

**Proposed Decision to be taken by the
Portfolio Holder for Transport and Planning
on or after 17 February 2017**

**High speed Two Phase 2b, Crewe to Manchester, West Midlands to
Leeds Route Refinement consultation**

Recommendation

That the Portfolio Holder for Transport and Planning endorses the proposed response to the route refinement consultation as set out in **Appendix A.**

1.0 Background

- 1.1 High Speed 2 (HS2) will be the UK's new high speed rail network. The network will link London and the West Midlands (Phase One) and will expand in the future to connect with Manchester and Leeds (Phase Two b).
- 1.2 In 2013 the government (Department of Transport; DfT) announced the initial Phase 2b route; this was followed by a route consultation. The Council issued a Cabinet approved response (12 December 2013), as set out in **Appendix B.**

2.0 Phase 2b route 2016

- 2.1 The Government is now seeking views on a number of changes to the 2013 route, one of which directly affects North Warwickshire. The route change at Measham in Leicestershire now places the track to the east of the town in preference to the west (2013). The change brings some benefit to the town of Measham but creates a number of new impacts in North Warwickshire. The comments and concerns of the council are listed in **Appendix A.**
- 2.2 The 2016 route refinement consultation only requests comments on the principal change at Measham. It does not in the view of the council fully account for all the additional impacts in North Warwickshire, namely:
- 1) the village of Austrey, is now closer to the track by between 33m (south side of the village) and 144m (northern) aspect of the village.
 - 2) the track height at Austrey is either at grade or on embankment as it passes the village.
 - 3) the potential loss of the village playing fields and amenity value of them to the community.
 - 4) the increased noise levels in the village and surrounding settlements that find themselves closer to the route.
 - 5) the road layout (as published in the plan and profile drawings) at present does not account for the changes or provide a practical means of using Newton Lane.

- 6) the communities of Kingsbury, Polesworth, and Austrey are all within the EA Flood Zones 2 & 3 and at risk of surface water flooding.
- 7) the unresolved impacts on Kingsbury Water Park and Pooley County Park which have annual visitor numbers in excess of 380,000 a year.
- 8) the negative economic impacts on the small businesses and concessions at both country parks.
- 9) the access provision for the heritage centre, car park and the scout hut at Pooley Country Park.
- 10) the potential detrimental health impacts that could arise from living nearer to transport infrastructure.
- 11) the detrimental cost to the local and sub-regional economy from increased congestion and delay for the existing A5 corridor, which is critical to many businesses and the nearby MIRA Enterprise Zone.
- 12) the potential to stymie Highways England's ambition to dual the A5, compromise the emerging Midlands Connect Strategy and adversely affect the delivery of the North Warwickshire Borough Local Plan.
- 13) the significant risks to the growth strategy for the Coventry & Warwickshire LEP(Local Economic Partnership) and the adjoining LEPs of Greater Birmingham & Solihull and Leicester and Leicestershire .

2.3 The reduction of the distance between the track and the village is a new point of great concern for the community, who without detailed information have no means of understanding the full implications of the change or the mitigation necessary to alleviate the change of route.

2.4 It is the view of the council that HS2 must engage with businesses, landowners and communities as soon as possible and be in a position to give open and honest information in a timely way so that the timescales for the forthcoming stages are fully understood by those most badly affected. It is incumbent on HS2 to show that it has learnt from the Phase One project and that it will deliver improvements in Phase 2b.

2.5 The council actively encourages and welcomes early engagement in the development of the mitigation so that the plans submitted for the draft Environmental Statement (ES) and ES more closely met the needs of Warwickshire at the earliest opportunity.

2.6 The council will continue to be a pragmatic and honest source of information for communities, supporting them in their understanding of the process. It will use the experience of working on Phase One to secure the best mitigation and minimise the impacts wherever possible.

3.0 Conclusion

3.1 That the Portfolio Holder for Transport and Planning agrees the recommendation to approve the response to the consultation.

Appendices

Appendix A – Warwickshire County Council's response to the High speed Two Phase 2b, Crewe to Manchester West Midlands to Leeds Route Refinement consultation.

Appendix B – Warwickshire County Council 12 December 2013 Cabinet report; HS2: Phase 2 Route Alignment Consultation Response.

	Name	Contact Information
Report Author	Sara-Louise Lee	saralouiselee@warwickshire.gov.uk 01926 412830
Head of Service	Mark Ryder, Transport and Economy	markryder@warwickshire.gov.uk 01926 412811
Strategic Director	Monica Fogarty, Communities	monicafogarty@warwickshire.gov.uk 01926 412514
Portfolio Holder	Cllr Peter Butlin	peterbutlin@warwickshire.gov.uk

This report was circulated to the following elected members prior to publication:

Councillors Butlin, Johnson, Boad, Clark, Williams, Whitehouse, Stevens, Redford, Parsons, Morson, Lea, Fowler, Moss, Appleton

**Warwickshire County Council's response to the
High Speed Two Phase 2b, Crewe to Manchester West Midlands to Leeds
Route Refinement Consultation 2017**

1. Introduction

- 1.1 The Council will restrict its comments to question 4 of the consultation. Question 1-3 concern themselves with changes in the Cheshire and Manchester areas with questions 5-9 concerning themselves with changes in the Leicestershire, Derbyshire and South Yorkshire areas, none of which are within the council's remit to comment on.

2. Consultation questions and response.

Question 4. Question 4 – Route around Measham, Leicestershire. The Secretary of State is minded to move the route so that it runs to the east of Measham, away from the A42. Do you support the proposal to realign the route to the east of Measham? Please indicate whether or not you support the proposal together with your reasons

2.1 The council does not support the suggested amendment to the route at Measham because of the increased detrimental impacts on the community at Austrey, namely:

1. the Phase 2b track will now be closer between 33-144m to the village, having a number of additional adverse effects to the residents of the area.
2. the track will be either at grade on an embankment as it passes Austrey, that closer proximity of the route creates new and significant adverse effects (noise, visual intrusion, greater proximity to the construction works) that must be addressed and communicated to the community.
3. the route change further encroaches on the playing fields and community facilities, such that it may be impractical for them to remain in their current position.
4. the possible road impact at Newton Lane, the Plan and Profile map show the line crossing Newton Lane almost at grade. The council expects details to be brought forward that keep both No Mans Heath Lane and Newton Lane open for road users. Detailed consideration is needed for the treatment of the vertical alignments of the roads and the impact such changes will have on the residents of Austrey.

The consultation does not invite comments on minor changes at Polesworth, Kingsbury village and the country parks or on technical matters of; waste, minerals, traffic management, road safety, highway closures or amendments, public rights of way, flood, ecology, heritage, economy, social isolation and health matters. All of which are understood to be contained in a future consultations for the Draft and Full ES at a later stage.

Cabinet

12 December 2013

HS2: Phase 2 Route Alignment Consultation Response

Recommendations

- 1) Cabinet is requested to endorse the current working arrangements on HS2 Phase 2 and to authorise the Strategic Director for Communities to reply to this and any forthcoming consultations on HS2 Phase 2 including; safeguarding, blight, a draft environmental statement and the full environmental impact assessment as necessary.
- 2) Cabinet is asked to request that the Government and HS2 Ltd establish a 'special management zone and process' to ensure the comprehensive coordination of project activity between Phase 1 and Phase 2 in North Warwickshire.

1.0 Introduction and past work on HS2

- 1.1 The county council whilst maintaining its opposition to HS2 (Full Council resolution December 2010) has always adopted a pragmatic engagement strategy with HS2. In the last 3 years, the council has commented on a substantial number of consultations for the Phase 1 route to Birmingham and engaged in numerous technical forum meetings and community forum meetings organised by HS2.
- 1.2 The council has maintained an evidence-led basis to its comments and scrutiny of HS2 thus ensuring that any mitigation plans proposed by HS2 give the best possible outcome for the communities of Warwickshire.
- 1.3 The preferred route for Phase 2 of HS2 was formally announced on 28 January 2013 by the Secretary of State Patrick McLoughlin. A route refinement consultation opened on 17 July this year inviting views on nine questions. The county council will be submitting a response in the New Year to these questions; the draft response is contained in **Appendix A**.

2.0 The impact of the route in North Warwickshire

- 2.1 The changes and alterations to existing roads at this stage are only indicative; there is insufficient information in the published plans to determine if the proposals meet WCC highway standards. WCC's experience from Phase 1

has been that in general the design philosophy applied to the permanent roadwork solutions have been satisfactory for the re-provision of the existing highways but fail to make provision for future development potential. Therefore HS2 Ltd and the DfT must consider the future proofing of the network now if it is to avoid closing North Warwickshire to all future employment, tourism and development opportunities.

