CFA 11 Stoke Mandeville and Aylesbury

The proximity of the proposed scheme to Stoke Mandeville, Aylesbury and Fairford Leys creates major adverse impacts for residents, meaning that excellent mitigation and further betterment measures are of paramount importance. As with CFA 10, we are concerned about the impact of the maintenance loop on the wider landscape, particularly the communities in and around Terrick, Nash Lee, Stoke Mandeville and Ellesborough. The Aylesbury area has been identified as a Green Infrastructure strategic priority location but any project to remedy the lack of green space is seriously compromised south and west of Aylesbury by the implementation of HS2. This is ignored in the draft ES. We expect that HS2 Ltd will include - and suggest mitigation for – all of these concerns in the formal ES.

Comments on Part B

2.1 The description of the area appears accurate but – like all the CFAs - does not communicate a ‘sense of place’. The lack of detail casts doubt whether the environs have been fully understood.

Description of the proposed scheme

2.2.2 We are concerned about the impact of the maintenance loop on the wider landscape. There is very little information given on the visual appearance and operation of the maintenance loop.

2.2.5 Further, the HS2 route and maintenance loop will be on an embankment in this area increasing its visibility. We are concerned about the impact of this in particular since the draft ES suggests that Risborough Road over bridge would rise to 15m. Appropriate assessment of the visual impact and mitigation is crucial but currently not included in the draft ES. More detail is required for the formal ES.

The CFA includes the re-alignment of Princes Risborough Road but does not include Stoke Mandeville bypass as put forward in the Blueprint (although this is still under review -2.6.63). The bypass could reduce the need for over-bridges in this section of the route and could potentially be beneficial in visual terms.

2.2.6 The ponds on the north side of Marsh Lane are proposed for highway drainage, and we would like to know if these have been agreed with the Highways Agency.

2.2.7 - 2.3.18 No baseline information has been provided to verify the assumptions on the impact on flood risk and water resources.
This area is key as there is a built up area at risk from the works over the River Thame and its tributaries. Very detailed design has already been put forward prior to any detailed assessment.

Another major concern is the complete change from a proposed viaduct over the Thame to an embankment with culverts. This has no technical assessment justification, appears to have been decided on cost alone and not impacts on flood risk to the West of Aylesbury. There is no information on flood storage compensation, only that it will be provided. However it is important to ascertain this early on to ensure it is technically feasible and secured within the land acquisition.

**Construction of the proposed scheme**

2.3.2 We expect that the local authorities will have the opportunity to review and comment upon the LEMP prior to construction commencing.

2.3.10 It is stated that fuel will be stored within the main site compound at Bicester Road. This fuel must be stored in accordance with The Control of Pollution (Oil Storage) (England) Regulations 2001. Plant and equipment will also be stored in these areas and these combined uses in addition to the fuelling of plant, vehicles etc. has the potential to cause contamination to the site from spillages of fuel, oil, lubricants etc. Therefore any spillages must be addressed promptly and a full procedure must be in place outlining how these spillages will be dealt with. Spill kits should also be located at a suitable point/s around the site as appropriate.

2.3.15 We object to the proposal that both the Risborough Rd compound and Marsh Lane compound should be accessed by M40 High Wycombe and A4010 Princes Risborough. Handy Cross junction with the M40 is already very congested and the A4010 through HW is not considered suitable for increased HGV movements.

2.3.18 Watercourse diversions cause concerns with regard to potential impacts on the hydrology in the area and we would expect HS2 Ltd to include comment from the EA.

2.3.11 & 2.3.31 It is stated wherever possible, excavated areas material would be moved directly from the area of excavation to areas of the works where fill material is required. However some temporary stockpiling of fill material may be necessary and these stockpiles will be located in the adjacent areas to the main compound. Any material which is identified as contaminated or potentially contaminated and needs to be stockpiled prior to disposal must be placed in a separate stockpile on a suitable membrane/area. This is to prevent the contamination of additional areas.

2.3.33 This site investigation work must take into consideration the potential for contamination to be present at the site. Buckinghamshire Councils also agree that these works are necessary and that this is the most appropriate stage for them to be completed.

Map book plans CT-05-041 The lack of detail on the drawings makes it difficult to judge whether sufficient land has been safeguarded to allow for adequate mitigation during construction and operation.
2.5.5 The description of the Stoke Mandeville and Aylesbury CFA needs state that it is a key area for potential increase in flood risk. For example it is stated that there are 6 watercourses proposed to be diverted to positioning of the embankments, however we need to understand the impact of these and how these diversions will replicate the natural existing watercourses. It is proposed to provide flood storage compensation to an area to the west, but this is not shown on any maps and not very location specific.

2.6.52 We are concerned about the proposed temporary closure of the Princes Risborough to Aylesbury Railway line and expect mitigation to be proposed by HS2 Ltd for the disruption this will cause to commuters and leisure users alike.

