



# HS2 Phase One environmental statement consultation

## Response Form

This consultation will close on ~~24 January~~ 27<sup>th</sup> February 2014 at 23.59

You can respond by downloading and saving this response form to your computer, completing it, and then attaching it to an email and emailing your comments to [HS2PhaseOneBillES@dialoguebydesign.com](mailto:HS2PhaseOneBillES@dialoguebydesign.com).

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

### Information about you

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

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

**CLERK TO GREAT MISSENDEN PARISH COUNCIL**

## Confidentiality and data protection

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

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

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

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

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

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

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

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

#### **1) INTRODUCTION :**

The proposed railway line outlined in the High Speed Rail (London-West Midlands) HS2 Hybrid Bill cuts right across the Great Missenden Parish. This is a scheme to which the vast majority of inhabitants within this Parish object. The Great Missenden Parish falls within the Central Chilterns Community Forum Area 9 and lies entirely within the Chilterns Area of Outstanding Natural Beauty (AONB), a nationally protected landscape.

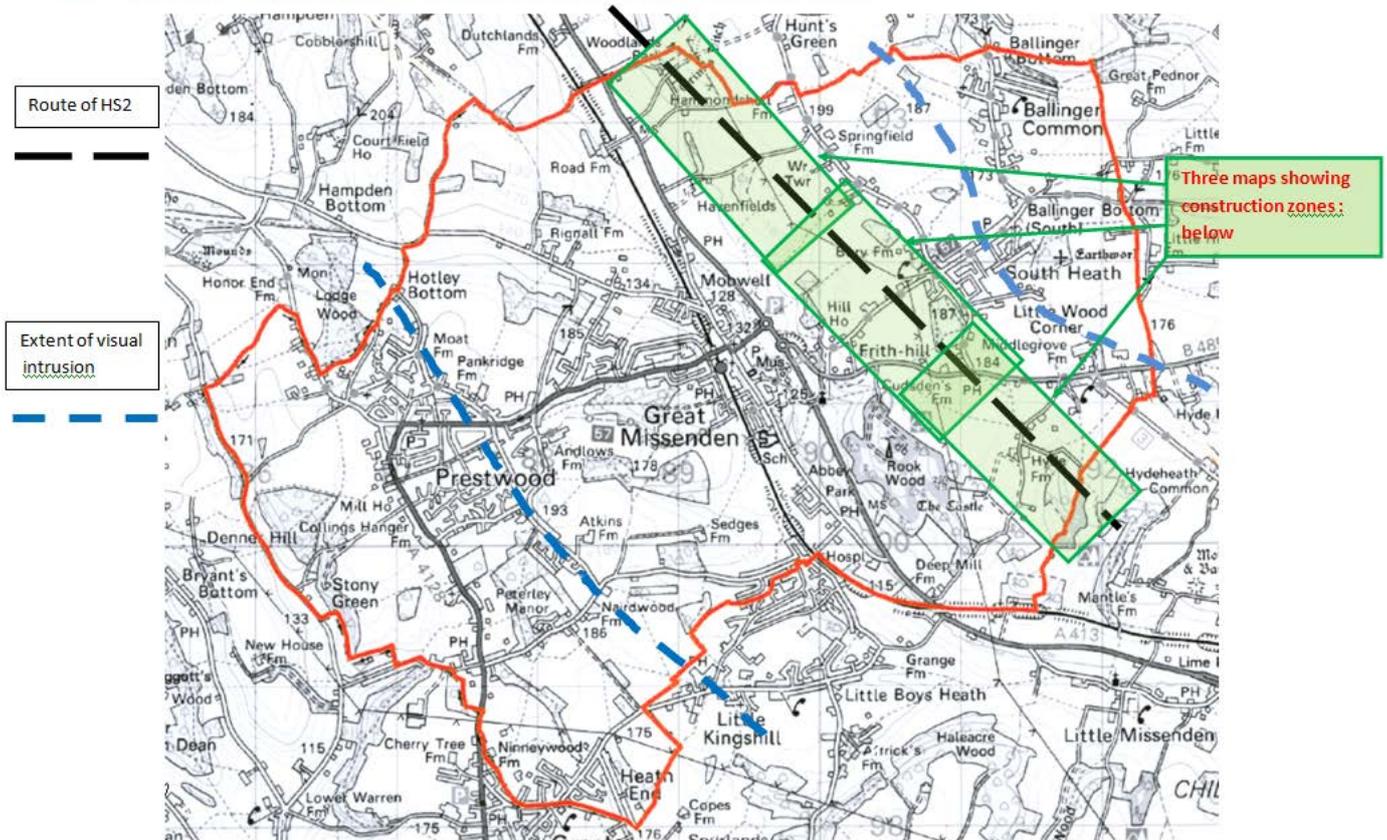
The proposed HS2 route passes through the north east of the Parish see map of Great Missenden Parish below, with South Heath, Hyde Lane and Potter Row being recognised as some of the worst affected settlements along the whole route (reference section 5.11.4 of the HS2 Impact Assessment).

The proposed HS2 scheme requires cutting down from the surface (up to 23m) throughout the Parish. The impact of building and operating the proposed HS2 scheme in this area is significant and is underestimated throughout the whole Environmental Statement. It should be noted that the ES document is full of factual inaccuracies and omissions.

There has been no proper Environmental Impact Assessment carried out prior to making the decision and inadequate consideration of alternatives.

The impact of HS2 would be felt across the whole parish and, as is often the case, it will be those vulnerable persons such as the elderly, single parent families, children and those with disabilities who will be the most affected. If HS2 goes ahead in accordance with the current proposals **the best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

Map of Great Missenden Parish showing the HS2 Route and the extent of visual intrusion



The communities in Hyde Lane, South Heath and Potter Row will be isolated from Great Missenden for up to seven years as has been recognised in the Health Impact Assessment report section 5.11.4 & 5 of the Environmental Statement with the following impact.