- 2.2 The implications for the communities of North Warwickshire are severe. The proposed route will pass close to and in some areas adjacent to established villages and hamlets. Whateley is especially badly affected as the line will annex one side of the village and mean the demolition of some property. Whilst HS2 'misses' most villages, the proximity of the route at Kingsbury, Whateley and Birchmoor is less than 100m and presents a real and present danger to the quality of life for the communities. The published documents do not as yet give any level of detailed mitigation or comfort that would enable the community to see a positive outcome.
- 2.3 It is far too early to estimate the full impact of the construction period, which is set to begin in 2023 and complete by 2032, or how it will be managed; this absence of information will only add to local concerns and fuel uncertainty. It is incumbent on HS2 Ltd to ensure that as much information and engagement as possible is given as early as possible to the widest audience. The county council would wish to see issues it has raised previously regarding poor communication and feedback, not repeated in the Phase 2 operation.
- 2.4 Part of the engagement process needs to include the establishment of a 'special management zone' for the Phase 1 & 2 interface covering the villages of Lea Marston, Marston, Bodymoore Heath and Kingsbury. The council calls for a specialist HS2 Ltd project manager to be appointed to coordinate the impacts on everyone who is uniquely and doubly affected by the planning and construction of HS2. The provision of this zone is critical due to the development of the rail head at Kingsbury Road serving both phases of the HS2 project.

3.0 The Rail Head; Kingsbury

- 3.1 HS2 Ltd are now proposing a rail head in the vicinity of Junction 9 of the M42; Dunton Island. Their proposal initially identified a location to the south of the Hams Hall business park; the Phase 1 Draft ES outlined the impact and scope of in May 2013. In September 2013 HS2 announced that they had made a significant amendment to the plans, the proposed rail head is to be located to the west of Kingsbury Road on the Y spur of the route. According to HS2 Ltd the site will serve both Phases 1 & 2 of the construction programme and provides a better environmental outcome.
- 3.2 There are a number of issues for the route consultation, the Phase 2 papers and plans currently fail to identify the rail head either as a feature of Phase 1 or 2. Plan reference C321-MMD-RT-DPP-110-550101 (Sheet 1 of 2 - Rev 05

dated 5/7/2013) does not show any detail of the Kingsbury Road Rail Head despite the chainage markers clearly identifies its location within the plans for Phase 2. The rail head is a significant development, approximately 1.2km by 0.5km comprising of circa 27 rail sidings, buildings and associated ancillary structures.

- 3.3 This 'development' now effectively straddles Phases 1 and 2 of HS2 but does not fully feature in either phase as a plan for public scrutiny. In other locations along Phase 1 HS2 Ltd have addressed this issue through the route refinement consultation, this has not been the approach used in North Warwickshire.
- 3.4 The rail head will serve both Phase 1 & 2 and may be in situ and operational for over 10 years which for many in this area of North Warwickshire does not suggest 'temporary' and for HS2 Ltd to imply the operation as temporary is disingenuous and fails to adequately assess the full impact of the additional traffic, construction operation and blight to their homes and daily lives.
- 3.5 This late amendment and omission of this from the previous consultations, highlights the importance and need for the Phase 1/ Phase 2 interface project team and must involve representation from the local authorities.

4.0 The Impact on the Country Parks in North Warwickshire

- 4.1 The proposed alignment of HS2 generally follows the route of the M42. The rail line directly affects both Kingsbury Water Park and Pooley Country Park. The primary effects will be on busy south side of the parks' main entrances where the visitor centres, cafes and toilets, and main visitor facilities are situated.
- 4.2 In addition to the 'land take' necessary for HS2, any land between the line and the M42 is effectively sterilised for visitors and/or any future use by businesses or the county council.
- 4.3 At Kingsbury Water Park the proposed alignment directly affects the miniature railway (run by Echills Wood Railway Association) who provide both pleasure rides and a transport system for park visitors between 3 stations. Furthermore the alignment will impact a range of other businesses and concessions as well as constraining overflow car parking.
- 4.4 HS2 is elevated on embankment through the water park and then on over 1km of viaduct. The height between existing ground levels to track bed varies between 7 and 10 metres (23 - 33ft). Inevitably the visitor experience within large areas of the park will be diminished by both the overall size and visual impact of the structures and exacerbated by the associated wires and gantries together with the associated noise.

- 4.5 At Pooley Country Park HS2 bisects the main visitor infrastructure to the South of the M42. The alignment, will cross the main park access, the car park, run close to the heritage centre, tea room and Pooley Wharf. If HS2 Phase 2 happens we will need to work with partners to develop a new future for Pooley, since a country park will not be viable with another major transport corridor running through it. It is essential that the work to regenerate this former mine site is not lost to the community as a result of HS2.
- 4.6 The county council requires HS2 to take a comprehensive approach to the evaluation of the impact of both Phase 1 & 2 on the whole of Kingsbury Water Park and Pooley Country Park, recognise that mitigating each element individually will devalue the true impacts on the assets and diminish their value to the community.
- 4.7 Furthermore, HS2 must establish a compensatory funding pot for mitigating alternative provisions, in advance of any damage to the country parks from the construction works. This will ensure that firstly the communities of North Warwickshire and the region can continue to enjoy the inclusive health and wellness benefits that currently exist through the provision of these facilities. Secondly, that as regional tourist destinations the parks support the local economies within the villages (pubs, shops, B&B's, etc.) and are a gateway to other attractions within the North Warwickshire Countryside.

5.0 The Phase 2 route in North Warwickshire

- 5.1 The interface of Phase 1 and 2 is just north of the M42 J9, Dunton Island and Kingsbury Road in North Warwickshire; Phase 2 of the eastern (Leeds) leg extends for approximately 17.7km in North Warwickshire before it enters Leicestershire.
- 5.2 The route crosses 11 county highways, directly affects M42 (J10) and A5 and intersects 15 Public rights of Way (PROW). The table below identifies each highway road and how (if known) HS2 will cross. At this stage HS2 have not provided sufficient detail in the published plans to undertake a similar exercise on the PROW. This will be addressed in the consultation response and future correspondence.

Table 1 – Roads in Warwickshire directly affected by Phase 2 – HS2

Road name/ location	Likely road solution
Bodymoore Heath Road	To go under new HS2 viaduct
A51 Tamworth Road	To go under new HS2 viaduct
Whateley Lane Loop	Not yet defined
Whateley Lane	Not yet defined
Overwoods Road	Not yet defined
M42 J10 (leg of A5)	A5 over HS2 line - in cut & cover tunnel

Road name/ location	Likely road solution
M42 J10 (leg of Green Lane)	Green Lane over HS2 line - in cut & cover tunnel
Green Lane near Birchmoor	Green Lane over HS2 line – in cut & cover tunnel
Hermitage Lane	Not yet defined
B5000 Tamworth Road	Not yet defined
Linden Lane /Shuttington Road	To go under HS2 viaduct
Newton Lane	Not yet defined
No Mans Heath Road	Not yet defined

6.0 Phase 2 questions

- 6.1 It is interesting that the Phase 2 consultation questions now focus on views relating to the locations and number of stations proposed and the inclusion of utilities along the spine of the route, this is a significant change from the Phase 1 consultation on the route.
- 6.2 The council welcomes the change of emphasis in Phase 2 but is disappointed that in Phase 1, no opinions were sought on these issues. Where information was offered on the inclusion of telecommunications infrastructure this was rejected as periphery to the Phase 1 project.

7.0 What next: Timescales associated with the decision and next steps

- 7.1 The council has continued to take a pragmatic, balanced and evidence-based approach to engagement with HS2 Ltd during Phase 1. The county council will continue this approach throughout Phase 2.
- 7.2 Despite this pragmatism, the council is already disappointed that lessons concerning community engagement and communication have not been learnt. The council urges the Government and HS2 Ltd to review and reinforce their planned engaging and communication policies for Phase 2.
- 7.3 The route consultation closes on 31 January 2014. We expect an outcome from the consultation in the autumn of 2014, shortly followed by an announcement from HS2 Ltd on their project plan and engagement processes. In the interim the county council will continue to press HS2 for greater engagement and route refinement concessions for the communities of North Warwickshire.

	Name	Contact Information
Report Author	Sara-Louise Board	saraboard@warwickshire.gov.uk Tel:01926 412830
Head of Service	Mark Ryder I	markryder@warwickshire.gov.uk Tel: 01926 412537
Strategic Director	Monica Fogarty	monicafogarty@warwickshire.gov.uk Tel: 01926 412514
Portfolio Holder	Cllr Bob Stevens	cllrstevens@warwickshire.gov.uk

Appendix A – HS2 Phase 2 consultation questions and responses

This consultation is seeking your views on the following questions:

1 Do you agree or disagree with the Government’s proposed route between the West Midlands and Manchester? This includes the proposed route alignment, the location of tunnels, ventilation shafts, cuttings, viaducts and depots as well as how the high speed line will connect to the West Coast Main Line.