The Buckinghamshire Councils have the following comments about the footpath, cycleway and bridleway diversions set out in Table 4, p.24, 2.3.27. Map Book Plans CT-06-040 to CT-06-047.

<table>
<thead>
<tr>
<th>Right of Way</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL/20/1 - south of A4010, Nash Lee to Stoke Mandeville</td>
<td>Agreed; path needs annotating on Proposed Scheme Plan CT-06-040.</td>
</tr>
<tr>
<td>SMA/5/1 south of A4010, linking Stoke Mandeville with the wider countryside</td>
<td>Agreed on the south side of the line; and path needs annotating on Proposed Scheme Plan CT-06-040. However, on the north side of the line, discussions were taking place to create a new footpath linking ELL/5/1 to St Mary’s Church and ELL/20/1 (above) on the north side of the line. This needs further consideration by HS2 before the final ES.</td>
</tr>
<tr>
<td>A4010</td>
<td>It the current proposal is taken forward, the A4010 overbridge needs to be future-proofed with a separated cycleway alongside the road. It is an aspiration to extend the Jet Way, which forms one of the Aylesbury Gemstone Cycleway routes, in order to connect Stoke Mandeville and the train station with the Butlers Cross and Terrick communities. This would provide a safe cycle route into Stoke Mandeville Train station for commuters, and a connection with the Chiltern’s Cycleway recreational route for residents of Stoke Mandeville. If the Stoke Mandeville bypass plan is taken forward there will still be a need to provide a walking and cycling crossing of HS2 into Stoke Mandeville around the Goat Centre area to pick up walkers along ELL/2, ELL/8 and SMA/5A; and cyclists that would normally use the A4010.</td>
</tr>
<tr>
<td>SMA/8/2 west of Stoke Mandeville, linking Stoke Mandeville to wider countryside</td>
<td>Agreed; however, path needs annotating on Proposed Scheme Plan CT-06-041. Footpaths SMA/8/3 and SMA/15A/2 should be included on the north side of the line. The ‘red line’ needs to</td>
</tr>
<tr>
<td>Reference</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>-------------</td>
</tr>
<tr>
<td>SMA/9/1</td>
<td>west of Stoke Mandeville, linking Stoke Mandeville to wider countryside</td>
</tr>
<tr>
<td>SMA/11/2</td>
<td>south of Aylesbury, linking Aylesbury to wider countryside</td>
</tr>
<tr>
<td>SMA/16/1</td>
<td>south of Aylesbury, linking Aylesbury to wider countryside</td>
</tr>
<tr>
<td>SBH/19/7</td>
<td>west of Aylesbury, linking Aylesbury to wider countryside</td>
</tr>
<tr>
<td>SBH/27/1</td>
<td>west of Aylesbury, linking Aylesbury to wider countryside</td>
</tr>
<tr>
<td>National Cycle Route 50</td>
<td>west of Aylesbury along A418 Oxford Road</td>
</tr>
<tr>
<td>SBH/32/1</td>
<td>west of Aylesbury, linking Aylesbury to wider countryside</td>
</tr>
<tr>
<td>SBH/34/1</td>
<td>west of Aylesbury linking, Aylesbury to Lower Hartwell</td>
</tr>
<tr>
<td>SBH/2/4</td>
<td>west of Aylesbury, linking Aylesbury with the wider countryside via Thame Valley Walk</td>
</tr>
<tr>
<td>FMA/1/1</td>
<td>north-west of Aylesbury, linking Aylesbury with the wider countryside</td>
</tr>
<tr>
<td>FMA/2/1</td>
<td>north-west of Aylesbury, linking Aylesbury with the</td>
</tr>
</tbody>
</table>
wider countryside

| An additional track could be created that connects the Cranwell Farm bridleway bridge (it is marked as a footbridge on some plans), across the entrance drive to Cranwell Farm, with the junction of Blackgrove Road. This would be the missing link in creating a cycling route all the way from Aylesbury to Waddesdon. |

Comments on Part C:

We suggest that the ‘Policy Framework’ section title within each of the below topics is amended to ‘Local Policy Framework in order to better reflect its content.

Air quality:

4.4.3 and 4.4.4 Within the environmental baseline these paragraphs are incorrect and require correcting. Buckinghamshire Councils would like to emphasise further key points which need to be corrected for the formal ES.

Local Air Quality Management

We would like to point out that Aylesbury Vale DC currently has two automatic monitors in Aylesbury Town providing data for NO2 and a representative number of passive diffusion tube sites covering the Town and more rural areas.

To date, three Air Quality Management Areas (AQMAs) have been formally declared in Aylesbury. Additional hot-spots have recently been identified during our on-going review and assessment program. These locations will either be declared as small individual AQMAs or incorporated into one single, larger AQMA. All sites were identified due to the annual mean air quality objective for nitrogen dioxide (NO2) being exceeded.

