is factually incorrect as in 2013 only two meetings were held locally, half the number of the stated bi-monthly meetings as HS2 claimed, incorrectly, they were unable to hold community forums in 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.

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.

6.25.4 – Table 7 states “*Old Oak Common. Work to GWML to accommodate a new interchange station serving the Proposed Scheme and GWML. The Acton and Northolt Line will no longer connect to GWML.*” No justification for the removal of the connection at Old Oak Common West Junction is provided anywhere in the ES and it is clearly practical to maintain this connection without any significant change to the design. Whilst supporting the proposed development of the interchange at Old Oak Common, LMPC considers this rail connection to be key to providing rapid access to HS2 and Crossrail by our parishioners.

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 and be part of the Hybrid Bill.

The conclusion is that the CoCP will be finalised by the principal undertaker. The 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 over 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

7.3.3. - 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 between Old Oak Common and Birmingham Interchange. Any local modal shift from car to rail between these two points will be associated with the Chiltern line, which will not experience any “released capacity” as claimed here. 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.

8 Scope and Methodology Summary

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 the 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*

8.9 Sound, noise and vibration

8.9.38 states *“Any noise effects arising from these short-term construction activities will be controlled and reduced by the management processes set out in the draft CoCP.”*

No definition is given of “short-term”. Construction machinery and activities are very noisy and along with the associated additional traffic noise which spreads far beyond the construction site, is expected to last up to six years. This will be exceedingly disturbing to local residents in the surrounding villages as well as close to the line of route. Mitigation would be significantly improved in the Chiltern AONB if the Chiltern Tunnel was extended to beyond Wendover as previously requested.

8.9.38 *“It is assumed that the engineering trains will be specified and operated so that any adverse noise effects are no greater than those for the night-time passenger services.”*

As the proposed service pattern has no late night passenger services these engineering trains are implied to be completely silent. In practise on the conventional railway, engineering trains are much noisier than passenger trains, due to their slow movement, their warning signals, their engineering functions, such as railhead grinding, ballast renewal and tamping, and there is no reason to expect HS2 engineering to be different. Hence this permanent activity requires the effect on local communities to be recalculated using practical examples.

Preferably, mitigation would be significantly improved in the Chiltern AONB if the Chiltern Tunnel was extended to beyond Wendover as previously requested.

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 tunnelling 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.

9.1 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 the benefits, especially the environmental benefits.

11.2.3 As identified above Table 8 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.

Volume 2 CFA 04 Report

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The statements in:

2.2.5 “The Acton to Northolt Line (ANL), which links London Paddington and West Ruislip, crosses the route at North Acton. The current passenger service is only one train a day in one direction, on Mondays to Fridays. Occasional freight services also use this line;”

& 12.5.38 “However, there are alternatives to this link and potential routes to access the retained section beyond Old Oak Common. This is not considered a significant effect.”

does not recognise the strategic position of the ANL route in providing a link to access the new station at Old Oak Common. The alternatives to this link are the Central Line to North Acton or East Acton and then a circuitous walk to Old Oak Common or a diverted train service via the Network Rail Greenford Branch which would give significantly longer journey times taking at least 20 minutes longer for journeys from South Buckinghamshire.

The map CT09- 06- 009a shows a new access road to be built on the track bed of the ANL from Old Oak Common Lane to the re-sited Network Rail Substation. The current substation is accessed by a footpath from Old Oak Common Lane. Why this road is needed is not detailed in any document. If an access road is needed it could be built from the bridge on Victoria Road. Alternatively the substation could be resited about 100m away on the opposite side of Old Oak Common Lane, which would avoid the need for the access road altogether.

The diversion of services from Marylebone to Old Oak Common/Crossrail would also free up capacity at Marylebone for the Chiltern Line services.

Volume 2 CFA 09 Report

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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.

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, Little Kingshill and other local villages within 1km of the proposed scheme .

2.1.8 - The villages of Little Missenden Parish rely on the A413, for access (including emergency vehicles). Access from the villages will be jeopardised by the increased traffic on the A413 to the north west to Wendover and Aylesbury and to the South East to Amersham and beyond, and in particular to the only local A&E Unit at Stoke Mandeville Hospital.

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 We note that no changes that we proposed in our response to the Draft ES have been included in the scheme.

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. 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.

The head house is described as 4m high and the auto transformer approximately 5m high. Auto transformers are not normally contained within buildings and have a very industrial appearance having a totally inappropriate visual impact for this location. The whole installation at this location must be designed to meld into the landscape of the AONB.

Tall screening is an inadequate mitigation.

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 measure of the construction traffic using these locations is provided. HS2 Ltd. informed the CAF9 community forum that there would be no access from the A413 in this manner.