1.1 Warwickshire County Council does not consider it appropriate to comment on proposals that do not directly affect Warwickshire.

2 Do you agree or disagree with the Government’s proposals for:

a. A Manchester station at Manchester Piccadilly?

b. An additional station near Manchester Airport?

2.1 Warwickshire County Council does not consider it appropriate to comment on proposals that do not directly affect Warwickshire.

3 Do you think that there should be any additional stations on the western leg between the West Midlands and Manchester?

3.1 Warwickshire County Council does not consider it appropriate to comment on proposals that do not directly affect Warwickshire.

4 Do you agree or disagree with the Government’s proposed route between West Midlands and Leeds? This includes the proposed route alignment, the location of tunnels, ventilation shafts, cuttings, viaducts and depots as well as how the high speed line will connect to the East Coast Main Line.

4.1 Warwickshire does not agree with the route as currently described in the consultation documentation because the proposed route and associated engineering structures do not currently afford sufficient protection or mitigation to the affected communities of North Warwickshire.

4.2 The Council has identified the following key areas of particular concern at this stage; each will require significant additional refinement and review by HS2.

4.3 The council believes that there could be community and environmental value in modifying the vertical alignment of the route throughout North Warwickshire.

4.4 Furthermore a full (& transparent) cost benefit study should be undertaken and shared with the community. This needs to clearly state the pros and cons of various options, including but not be limited to: a full appraisal and consideration of the advantages of adopting more “Green Structures” to mitigate the impact of the rail line where it interacts with communities and crosses existing transport infrastructure. This could in turn reduce the long term visual impact on communities, provide noise mitigation, avoid some aspects of land severance and reduce the barriers to existing wildlife corridors.

4.5 The published consultation plans show incomplete local road alignment details for almost two thirds (7 out of 11) of the County roads affected by Phase 2. These are:

Road name/ location	
Whateley Lane Loop	HS2 to provide road realignment details
Whateley Lane	HS2 to provide road realignment details
Overwoods Road	HS2 to provide road realignment details
Hermitage Lane	HS2 to provide road realignment details
B5000 Tamworth Road	HS2 to provide road realignment details
Newton Lane	HS2 to provide road realignment details
No Mans Heath Road	HS2 to provide road realignment details

The council requires HS2 to:

- a) Engage at the earliest possible stage of their planning process to ensure that their proposed solutions meet the County Highway Design Standards and give full and proper consideration to the form and function of their design and local character.

4.6 Rail Head: The Council is very disappointed in the presentation and timeliness of the railhead details Plan C321-MMD-RT-DPP-110-550101 (Sheet 1 of 2 - Rev 05 dated 5/7/2013) fails to show any details of the Kingsbury Road Rail Head. The recent move of the major railhead facility, which is over 1.2km by 0.5km and comprises of rail sidings and buildings, now effectively straddles the Phase 1 and 2 zones of HS2 at a location immediately south-west of Marston. At present the detail on the current published plans makes no reference to the additional development.

4.7 The scale of construction and planned use of the railhead will generate significant traffic which will compound peak hour capacity issues on the A446/ J9 of the M42. It is vital to maintain a safe and effective access to the local communities of Marston, Lea Marston, Kingsbury and the Kingsbury Fuel Depot. Temporary closure of the A4097 would not be acceptable.

The council requires HS2 to :

- b) Take full account of the County Council's Cabinet report on 12 September 2012 that states on page 5 that "There will be no permanent closure to any road within Warwickshire's current highway network," and amend its intention to close the A4097
- c) Update the published Phase 2 plans to show the full extent of the Rail Head structures at the start of Phase 2.

Marston:

4.8 Marston runs alongside the M42's easterly side in cutting up to 8m deep, severing Cocksparrow House Farm then passes over the River Tame flood plain and Bodymoor Heath Road on viaduct

The council requires HS2 to

- d) Address the impact on the village within the 'Special Management Zone' as set out in requirement "P" on page 6

Kingsbury Water Park

4.1 The proposed alignment generally follows the route of the M42. The rail line is on the busy and congested southern side of the water park, close to the park's main entrance where the visitor centre, cafe and toilets, and visitor facilities are situated.

4.2 In addition to the 'land take' necessary for HS2 any land between the line and the M42 is effectively sterilised for visitors and/or any future use by businesses or the Council.

4.3 The proposed alignment directly affects the miniature railway (run by Echills Wood Railway Association) who provides both pleasure rides and a transport system

for park visitors between 3 stations. Furthermore the alignment will impact a range of other businesses and concessions as well as constraining overflow car parking.

4.4 HS2 is elevated on embankment through the park and then on over 1km of viaduct. The height between existing ground levels to tracked varies between 7 and 10 metres (23 - 33ft). Inevitably the visitor experience within large areas of the park will be diminished by both the overall size and visual impact of the structures and exacerbated by the associated wires and gantries together with the associated noise.

The council requires HS2 to

- e) Take a comprehensive approach to the evaluation of the impact of both Phase 1 & 2 on the whole of Kingsbury Water Park and recognises that mitigating each element will devalue the true impact on the asset.
- f) Establish a compensatory funding pot for mitigation and alternative provision in advance of any damage to the parks from the construction works. This will ensure that the communities of North Warwickshire and the region can continue to enjoy the health and wellness benefits that currently exist through the provision of the Parks.

Kingsbury village

4.5 The Council recognises the aspirations of the Kingsbury community that, HS2 should consider a tunnel under Kingsbury Park and extending to the far edge of Polesworth. This would provide a significant reduction in the environmental impact in North Warwickshire and remove the need for lengthy and complex works at Junction 10 of the M42. It will negate the need for the structures associated with the crossing at Green Lane, Hermitage Lane and B5000 and benefit residents in Polesworth, Birchmoor and Tamworth by reducing the temporary road works in the area.

The council requires HS2 to:

- g) Publish a report that compares the cost difference and environmental value of constructing the four viaducts structures, verses a tunnel to the edge of Polesworth.
- h) Publish a follow up report, (if needed) that compares the cost difference and environmental value of constructing the four viaducts structures, verses a tunnel from Ch. 5+000 (plan 2 of 2) just north of the viaduct over the railway and M42 to the viaduct over the Coventry canal.

Whateley

4.6 HS2 passes directly through the hamlet of Whateley and a number of dwellings will be blighted or lost by the proposed route of HS2.

The council requires HS2 to:

- i) Give clarity is given to those directly affected as to the nature and extent of the property blight and closure on the Whateley Lane loop.

Birchmoor / M42 J10

4.7 Extensive temporary motorway works would be required here as the M42 would be temporarily diverted to construct the tunnel and this would significantly impact on Birchmoor with the motorway being within 50m of residential areas. Properties on Green Lane on the fringe of Tamworth and at the end of Dark Lane will be significantly adversely affected during construction.

The council requires HS2 to:

- j) Make every efforts to accommodate an enhanced 'box tunnel' under Junction 10 with the additional engineering works necessary to turn the deep cutting at Ch. 500m to Ch. 1100m at Hermitage Lane into a 'green tunnel' between M42, Green Lane and Hermitage Lane.

Pooley Country Park

4.8 Situated near Polesworth, Pooley occupies the site of the former Pooley Hall Colliery. The site is Warwickshire's newest country park having opened in 2002 and currently attracts in excess of 35,000 visitors a year. The site was taken on by WCC at the request of the local community and redeveloped as a public amenity. A great deal of public resource has been committed to transforming the site with the addition of a heritage centre/ tea room, play area, paths and trails, car park, opening up of the canal arm, and other infrastructure.

4.9 HS2 will travel in cutting towards the Pooley Country Park, the HS2 line will require a 10m high embankment on each side of the canal to accommodate the rail line, this will pose an unacceptable intrusion, rendering it inoperable as a country park and result in the destruction of the newly funded Scout Association facility.

The council requires HS2 to:

- k) Evaluate not only the direct effects on Pooley Country Park but also the aggregated effects of the reduced operation and loss of the largest two public spaces in North Warwickshire.
- l) Establish a specific compensatory funding programme for mitigation and alternative provision in advance of any damage to the parks from the construction works. This will ensure that the communities of North Warwickshire and the region can continue to enjoy the health and wellness benefits that currently exist through the provision of the Parks.