Aylesbury Air Quality Action Plan

It should be noted that an overarching Action Plan covering the whole of Aylesbury was adopted at the end of 2010. All AQMAs and hot-spots are therefore covered by it and the air quality impact assessment undertaken for the proposed development should take this into account.

Emission Factors

Recently, Emission Factors generally used within air quality assessments, have predicted a steady decline in Oxides of Nitrogen (NOx) and NO2 in future years, based on the assumption that improving vehicle emissions standards will bring about significant reductions in vehicle pollutants. However, there is increasing evidence that such
improvements in vehicle emissions standards to date have not brought about the expected reductions in air pollution (DEFRA 2011 *Trends in NOx and NO₂ emissions and ambient measurements in the UK*), and DEFRA are in the process of amending Emission Factors to reflect this understanding.

This renewed understanding is supported by monitoring data throughout Aylesbury that illustrates an overall increase in roadside concentrations of NO₂, year on year. Based on this data we would expect that concentrations of NO₂ on the identified AQMAs/hot-spots are likely to continue to exceed the associated long term air quality objective in the future.

It is therefore considered appropriate to base air quality assessments on Emission Factors that reflect the current understanding of trends of vehicle pollutants.

**We have listed the potential emissions during the construction phase:**

**Oxides of Nitrogen:**

During the construction and operational phases, there is significant potential for additional vehicle movements generating increased emissions of oxides of nitrogen. Locations in and around Aylesbury such as the A41 Bicester Road are likely to be affected. This location has previously been identified via our Air Quality Review and Assessment process as one with elevated concentrations of NO₂. In 2010 a detailed assessment identified the need for a stretch of this road (between Stonehaven Road and the Broadfields Retail Park) to be declared as an AQMA. Such a declaration has been withheld due to consideration currently being given to a single, larger AQMA incorporating all current AQMAs and traffic hot-spots.

**Particulates/Dust:**

Buckinghamshire Councils would also like to give emphasis to the local soil characteristics of the CFA, as much of the underlying geology of the Vale is chalk and clay, both of which have the potential to generate significant air borne dust emissions during certain prevailing meteorological conditions. During the construction phase, sensitive receptors are likely to be adversely effected by dust without appropriate, proportionate and effective dust management regimes.

In order to quantify the potential impact of dust emissions, a dust emission baseline should be established at relevant (sensitive receptor) locations along the route. These should include locations where human, ecological, and agricultural/horticultural receptors exist. Accordingly, an appropriate dust monitoring program shall be funded and implemented by the developer prior to any ground construction/engineering works commencing. Monitoring should continue throughout the construction phase and the methodology and sampling locations shall be agreed the Buckinghamshire Councils.

It is also important to note that during the construction phase, all associated traffic and transport should be routed as far away from sensitive receptors and Air Quality Management Areas (AQMAs) as is practicable.
It is extremely disappointing that there is no consideration, assessment or analysis of the strategic Green Infrastructure (GI) network for Buckinghamshire. Given this serious deficiency it is difficult to provide comments for this CFA.

Buckinghamshire Councils have identified the Stoke Mandeville and Aylesbury CFA to contain a strategic priority area for Green Infrastructure in the HS2 corridor. Aylesbury Linear Park, incorporating Hartwell House, is the identified priority strategic location, which has the provision of a linear park and network of connected green infrastructure around Aylesbury. The viability of this project may be compromised south and west of Aylesbury by HS2 construction. Land will become isolated between Aylesbury town and the railway. There are significant benefits and opportunities in taking a multi-functional approach to environmental mitigation in this location. This will need to be incorporated in the formal ES as a key priority for mitigation and offsetting related to GI.

The Policy Framework should include and consider the draft Vale of Aylesbury Plan, the Bucks Green Infrastructure Strategy 2009 and the Aylesbury Vale Green Infrastructure Strategy. These should be used as a key reference for planning and managing the HS2 line and its associated infrastructure.

The loss of land at Hartwell House and Aylesbury Golf Club has been recognised as loss of GI, but as it is in an area of existing GI deficit, the Proposed Scheme will only make it worse, and therefore mitigation/offsetting is essential (in PAA2 Buckinghamshire GI Strategy 2009).

Any loss or degradation of any GI will be in an area of existing GI deficiency and exacerbate a recognised GI deficiency. Measures should be put in place for mitigating and offsetting this: see Priority Action Area 2 within the Buckinghamshire GI Strategy 2009.

5.4.5 The ES must take into account the proximity of the line to community facilities. For example, while it is stated that there is no land take planned for the Buckinghamshire Goat Centre, it is not stated whether there could be disturbance to the livestock or to visitors which would make the operation of the centre unviable. A relocation of the Centre may be required. It is clear that there are likely community and socio-economic impacts which need to be fully addressed.

