

**WHITMORE PARISH COUNCIL'S (WPC) RESPONSE TO THE HS2  
CONSULTATION DOCUMENT CONCERNING THE "WORKING DRAFT  
ENVIRONMENTAL IMPACT ASSESSMENT REPORT" VOLUME 2:  
COMMUNITY AREA REPORT CA4: WHITMORE HEATH TO MADELEY**

WPC wishes to formally register the following list of "Serious Harm Issues and related comments" in response to this Consultation, covering the section of the proposed rail construction running through the Parish of Whitmore:-

**1) CORE REACTION TO THE CURRENT PROPOSAL:**

The proposed project detailed in the "Working Draft EIA Report" will create massive upset and disruption to our Parish during the whole of the construction period 2020-2027. Our review of the project as a whole shows that the Parish of Whitmore is destined to be subjected to more major infrastructure implantations than ANY OTHER SECTION of the whole HS2 layout! The "HARM" created during construction will be massive and widespread. The long term "HARM" to our local environment will be devastating in its sheer scale. WPC has detailed below the key issues of concern and suggests some changes to, or adaptation of, the project design which, if implemented, would reduce the massive "HARM" caused.

**2) MAJOR HARM ISSUE No 1 - The Meece Valley Section**

The project is to run the rail line across the Meece Valley along the top of an embankment and viaduct of upto TEN METRES high. This raises two serious concerns:-

- a) it will totally destroy the picturesque Meece Valley landscape, rendering the construction and trains visible from a wide area.
- b) it raises great local concern about the operational noise impact over a wide area. The CA4 map ref SV-01-116 indicates that the operational noise level will have fallen to an almost imperceptible level of <40db (rated as equivalent to a babbling brook or a computer noise level) well short of the village of Whitmore BUT the noise contour map is derived from modelling, not by physical measurement of an existing system. Given that the train has not yet even been invented, and that it will be travelling at very high speed, perched some 10 metres above the surrounding ground level, WPC simply cannot believe that this even remotely represents the reality of what residents will be faced with.

**REQUESTS:**

- (i) install 3m high sound barriers along both edges of the track over the whole of the raised section length (none at all are foreseen in the Draft document!)
- (ii) lower the track to as near as possible ground level

**3) MAJOR HARM ISSUE No 2: Crossing the A53 Trunk Road**

The project is to raise the A 53 in order to run the track under it, this by closing the A53 temporarily in order to construct and insert a bridge to take a restructured A53 over the track. Traffic to be diverted along a temporary relief road created alongside the A53 section affected. Work projected to take some three months. Now, the A53 is a major trunk road which is the access road between the Potteries and the West Country and is already very heavily trafficked during the "rush hour periods" morning and evening. Replacing a 60 mph road access with a temporary detour will inevitably slow traffic enormously, creating massive queues and tailbacks during the busy periods for the whole of the envisaged three month construction. The bridge foreseen will surely not be a simple "humpback" arrangement but will involve grading the new A53 road section up to pass over the bridge and then back down

again. Can this all really be achieved in only three months or will it take six or nine or...? HOWEVER, the problem is a great deal worse even than this because the project foresees the Construction Vehicle Access Route to be "M6 junction 15 / A519 / A5182 / A53"**(which includes the section crossed by the track)**. Adding the Construction Vehicle flow to the existing heavily trafficked road will create massive congestion on this principal access route for the whole of the nearly SEVEN YEAR construction project. Especially since the project plans to bring Construction Vehicle access generated by the Madeley works down the A525 to Woore and then the A51 to its junction with the A53 and thence down the A53 through Baldwins Gate! Note that congestion at the junction of the A5182 / A519 during morning and evening rush hour is already considered locally to be an "avoid if you possibly can" chaotic "bottle neck" situation. Add the Construction Vehicle Flow to and from Baldwins Gate and the imagination quakes! Finally, the report does not indicate by how much the A53 would need to be raised but informed local estimate is by approximately 8 METRES! The visual impact of the A53 perched upto 8 metres above current ground level represents HORRENDOUS PERMANENT HARM.

#### **REQUESTS:**

- (i) find a different Construction Vehicle Access Route (M6 junction 15 / A519 / A51 / A53? Or M6 junction 14 / A34 / A51 / A53?)
- (ii) work with SCC Highways to evaluate / verify the level of the problem, seek solutions and make them available for public comment.
- (iii) start the tunnel 200 metres before reaching the A53 by adding a cut and cover section. This has been requested for some time and, we understand, actually appeared in updates of the plans at one point - but has sadly been removed again in the latest drawings, without explanation.....