During seven years of construction, which can hardly be termed as temporary, involving:

- Loss of social cohesion; a parish community cut in two, loss of access to neighbouring amenities which include churches, schools, community centres, shops, post office and banks
- Loss of footpath access to and from Great Missenden
- Disruption of, and losses to businesses in Potter Row, South Heath and Great Missenden
- Detrimental effect on health and well-being of residents across the area, particularly in Hyde Lane, South Heath and Potter Row
- Construction noise and windblown dust from spoil dumps
- Construction traffic and noise along Potter Row, Kings Lane, A413 and connecting roads (ref Vol 2, CFA09 report, section 11.3.23)
- Significant delays and congestion in traffic flows in the area (ref Vol 2, CFA09 report, section 12.4.13) and life threatening delays to emergency services

During the operation of the railway:

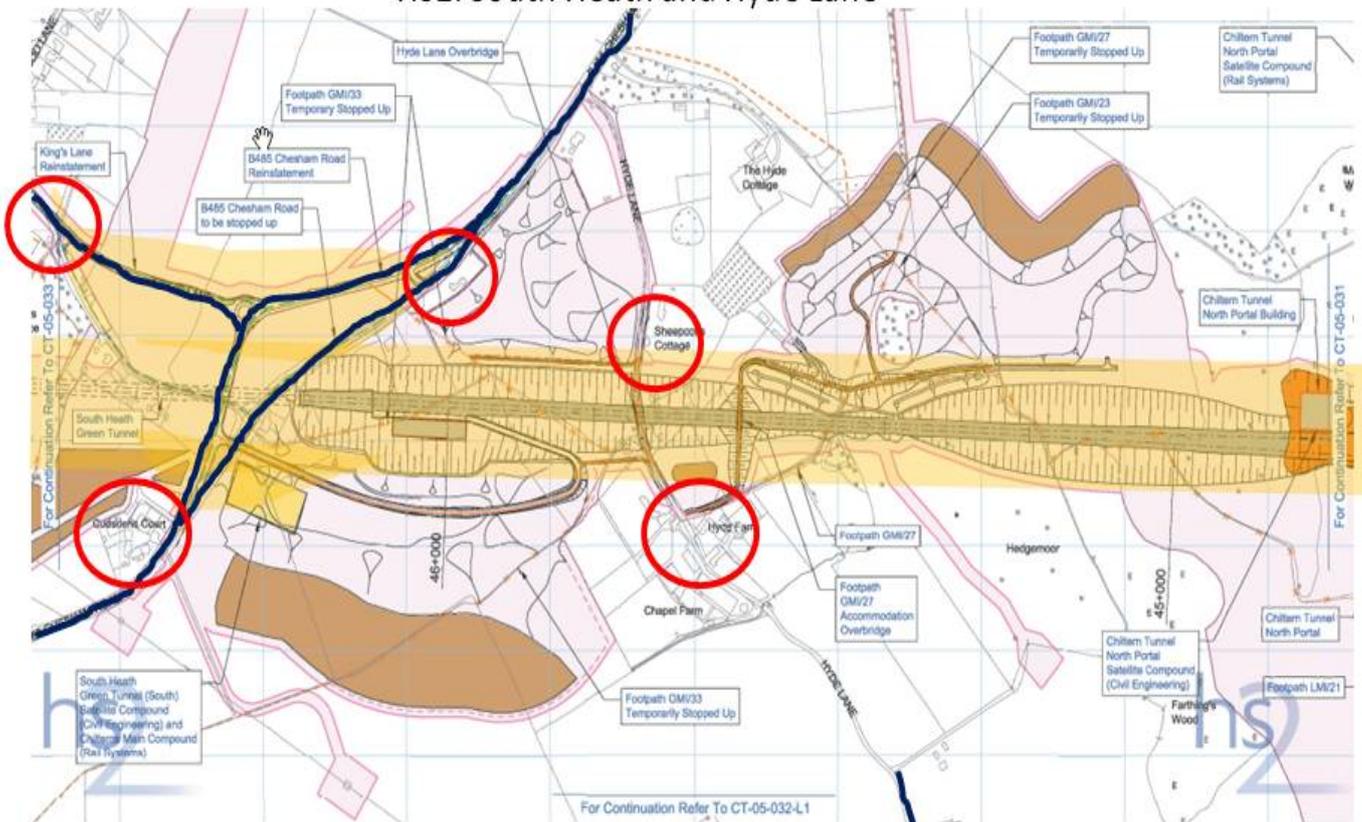
- Noise and vibration levels in Potter Row, South Heath and Hyde Lane requiring additional noise barriers (ref Vol2, CFA09 report, section 2.2.10 to 14) which are only effective for a limited time – 40 years

- Tunnel boom : pressure waves on entering and exiting a tunnel have not been taken into account both in the noise modeling exercise and on the sound contour maps SV-01-016 and SV-01-017. (ref Vol 5, Technical Appendix SV-001-000Annex G 1.2.30)
- Visual blight on the landscape: spoil dumps, settling ponds
- Loss of Green Belt and agricultural land from within the AONB
- Destruction/diversion of Rights of Way
- Barrier to wildlife

The extent of construction work and construction traffic has far exceeded that outlined in the draft Environmental Statement in May 2013; see maps below. The land grab, size of spoil dumps (brown) and construction compounds (orange) have greatly increased.