5.4.13 As discussed above, the ES must take into account the proximity of the line to community facilities. This applies to Fairford Leys sports ground and golf course. Consideration must be given to the long term disturbance of the sites, as well as during the construction phase, and this may require a relocation of the sports ground and golf course elsewhere.

5.6.2 The draft ES states that there would be significant impact upon the Aylesbury Park Golf Course. The Fairford Leys sports ground is adjacent to the golf course and should therefore similarly be considered to be significant impacted by the proposal.

Due to the consideration of multiple community effects and mitigation measures being deferred to the formal ES, Buckinghamshire Councils are unable to comment on these matters in this current draft ES.
Cultural heritage

6.2.1 This document should refer to ‘Aylesbury Vale District Council’ Local Plan policies, not ‘Aylesbury Vale District’ Local Plan policies. The relevant policies should include ‘GP53’ and ‘GP59’, not ‘53’ and ‘59’. It should also refer to ‘Wycombe District Council’ Core Strategy and Local Plan policies, not ‘Wycombe’ Core Strategy and Local Plan policies.

6.2.2 The High Wycombe Town Centre policy HW1 is not relevant to the proposed scheme. Mention should however be made to the Buckinghamshire and Milton Keynes Historic Landscape Characterisation as a relevant document.

There is no reference to the overall assessment scope and key assumptions for the cultural heritage assessment in Volume 1. We do not agree that these are adequate (see separate detailed comments).

6.3.2 This paragraph is inaccurate. Detailed HER data was supplied for the full 10km corridor within Buckinghamshire.

6.4 The baseline is a descriptive summary only and includes some inaccuracies. There is no detailed presentation or listing of all the heritage assets within the study area, the ZTV or the temporary and permanent land take areas and only nationally designated heritage assets are shown on the maps. This is completely inadequate as an environmental baseline.

6.4.2 We are puzzled by the references to light soils within this paragraph.

6.4.3 This paragraph is inaccurate. There is a known Iron Age hillfort at Aylesbury and a probable Late Iron Age high status site nearby at Bierton. There does not seem to be evidence for large Roman villa estates in this part of the Vale of Aylesbury, just a large number of small farmsteads. There is strong evidence for a Roman small town at Fleet Marston, not simply a roadside settlement.

6.4.4 This paragraph is inaccurate. There is no mention of the important early Saxon settlement at Walton in Aylesbury or the cemeteries at Bishopstone, Hartwell and Stone; and no mention of the middle Saxon minster and royal estate at Aylesbury. There is no evidence for late Saxon or medieval settlements at Walton Court or Coldharbour.

6.4.5 The park and gardens at Hartwell House were first laid out in the late 17\textsuperscript{th} and early 18\textsuperscript{th} centuries.

6.4.9 The scheduled remains at Quarrendon comprise the ruins of the medieval church, medieval moated manorial and deserted village earthworks and the earthworks of a complex of Tudor gardens and rabbit warrens. The reinterpretation of the earthworks by English Heritage has been generally accepted but the scheduling documents have still to be updated with a revised description. There is no specific mention of the grade II* listed Medieval building of St Mary’s church at Fleet Marston. The Conservation Areas at Bishopstone, Aylesbury and Stone are missing from the list of designated assets within the ZTV.
6.4.10 The assessment of non-designated assets is incomplete, lacking in detail and is inadequate. The remains of the church of St Mary at Stoke Mandeville include upstanding walls and the most recent burials appear to date from the late 19th century.

6.5 There is only limited assessment provided of the impact the proposals will have on individual heritage assets, no assessment of the impact on historic landscapes, and only limited detail of the mitigation proposed. There is insufficient detail to support the statements of the relative heritage value of the assets affected. As a result this section is wholly inadequate.

6.5.3 There appears to be no understanding that constructing bridges, balancing ponds, providing materials stockpiles, screening earthworks and planting during construction creates additional archaeological and visual impacts, including an impact on setting and will actually add to the impacts on heritage assets. It is not clear how the rerouting of the A418 at Hartwell will reduce the physical impact and the impact on setting as the new road will actually have an additional impact on the setting of the listed buildings and registered parkland and will also have a physical impact on buried archaeological remains of Pleistocene, Iron Age and Roman date.

6.5.4 The site of Old Stoke Mandeville Church is also of community value and is often visited – the churchyard is on a public footpath, is actively maintained as a public open space and contains relatively recent burials of members of the local community. There are also buried medieval settlement remains and surviving ridge and furrow and mill mound earthworks at Putlowes (Fleet Marston). The Roman small town at Fleet Marston may well be of schedulable quality – there is no information provided to support the assumption that it is of only moderate heritage value. There is no mention of the impact on the buried remains of the Roman road of Akeman Street.