Austrey

4.10 The consultation details shown on Plan C321-MMD-RT-DPP-110-550620 show the route of HS2 to be in transition from cutting to embankment up to 9m high in close proximity to Austrey, where it runs approximately 300m from the edge of Austrey with embankments of up to 9m high in places.

The plan fails to show likely highway alignment alterations to both Newton Lane and No Mans Heath Lane or any outline provision for the sports grounds.

The Council requires HS2 to

- m) Maintain the highway routes in the village.
- n) Lower the line in this area
- o) Provide a clear indication of the mitigation for the village regarding the sports grounds.

Phase 1 & 2 interface concerns:

4.11 The impact of the construction works associated with the “Y” junction to Leeds and the railhead will present significant traffic issues on the A4097 Kingsbury Road. It is absolutely vital to maintain safe and effective access to the local communities of Marston, Lea Marston, Kingsbury and Kingsbury Fuel Depot. A temporary closure of the A4097 would be unacceptable.

The Council requires HS2 to:

- p) Clarify the duration of the “temporary railhead facility” as it appears to be needed at least up to the end of Phase 2 in 2032, or possibly beyond.
- q) Create a ‘**special management zone**’ for Phase 1 & 2 that directly addresses the special circumstances surrounding the end of Phase 1 and the start point of Phase 2 in North Warwickshire.

4.12 It is the council’s view that failure to address these issues now will result in unacceptable impacts and additional blight on the communities of North Warwickshire.

5 Do you agree or disagree with the Government’s proposals for:

a. A Leeds station at Leeds New Lane?

b. A South Yorkshire station to be located at Sheffield Meadowhall?

c. An East Midlands station to be located at Toton?

5.1 Warwickshire County Council does not consider it appropriate to comment on proposals that do not directly affect Warwickshire.

6 Do you think that there should be any additional stations on the eastern leg between the West Midlands and Leeds?

6.1 Warwickshire County Council does not consider it appropriate to comment on proposals that do not directly affect Warwickshire.

7 Please let us know your comments on the Appraisal of Sustainability (as reported in the Sustainability Statement) of the Government’s proposed Phase Two route, including the alternatives to the proposed route?

Warwickshire County Council welcomes the opportunity to comment on the Appraisal of Sustainability and wishes to draw HS2 Ltd.’s attention to the following areas:

Sustainability Statement: Appendix E1 – Landscape, Townscape & Visual	
Reference	Comment
General Observations	<p>Scope, Approach & Methodology of Appraisal The report states, it has been carried out at a broad, strategic level and therefore it is difficult to make any comment at a more local North Warwickshire level.</p> <p>There are currently no mitigation proposals in place and the assessment is based on this. Again, it is impossible to make a full judgement about HS2 Phase 2 without knowing the detail of landscape mitigation proposals.</p> <p>The route passes straight through two Country Parks where there will be significant local landscape and visual impacts experienced by the communities along the route. This issue is in the Council’s view underestimated in the description.</p> <p>At present there is no information regarding the preservation of existing mature vegetation which currently screens the M42.</p>

Sustainability Statement: Appendix E1 – Landscape, Townscape & Visual

Reference	Comment
	<p>It is the council's view that this must be retained and protected as a presumption of duty and not removed to ease the construction.</p>
<p>Para 2.2.1</p>	<p>Of the Methodology states that the second edition (2002) <i>Guidelines for Landscape & Visual Impact Assessment</i> have been used for this appraisal.</p> <p>Whilst the third edition of this publication may not have been available at the time of the assessment, the third edition has been available and came into force in April 2013.</p> <p>This assessment must be reviewed in accordance with the updated Guidelines and updated if necessary.</p>
<p>Para 2.3.7/8</p>	<p>This section mentions various visual receptors including long distance paths (Promoted Rights of Way) but does not include other local PROWs which are often better used e.g. by the local community for dog walking etc.</p> <p>The visual impact is likely to be greater for local people who use paths every day rather than occasional users from further afield.</p> <p>The Council expects HS2 to reconsider its assessment and amend the list of receptors</p>
<p>Para 2.3.10</p>	<p>The section uses the word 'significant' but does not provide a definition for the reader.</p> <p>The Council expects HS2 to address this point in the next publication. And provide a definition of "significant"</p>

Sustainability Statement: Appendix E1 – Landscape, Townscape & Visual

Reference	Comment
Para 2.3.11	<p>There is no explanation on how the ‘sensitivity, importance and value’ of the baseline environment is determined?</p> <p>The Council expects HS2 to address this point in the next publication. And prove a definition of “sensitivity, importance and value.”</p>
Water Orton to Kingsbury	<p>The statement that as the route is in cutting or close to the M42 there should be limited impact on landscape character is not necessarily the case.</p> <p>A cutting can still have an impact on field pattern, landform etc. Proximity to the M42 is given as a limitation on impact, any removal of mature trees and woodland, either for the route and / or construction, could result in opening up views of the M42 as well as HS2.</p> <p>The line of the railway should be as close to the M42 as possible, particularly through Kingsbury Water Park.</p> <p>The council expects HS2 to provide its rationale and reasons why they are not ‘hugging’ the route more closely.</p>
Kingsbury to Birchmoor	<p>This is described as “a fragmented landscape which would benefit from reconstruction”.</p> <p>Mitigation proposals will therefore need to be mindful of this so that HS2 does not further fragment the landscape and compound the issue.</p> <p>The landscape around the villages of Freasley and Whateley is described as being “sensitive” and that the settings of these villages should be safeguarded. The proposed route passes very close to Whateley (within 50 meters) but does not respect its setting in the same way.</p>

Sustainability Statement: Appendix E1 – Landscape, Townscape & Visual

Reference	Comment
	<p>The Council expects that consideration is given and the findings shared with the community, to moving the route away from the village and closer to the M42.</p> <p>The viaducts and embankments are up to 20m high in this area and will be highly visually intrusive regardless of whether or not there are existing built features within the landscape, especially when the associated overhead line equipment is also considered.</p> <p>The council expects a full technical engagement on options that enable the route to be lowered</p>
Birchmoor to Measham	<p>There will be a major impact on both landscape character and visual amenity at Pooley Country Park.</p> <p>The route will be highly visible in the open, flat landscape around Austrey.</p> <p>The M42 is again used as a limitation on the impact, however the council considers that the impact may be greater than the report currently suggests.</p> <p>The council expects HS2 to give further consideration to the impact of the line on the field patterns and ensure that they remain in tact following the construction of the line.</p>
General Observations	<p>The council is concerned that the following principles have not been adequately addressed in the documentation to date:</p> <ol style="list-style-type: none"> 1. Green infrastructure is not mentioned in Appendix E1. Reference should be made as to how HS2 Phase 2 fits in with Green Infrastructure Strategies. 2. Whilst landscape objectives have been identified for the character areas it is not clear how, or if, these have informed the proposals. 3. The route of HS2 runs roughly parallel to the M42, however does not abut it completely. This will leave an area of 'redundant/ sterilised' land between the two corridors which will be severed from its surroundings. For the most part this will not be viable for modern farming practices. There is

Sustainability Statement: Appendix E1 – Landscape, Townscape & Visual

Reference	Comment
	<p>no information at present how this land will be used, if HS2 plan to use it as mitigation it will need to be designed sensitively as large blocks of woodland may not always be appropriate in this landscape.</p> <p>The Council expects HS2 to consider creative community and wildlife mitigation plans to create green infrastructure assets, and to find ways of linking these to the wider area with green corridors and aspirations expressed by the Ecology and Biodiversity specialists on pages 16-18 .</p>

Sustainability Statement: Appendix E2 - Built Heritage

Reference	Comment
General	HS2 Phase 2 will have a significant impact upon North Warwickshire’s Historic Environment.
	<p>The assessment undertaken to date is insufficient to enable the impact of HS2 Phase Two upon Built Heritage (including historic parks and gardens) to be understood.</p> <p>The sustainability assessment has only considered Listed Buildings, Registered Parks and Gardens and Conservation Areas.</p> <p>Many of the heritage assets which contribute to the Historic Environment of North Warwickshire are undesignated, and have therefore fallen outside the scope of the AoS.</p>