**HS2: Safeguarding and Construction Zones**

**HS2: South Heath and Hyde Lane**



Full ES: Vol 2, Map Book CFA09 Chilterns Construction Phase CT-05-032

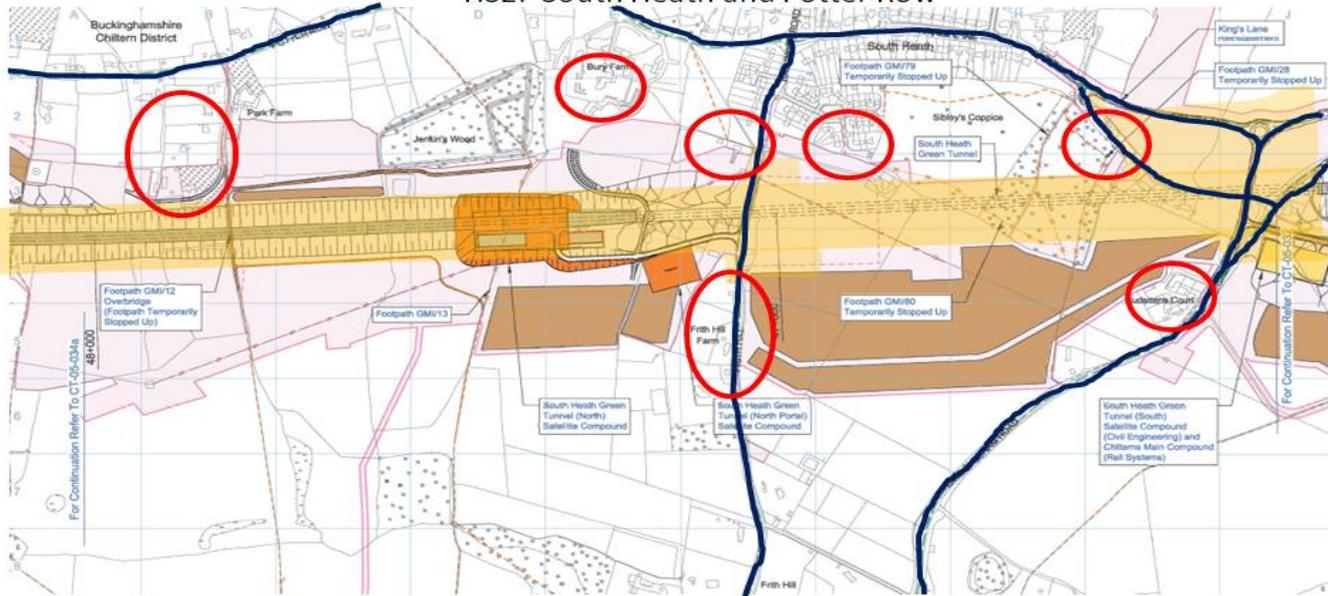
Safeguarding zone: map HS2-HS2-PL-MAP 00-000028-PO3 overlay approximation

— Construction Traffic Route  
 ○ Vulnerable Areas

HS2S&CZ MJ 02 021213

HS2: Safeguarding and Construction Zones

HS2: South Heath and Potter Row



Full ES: Vol 2, Map Book CFA09 Chilterns Construction Phase CT-05-033

Construction Traffic Route

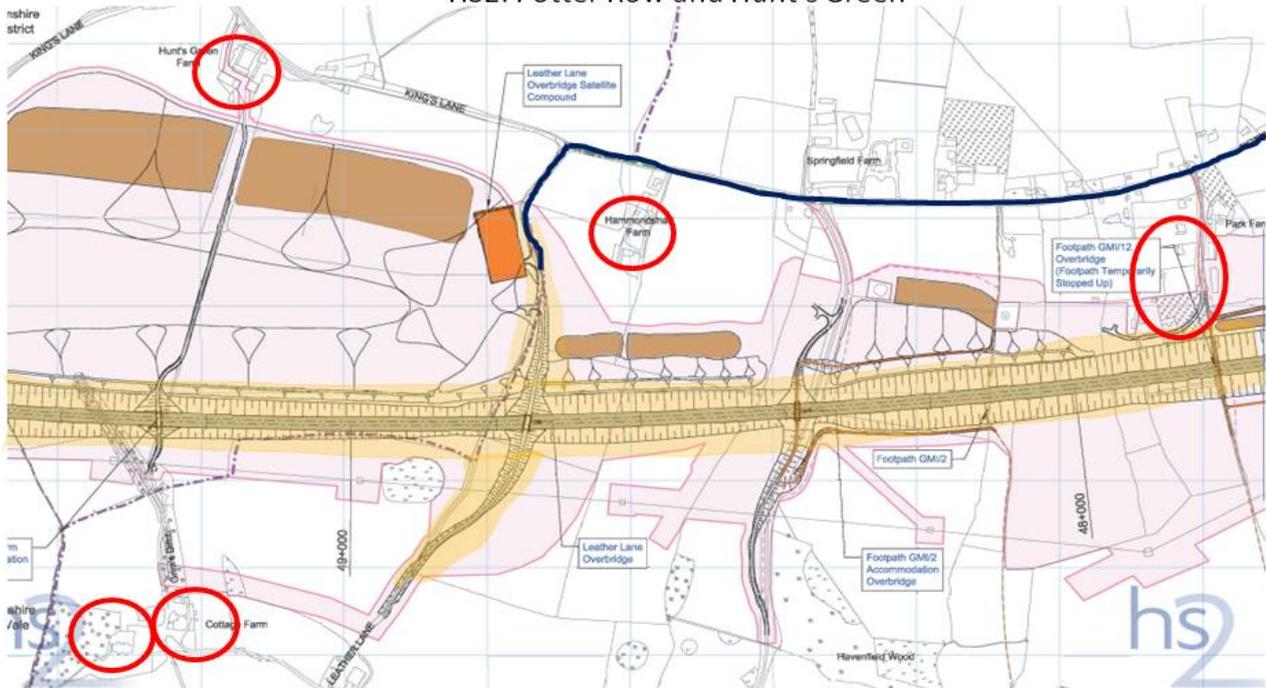
Safeguarding zone: map HS2-HS2-PL-MAP 00-000028-PO3 overlay approximation

Vulnerable Areas

HS2S&CZ MJ 03 021213

HS2: Safeguarding and Construction Zones

HS2: Potter Row and Hunt's Green



Full ES: Vol 2, Map Book CFA09 Chilterns Construction Phase CT-05-034a

Construction Traffic Route

Vulnerable Areas

Safeguarding zone: map HS2-HS2-PL-MAP 00-000029-PO3 overlay approximation

HS2S&CZ MJ 04 021213

A major concern to the Council is Clause 47 in the Hybrid Bill enabling compulsory purchase if the government "considers that the construction or operation gives rise to the opportunity for regeneration or development of any land". This is unacceptable. Any proposal to purchase land taken for temporary use by HS2 should be subject to agreement with the appropriate District and Parish Council to ensure consistency with the current planning requirements for the Green Belt and areas of the Chilterns AONB.

## 2) Physical impact of HS2 on Great Missenden Parish

Along the 3 km length of the route through the Parish, the route does not follow the valley but runs along the northern ridge where tranquillity is high, there will be:

- Two deep cuttings
- One shallower cutting
- A green tunnel (excavated as a cutting, spoil kept for 4½ years then used to cover over)
- A number of embankments and noise barriers required because HS2 Ltd recognise that operational noise is significant in this area
- The realignment of four roads and eleven rights of way
- The loss of parts of ancient woodlands
- Nine balancing ponds to take away contaminated surface water.