6.5.5 The impact on the setting of Old Moat Farmhouse, a grade II listed 15th century timber-framed house with surviving medieval moat and fishpond earthworks is missing.

6.5.6 There appears to have been no consideration of whether there will be a visual impact on the setting of the complex of scheduled monuments at Quarrendon in terms of views outward from the monuments.

6.5.8 There is no consideration of the lasting residual impact of the proposed scheme on the historic landscape.

6.6.2 There are significant impacts of the proposed scheme on the setting of heritage assets and the historic landscape within this CFA.

6.6.3 There appears to be no understanding that screening earthworks and planting will in turn create additional visual impacts, including an impact on setting.

6.6.4 It could be argued that the scale of the impacts on the setting of the individual assets at Hartwell are such that it actually constitutes substantial harm. The impact on the setting of the Conservation Areas at Bishopstone and Sedrup are missing from the list.

Ecology:
Buckinghamshire Councils would like maps to be provided showing which land parcels have been and have not been accessible for ecological assessment. We would also like to place particular emphasis on the timings and effort of ecological surveys which must be questioned, for example the route wide impacts of bats, tree-climbing surveys for bats, reptile and great crested newt surveys (as neither of these two are mentioned).

We would also like to highlight our concerns over where the raw ecological survey data to enable full assessment and consultation can be found. This should be provided within an ES and if this stage is the last chance for the public to make comment to influence the final ES, then the data should be provided.

7.4.6 Table 6, shows the records of reptiles (Common Lizard) reported in EIA for proposed mixed development at Fleet Marston, however we need to know if a comprehensive reptile surveys been undertaken, if comprehensive great crested newt surveys have been undertaken, what proportion of suitable ponds have been surveyed and are the two records presented from the only ponds surveyed, or have all ponds been surveyed? For example, what is the proportion of ponds containing great crested newts of those surveyed, and also of the number of ponds which should be surveyed within this CFA.

7.5.3 Construction section raises further concerns for Buckinghamshire Councils, raising the question that there must be scope of the scheme for the potential to create suitable reptile habitat for Adder. Also why should these have to remain as significant residual permanent adverse effects when they could be mitigated or compensated? It is acknowledged that further mitigation measures are being considered at this stage, but bearing in mind this consultation could be the last opportunity for public consultation to influence the final ES, more details on proposed mitigation should be provided. If this lack of detail is because baseline data has not yet been established to guide appropriate mitigation then this is not in line with EIA regulations.

7.5.4 Is there scope of the scheme for the potential to create suitable aquatic and terrestrial habitat for great crested newt? Why should these have to remain as significant residual permanent adverse effects when they could be mitigated? It is acknowledged that further mitigation measures are being considered at this stage, but bearing in mind this consultation could be the last opportunity for public consultation to influence the final ES, more details on proposed mitigation should be provided. If this lack of detail is because baseline data has not yet been established to guide appropriate mitigation then this is not in line with EIA regulations.

Buckinghamshire Councils also think that there should be scope within the scheme for the potential to plant new broadleaved woodland to mitigate the loss of bat foraging habitat in the vicinity of Hartwell House? Will any roosts be destroyed? Why should these have to remain as significant residual permanent adverse effects when they could be mitigated through improved habitat connectivity? It is acknowledged that further mitigation measures are being considered at this stage, but bearing in mind this consultation could be the last opportunity for public consultation to influence the final ES, more details on proposed mitigation should be provided. If this lack of detail is because baseline data has not yet been established to guide appropriate mitigation then this is not in line with EIA regulations.
We would also like to know what ratio of compensation for loss of ponds will be provided to ensure fragmentation of metapopulations does not occur (especially where metapopulations are bisected). Will compensatory reptile/great crested newt habitat be secured, delivered and allowed to mature prior to destruction and translocation of animals? How will these habitats be managed for the long-term to ensure translocated populations survive? We expect a response to all of these questions.

Land quality:

8.4.10 In the stated current and historic land use, there are several land uses which have the potential to cause contamination to the land including an infilled brick pit and historical landfill. Our records indicate there are no other additional areas of potentially contaminated land which need to be taken into consideration.

However other areas of potentially contaminated land may be encountered during the construction phase which has not previously been recorded or identified. This therefore must be taken into consideration during the construction phase and the Environmental Health Department must be contacted if and when any additional areas of previously unidentified contamination are encountered.

8.5.2 & 8.5.3 Buckinghamshire Councils agree and recommend that ground investigation must be undertaken before construction takes place to confirm any areas of contamination. Any remedial schemes required as a result of investigative work must be discussed with the Environmental Health Department and the Environment Agency. Written approval from both these authorities must be obtained before any work can commence. We also agree it is appropriate and acceptable to undertake any remedial works during the construction phase.