Sustainability Statement: Appendix E2 - Built Heritage

Reference	Comment
	<p>Warwickshire County Council expects the impact of a proposed development upon both designated and undesignated built heritage assets to be fully assessed at the earliest opportunity in order to ensure that:</p> <ul style="list-style-type: none">• there is sufficient information available to enable an informed decision to be made,• a scheme is developed that avoids, as far as possible, a negative impact upon built heritage. <p>This must include undertaking detailed assessment of the impacts (both direct and indirect) of the proposed scheme upon any known heritage assets including:</p> <ul style="list-style-type: none">• the late 16th/early 17th century Grade II Listed Holt Hall and its associated buildings and gardens,• the late 16th century Grade II Listed Whateley Hall Farmhouse. <p>There is also a potential for other, as yet unidentified, historic buildings and other areas of significant historic landscape character, to be affected by this proposal.</p> <p>The County Council expect further detailed survey to be undertaken to characterise, where necessary, known heritage assets, and identify and characterise any previously unknown heritage assets.</p> <p>The Council expect this detailed survey to be undertaken at the in a timely way, that takes account of the landowners needs.</p> <p>The council expects HS2 to engage with all the local authorities, national bodies and relevant specialists to ensure that historic environment issues are management correctly.</p>

Sustainability Statement: Appendix E2 - Built Heritage

Reference	Comment
<u>Sections 2.2.</u>	<p>Many heritage assets have extensive settings that contribute to their significance. The sustainability appraisal has only considered the impact of the scheme on Listed Buildings within a 350m 'buffer zone' of the centreline. This is inadequate as the proposal may have a significant impact upon the setting of heritage assets which lie outside of this 350m buffer.</p> <p>The Council expects this to be addressed in the next version of their documents</p>

Sustainability Statement: Appendix E3- Archaeology

Reference	Comment
Para. 2.2.1	<p>The assessment undertaken to date is insufficient to enable the impact of HS2 Phase2 upon the Historic Environment to be understood.</p> <p>This sustainability assessment has only considered Scheduled Monuments and Registered Historic Battlefields. No data has been captured from the Warwickshire Historic Environment Record, nor has the Historic Landscape Characterisation data for this area been interrogated.</p> <p>Many of the heritage assets which contribute to the Historic Environment of North Warwickshire are undesignated, and have therefore fallen outside the scope of the AoS, this is an unacceptable situation.</p>

Sustainability Statement: Appendix E3- Archaeology

Reference	Comment
	<p>The council expects the impact of a proposed development upon both designated and undesignated heritage assets to be fully assessed at the earliest opportunity. in order to ensure that:</p> <ul style="list-style-type: none"> • there is sufficient information available to enable an informed decision to be made, • a scheme is developed that avoids, as far as possible, a negative impact upon the Historic Environment. <p>This must include detailed assessment of the impacts (both direct and indirect) of the proposed scheme upon any known heritage assets including:</p> <ul style="list-style-type: none"> • the probable site of a deserted medieval settlement at Holt (Warwickshire Historic Environment Record MWA 21), • the possible site of a chapel of medieval origin associated with a nunnery at The Hermitage, Polesworth (MWA 13159).
	<p>It is certain that there will be undiscovered sites which will be impacted. This is recognised in para. 2.3.5 of Sustainability Statement, Appendix E3 – Archaeology¹.</p> <p>The council expects further detailed evaluative fieldwork (both non-intrusive and intrusive evaluative) to be undertaken to both further characterise, where necessary, known heritage assets, and identify and adequately characterise any previously unknown heritage assets.</p> <p>The Council expect this detailed evaluative fieldwork to be undertaken at the earliest opportunity. This is particularly important in respect of undertaking surveys which require landowner permission to obtain access to undertake surveys etc.</p>

¹ Para. 2.3.5. 'It is also likely that the proposed route and the immediate are contain currently unrecognised assets of archaeological interest that by definition cannot be factored into the appraisal at this stage'

Sustainability Statement: Appendix E3- Archaeology

Reference	Comment
	<p>It is the council's expectation that HS2 Ltd will learn from the Phase 1 experience and undertake these surveys at an earlier stage.</p> <p>Warwickshire's Historic Landscape Character is a significant component of the County's Historic Environment. The Council expects the impact of the proposal upon the County's Historic Landscape Character to be fully assessed.</p> <p>The County Council expects the assessment and the development of the subsequent mitigation strategy to be informed by local, regional and national research frameworks. A research framework should be developed and agreed with appropriate specialists including English Heritage and Local Authority archaeological advisors; this should be re-assessed and refined throughout the project as new information becomes available.</p> <p>The council expects HS2 to engage with all the local authorities, national bodies and relevant specialists to ensure that historic environment issues are managed correctly.</p>
<u>Sections 2.2,</u>	<p>Many heritage assets have extensive settings that contribute to their significance. The sustainability appraisal has only considered the impact of the scheme on Scheduled Monuments within a 350m 'buffer zone' of the centreline. This is inadequate as the proposal could have a significant impact upon the setting of heritage assets which lie outside of this 350m buffer. The Council expects this to be addressed at the earliest opportunity.</p>

Sustainability Statement: Appendix E4– Biodiversity

Reference	Comment
General Observations	The council is pleased that some of the comments previously made in Phase 1 have been included in this document and that the Biodiversity chapter of the Sustainability (Appendix 4) has learnt some lessons from Phase 1.
2.8.1	<p>There are still some areas of concern. The major concession made from Phase 1 is that a ‘precautionary approach has been adopted for sites of national value and below’</p> <p>In Warwickshire this could be interpreted as sites of parish value in the Warwickshire Biological Record Centre (WBRC). This is a significant concession that is still being requested for Phase 1 as it infers that where evidence is not present a reasonable ‘worst case scenario’ will be adopted.</p> <p>It is also encouraging to read that hedgerows impacted by HS2 ‘where the hedgerow network provided linkages with Ancient woodland or HPI [High Priority Habitats of Importance] habitats’ would be valued at moderate impact. This infers that connectivity in the landscape is being taken more seriously.</p> <p>It is still disappointing that the WBRC has not been approached to collect initial habitat or species data to identify High Priority Habitats of Importance, i.e. using current and up-to-date information, as recommended by good practice guideline for Sustainability Statements.</p>
Section 2.10:	<p>Limitations states that ‘Data on other features of ecological value including ponds and hedgerows was not available” (App 4: 2.10.2) and that ‘the density and integrity of hedgerows were assessed using aerial photography’ (App 4: 2.5.2).</p>

Sustainability Statement: Appendix E4– Biodiversity

Reference	Comment
	<p>The council considers this approach particularly disappointing as the WBRC is available through a licence (as achieved by HS2 Phase 1) or freely accessible by visiting the WBRC and contains hedgerow data and ponds that would better inform the statement.</p> <p>The WBRC also has species data that could have addressed the limitation of ‘potential indirect effects such as ... population fragmentation ... could not be judged accurately based on the information provided’ (App.4: 2.10.3)</p> <p>The council expects HS2 to engage directly with the Ecology and biodiversity team (as it has in Phase 1) and utilised the information available without further delay.</p>
Chapter 4:	<p>Findings – Eastern Leg: The council believes that the European and national sites have been correctly identified within Warwickshire.</p> <p>The Council is concerned that there is no reference to the Tame Valley surrounding Kingsbury Water Park (WCC) and Middleton Lakes (RSPB) as a regional important area for bird assemblages.</p> <p>Of equal concern is that County Important sites (Local Wildlife Sites) have been discounted in this Statement (App.4: 2.3.2) which is a serious error as ‘Local Sites are sites of substantive nature conservation value’ (Defra, 2011²) and they often contain Habitats of Principle Importance and as such ‘many are equal in quality to the representative sample of sites that make up the series of statutory Sites of Special Scientific Interest (SSSIs)’ (Defra, 2011).</p>

² <http://archive.defra.gov.uk/environment/biodiversity/documents/single-data-list-guidance.pdf>

Sustainability Statement: Appendix E4– Biodiversity

Reference	Comment
	<p>This evidence is available through the WBRC. Local Wildlife Sites impacted include Kingsbury Water Park, Kettlebrook Local Nature Reserve (Staffordshire) and Alvecote Pools buffer (aka Pooley Country Park).</p> <p>The council expects HS2 to address this error and publish a more accurate assessment in the next iteration of the documents.</p>
	<p>The council welcomes the concessions and lessons 'learnt' from HS2 Phase 1 in this area but are alarmed that there remains a significant under-estimate regarding the impact of the project due to the use of insufficient data and poor interpretation.</p> <p>This mistake was made on Phase 1 and must not be repeated in Phase 2.</p>
Conclusion	<p>It is the council's view that there will be a significant loss to Warwickshire's biodiversity if Phase 2 is undertaken. There will need to be significant additional structural mitigation in addition to that shown on the current plans (i.e. green tunnels not green over-bridges) to maintain the ecological connectivity within the landscape</p>