The cost of digging deep cuttings across the AONB landscape has been mentioned in CFA report 9 but not quantified. The report states that extending the Chiltern bored tunnel towards Wendover offers the most benefit in the reduction of impact on environmental factors such as landscape, visual, ecological, cultural heritage, noise, socio-economic and agricultural aspects within the AONB (Vol 2: CFA9: 2.6). These savings have not been offset against the cost of extended tunnelling.

The Chiltern AONB is the only AONB on the whole of the proposed route and has the highest possible national designation; Category V which puts it on the same level as a UK National Park. If the scheme goes ahead as proposed it effectively paves the way for development in all National Parks. Great Missenden Parish lies at the very heart of the Chilterns AONB and is in fact, recognised as a gateway to the AONB (ref Chiltern Cycles Project).

According to Environmental Statement Vol2 CFA 9 section 2.6.6 extended tunnel options B to D which would benefit the AONB are rejected because of the additional cost. **There is no value attributed to the AONB and no recognised cost in relation to the damage caused.**

All the alternatives that reduce the impact on South Heath and the adjoining local communities have been rejected on the basis of cost. This without any costs being specified or published, either in the Environmental Statement or elsewhere. No regard is given to the significant savings that would result if there were no cost of mitigation, no disruption of traffic due to road realignment, no loss of business, no rebuilding of roads to take construction vehicles and no permanent noise mitigation for those properties at either end of the South Heath green tunnel.

**Discussions with HS2 Ltd engineering contractors have indicated that the cost of extending the bored tunnels is at best a cost saving or at worst a small cost increase which is more than amply offset by the savings mentioned above.**

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

The Great Missenden Parish Council's response is focussing on omissions and errors in the Environmental Statement and the effect of the Proposed Scheme on communities and businesses in the Parish and on residents' quality of life.

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

**Our comments on the Non-Technical summary are:**

- 1.1) Section 9.2 outlines and attempts to minimise the impact of the proposed scheme on the Chilterns AONB. It acknowledges that it is a designated landscape. It fails to point out that it is afforded the highest possible national designation; Category V. Category V is also the same category as the UK's National Parks. It fails to point out the resultant government responsibilities as defined by the Countryside and Rights of Way (CROW) Act and the National Planning and Policy Framework (NPPF).
- 1.2) The Non-Technical Summary states that approximately 3km<sup>2</sup> of the landscape will be altered. The Chiltern Conservation Board, the statutory body which has responsibility for the management, conservation and enhancement of the AONB, estimate a 55km<sup>2</sup> area in construction and 45km<sup>2</sup> in operation. The Non-Technical Summary further states that less than 0.5% of the AONB will be altered which is not consistent with the Chiltern Conservation Board's figures. This is a blatant attempt at minimisation of impact. The emphasis should be to avoid any impact whatsoever to the AONB.
- 1.3) The local effects are not confined to one community as the Non-Technical Summary suggests. The extent is far wider as HS2 Ltd knows but refuses to acknowledge. Hyde Heath, Potter's Row, The Lee, Ballinger, Wendover and Great Missenden, Little Missenden, Prestwood, Little Kingshill and Great Kingshill will all be very significantly affected. The impact of the construction will spread along the entire proposed route and far beyond the immediate vicinity. The Non-Technical Summary fails to make this clear.
- 1.4) The sections on traffic are particular areas of miscalculation and so it is difficult to make comment. However turning to 8.9 and equivalent sections in 8.8 and 8.10 the full potential traffic chaos becomes apparent. The Non-Technical Summary states that the A413 will experience congestion and delays in CF 10 at several junctions (including B4009), CF9 the same at junctions with A 4123 and B 485 (in fact they are the same junction). It is stated in CF8 that there will be intermittent delays at the Amersham junction. This again underestimates the cumulative effects of more construction sites and increasing numbers of construction vehicles. This will be greatest at the junction of the A355 and the A413.
- 1.5) Section 7.4 describes '*the sensitive laying out of construction sites*'. Cudsdens Court backs onto a high spoil heap and it is proposed to place a construction camp opposite. This siting cannot be described as sensitive. Again this matter was raised and dismissed within the community forum
- 1.6) In summary, the Non-Technical Summary is inadequate and misleading as it fails to provide a summary of the significant residual effects on the environment

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

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

**Our comments on Volume 1 are:**

- 2.1) Section 8 lists examples of many important local issues, raised at the community forum where HS2 Ltd stated they would be addressed in the ES. They have not been answered. Thus the important issues have not been discussed but have been ignored. This is in direct conflict with section 3.2.9, namely: *to consider local issues and discuss possible ways to avoid or mitigate the potential impacts*. Furthermore, section 2.3.10 is factually incorrect as in 2013 only two meetings were held, half the number of the stated bi-monthly meetings. Core environmental values have not underpinned that approach from the start. As a result community 'engagement' was very much limited to informing the community of the latest engineering requirement. Indeed, the environmental spokesperson was noticeably absent from later meetings.
- 2.2) Section 3.2.13 discusses the consultation on the draft ES. This is detailed in Volume 5 Appendix CT-008-000. One common feature of local responses was the inadequacy of the draft ES. A key feature was the question of how, given the time-scale between the draft and final ES, any response was likely to influence the project or the ES. Section 3.2.14 states that a summary of the changes resulting from the consultation are provided in an appropriate Appendix to Volume 5. This is not true. There is no summary of changes, simply a bland reassurance. Volume 5 merely confirms that the consultation on the draft ES was designed to identify weaknesses in the drafting rather than make any meaningful contribution to questions of route or mitigation.
- 2.3) Dialogue by Design's executive summary of the responses states: *the overall comments contain expressions of concern and dissatisfaction, the quality and completeness made, the accuracy of the data, the mitigation being insufficient to counteract the impact and the visual blight to the Chilterns AONB*. These conclusions have been totally ignored in the ES. This is not surprising since this report was published only two months before the issue of the ES.
- 2.4) Section 6.10 Highways (roads) and public rights of way does not describe advanced works in relation to construction traffic routes and if cross referenced to Volume 2 CFA09 2.3.17 -18 again there is no description of the work required or who will have the responsibility to upgrade, maintain small local (village) roads up to the standard to carry large volumes of construction traffic and subsequently restore them. HS2 should bear this responsibility with its associated costs.
- 2.5) Section 6 sets out the construction of the proposed scheme and the reliance on the draft Code of Construction Practice (CoCP). There is no explanation why the CoCP remains in draft except for a statement that the CoCP will be finalised by the principal undertaker. This is unacceptable. The CoCP will be so important to the local communities along the route that it must be legally enforceable. Local Authorities must have powers to enforce which must include the power to order a contractor to stop work if they are in breach of the CoCP. This draft CoCP is based on the Olympic legacy document. **Unlike that document, however, the strict lines of accountability are removed.** Volume 1 fails to clarify the principle undertaker's accountability. It defines what the undertaker is likely to expect of the contractors but not what is expected of the