Within one month of completing the remedial works a full validation/verification report must be submitted for approval.

8.5.4 & 8.5.6 The Councils also agree that remediation may be required in these areas depending on their level of risk. Any remedial schemes must be discussed with both the Environmental Health Department and the Environment Agency. Consequently, written approval from both these authorities must be obtained before any work can commence.

8.5.5 We agree that the remediation is unlikely to be required along the route apart from those sites discussed in section 8.5.4 and 8.5.6; however as identified in the section above, there is the potential to encounter contamination which has not previously been recorded or identified during the construction phase. This therefore must be taken into consideration during the construction phase and the Environmental Health Department must be contacted if and when any additional areas of previously unidentified contamination are encountered.

8.6.1 During the operation of the railway there is the potential for contamination to occur along the route. However section 8.6.1 states that adequate procedures will be put in place to deal with any spillages etc. which may occur during the maintenance and operation of the railway. Therefore we do not believe any further mitigation measures are required in relation to this.
Landscape and visual assessment:

There is not enough specific information to make meaningful detailed comments on the proposals for individual CFAs and there is a need to understand why some of the proposals that have been put forward in the ‘Buckinghamshire’s Mitigation Blueprint for HS2’ e.g. the linear park on the southern edge of Aylesbury have been omitted.

Further, there is a need for design level engagement between HS2 Ltd and local authority landscape architects, biodiversity, and drainage officers etc. on the design of the infrastructure, mitigation and enhancements for the whole of the route through Buckinghamshire.

9.4.3 Reference to Wycombe District Landscape Character Assessment missing (although character boundaries appear to have been used).

9.5.2 There generally appears to be a strong emphasis that most impacts are only temporary, ie. occur only during construction. Whilst construction will result in additional impact there will also be permanent impacts which might significantly change the character of the area.

9.5.13 and Mapbook drawing LV11 Many of the chosen viewpoints are very close to the line. It is however important that the scheme is also assessed from viewpoints further away to fully appreciate its impact in the landscape. The ZTV should assist in choosing appropriate locations and the lack of identified viewpoints gives rise to concerns that the impact on middle and long-distance views will not be adequately covered. Impacts on views from further afield such as Marsh Lane Crossing (railway crossing) and Coombe Hill should also be included in this section.

The lack of ZTV make it difficult to judge the appropriateness and coverage of the viewpoints. No verifiable photomontages from any of the viewpoints south of SM have been provided. We are not sure whether such photomontage will be provided at the Formal ES but it is considered essential that all identified critical viewpoints are accompanied by a photomontage.

9.6.1 and Map book plans CT-05-041 & CT-06-041 The lack of detail on the drawings makes it difficult to understand the rationale behind the proposed type of mitigation, areas of land chosen for mitigation etc. It is important that mitigation is chosen that reflects the character of the surrounding landscape and that is most appropriate in visual and ecological terms.

9.6.10 No assessment of lighting included in draft ES but promised for the formal ES. This information is essential to assess impact on landscape character and views including those from the AONB.

9.6.11 We are concerned that impacts on middle distance and long distance views will not be adequately assessed due to the low number of photomontages.
9.6.15 It is stated that further mitigation is ‘currently being considered’. However, much of the acceptability of the design of structures, landforms and mitigation will depend on the further mitigation measures. These could make a significant difference to the design quality, contextual response, landscape quality and legacy of the proposed scheme.

Socio-economics:

It is stated within Volume 1 (5.11.1) that “Localised effects on businesses and observations on potential local economic effects are reported within each CFA”, but the section does not address these matters. There is no attempt to quantify the local impact on each CFA. This is not best practice and unacceptable.

10.4.3 Latest figures should be used.

10.4.4 Proportion of employment by sector would be a useful measure here.

10.5.4 & 10.6.2 “The likely residual socio-economic effects are currently being assessed and will be reported in the formal ES”. This is very unhelpful and we request that at least an interim report on the effects should be made in advance of the formal ES.

10.6.1 It appears that no real effort has been put into consideration of employment opportunities for local residents. No thought has been given to distances involved.

An analysis of occupations by district would be helpful

Sound, noise and vibration:

It is almost impossible for Buckinghamshire Councils to make comprehensive judgement over the validity of those communities identified as potentially significantly affected by noise (or indeed those not so identified) because no baseline noise information is provided within the draft ES.

11.6.4 (and paragraph 5.12.8 of Volume 1) The criteria being used to determine potential significant affects on individual dwellings is set out (or groups of dwellings that do not constitute a community). However we do not consider that these criteria are sufficient to identify all those significantly affected by noise from operation of the railway.

With regards to construction impacts and mitigation there is insufficient information within the draft ES to identify whether or not the construction impact identified are complete.