2.3.17 The access routes listed for each construction site in the following sections commence at either the M25 (via the M40 and A412 Denham to Watford) and/or the M40 (via the A355 Amersham to Beaconsfield). There has been no consideration either in CF8 or area CF9 of the cumulative effects of the traffic on the A413. In CFA 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.

2.3.27 The ES fails to recognise that the construction route for the accessing the Little Missenden Vent shaft is across a dual carriageway. This will have consequential impact on the access out of Little Missenden, and on other users of the A413.

2.3.39 A major PRoW Impact is that LM17 and LM 21 have been merged and a 1500m diversion proposed along the tunnel access routes. This is a major hazard for walkers using this designated footpath during the construction period along Hyde Heath Road.

It is also stated that *“Footpath LMI/21 remains open during construction until it is permanently diverted 450m to the east over realigned Footpath LMI/17”*. In fact map CT-06-032 shows LMI/21 permanently stopped up, with no alternative provided apart from the 1500m diversion along Hyde Heath Road. This routing is not acceptable.

2.6 Route section main alternatives

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 National Importance. 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 have been provided 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”*

Alternative proposals to extend the Chilterns tunnel to tunnel throughout 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 about the decision to build a tunnel at Northolt but not to do so for an area of National Importance

As the impact on the environment for the Chilterns AONB is substantially worse than at Northolt, where an existing rail route in a built up area was to be upgraded, the dismissal of an extended tunnel in the much more peaceful AONB where the reduction in *“visual, sound, noise and vibration and traffic and transport effects”* would be much more significant is not acceptable.

Extended Chiltern Tunnel to the end of the AONB
Sections 2.6.5 – 2.6.16

Little Missenden Parish Council continues to request that the Chiltern tunnel should be extended to pass beneath the entire AONB.

The overarching principle being to protect the AONB and in particular to remove the threat of destruction to Mantles Wood and its ancient woodland, at the heart of the AONB.

All the extended tunnel options described in the ES, perform well on environmental grounds compared with the present proposal, as they avoided a range of impacts upon environmental receptors. This included 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.

A fully bored tunnel throughout the AONB would reduced 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 this must also be taken into account when considering a fully bored tunnel. Furthermore, any assessment of the benefit of a fully bored tunnel must take into account the non-market effects of High Speed Rail in the Chilterns (ref Peter Brett report 'An assessment of the non-market effects of the Proposed Scheme compared to the Alternative proposal') which have not been taken into account hitherto.

HS2 Ltd list as other objections, apart from cost, as including Environmental damage to Durham Farm, and the need for a construction site at Wendover. There is already a construction site at Durham Farm and there is a construction site at Mantles Wood where the environmental damage to an ancient woodland is greater as well as ten construction sites between there and Wendover.

2.6.12 states *"However, there would be some new local impacts under both Options as they would require tunnel boring to be conducted from the northern end of the extended tunnel resulting in the need for an extensive construction site north of Wendover. This would increase traffic, noise, construction and material handling in this location. In particular, the surplus material from the tunnel would have to be brought to the surface, treated and moved to a suitable location for reuse or disposal. Additional lorry movements on the road network within the AONB under Options B and C would therefore be required."*

This statement reflects the HS2 Ltd obsession of using roads rather than rail for transportation of material. We have repeatedly requested that HS2 uses rail rather than road where at all possible as this is lower cost and more environmentally friendly. This argument regarding additional lorry movements is spurious. The HS2 route north of Wendover is immediately adjacent to the Chiltern rail line, and the HS2 plan includes a maintenance loop so that space will be readily available for exchange sidings and as a construction site during the construction period.

5. Community

5.3 Environmental baseline

Little Kingshill must be included in this community analysis for it to be meaningful. Little Kingshill has the following community facilities, a Nursery School, a Primary and Junior School, a Baptist Church and a Village Hall (which HS2 Ltd used for Community Forums meetings), a Common, a Cricket Club and the Full Moon Public House.

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.

5.4.4 - The conclusion that there is no temporary or permanent effect on Hyde Heath and Little Missenden is seriously misleading. The construction will impact connectivity, access to the Misbourne School and Great Missenden station. Access to and from Little Missenden and Hyde Heath will be severely impacted by the construction traffic using the A413 from the construction sites.

5.4.4 states “*No significant temporary effects have been identified in the community assessment for Hyde Heath and Little Missenden*”. Little Missenden will be severely affected by the proposed scheme by having two construction sites; the Ventilation shaft and transformer construction site to the East and a further one at Mantles Wood, to the West of the Village. As well as noise, light and dust pollution, traffic flow will be adversely affected on the A413 impeding access to and from the village.

5.5.1 - The effects of the road delays on all Little Missenden Parish residents have been totally ignored.

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 across the Misbourne Valley from Holmer Green, Little Kingshill, Little and Great Missenden. With the raising of the line by 3m in many of the cuttings, the catenary masts will be visually objectionable and at night there will be the light pollution effect of light flashes every few minutes as a train passes.