Sustainability Statement: Appendix E5 – Water

Reference	Comment
Chapter 1	<p>The introduction states that this report places emphasis on the key impacts only.</p> <p>This may be necessary at the early stages, there is no mention of surface water flooding or its mitigation throughout Appendix E5, not even in any 'Exclusions and Assumptions' paragraphs.</p> <p>The Environment Agency estimated that two thirds of the flooding in summer 2007 was due to surface water flooding – more recent events since, in particular the flooding in 2012, followed a similar pattern.</p> <p>In order to ensure that surface water is managed effectively, that existing surface water flooding issues are not exacerbated and that new surface water flooding issues are not created, the council expects above surface Sustainable Drainage to be utilised.</p> <p>There are too few balancing ponds in HS2 Phase 1, and we have already commented that their location is not well thought out in terms of drainage – they appear to be positioned for convenience of land-take more than for drainage. We would therefore expect the location of balancing ponds to be considered more fully for Phase 2 so that the appropriate land take can be managed.</p> <p>The council expects to see the locations and sizing of balancing ponds, with associated calculations, in the next edition.</p> <p>The route runs near the M42 in a number of places; it is therefore expected that the detailed drainage design for HS2 will take account of the existing surface water drainage arrangements for the M42 and be fully integrated with existing drainage arrangements.</p> <p>It will be important that, as part of the construction works, any existing drainage is maintained. Previous large-scale infrastructure projects like this have often interrupted existing subsurface drainage arrangements (such as field drains which have been in place and effective for many years) and caused</p>

Sustainability Statement: Appendix E5 – Water

Reference	Comment
	subsequent surface water flooding issues.
Para 2.1.2	<p>There appears to be some double-standards applied to main rivers and non-main rivers.</p> <p>For example, paragraph 2.1.2 describes minor watercourse diversions being, usually, culverts where there is ecological mitigation to avoid negative impacts on WFD (Water Framework Directive). By contrast, paragraph 3.1.2 referring to main river diversions mentions taking advantage of opportunities for ecological enhancements.</p> <p>Given that two thirds of the flooding in summer 2007 was due to surface water, and given that the reason for main rivers not being satisfactory in terms of WFD compliance is often related to non-main rivers further up the catchment.</p> <p>The council expects that HS2 will engage with Warwickshire County Council as Lead Local Flood Authority in the same way as it engages with the Environment Agency, and non-main rivers will be afforded the same consideration, both in terms of flooding and ecology, as main rivers.</p> <p>As part of the detailed Flood Risk Assessment (FRA), we would expect that all sources of flood risk are included and considered rather than just the fluvial risks. Where local communities or authorities have highlighted known flooding issues along the route, or where the route crosses a watercourse (including ordinary watercourses) these should also be considered in the FRA, detailing whether there are any existing issues on the watercourse, and how the construction will affect this.</p> <p>It is the council's expectation, that as part of the detail design stage, full hydrological and hydraulic models are created and shared, not only to include fluvial flooding, but also considering surface water, ground water, potential reservoir inundation and possible flooding from canals being breached.</p>

Sustainability Statement: Appendix E5 – Water

Reference	Comment
	<p>It is essential that all bridges and other structures associated with HS2 Phase 2 (including temporary works) crossing watercourses are subject to Flood Defence Consent from the Environment Agency (where crossing a main river) and Warwickshire County Council (where crossing an ordinary watercourse), so that the risk of exacerbating fluvial flooding is avoided.</p>
Chapter 2.2	<p>The chapter on Groundwater considers potential environmental impacts but makes no mention of groundwater flooding and groundwater flood risk.</p> <p>This needs to be considered at this early stage with reference to British Geological Survey bedrock, drift geology and groundwater vulnerability mapping to locate cuttings such that permanent pumping will not be required; cuttings through aquifers could destroy existing natural drainage paths and create new ones. The impact of the new paths must be assessed to ensure that local areas sensitive to ground water flooding are not made worse.</p>
Para 2.3.1	<p>The screening of viaduct crossings has been undertaken with reference to Flood Zone 2. Flood Zones only show flood risk in catchments greater than 3km². Surface water flooding and fluvial flooding can also occur on catchments smaller than 3km².</p> <p>The council expects in the next edition that crossings are considered with reference to the 1 in 200 year shallow Flood Map for Surface Water layer, as well as Flood Zone 2.</p>
Page 75	<p>It is very difficult to ascertain from the maps whether the inverted triangles are denoting rail levels at least 4m above the estimated flood level (from Flood Zone 2 only), or less than 4m above the estimated flood level or below the estimated flood level.</p> <p>The council requires clarity on this in the next edition.</p>

Sustainability Statement: Appendix E6 - Noise

Reference	Comment
General	<p>The council expects HS2 to fully to engage with Warwickshire County Council on noise and vibration issues and to provide appropriate technical information as the route design is developed.</p> <p>The council requires HS2 to develop the highest level of mitigation to reduce the impact where increases in noise are identified in the appraisal process. It is vital that the whole community are included in the process and that all dwellings and amenities subjected to noise impact benefit from mitigation measures.</p>
Para 4.1.1	<p>HS2's approach to Phase 2 appraisal is to follow on from the methodology developed for Phase 1. The council are concerned that issues raised and logged with HS2 by members of the Planning Forum Acoustics sub-group (Phase 1) remain outstanding and seek assurances that all of these issues are fully addressed and resolved before the noise appraisal work commences for Phase 2.</p>
Para 4.6.2	<p>The council seeks assurances that detailed baseline noise surveys are carried out and that the general level of 45 dB $L_{Aeq, 18 \text{ hr}}$ as given in the Sustainability Statement is not used in the appraisal process.</p>
Para 4.10	<p>Where noise sensitive dwellings are identified as being subject to a noticeable noise increase, additional mitigation is to be considered in all cases and not just for locations where there are clusters of properties.</p>
Kingsbury	<p>There will be a major impact on Kingsbury Water Park and Kingsbury village where the route is on embankment/viaduct of up to 15 metres high. The council is concerned about the intensified and</p>

Sustainability Statement: Appendix E6 - Noise

Reference	Comment
	compound impact of noise from both the M42 and HS2. Consideration to re-aligning HS2 closer to the M42 should be given.
Birchmoor	The council support the proposed cut and cover tunnel under the M42 but urge HS2 to extend the length of it in order to provide additional visual and noise mitigation for the nearby community.
Austrey	The council has significant concerns about the noise impact from the route due to the 8m high embankment to the south of Austrey which extends for a considerable length. The council seeks to ensure HS2 provide the highest degree of mitigation against the impact on dwellings and the peaceful enjoyment of the Austrey Playing Fields.

Sustainability Statement: Appendix E7 - Community Integrity

Reference	Comment
General observation	<p>The technical appendix is less than three sides of A4 and does not provide a link to the data or polygons used in the assessment, therefore it is almost impossible to comment on the value of the text.</p> <p>The council notes that both Kingsbury Water Park and Pooley County Park are likely to fall within the 'polygon' for isolation and demolition respectively, no further information is currently available.</p>

	The council is dissatisfied with level of consideration given to both Kingsbury Water Park and Pooley county park in this section.
--	--

Sustainability Statement: Appendix E8 Access	
Reference	Comment
General Observations	<p>The majority of this appendix considers access the stations in Phase 2, this is not an area that involves Warwickshire, and therefore no comments are submitted on issues relating to the stations.</p> <p>The current plans appear to suggest that AE17 near to Birchmoor will be deleted from the network, as previously noted and endorsed by the Cabinet of the county council, this is unacceptable to the county council..</p> <p>There are some design refinements open to HS2 that could easily be adopted at this stage of the project which would mean that more PROW could be unaffected. Options include altering the length of the viaducts carrying HS2 to allow PROW to pass under the track rather than forcing a long diversion around an embankment.</p>
Section 5 Rights of Way Appraisal	<p>However, the issue of Public Rights of Way (PROW) is not given an appendix to itself and appears in passing in this chapter.</p> <p>Comments already given under the Sustainability Statement apply here for clarity and cross referencing these are:</p> <p>Sustainability Statement</p>

	<p>r) Para 4.6.3 PROW are mentioned but it is clear that not all routes have been full considered. HS2 have only considered designated routes which is unacceptable to Warwickshire. It appears that that is a commitment to provide new or temporary access for PROW but with proviso that this is “where practicable.”</p> <p>The council requests clarification on this and the number of PROW affected</p> <p>s) Para 6.5.17 states that it is assumed that permanent access along all PROW would be maintained (diversion/re-instatement). Further that a detailed appraisal of all crossings will be undertaken as part of the EIA</p> <p>The council requests that engagement of the PROW team and dialogue is entered into in advance of the EIA and clarity is given as to the intent of early engagement.</p> <p>t) In section 4.11.3 it suggests that users of footpaths are assumed to be a sensitive group – when considering visual impacts.</p> <p>The council requests clarity on how the work on visual impact from the perspective of a footpath user be considered if HS2 are not yet clear where the footpaths that these users might be on are located.</p>
<p>Section 2.1.3 Outline scope</p>	<p>This appears to be a meaningless statement or at best ambiguous.</p> <p>The council requests clarity from HS2 as to their intention, do they plan to use Phase 1 methods or create a new version for Phase 2.</p>
<p>Section 2.2.3</p>	<p>It appears from this section that HS2 are only concerned with perceived important routes rather than locally ones.</p> <p>The council do not consider this an acceptable approach or methodology. All PROW must be included in the desktop and field surveys.</p>

