

HS2
Response

Room 2.06
14 Martin Street
Stafford
ST16 2LG

Telephone 01785 277890
protect@cprestaffordshire.org.uk
www.cprestaffordshire.org.uk

Draft Environmental Statement Consultation
PO Box 70178
London
WC1A 9HS

Postal Address:
Wedgwood Building
Block A
Tipping Street
Stafford
ST16 2DH

9 July 2013

Working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone
to value and enjoy.

Dear Sirs

Charity number 219443

**Draft Environmental Statement - HS2 Phase One
Response from Campaign to Protect Rural England (CPRE) Staffordshire Branch**

Staffordshire Branch of CPRE is an independent charity covering the whole geographical County of Stafford. Its purpose is defined by its title. We subscribe to the general thrust of National CPRE's response to the HS2 - including its caveats - but have reservations regarding the degree of local benefit or disbenefits, or indeed justification having regard to its impact on Staffordshire. These reservations can, and do, amount to a firm but negative attitude towards the whole HS2 concept. This is summarised briefly in our Press Release of 5 February 2013 (copy attached).

PART 1

Our opposition, in principle, to HS2 is as follows:-

1. Cost. We are convinced by the financial and fiscal statements issued by government that the nation's forecast economic situation is perilous in the extreme. The National Debt which is still growing at £120 billion per year, will at the present rate amount to 5 times GDP by 2040, and debt interest alone will equal half of all tax revenues.

This is a situation which must concern every section of the community and its solution forebodes a regime of economic austerity far exceeding recent stringency. In this climate the expenditure of £40 billion, possibly reaching £100 billion, on a single engineering project must rank as perverse. The economic case of HS2 has been widely criticised as unsound with the cost/benefit ratios only being reduced to parity by accountancy measures not normally considered acceptable in public expenditure projects. Such benefits as do accrue would only favour Birmingham and/or London, and then only a narrow section of the community. In the case of Staffordshire virtually no financial or other benefits would accrue across the great majority of the County; a judgement which explains the almost universal opposition to the proposal from all elected bodies - County Council, District and Parish Councils, and the MPs along its route.

President
Mr Ian Dudson CBE
HM Lord Lieutenant of Staffordshire
Chairman
Mr A H Stafford Northcote KM, MA(Oxon)
Technical Adviser
Mr P J D Goode MRTPI(Retired)
ALI(Retired)
Secretary/Coordinator
R E (Bob) Bray

52H

2. Speed. The claimed economic benefits are derived from shorter journey times following the high speeds to be achieved. These arguments are refuted as assumptions regarding the supposedly unproductive nature of travel-time are proved to be inaccurate in this age of electronic communications. Journey time is now seen as effectively working-time; few economies are achievable by reduction of this time.

Time savings too are illusory as these relate to station-to-station timing. Door-to-door travel times show time savings over the whole journey as a much smaller proportion of overall journey times.

Journey speed is to be achieved by reducing or eliminating intermediate stops along its route. Staffordshire's population approaching 2 million people derives no benefits from accessibility to HS2, needing to drive or ride north or south beyond the County boundary to gain access. Any sustainability arguments advanced favouring High Speed Rail are likely to be more than offset by enhanced car usage accessing widely-spaced station sites.

CPRE would point out that an HS2 concept which concentrates inter-modal change at city centre sites will be inordinately expensive in infrastructure works, notably road construction. This factor alone skews the finance case for HS2, added to the enormous cost of the redevelopment supposed to be facilitated.

3. Integrated Transport. In an anticipated future scenario of climate change, world shortages of resources and increased global competitiveness, the whole spectrum of transport must be seen and planned to be inter-related air/road/rail/walking/cycling et al.

Transport is responsible for one third of CO² emissions, and the first sustainability principle in this field is TO REDUCE THE NEED TO TRAVEL. HS2 breaches this first principle. CPRE supports an increased percentage of travel by rail, but this must accept rail travel for inter-connecting over distances where this has advantages, ie regional travel. Beyond these distances rail becomes unsupportably expensive, and for shorter distances increasingly inconvenient (hence the historic decline in railways in favour of road travel especially by private car ownership).