9.2.4 which states that several PROW's were inaccessible is incorrect, as by their definition the public have a right of way. This statement indicates the total inadequate quality of the consultancy work carried out.

9.5.7 - 9 - The ES concludes that there will be a moderate adverse effect in operation on the Misbourne North and Hyde Heath North LCA's 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 are 55 million tourist visits the Chilterns AONB with substantial income generated for the area.

11. Sound, Noise and Vibration

11.2 details the sound, noise and vibration baseline. The baseline locations have been limited to locations immediately adjacent to the line of route. Locations to the east of Little Missenden and west of Hyde Heath are listed in SV-002-009 but we have been unable to find any maps that identify the actual location of these sites. The Little Missenden Parish villages of Little Missenden, Little Kingshill and Hyde Heath, are all likely to be affected by construction noise and potentially by noise generated by the operational railway. Not taking these relatively quiet locations into account is not acceptable.

11.3.3 – states “*Some tunnelling support activities at Chilterns tunnel north portal will need to be undertaken during the evening and night-time for reasons of engineering practicability*”. Such general expectation is totally unacceptable and must to be controlled by powers in the hybrid bill.

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

During the construction phase there will be severe noise pollution at Pipers Wood Cottages, next to the vent shaft construction site, and Park View cottages directly opposite it. Tall screening will be an inadequate mitigation.

Noise and light pollution from evening and night working at the Mantles Wood tunnel portal and during operation will be substantial and will affect the tranquillity of residents and visitors to the AONB.

11.4.13 – The ES avoids adhering to the interim target of WHO night noise. This is unacceptable.

12 Traffic and Transport

12.2.3 - The assessment is inadequate. 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 commute to work, so this analysis is illogical. Most of the commuters use their cars either to get to Great Missenden or Amersham stations, or to drive to work. Additionally cars and buses are used to transport children to and from schools. In practice, all local roads as well as the A413 and B355 are very busy from 7.00 to 09.00 and from 15.00-19.30.

12.3 Environmental Baseline

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.

12.3.6 - fails to consider school buses which are much more numerous and important in the area for all communities than the twice weekly bus services in Hyde Heath and Little Missenden.

12.3.5 states *“Safety and accident data for the road network subject to assessment has been obtained from BCC for the three year period of 2009 to 2011”*. This data does not reflect the serious accidents on the A413 in this area in the last two years and for the Environmental Statement to be accurate must be updated.

As noted in our response to the NTS nowhere is there any consideration of the risks to other road users, including cyclists and pedestrians, arising from the traffic generated by the construction of HS2. It is clear from recent deaths of cyclists in London from HGVs, that this is a serious risk. The NTS should include an estimate of the increase in deaths and serious injuries arising throughout the route.

The issue is noted in the Health Impact Assessment but no conclusions are reached or mitigation proposed. The associated evidence base which is calculated on a national basis, where HGVs do most of their journey's on motorways is also skewed to minimise the effects.

LMPC believes, as previously requested, that a Cycleway/footway must be provided along the A413 to minimise the chances of accidents affecting these users.

12.4 - Effects arising during construction. Avoidance and mitigation measures.

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”*

Examination of Volume 5 Map book Transport and Traffic 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. Hyde Lane and Leather Lane are not shown as access routes, yet both will be used to access the HS2 route.

The effect of traffic flows on the A413 is shown either side of Little Missenden as moderate, but it is not calculated for the section past Deep Mill and Little Missenden, which is single carriageway and has additional flows from/to Little Kingshill, Great Missenden, Prestwood, Little Missenden, Hyde Heath and Holmer Green. Here the effects will be major.

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.

A413 Amersham Bypass with Whielden Street and A 404 (moderate adverse effect due to HGV flow whereas this cannot be with cumulative traffic from a major adverse area and increasing traffic as recorded in the published surveys.)

In short these assessments are totally illogical they must have been assessed individually. Traffic increases from each construction site especially with another construction site at the junction of A 404 road to High Wycombe and from incoming traffic at each junction along the designated construction route so that each assessment has to be greater along the construction route. These assessments are made even more flawed as the final junction, A413 with A355 where construction traffic is shown in part as leaving A413 has been totally omitted in the ES assessment, apart from the almost irrelevant effect on non motorized users.

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. The definition of clusters of accidents used in Volume 5, as 9 severe accidents over three years, may be one used by the DoT, but it does not reflect the effect of a single accident on the families involved. The A413 in the vicinity of Little Missenden has experienced several fatal accidents in recent years and the traffic will increase with several construction sites in the vicinity and using the A413 all of which belies the statement.