- principal undertaker. The principal undertaker's accountability to Parliament is undefined. If Parliament makes the decision to proceed with HS2 then it too must remain accountable for that decision throughout the life of the project and beyond.
- 2.6) **The absence of the impact on Tourism from the scoping report for this section is startling in its omission.** There are 55 million visitors a year to the AONB bringing in £471.6 million of expenditure associated with leisure visits to the Chilterns and sustaining an estimated 12,000 FTE jobs. There is no attempt to assess the loss of business as a result of a reduction in visitor numbers, notwithstanding the loss of reputational value.
- 2.7) This section states that the operator will maintain landscaped areas within the rail corridor. There is no confirmation whether this is a temporary or permanent contractual arrangement. It is therefore a meaningless statement. There is a suggestion that there will be a tree-free zone either side of the railway. It is difficult to see how these features will be 'landscaped' when the straight line of the railway is visually reinforced by the artificial, unnatural treeless zone.

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

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

**Our Comments on Volume 2; Community Forum Area 9 Central Chilterns are:**

- 3.1) Section 2.1.7 covering notable community facilities is incomplete. Full details of each village were supplied as requested following the consultation on the draft ES and are attached :
- Appendix A** covers the parish's response to the draft ES plus some images of the parish **Appendix A1** and **Appendix B** The parish's response to the further enquiry from the TEMPLE group.
- The section 3.1.1 fails to identify the impact on communities further than 1 km from the line. Great Kingshill, Little Kingshill, Prestwood, Little Missenden, Ballinger and The Lee barely qualifies for a mention yet they too will suffer. This is a serious misrepresentation of the impact of the scheme. It is a particular concern locally because there is a complex inter-relationship between these communities.
- 3.2) At peak school times, there is intensive activity associated with school transport. Young children and students are ferried between the communities in coaches, cars and travel on foot and bicycle. There are key coach pick-up and drop-off points in the hilltop villages. In addition, taxis and mini-coaches collect and deliver vulnerable children to various local schools. The draft ES contained a commitment for local school safety training for the proposed scheme covering construction and operation. This commitment is not evident within the ES and should be inbuilt to the process.
- 3.3) Great Missenden/Prestwood is a natural focus for outlying communities because of its wide range of community facilities e.g. library, doctors, shops, regular farmers' markets, the local Food Festival and fairs, only some of which are identified in the ES. The purpose of section 2.1.8 is unclear unless it is to minimise the importance

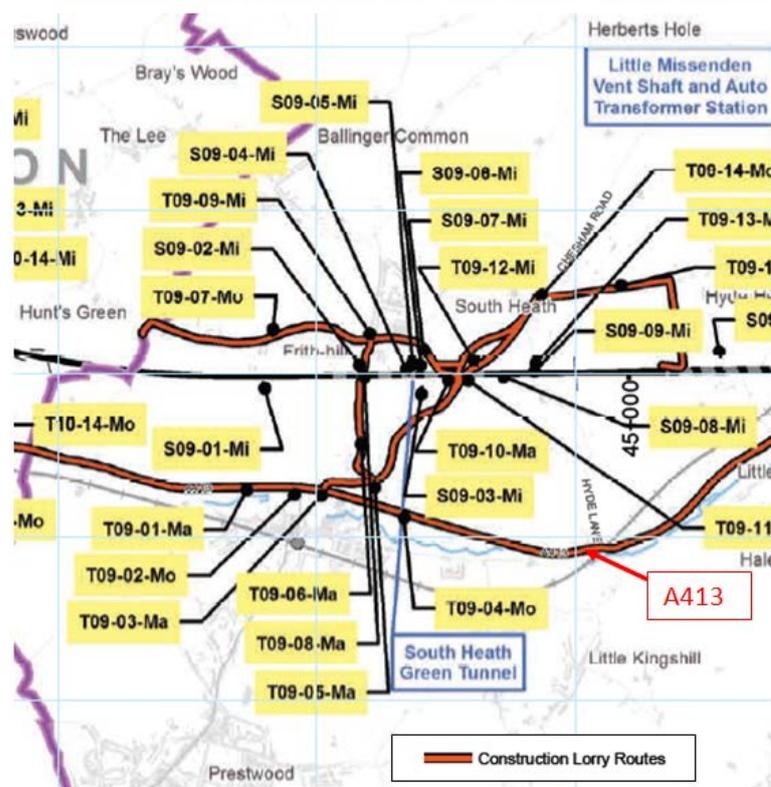
of these communities. It is not true to state that people have to go elsewhere to access services. People exercise choice as to where they shop, nevertheless Great Missenden/Prestwood are coherent communities providing all essential services –

**Appendix C** outlines facilities and services provided within the parish as part of the response to the enquiry from the TEMPLE group