11.5.3 Whilst major infrastructure developments are identified as potential effects, there appears to be no recognition of the noise and disruption caused by the major earthworks required along the length of the line and particularly the potential noise caused by lorry movements transporting spoil from one site to another.

Our understanding is that as part of the track laying process the tracks themselves have to be pre-tensioned to allow for potential thermal expansion. This process involves cutting stretching a re-welding the rail. This work needs to be carried out when the ambient
temperature is low and therefore will be carried out at night. Whilst it is of limited duration in any one location it has the potential to be quite disturbing for residents close to the line.

As stated above we do not believe that using Noise Insulation Regulation thresholds is sufficient to identify all, non community, residential receptors that will be significantly affected by noise.

Based on our general knowledge of baseline noise levels and the information presented on the operational sound contour maps within this community forum area, we believe the following individual/groups of properties, not included as identified community impacts, will experience a rise in noise levels of at least 10dBLpAeq,16hr and therefore should be identified as potentially significantly affected.

1. Map ref SV-01-21 E5/6 Properties around Moat Farm (it is not clear whether they are included within SV-11-C02

2. Map ref SV-01-22 E5 Hartwell Cottage and The Oaks (although it is noted that these properties are close to the A418, an existing noise source)

3. Map ref SV-01-23 D/E 5 Putlowes Farm

There are two further communities we believe could be significantly affected, these being:

1. Map ref SV-01-22 C3: Lower Hartwell, which is comprised of at least 7 dwellings and is located in a quite area away from the main roads.

2. Map Ref SV-01-22 E3: the N/E portion of Meadoway, Sedrup which will also be potentially affected by the diversion of the A418 as well as noise from operational HS2 trains.

11.6. No details have been provided of the assessments that have been carried out on the impacts of realigning roads, particularly A418 Oxford Road and Risborough Road, Stoke Mandeville. These will need to be provided in the full ES.

11.6.12 The communities that have been identified as potentially significantly affected are not well defined either on the operational contour maps or within the descriptions in paragraph 11.6.12. This will need to be addressed in the final ES.

With regard to sensitive receptors there is a current development of a 92 bed care home on the Risborough Road Stoke Mandeville (map ref SV-10-21 I3) which falls into the 55-60dB contour and therefore could be significantly affected.

11.6.10 There is no detail provided on the properties potentially affected by ground-borne noise and vibration, it is therefore impossible for us to comment further on this aspect at this time.
Traffic and transport:

12.2.1 -12.2.3 Buckinghamshire’s LTP3 is broadly reviewed with reference to the Sustainable Community Strategy. Reference is also made to Buckinghamshire’s LTP3 Implementation Plan and the reference to HS2 contained within it. However, it fails to mention that the reference at that time was in opposition to the HS2 scheme proposals.

Within the Policy Framework there is no mention of Buckinghamshire’s Freight Strategy nor the Local Area Strategy which sit under the LTP3.

12.3.5 It is stated the ‘design development of the Proposed Scheme remains in progress’ and therefore, updated and revised assessments are required.

The first limitation states ‘the capacity of junctions that would be affected by the Proposed Scheme has not yet been assessed in detail. A more detailed assessment will be carried out for the formal ES where necessary’. Junctions assessed should be determined in consultation with the respective local authorities. BCC is currently producing a list of locally sensitive junctions throughout Buckinghamshire that will need to be assessed in the formal ES.

12.3.7 We have particular concern about lorry traffic using A4010, B4009 and Marsh Lane to serve compounds.

Buckinghamshire Councils are also aware that the forecast traffic generation will not take account of wider effects; if the construction routes, diversions or highway closures will affect bus routes, there may be modal shift from public transport to private car. Such effects need to be estimated as part of the formal ES.

For construction traffic, forecast traffic flows and size of vehicles will need to be confirmed in order to fully assess and ensure that construction routes identified are appropriate. Construction traffic must be assessed and agreed by BCC as the local Highway Authority.

As stated within Buckinghamshire’s Mitigation Blueprint for HS2, roads across Aylesbury and Stoke Mandeville are becoming increasingly congested as a consequence of development, not least being HS2. Concern was raised in particular with regard to the severe construction traffic impacts anticipated around and through the town. Substantial and permanent improvements to Aylesbury’s road network were therefore stated as a necessity, including the realignment of the A4010 Risborough Road. BCC expect to engage with HS2 Ltd and their consultants to agree this proposal and ensure it is a key component in future proposals, since it provides clear benefits and minimises the impacts of HS2 on Stoke Mandeville.

Construction traffic for Aylesbury and its environs should come from either the M40 (Junction 8) or the M25 (Junction 20) and then via the trace (track). Construction traffic for the route north of Aylesbury should be routed via Junction 9 of the M40.