As stated in our response to the NTS no where is there any consideration of the risks to other road users, including cyclists and pedestrians, arising from the traffic generated by the construction of HS2. It is clear from recent deaths of cyclists in London from HGVs, that this is a serious risk. The CFA9 Report should include an estimate of the increase in deaths and serious injuries arising throughout the route.

The issue is noted in the Health Impact Assessment but no conclusions are reached or mitigation proposed. The associated evidence base which is calculated on a national basis, where HGVs do most of their journey's on motorways is also skewed to minimise the effects.

LMPC believes, as previously requested, that a Cycleway/footway must be provided along the A413 to minimise the chances of accidents affecting these users.

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.

13.1.9 refers to ongoing discussions with the Environment Agency and Affinity Water. To protect the public water supply, these discussions must be concluded prior to the conclusion of the report stage of the Hybrid bill and the results published so that the Parish Council and other local parties can make appropriate representations.

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.

13.4.12 the proposal to discharge water from the Vent Shaft works at Little Missenden is unacceptable. These works will produce contaminated water and without any hydrological survey being carried out, there remains a risk that public water supplies will be contaminated.

13.4.43 the conclusion that no significant effects on surface water, groundwater and flood risk have been identified is invalid until hydrological surveys have been carried out.

13.5.2 Volume 1 section 9 contains only examples and no guaranteed solutions 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.

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 key words regarding 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 a consistent 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 has consistently failed to demonstrate that HS2 and its route through the Chilterns AONB in particular, are in the public interest, nor have they fulfilled their statutory duty to properly identify and objectively rule out ALL viable alternatives.

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. Furthermore the M40 and the west coast main line cross the AONB at 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.

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.

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.

2.3.17 - 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.

2.3.20 As the M25 only crosses the AONB for about a mile in one corner, to refer to it in discussing tranquillity is invalid.

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 the greatest possible destruction to this valuable area.

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. Through the length of the route within the AONB there will be a continuous string of compounds which will cause substantial and long term disruption, noise light and dust pollution. In the case of Mantles Wood, permanent destruction of ancient woodland will arise, which the subsequent proposed planning will take at least 50 years to adequately replace.

2.5.5 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 – Whilst damage on the ground will mainly be limited to the NW of the Misbourne valley, the visual impact across the valley will not be limited

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

Woodlands

2.5.14 - Although the loss of woodland described represent a small proportion in the AONB, they are 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. The ES singularly fails to do this.

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 only to minimise the scale of the destruction.

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.

2.5.20 Network of PRow and Ancient Routes

There is no mention of the adverse effects of the scheme on these footpaths. E.g. the permanent closure of LMI 21, the permanent 1500m diversion of LMI/17 & 21 along the HS2 access road and Hyde Heath Road and the temporary closure of the South Bucks Way at Shardloes Park. The need to divert LMI/40 which passes through the Little Missenden Vent shaft site has not been identified.

Chalk Streams

2.5.21 – Chalk Streams

There is no mention of the adverse effects the scheme will have on the flow and water quality of the river Misbourne – an ancient chalk stream famous for sustaining a rare wild rainbow trout breeding environment .

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**. 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.

The effects of the construction and operation of the proposed railway will be substantial in the Misbourne Valley and on the residents of the villages of Little Missenden, Little Kingshill and Hyde Heath.

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.

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 km and the operational effect will be 45 sq km. 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’.

Network of PRow and ancient routes

2.6.15 states “By year 15 of operation, the reinstated hedgerows will have matured, reinforcing the historic field patterns present in the landscape, although these will still be severed by the Proposed Scheme in places.”

Ancient hedgerows cannot be replaced by a quick planting scheme, as they mature over hundreds of years.

2.6.17 – There is no mention of the permanent loss of PRowS in this section, which makes it inaccurate and incomplete. In particular LMI/21 will be closed and as proposed will be permanently diverted by over LMI/17, an increase of 1500m.

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 as no evidence of professional surveying or hydrology analysis being carried out.

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 its destruction of the Misbourne valley.

2.6.27 – The extensive list of specific impacts in this section undermines the conclusions in paragraphs 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 makes 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 disingenous. To conclude impacts on the centre, and widest part of the AONB, incorrectly referring to the Misbourne valley when the impacts are on the top of the chalk escarpment as well as on the AONB as a whole. It is unacceptable to suggest some form of ‘average impact’ over the whole AONB maybe an acceptable conclusion.

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 affecting as it would a national asset as it would be after 60 years.

2.3.33concludes “Taking into account the above, the effects of the Proposed Scheme on the special landscape qualities, natural beauty and landscape character and setting of the wider AONB during year 60 of operation will reduce such that it is not considered to be significant.”This statement made in the context of the wider AONB, is totally unacceptable for an area with National significance.

To summarise, it is clear that the effect of HS2 as proposed, on the AONB and its residents and visitors, is so great that the only acceptable solution is to tunnel completely through the AONB.