- 3.4) In the CF9 Volume 2 Section 12.4.19 states “The effect on accident and safety risk is not significant as there are no locations where there are existing clusters of accidents and where there are substantial increases in traffic during construction.” The A413 between Great Missenden and Amersham has experienced a number of fatal and serious accidents during the last 18 months which belies this statement. We note that no detailed improvements in safety measures are proposed and ask that the provision of a separated cycle and footway on the A413, where there is no immediate alternative route between Amersham and Wendover, be included in the scheme, particularly in the light of the current spate of cycle accidents in London.
- 3.5) Section 2.2.4 states “the B485 Chesham Road will be realigned with a new roundabout junction with King’s Lane”. A key feature of the Chilterns AONB is the fact that there are few roundabouts and, as essentially an urban feature, are out of keeping with rural roads.
- 3.6) Construction Traffic**  
Section 12.4.25 states “*From areas to the south, including The Chalfonts and Amersham CFA8, the cumulative average construction traffic flows of approximately 20 cars/LGV per day (two-way) have been included in the assessment for this area. Any HGV traffic generated to the south will not directly access roads assessed within this area.*” This statement is in direct contradiction to Sections 2.3.27, 2.3.34, 2.3.43, 2.3.46, 2.3.56 & 2.3.59. This contradiction challenges the credibility of the traffic assessment.
- 3.7) Section 2.3.12 states “*main compounds will contain space for the storage of bulk materials (aggregates, structural steel and steel reinforcement)*” Throughout the documentation there are no risk assessments relating to public safety. Local roads were not designed for 35T or articulated vehicles and are narrow. Entering and leaving construction sites will be difficult. There is concern that contractors will utilise ad hoc solutions or unspecified engineered solutions to overcome these problems leading to further degradation of the environment. An example would be radically changing the road junction at the Frith Hill South leg because they find, despite warnings, that construction traffic is unable to make the turn. Frith Hill is a particular concern in winter- conditions made worse by excessive mud/slurry deposited by these heavy vehicles.
- 3.8) Section 2.3.18 states *Movements between the construction compounds and the work sites will be on designated haul roads within the site, often along the line of the railway or running parallel to it*. Haul roads are not indicated. This statement is directly contradicted in CFA10, 2.3.21-26 which states: *The compound will be accessed via Leather Lane, Potter Row, Frith Hill, and B485 Chesham Road.* Farmers locally use escort vehicles when moving combine harvesters. No such escort is identified for heavy truck movements. There is no indication of the nature of these haul road. The road and their surroundings must be returned to their original state after construction is completed.

- 3.9) Section 2.3.46 relates to: *South Heath green tunnel (south) satellite compound and Chilterns main compound (rail systems)*. This remains far too close to Cudsdens Court which is now shown (CT-05-033) surrounded by land potentially required during construction. In reality, the claim for *sensitive placement* of engineering compounds is meaningless. This area will be used for temporary storage of excavated spoil and will be too large to be sheeted. Residents will be surrounded by dust and noise. The B485 passes Cudsdens Court and is a construction traffic route. The residents are effectively marooned and their lives will be intolerable. A solution to this appalling situation must be found by discussion with the residents of Cudsdens Court.
- 3.10) Section 2.3.47 states: *Works in this section of the Proposed Scheme will be carried out in the following broad phases*: There is no reference to the re-building, use, repair and particularly the re-instatement of construction traffic routes to their previous condition in the list of bullet points. Construction route traffic will have a very significant impact on the residents of Hyde Heath, Hyde End, South Heath and Potter Row- see map below.

TR-03- Significant Transport Effects arising during Construction and Construction Lorry routes



- 3.11) Construction traffic will be routed on the A413 then via A355 to M40. 310 HGV trips on the A413 (in each direction, excluding the movement of spoil) are projected as well as 835 car/ light goods of other construction traffic each day. The impact of this additional construction traffic on the current morning and evening rush hour traffic (approximately 1200 vehicles one way per hour at the peak) has not been adequately assessed. There are, at present, no measures to mitigate the impact.(Vol 5: Transport TR001-0000, section 7.5.68).
- 3.12) Construction traffic will hugely and adversely impact many of the villages in the Chilterns, several miles from the proposed route. Response times from emergency services will be significantly affected, particularly those, to and, from Stoke Mandeville hospital for residents in this Parish. The ambulance response times in this rural area are already at the limit of acceptability and an air ambulance service

may be the only acceptable alternative. Numerous cut through/ rat runs along very narrow lanes will be created as a result of the A413 main road congestion. The quality of life will be significantly diminished. Concerns about the impact of construction traffic have been wholly disregarded as evidenced by the open provision Vol.1: 6.3.24.

### 3.13) Tunnel Options

Section 2.6.6. examines the various tunnel options. Option A is the current scheme. **The extended tunnels, Options B to D, all performed well on environmental grounds compared with Option A.** Option C (extended tunnel to the North-west of Wendover) was considered to have the most potential benefits compared to other options because **this would avoid direct impact to the majority of the AONB and local residents as well as on Grim's Ditch scheduled monument.** It was rejected because of cost and time constraints with neither being quantified against the ever increasing cost of the scheme.

3.14) A fully bored tunnel would result in very significant environmental advantages which is what would be nationally expected for a designated and protected area as is the Chilterns AONB. The Chilterns Conservation Board's principle is that HS2 should not be seen, heard or felt throughout the AONB. The tunnel options would substantially reduce the damaging environmental impact of the line. Explicitly these are:

- Minimal disruption to local communities, businesses, schools and road users
- No Loss of ancient woodland or protected hedgerows
- No dumping of spoil in the Chilterns
- No loss or severance of farmland
- No need to close or divert roads
- No need to close or divert Rights of Way
- Significant reduction in Noise issues
- No impact of wildlife and ecology
- No need for settling ponds etc.
- Limited damage to the reputation of the Chilterns for visitors and tourism.

### 3.15) Impact

Section 3.2.25 Table 9 sets out an assessment of the permanent impact. The assessment of the impact is again called into question by the "moderate adverse" effect on Hyde Farm. A large part of the holding will be compulsory purchased, and the farm, finishes up on the side of a 25m deep cutting with up to 36 trains per hour passing. A similar situation applies to 94 King's Lane, Bury Farm, Mulberry Park Hill and Sheepcotts Cottage.

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

3.17) Section 5.4.32. Identifies no temporary effects on Great Missenden which is a ridiculous statement. There will be a significant impact on traffic on the A413. This will cause traffic to back up in Great Missenden between 07.00 and 09.00 and in the late afternoon. Businesses in Great Missenden will be impacted by the loss of tourism based on the large number of walkers and cyclists, who will be deterred from visiting the area because of construction and the damage to its reputation. The construction has already blighted property in the area and homeowners are locked into their properties for the foreseeable future.