Detailed information about the proposed maintenance sidings between Nash Lee Road and Old Risborough Road is also required so that appropriate and suitable mitigation measures can be developed to reduce the impacts on surrounding communities and
HS2 draft ES: response of the Buckinghamshire Councils

businesses. This must include arrangements for access to the sidings and routeings for construction vehicles on suitable and enhanced roads, such as Nash Lee Road.

As stated within The Buckinghamshire Blueprint for HS2, Buckinghamshire Councils expect routes used for construction traffic to be clearly identified, maintained and used by all, with any breaches monitored and enforced. Buckinghamshire Councils expect these routes to use appropriate roads that have least impact on the local environment and communities. Consultation throughout the construction phase will be required.

12.4 A broad outline of baseline conditions is presented. However a more detailed analysis should be provided in the formal ES and Transport Assessment. Baseline conditions should include traffic system performance data, including queue lengths and/or journey time data, and assessment of the locally sensitive junctions throughout Buckinghamshire as identified by Buckinghamshire Councils. Future baseline traffic volumes should take account of locally committed development and infrastructure.

12.5 Measures to avoid/reduce impacts on travellers are given – reference is made to construction materials and equipment being transported along haul road adjacent to the Proposed Scheme alignment ‘where reasonably practicable’, however, no further details or potential impact provided. Defined lorry routes should be confirmed and agreed with Buckinghamshire Councils. The realignment of the A4010 Risborough Road as previously proposed by the Buckinghamshire Blueprint should be included. There should also be reference to how this will create the minimisation of impacts on cyclists.

12.5.4 The temporary road closure of Marsh Lane and associated diversion is stated. The road closure is stated to last ‘for a month or more’, however Buckinghamshire Councils would like confirmation of the likely duration that will be required. We would also like to know what local access to be maintained. The permanent closure of Old Risborough Road is also identified, with a permanent diversion via the A4010 required. We expect important effects as a result of such closures/diversions to be fully assessed.

12.5.5 Access points to construction compounds will require review and approval by BCC Development Management.

Table 13 outlines the estimated numbers of vehicles generated by the site compounds in this area. Flows are provided in ‘typical daily number of two-way trips’, however no reference is made to any restrictions or likely times of travel. Whereas 12.5.8 lists the roads anticipated to result in significant increases in traffic flows (i.e. more than 30% for HGV or all vehicles). Concern is raised with regard to such increases on already congested routes. Impacts should be fully assessed in conjunction with the proposed A4010 realignment.

12.5.9 It is stated that the CoCP would include HGV management and control measures. Buckinghamshire Councils will require the details of such measures and their impact on the CFA. Paragraphs 12.5.9 to 12.5.11 refer to the development of the CoCP and a construction workforce travel plan. The workforce travel plan should be completed in line with current best practice guidance and reviewed by BCC Sustainable Travel team when available.

12.5.14 The likely effects with respect to journey times on Old Risborough and Marsh Lane have been identified as minor significant. However a definition is required as to how the
'minor significant effect' was quantified. **12.5.15** states the level of effect to be determined on Old Risborough Road, but assessments should also consider locally sensitive junctions as identified by Buckinghamshire Councils.

**12.5.19** The identification and details of further mitigation measures is required.

**12.6.6** The identification and details of further mitigation measures is required.

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**Water resources and flood risk assessment:**

**13.4.13** A proposed viaduct is repeatedly referred to. However early on in the report for this area, it was explained that the proposed viaduct has been removed. Therefore this should be amended and reflected in the formal ES and the proposed scheme maps, as we can not assess this any further without this detail.

**13.5** It is stated there will be minor culverting works to many smaller watercourses and concludes there will be no significant affects. Buckinghamshire Councils can not agree with this without knowing the location, size and length of the proposed culverts. This will need a technical assessment before this conclusion can be made.

**13.5.5** We need to know the impact of the permanent diversion of Stoke Brook and 3 diversions on the catchment of this watercourse.

The maps of the Stoke Mandeville and Aylesbury CFA also raise concern with Buckinghamshire Councils as there are few points that need clarification before they can be agreed to.

**CT-03-23** needs to be amended to remove viaduct as proposed in report.

**CT-05-041, CT-06-41** and **CT-06-042** We need to know where the flood storage compensation will be located.

We can see that Stoke Brook is being realigned to run along the base of the railway embankment; however it is unclear to see how this will be managed from natural erosion and loss of natural bank, as well as how direct run-off from the embankment into the Brook will be managed.

The maps also show that there is a large pond proposed close to residential areas, but we need it to clarify as to what the residual risk would be if this should breach or fail.

On map **CT-06-043**, how will additional volumes be managed from surface water run-off through existing road culvert under the A418 and on map **CT-05-045** where is the viaduct? Buckinghamshire Councils also need to know where the flood storage compensation areas, what the impact on flood flows will be and how the ponds that are located in the floodplain will be managed if inundated.