HS2 with a planned speed of 225 mph incurs a disproportionate penalty in power consumption, contrary to the aims of sustainability, an over-arching principle of government. On these terms the construction of the project itself would itself generate huge CO² emissions.

4. Comparability. CPRE sees arguments advanced advocating HS2 for Great Britain because "other countries have it". We urge that comparisons with other countries should take into account differences of terrain and landscape, density of population, methods of financing and attitudes toward public v private ownership of rail, and towards land acquisition. We advocate special attention being paid also to the degree of public acceptability of strictly maintained public order. We fear that the UK's relaxed freedoms will expose high speed rail travel to an unacceptably high level of security risk and sabotage, without the safeguards inherent in policing comparable air travel.

PART 2

The document to which these comments relate concerns itself with Environment, perhaps best defined as the physical setting forming the background to people's lives. Our response relates to the initial part of Phase 1 of HS2 which lies within the country of Staffordshire - from a southern boundary at Drayton Bassett to a point at Handsacre, north of the cathedral city of Lichfield where a junction is proposed with the West Coast Main Line railway (WCML).

Our first comment should refer to the criteria that seem to have dominated the thinking of the rail planners.

a) the perception of Staffordshire as the grimy industrial face of the 19th century Industrial Revolution. While this has been true in the past, such areas have always been confined to the conurbation of the Black Country and The Potteries. Outside these close confines Staffordshire is a leading agricultural county with a countryside not only climaxed scenically in the Peak District National Park and the Cannock Chase Area of Outstanding Natural Beauty (AONB) but containing and comprising wide areas of great attractiveness.

Staffordshire is the county with the greatest range of geology and therefore scenery, both upland and lowland. Its varying topography and character gives rise to wide vistas as far as the Welsh Hills and the Derbyshire Peaks and enshrines many small-scale scenic gems within its folds.

Attributes which CPRE sets out to protect, and which HS2 threatens to mar or destroy include:-

- Beauty of our countryside - its pattern of fields and hedgerows, of trees, woodland and water
- Its changes with the seasons, under changing light
- Beauty also of its heritage of historic buildings and waterways and their landscape setting; and of humbler buildings attractively grouped to form compositions of great beauty - our hamlets and villages
- We value the dominance of nature, its flora and fauna
- We treasure its peace, tranquillity and seclusion; the opportunities for inhabitants to escape and retreat from metropolitan life - the accessibility afforded by its footpaths and bridleway network.

b) CPRE selects out for especial mention the values of peace, tranquillity and seclusion, escape for city dwellers. In threading HS2 clear of obstacles in its path such as built-up areas and statutorily-protected reservations, it has taken the line of least resistance - open countryside. CPRE has independently mapped the county identifying degrees of seclusion, "tranquil areas", and it is upon these areas of the highest ranking of tranquillity that so much of HS2 impinges. Noise and disturbance must be the very antithesis of tranquillity sought by recreational users of rural areas, a body of increasing importance to the tourism economy of the County.

c) In aligning HS2 through the "tranquil" areas, there seems to be displayed a lack of concern for its inhabitants, the people living there, both in the environmental disturbance created and the direct effect upon properties and livelihoods by severance and demolition.

The past half-century has seen a wide dispersal of housing from town to country, often into villages but frequently into hamlets or as individual properties much-loved and cherished by their owners. The chosen HS2 route shows a disturbing number of homes to be demolished or so affected as to become uninhabitable, certainly by their owners.

CPRE protests strongly at the underlying injustice involved here where a railway line is to be driven through for the benefit of a time-saving miniscule percentage of well-cushioned travellers at the cost of the ruination of the lives and hopes of so many residents, farming communities and individuals. It would require an overriding national emergency of the greatest degree, and an unquestionable need for a project to justify sacrifices of such a nature. HS2 cannot be said to attain such status.

PART 3

CPRE has inspected the HS2 route previously published insofar as it runs through Staffordshire, and we have a number of detailed reservations upon which we wish to comment. However this current consultation only covers part of this route, as detailed earlier.

In our Press Release at an earlier stage (enclosed - headed "HS2 - The Price to Pay") we concluded by referring to the mitigation measures needed as "wide-ranging and imaginative in their scope and comparable to the scale of this £34 billion project". We have awaited, and still await, publication of these mitigation measures, and are disappointed that such measures seem to suggest following HS1 detailing. These do not reflect the topography of Staffordshire, magnitude of works involved in HS2 or the need to assimilate the railroad into the countryside through which it would pass in acknowledgment of the settlement pattern.