### 3.18) Tourism

Nowhere in Volume 2 of the CFA Report on the central Chilterns (Area 9) is the word tourism mentioned. This is despite Section 2.1.5 "recognising that Great Missenden station serves as an access point to the Chilterns AONB" and in 9.3.4 acknowledging that "the landscape is of national value".

- 3.19) The tourist industry within the AONB accounts for 55 million visits per year generating in excess of £400 million and yet the Environmental Statement is silent on such a vital issue. No attempt is made in the ES to value this or to assess the socio/economic and other impacts the construction and operation of HS2 will have on this protected landscape. This is a startling omission and thus is seriously misleading about the impact that HS2 will have on the local economy. particularly so as it is a defined NPPF assessment that the developer has to make. An independent visitor's survey should have been carried out as a part of the environmental assessment. In purporting to analyse the impact on CF9 the ES fails in this very important regard. It is therefore deficient and not fit for purpose.
- 3.20) Section 5.4.34 States that "*No significant temporary or permanent effects have been identified in the community assessment for Great Missenden*". This statement is patently untrue and evidences a failure properly to assess (or to assess at all) the impact of the construction phase on tourism. The Environment Statement recognises that the scale of the construction activities means that works will be visible in many locations and will have the potential to give rise to significant temporary effects which cannot be mitigated practicably. It acknowledges there will be a high magnitude of change resulting in major adverse consequences.
- 3.21) Great Missenden and the surrounding villages are at the heart of the Chilterns AONB. Great Missenden is identified as the principal access point to the AONB elsewhere in the ES. It is a popular centre for walkers and cyclists. The Roald Dahl Museum is located in Great Missenden. This hosts daily visits from school parties and tourists from all over the world. The retail, restaurant, B&B and pub businesses in Great Missenden, as they do in other local villages, derive considerable trade from these visitors, alongside the business from residents of nearby communities.

### **3.22) Landscape and Visual Assessment**

Section 9.2.2 describes the Zone of Theoretical Visibility (ZTV), but then excludes the temporary impacts of cranes and other large construction equipment, and more importantly excludes the impacts of the overhead line equipment on the view. With the raising of the line by 3m in many of the cuttings, the catenary towers will be visible above the cuttings. At night there will be continuous light flashes as trains pass which will be visible across the Misbourne Valley up to 2km away in Prestwood.

### **3.23) Socio-economics**

As outlined in the response made to the TEMPLE group's supplementary enquiry in August 2013, for the Environmental Impact Assessment, there are 57 retail outlets in Gt. Missenden including pubs and restaurants, but excluding banks and non-retail businesses. Many are to a greater or lesser extent dependent on visitors. In addition there are 70,000 visitors per year to the Dahl museum in Great Missenden. Within Bucks County 8.9% of jobs relate to tourism. The 55 million visitors to the AONB play a very important part in the local tourist industry, contributing £471.6 million to the Bucks economy.

- 3.24) The Chilterns Countryside Group's survey indicates that large numbers of retail businesses in Great Missenden Ward do not expect to survive the HS2 construction period. The annual turnover of almost one half of Great Missenden's

retail traders may be reduced to a level that would threaten the viability of their businesses.

3.25) The survey also indicates that during operation more than half of Great Missenden retail traders expect HS2 to be harmful to their businesses. Over 40% of the respondents do not expect to have as many customers during operation as they did at HS2's launch (March 2010). This prediction may be due to:

- HS2 reducing the attractiveness of the area to visitors from noise and landscape impacts.
- The potential loss of customers expected by traders during the construction period persisting during the operational phase due to changed shopping patterns.
- The potential for Great Missenden to disintegrate as an economic focus during the construction phase.
- The reluctance of potential customers to rely upon a business that may not be in existence in the foreseeable future.

3.26) There is no compensation for the adverse impact on businesses, nor for the loss of community amenities such as the gym and public house in South Heath. There should be a community compensation fund financed by the DfT and whose disbursements are under the control of the local community and local authority.

### **3.27) Sound and Noise**

The sound of a high speed train travelling on the surface of the Chilterns AONB will be noticeable up to 2 to 3 kms from the line depending on ground topography and the prevailing winds. It is a well established fact that noise travels further and is more intrusive in rural areas such as the Misbourne Valley. Nearer to the proposed railway line the sound will cause nuisance and it is acknowledged that the HS2 contractors have tried to mitigate the disturbance through the use of cuttings, green tunnels and noise barriers. However the trains will still be heard. **The best mitigation is to continue the bored tunnel as far as possible throughout the Chilterns AONB.**

3.28) *Noise Fence barriers – quoted in CFA09 report 2.2.10 and 2.2.14 Near the Chiltern tunnel north cutting at Hyde Lane, noise fence barriers approximately 3m above the top of the rail, (which is acoustically absorbent on the railway side, and which is located 5m to the side of the outer rail) and 350m long will be built at the base of the cutting and in the Potter Row area two barriers 3m high, one 180m long and the other 700m long.*

HS2 must consider the train noise to be 'major adverse' to justify such barriers. The barriers will need to be maintained as they have a design life of 40 years, best in class and whilst effective for wheel and possibly motor noise, their effectiveness is questionable on mitigating pantograph noise whose source is 4m above rail height.

3.29) A further concern is vibration which by its nature is unpredictable and no attempt has been made to assess its possible impact.