Sustainability Statement: Appendix E9 – Health Analysis

Reference	Comment
3.5 Access to housing	<p>There needs to be recognition of the emotional attachment that can be attached to a home, particularly if you have lived there a long time or it is near family and friends. The impact from severance from that home and the community should not be underestimated. Moving away or being forced to leave your home can also lead to depression, not just stress and anxiety as stated, affecting the mental health of those being displaced. This negative impact on mental health will lead to increased health and social care costs. Any replacement housing should be of the same standard and offer the same or higher standard of living for those moving.</p>
3.6 Access to community facilities	<p>The removal of community facilities can have an impact not only on those most deprived but on those that are house-bound, less mobile or older, particularly in rural areas.</p>
Table 4.1 / Figure 4.2	<p>Figure 4.2 shows that the areas of North Warwickshire directly alongside the proposed route have a deprivation score that places them in the 20-40% most deprived and the neighbouring areas in the 40-60%. The communities in the 20-40% most deprived are not indicated in table 4.1 as the local authority average has been used. The proposed route will affect the areas of North Warwickshire that are already suffering the highest inequalities and deprivation in the borough.</p> <p>Only the health and disability domain was used. Looking at some of the domains which affect health e.g. access to housing and employment, North Warwickshire may have higher deprivation for these domains.</p>
Table 5.1 – Health Analysis - Access to housing	<p>The table is not detailed enough as to the precise impact hit along the route i.e. how many houses in North Warwickshire will be demolished?</p>

Sustainability Statement: Appendix E9 – Health Analysis

Reference	Comment
	<p>The impact of the demolition only focuses on those areas where the new stations will be built. No new station is to be built in this area to replace the houses demolished. North Warwickshire is a rural borough and displaced residents may be rehoused far from their current property and the community links established there. The village of Whateley will be demolished as the proposed route is through the centre.</p>
<p>Table 5.1 – Health Analysis - Access to community facilities</p>	<p>The table is not detailed enough as to the precise impact hit along the route i.e. what are the community facilities in North Warwickshire.</p> <p>This is a rural area where services may already be limited in terms of access by transport, opening times, availability etc. Closing any of these will impact negatively on the local community. This may be a larger negative impact than densely populated city areas where there will be multiple similar services nearby.</p>
<p>Table 5.1 – Health Analysis - Access to education</p>	<p>Again the health analysis focusses mainly on the impact within the larger cities and does not take into account the impact on rural communities. The road closure and alterations both during construction and afterwards, as well as removal of walking routes in the rural communities will affect those who live close to the proposed route accessing education and work on a daily basis.</p>
<p>Table 5.1 – Health Analysis - Access to healthcare facilities</p>	<p>More work needs to be done on the impact to the rural communities that may have limited access to healthcare facilities due to road closures, changes in public transport or closure of facilities. Where these facilities will be impacted alternative provision needs to be provided as part of the mitigation by HS2.</p>
<p>Table 5.1 – Health Analysis - Access to public transport</p>	<p>Again the health analysis only focusses on the beneficial impacts to the five areas that will receive a new station. No consideration has been given as to the negative impacts on North Warwickshire, who will not receive any new station or interchange. This area may suffer reduced public transport access and reduced access to services and facilities as a result of the proposed route.</p>
<p>Table 5.1 – Health</p>	<p>The analysis has not acknowledged any adverse health impacts associated with the operational stage</p>

Sustainability Statement: Appendix E9 – Health Analysis

Reference	Comment
Analysis - Community severance or isolation	that cannot be avoided through the maintenance of access paths. The village of Whateley will be demolished as a community which has not been recognised and cannot be avoided through maintaining access roads. Isolation is only regarded from the aspect of older people, but many other groups are also vulnerable, particularly in the rural communities of North Warwickshire affected by the proposed route. No analysis of other vulnerable groups has been explored and we would recommend this is done.
Table 5.1 – Health Analysis - Access to green spaces or physical activity	<p>The analysis states that no open access areas or intersected by the scheme. This is incorrect as both Kingsbury Water Park and Pooley Country Park are dissected by the route. These are the two country parks in North Warwickshire and two of the three in the whole of the north of the county. Removing these country parks from public use or dissecting them to the extent of making access impracticable will affect not only those living in the surrounding local area but those in the wider community and neighbouring local authority areas for who these country parks are the main source of green space. Green spaces are vital for health, offering opportunities for physical activity, mental health and wellbeing as well as educational and social. The country parks are also a source of employment, tourism, business and education, none of which have been taken into account in the health impact analysis. The analysis stating that reduced access to green spaces is expected to be avoided by diversion of paths does not apply here as the route itself cuts through the park and therefore cannot be avoided. We would request that a replacement country park is built to mitigate the effects from the destruction of Pooley Country Park and the disturbance to Kingsbury Water Park minimised. We would also recommend that a more thorough health impact analysis be conducted.</p> <p>There are a lot of PRow, footpaths, cycle paths etc. that cross North Warwickshire and in the route area that are important to local communities for recreation, physical activity, social inclusion and access to employment and services. It should be ensured that any paths that are diverted by construction or operation should be appropriately re-sited so that they are still easily accessible and of full use to the local communities.</p>

Sustainability Statement: Appendix E9 – Health Analysis

Reference	Comment
Table 5.1 – Health Analysis - Safety	<p>The analysis has only focussed on traffic around stations but has not taken into account crossing the line at various points by car or foot. The risks at crossings need to be explored in the health impact assessment.</p> <p>North Warwickshire is a rural borough and the country roads may be narrower, have higher speed limits with lower visibility which may cause more accidents with slow moving construction vehicles. We recommend a comprehensive health impact assessment of the risks to road users during the construction phase be undertaken.</p>
Table 5.1 – Health Analysis - Landscape and visual impacts	<p>We would suggest that additional planting be undertaken to screen the line and reduce the visual impact. This is particularly important in North Warwickshire as the route crosses through rural areas where the line would be very noticeable and take away from the natural landscape. This may also reduce the potential adverse health and wellbeing impacts.</p>
Table 5.1 – Health Analysis - Noise and vibration	<p>The analysis states that effects are more likely to be felt by young children at school but have not taken into consideration residential impacts such as those that work from home and shift workers. Mitigation measures are only suggested for the impacts on learning but not for the impacts on employment, sleep, and stress and anxiety from annoyance. We would recommend that a more detailed health impact analysis be undertaken to explore the impact of noise and vibration.</p>
Table 5.1 – Health Analysis - Air quality	<p>Only construction dust at stations has been highlighted. North Warwickshire will suffer from additional dust and traffic emissions from construction not only from this phase but from phase one and the proposed railhead site, without the benefit of a new station. We recommend that further impact analysis is required as to the cumulative effect of the whole HS2 route on the health of North Warwickshire population.</p>
Table 5.1 – Health Analysis - Socio-	<p>No indication is given as to the jobs created along the route during construction, given that none will be appropriate for local people during operation as the focus is on staffing the new stations, of which there is</p>

Sustainability Statement: Appendix E9 – Health Analysis

Reference	Comment
economic impacts	<p>not one being built in North Warwickshire. The analysis also gives no indication of the jobs potentially supported through regeneration in this area; all figures are for the three new station areas on the eastern leg which would suggest that there won't be any regeneration for North Warwickshire. We would recommend that local people are employed for the construction sections locally, given that there is no long term/permanent operational employment opportunities available from HS2.</p> <p>The number of job losses through displacement is stated to be much lower than the number of jobs created. No indication as to the number of jobs created locally in North Warwickshire has been given, and we can see from the above that the long term employment opportunities will likely be at the new stations a long distance from North Warwickshire and therefore not suitable for local residents to take up. No consideration or impact has been given as to the removal of jobs in this rural area. If jobs are displaced, there may not be the public transport or road access to enable those employees to move with the company to a temporary premise, thereby causing more unemployment. Unemployment and stress over the potential loss of jobs can cause great mental health and wellbeing issues including sleeplessness, anxiety and depression.</p>
6. Summary	<p>The analysis undertaken in this report focusses almost exclusively on the impacts in the areas around the new stations. The council would have expected to see an analysis that included the impact on all the areas and communities along the route that will be affected, not just those around the new stations.</p> <p>North Warwickshire will be impacted negatively from the route but will not receive the benefits of a new station and associated improvements in education, employment and access to transport.</p> <p>The Council requires a more detailed health impact analysis be undertaken exploring the impact on all communities.</p>