In the absence of such a comprehensive landscape approach we highlight the landscape and environmental impact on certain localities, where our judgement is that the harm is so extreme as to call into question the viability - in environmental terms - of the whole scheme and the chosen route alignment of HS2 Stage 1 within our County. There are many more such instances further along the line, which raise similar concerns.

Example A: Chainage 176&800/178&000 - Hints Village and Blackbrook Valley

Hints village is a charming even exquisite and unspoilt hamlet, lovingly maintained by its owners with care for its character. We do not hesitate to describe it as an environmental jewel. Its setting on the slopes of the steep Blackbrook Valley with the winding lane crossing a ford and then rising up sloping fields to the crowning woodland opposite makes a perfect composition. It was earlier given the accolade by the District Council of "Special Landscape Area" until government decreed for administrative reasons the withdrawal of such categories other than for designated areas.

CPRE would have no hesitation in describing the village and Blackbrook Valley as the most idyllic - and tranquil - location in the County. It would merit at least re-routing HS2 to run within the woodland in a roofed cutting, and/or re-routing to cross Blackbrook further west with a continuous tunnel as far as the re-routed A5. (NB what headroom is required to cross a flood plain?)

Example B: Chainage 179&400 - Flats Lane Diversion

Great publicity has attended the opposition of residents to this alignment, leading to suggestions for a "new village" to be created in the Green Belt for re-housing occupants. CPRE would oppose this "solution" as breaching Green Belt policy to facilitate an unattractive intrusion by HS2.

We would rather advocate a "cut and fill" tunnel of minimum walled width to minimise property demolition, roofed to form a "village green" with the four crossing lanes routed informally across it. This solution envisages joint working across the professional fields of engineering architecture, landscape architecture and site planning, which we believe should be normal practice.

Example C: Chainage 181&600 to 182&400 - Whittington Heath Golf Course

CPRE has watched the transformation over many years of a bleak heathland site, to what now can seriously be described as an Arcadian woodland setting of unbelievable "natural" beauty. It goes beyond belief that HS2 can now contemplate its destruction and presumably replacement elsewhere, starting again from scratch the 40 or 50-year process of wooded landscape creation.

This example along would condemn the HS2 project; re-routing or an extended tunnel would seem the only practicable landscape solution, which would link with the solution to Example B above.

Example D: Chainage 183&000 to 185&100 - Darnford Lane to A38.

This length of HS2 presupposes a continuous 45ft to 50ft high embankment (plus power pylons) effectively "damming" the longitudinal visual sweep of the bally and cutting across the eastern arc of view of Lichfield and its cathedral spires. The domination of the landscape by such a structure can be best judged looking northward from Darnford Lane at line level across the Streethay Farm on the A38 which the line oversails, and dominates on a 50ft high embankment.

We draw attention to the proximity of HS2 to the canals along this stretch, and others, and the transformation this effects on their tranquil setting. Staffordshire's canals are a major feature of its rural attractiveness and thus rural economics. Detriment to these historic and environmental assets is to be deplored and avoided by whatever means.

CPRE fundamentally questions the choice of alignment for HS2 which results in such enormous and alien earthworks and raises real doubts whether any effective mitigation is feasible. It has given rise to debate locally whether an alternative alignment west of Lichfield is worth attention even bearing in mind the disadvantages of such a routing.

Such public meetings as have been attended by CPRE when referring to environment mitigation and assimilation of the HS2 works into the landscape have had pointed out the HS1 works as exemplars of satisfactory practice. For Staffordshire in particular its broken topography and choice of routing over higher ground has led to need for earthworks of a much more forceful impact than experienced on the earlier HS1 - and a corresponding need for major mitigation works on perhaps a wider and more imaginative scale.

These examples above are indicative of the range of environmental problems on the whole length of the line through the County.

We regard this present consultative process as inevitably leading to a progression of more detailed proposals and look forward to participating in such discussions at an early stage if possible.

Yours faithfully

PJD GOODE
Hon Technical Adviser