3.30) Tunnel Boom, ie the sound from pressure waves on entering and exiting a tunnel, should have been taken into account both in the noise modeling exercise and on the sound contour maps SV-01-016 and SV-01-017

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

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

**Our comments on Volume 3 are :**

- 4.1 Section 1.3.1 states that the effects reported in this volume are those considered to be appropriately assessed at a geographical scale greater than presented within the Volume 2 CFA reports including “*an assessment of the effects on the special landscape qualities of the Chilterns AONB.*”
- 4.2 HS2 Ltd does not regard the AONB or the Misbourne Valley as deserving a unique status which is unacceptable. The proposals for mitigation that HS2 Ltd have put forward are inadequate. HS2 Ltd have failed to assume their responsibilities to carry out the required assessments. The omission of these assessments from this section is so fundamental that the assessment of the Chilterns AONB contained within Volume 3 is inadequate.
- 4.3 There are some very significant inaccuracies. The M1 does not pass through the AONB. Furthermore the M40 and the west-coast-main-line cross the AONB at very significantly narrower points. The A41 crosses the AONB at the same narrowest point as the west coast mainline. To suggest that tranquillity in the Misbourne Valley is affected by the M25 is incorrect and leads to an illogical conclusion about the level of tranquillity of the AONB near the proposed scheme.
- 4.4 Section 2.3.12 detailing historic settlements in the valley factually omits two important historic settlements that have conservation areas, Great and Little Missenden both of which have conservation areas. The result is that the effect on them of the proposed scheme on the environment (section 2.5.19) must therefore be incorrect. In addition, the assessment scope and the landscape baseline set out in the ES include many fundamental errors describing the AONB.
- 4.5 **Volume 3 fails to assess and give weight to the cumulative impact of construction along the Misbourne Valley.** The judgement is deliberately misleading and incorrect. **The construction phase will have a major adverse impact on the AONB.**

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**

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

**Our comments on Volume 4 are :**

- 5) Off-route effects are defined as those that may occur at locations beyond the Proposed Scheme's route corridor and its associated local environment which are not covered within the spatial scope of the CFA reports (volume 2 or Volume 3), such as rail stations and depots.  
Central Chilterns is covered by CFA 9 and so the Council has no comments relevant to this section.

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

**Our comments on Volume 5 are:**

**6.1) Draft Code of Construction Practice CT-003-000**

The Code is too hedged with qualifications and a lack of enforcement measures to give the community confidence.

Non-exhaustive examples of current weaknesses are:

- Imposing specified working hours and then removing them by allowing HS2 to permit other working hours;
- the use of words and phrases such as “may”, “consult”, “seek”, “take reasonable steps” “where reasonably practical”
- the weak definition of “Best Practical Means”

HS2 must accept the unambiguous primary responsibility for compliance with and enforcement of the Code:

- Allow anyone who suffers loss or damage (or who is likely to do so) to require its compliance with the Code;
- In its contract with its Nominated Undertaker (and they with their contractors) HS2 must undertake to include such terms as shall give communities and other stakeholders confidence that the Code can and will be enforced and that meaningful penalties will be imposed for failures to comply.

The Code must include provision for independent monitoring (and the public availability of compliance data) sufficient to provide evidence that the Code is being complied with. Local Authorities must have the powers to enforce the Code if necessary by requiring that work stops until compliance is achieved.

Section 2.3.6 states that “General provisions relating to the construction process are set out in more detail in Volume 1, Section 6 and the draft CoCP (see Volume 5: Appendix CT-003-000)”. The draft CoCP provides wholly inadequate powers that will ensure the Code is complied with by HS2 and its contractors.

**6.2) Impact of construction noise Vol 5 : CFA09 SV-003-009**

Section 4.3.12 states “Construction road traffic associated with the construction phases of the Proposed Scheme will generate airborne noise. The change in traffic noise level at a reference distance of 10m from the edge of the nearside carriageway resulting from the presence of construction traffic for a given road has been predicted, based upon traffic information for the Proposed Scheme. The results for the roads where potentially significant effects could arise are presented in Table 4”

Table 4: Assessment of construction traffic noise levels

Road name	Link	Future baseline sound level (dB)	Future baseline sound level + construction traffic (dB)	Change (dB)	Significant effect
		Daytime LpAeq,16hr 0700-23:00 free-field	Daytime LpAeq,16hr 0700-2300 free-field		
King's Lane (south of Frith Hill)	South Heath	57.5	63.3	+5.8	CSV09 C02

This increase in construction traffic noise is more than significant; is unacceptable and will need to be monitored. Additionally, mitigation should be implemented to ensure that these levels are never reached and if exceeded the contractors should be heavily fined and residents compensated

**6.3) Construction Worker Impacts** – Vol 5 Technical Appendix (CM-002-000) states that up to 33% of construction workers are expected to reside at worker accommodation sites and have normal working hours of 08.00 to 18.00 except where there are tunnelling activities. There is no mention of the effect, as experienced with HS1, on the consequential increase in demand on local services, facilities, health provision, law and order and on emergency services in this rural area.

**6.4) Impact Assessment - Health and Wellbeing**

A recent survey, conducted under the aegis of the Chilterns Conservation Board in the environs of South Heath, revealed that of 286 respondents, 87.8% reported adverse effects upon their health and wellbeing directly attributed to the threat of HS2 and 16.4% had sought medical help.

**6.5) Health Impact Assessment ESA 4.6** It is noted that the Health Impact assessment ESA 4.6 is not part of this consultation and it should be. The health effects of both the construction and operational phases could be significant. For example there is no provision for dust assessment at construction and spoil storage sites and the implementation of appropriate mitigation measures.

Section 5.11.4 of the impact assessment states that the construction of the Proposed Scheme will increase isolation effects between communities, due to journey time increases caused by road closures and diversions affecting people's access to neighbouring residential areas, or opportunities for social interaction at facilities such as churches, community centres and public houses.

Community isolation effects will occur predominantly in rural areas of the route. One of the four key communities highlighted in the report that are likely to experience isolation effects includes South Heath to Great Missenden.

**3) Disclaimer:**

This consultation response is without prejudice to our contention that the consultation and the process of which it is a part, are deeply flawed. Without limitation, significant impacts have been ignored or inadequately assessed; unsupported assumptions have been made and conclusions drawn. The volume and difficulty of navigating the consultation documents and the limited time allowed to do so are unfair and prejudicial to an informed response.

It is our intention that a petition will be deposited against the Bill, and that this response to the ES is without prejudice to anything that may be said in the petition, and that additional points relating to the ES may be raised in the petition and at other stages.

**4) CONCLUSION :**

The Environmental Statement underestimates the impact of the construction and operation of the proposed HS2 Scheme within the Parish and particularly on those more vulnerable sections of the community. In addition the Statement contains errors, omissions and misrepresentations and this is a great cause of concern.

**The best mitigation is to extend the bored tunnel as far as possible throughout the AONB.**