Sustainability Statement: Volume1 main report of the Appraisal of Sustainability

Reference	Comment
Page 13 para 1.3 – HS2 and sustainability	<p>WCC recognises that HS2 Ltd’s 7 themes in its Sustainability Policy recognise that in relation to resources and waste, they “source and make efficient use of sustainable materials, maximise the proportion of material diverted from landfill and reduce waste”. However, it would repeat it’s comments on the Phase 1 Draft ES about the need to provide much more detail on the excavated materials arising along the route and that consideration be given early to how much excavated material can be reused on site or how much would be transported to appropriate disposal facilities off – site</p> <p>In addition, WCC would repeat it’s comments made at Phase 1, in that it would expect HS2 Ltd to ensure that the use of minerals are minimised as far as possible with recycled and/or secondary aggregate used in preference to primary aggregates.</p> <p>Further, WCC would repeat its comments about preventing the sterilisation of mineral resources and where the route crosses mineral deposits that their prior extraction is secured where necessary.</p> <p>The Council expects HS2 Ltd to ensure that any sites that are used for mineral extraction are restored to the most beneficial after uses using the highest possible standards of restoration.</p>

Sustainability Statement: Volume1 main report of the Appraisal of Sustainability

Reference	Comment
<p>Page 42 para 4.3 - Planning and Development</p>	<p>This section identifies that HS2 Ltd has commissioned a review of major development proposals along the route, including major minerals and waste management sites (including both new and extended sites). The County Council would expect a definition of what is included within the major minerals and waste management sites</p> <p>HS2 Ltd is strongly advised to contact all Waste Planning Authorities along the route so that a full list of waste sites affected by Phase 2 is acquired, and the environmental impacts of the route upon the sites fully assessed. It appears that in assessing waste sites along the route, only the Environment Agency's 'historic landfill sites' dataset has been used. For example, in para. 3.3.2, there is no reference to the permitted and operational landfill site at Kingsbury operated by Biffa (see attached) where the route appears to cut through the site. According to the Council's latest capacity figures, it is understood that there is approximately 30 years of remaining landfill capacity at the Kingsbury landfill (based on observed input rates). This may be an important waste disposal site for the sub-region/region in the future and the Council would not wish to see it unnecessarily sterilised. This reflects the approach set out in Policy CS8 of the Adopted Warwickshire Waste Core Strategy.</p> <p>The Kingsbury landfill site also incorporates the Kingsbury Brickworks site operated by Weinerberger. Etruria marl brick clay is worked at the site and this is a nationally important brick clay resource, used for high quality facing and engineering bricks, pavers and roofing and floor tiles. The route appears to cut the corner of the site and thus there is a potential sterilisation of a nationally important clay resource. Given the scarcity of the resource, the Council would expect prior extraction of the mineral where it is practicable and environmentally feasible. This reflects the guidance in the National Planning Policy Framework. The route also cuts through an area with permission for the importation of 6000m³ of inert material and topsoil at land off Tamworth Road, Cliff - see application NWB/12CM008. Again, HS2 Ltd will need to take sufficient account of this proposal and ensure that the environmental impacts of the route are adequately assessed.</p> <p>The route also cuts through an area allocated in the Warwickshire Minerals Local Plan (1995) as an Area</p>

Sustainability Statement: Volume1 main report of the Appraisal of Sustainability

Reference	Comment
	<p>of Search for sand and gravel extraction- 'Site AS1 Bodymoor Heath' (see attached). Again, in the interests of safeguarding a mineral resource of regional and national importance, the Council would expect to see prior extraction of the mineral where practicable and environmentally feasible</p>
<p>Page 63 para 4.18 – Excavated material and waste production</p>	<p>In addition, WCC would repeat it's comments on the Phase 1 Environmental Statement about the need to provide much more detail on the excavated materials arising along the route and that consideration be given early to how much excavated material can be reused on site or how much would be transported to appropriate disposal facilities off – site.</p> <p>Further, the Council would expect the Environmental Statement considers waste in a wider sense, and that it provides further detail on how HS2 Ltd are going to : -</p> <ul style="list-style-type: none"> • Ensure that it adopts sustainable design construction and operational practices that enable waste minimisation and recovery. • Ensure that any remaining material to be disposed of is managed as close as possible to its source and with minimum environmental impact. <p>Further,</p> <ul style="list-style-type: none"> • We would expect a detailed waste assessment to be undertaken that quantifies all waste arising during the project, together with a breakdown of waste to be re-used, recycled, recovered or disposed of. • We would expect a detailed waste management strategy that assesses the capabilities and capacities of waste management facilities identified to be used, as well as a detailed assessment of the potential environmental impacts from using them.

Sustainability Statement: Appendix E10 – Waste

Reference	Comment
Page 5 – para 3.3 – Eastern leg	<p>WCC repeats it's comments above in that HS2 Ltd is strongly advised to contact all Waste Planning Authorities along the route so that a full list of waste sites affected by Phase 2 is acquired, and the environmental impacts of the route upon the sites fully assessed. It appears that in assessing waste sites along the route, only the Environment Agency's 'historic landfill sites' dataset has been used. For example, in para. 3.3.2, there is no reference to the permitted and operational landfill site at Kingsbury operated by Biffa (see attached) where the route appears to cut through the site. According to the Council's latest capacity figures, it is understood that there is approximately 30 years of remaining landfill capacity at the Kingsbury landfill (based on observed input rates). This may be an important waste disposal site for the sub-region/region in the future and the Council would not wish to see it unnecessarily sterilised. This reflects the approach set out in Policy CS8 of the Adopted Warwickshire Waste Core Strategy.</p> <p>The Kingsbury landfill site also incorporates the Kingsbury Brickworks site operated by Weinerberger. Etruria marl brick clay is worked at the site and this is a nationally important brick clay resource, used for high quality facing and engineering bricks, pavers and roofing and floor tiles. The route appears to cut the corner of the site and thus there is a potential sterilisation of a nationally important clay resource. Given the scarcity of the resource, the Council would expect prior extraction of the mineral where it is practicable and environmentally feasible. This reflects the guidance in the National Planning Policy Framework.</p> <p>The route also cuts through an area with permission for the importation of 6000m³ of inert material and topsoil at land off Tamworth Road, Cliff - see application NWB/12CM008. Again, HS2 Ltd will need to take sufficient account of this proposal and ensure that the environmental impacts of the route are adequately assessed.</p> <p>The route also cuts through an area allocated in the Warwickshire Minerals Local Plan (1995) as an Area of Search for sand and gravel extraction- 'Site AS1 Bodymoor Heath' (see attached). Again, in the interests of safeguarding a mineral resource of regional and national importance, the Council would expect to see prior extraction of the mineral where practicable and environmentally feasible.</p>

Sustainability Statement: Appendix E10 – Waste

Reference	Comment
	<p>It is acknowledged that this appendix concentrates on HS2 Ltd's finding from its landfill hazard waste assessment. However, the Council would expect the Environmental Statement considers waste in a wider sense, and that it provides further detail on how HS2 Ltd are going to : -</p> <ul style="list-style-type: none">• Ensure that it adopts sustainable design construction and operational practices that enable waste minimisation and recovery.• Ensure that any remaining material to be disposed of is managed as close as possible to its source and with minimum environmental impact. <p>Further,</p> <ul style="list-style-type: none">• We would expect a detailed waste assessment to be undertaken that quantifies all waste arising during the project, together with a breakdown of waste to be re-used, recycled, recovered or disposed of.• We would expect a detailed waste management strategy that assesses the capabilities and capacities of waste management facilities identified to be used, as well as a detailed assessment of the potential environmental impacts from using them.

(viii) Please let us know your comments on how the capacity that would be freed up on the existing rail network by the introduction of the proposed Phase Two route could be used?

Warwickshire County Council does not consider it appropriate to comment on this question as there is insufficient detail to form a view at this time.

(ix) Please let us know your comments on the introduction of other utilities along the proposed Phase Two line of route?

The council welcomes the principle of utilising the Phase 2 route as a means to provide utilities to as many communities as possible. This is especially valuable where there is no natural gas provision and domestic heating relies on costly and inefficient fuels.

The council would welcome a cross cutting theme that reduces fuel poverty.