#### **4) MAJOR HARM ISSUE No 3: The twin bore tunnel under Whitmore Heath**

The project still refers to the ground below the Heath as being hard sandstone. Locals report that in fact the ground consists of sand and gravel and the Heath today is what remains of an extensive sand and gravel extraction quarry. The ground is unstable with surface slippage in places evidenced by ranks of trees leaning heavily as a result of localised ground slippage. WPC has discussed this with HS2 who have been and visited the Heath with us, as a result promising as long ago as March to carry out bore holes to verify what ground conditions lie beneath but work is still pending. This situation raises extreme concern locally as to whether or not a tunnel can be bored through what we believe to be unstable ground and, if we are correct, and it is bored through, whether it will be safe and what effect it will have on adjacent / nearby residences (vibration problems, subsidence issues, etc)?

#### **REQUESTS:**

**(i) carry out the bore hole tests as a matter of urgency and provide expert advice as to the the validity or otherwise of the concerns expressed.**

(ii) extend the tunnel by 200m by adding a "cut and cover" section, on its exit from the Heath, in order to reduce the operational noise and visual impact (same comment as for "3(iii)")

#### **5:MAJOR HARM ISSUE No 4: Whitmore Wood**

The project foresees the destruction of about one third of this old wood, the line to be set on an immense "shelf" cut through the wood, the wooded land above the track to be held back by an enormous retaining wall. This creates widespread local condemnation of such destruction of important woodland and the attendant threat to its wildlife. There is also

serious concern that the residents of the nearby Madeley Park Wood development will be assailed by operational noise reflected onto them from the retaining wall.

**REQUEST:**

(i) Carry out expert evaluation of the noise situation (are the fears valid? How serious is the problem? What measures can be taken to minimise the HARM?) and make the results available to WPC and to the residents affected.

(ii) Consider cut and cover through Whitmore Wood extended up to the River Lea viaduct to help to protect residents of Madeley Park Wood.

**6: MAJOR HARM ISSUE No 5: Compensation for residents of the Heath**

Section 10 in the HS2 Annual Report and Account 2015/16 states that (quote) "Ensuring that legal requirements are met, *and that land and property owners are treated with dignity and respect through fair settlements, is critical to both successful land assembly and stakeholder management*" (unquote). WPC understands from those affected that several residents have been treated in a manner which is very different to this. WPC has suggested to Richard Johnson of HS2 that the situation presented by the Heath is so severe and so unusual that, instead of residents being dealt with individually when seeking compensation in order to be able to leave the Heath, the problem should be looked at "as a whole" by HS2 and a more evenly balanced solution put together. Richard Johnson agreed that this suggestion seemed reasonable and should be looked into and that he would visit us in the near future to take it forward.

**REQUEST:**

(i) **that this matter be looked into now, as a matter of urgency.**

**7: MAJOR HARM ISSUE No 6: disruption of Snape Hall Road**

The project plans to use Snape Hall Road in Baldwins Gate as an integral part of the Construction Vehicle Access Route and to PERMANENTLY CLOSE a section of it at the point where the HS2 line crosses it. This closure also blocks a highly valued and much used pedestrian pathway which runs through the Heath. Note also that this is a narrow single track road which is totally unsuitable for such a usage so that some sort of extra roadway will need to be created.

**REQUEST:**

(i) that some means of pedestrian footway is included in the design, allowing walkers to cross the track and so reinstate the pedestrian pathway.

**8: MAJOR HARM ISSUES: suggested key solution number 1:**

It is clear that if the track could be lowered significantly throughout the length of Whitmore Parish, many of the "Major Harm Issues" above could be greatly reduced or even eliminated ie

(i) Lower the track by 10 metres:

=> the Meece embankment would disappear, greatly reducing both the visual harm and the level of noise harm.

=> the track could pass under the A53 without the need to raise it, thus eliminating that particular cause of traffic chaos and visual harm.

=> the track could be taken through Whitmore Wood in a "cut and cover" tunnel, ideally extending it right up to the River Lea Viaduct, or at least be set in a deep cutting, greatly

reducing or even eliminating the reflected noise issue and at the same time reinstating the pedestrian footway on the Heath (see "7" above).

### **COMMENT**

Informed local opinion suggests that dropping the track by 10m would create a problem with crossing the West Coast Mainline further along the track? If so, perhaps dropping it even further would enable it to pass UNDER the WCML instead of, as currently planned, crossing over it. WPC recognises that this may well not be possible in practice and that, even if it is, it would be very expensive. HOWEVER, exactly this solution has been adopted, at great expense, to reduce serious Environmental damage in the Chilterns. In view of the very extensive and extremely severe environmental HARM that the current project design will cause our beautiful rural parish, WPC requests that HS2 evaluate the technical viability and cost implications of this solution which should then be judged upon its merits.

**9: MAJOR HARM ISSUES: suggested key solution number 2.** The "non technical summary" consultation document refers to "The Atkins Report: Rail Alternatives to HS2 Phase 2A, November 2015". This presents the evaluation of three alternative rail options, two of which have already been discounted. The remaining alternative, "the high cost Option number 1", has not yet been discounted and is defined as being less expensive than the current proposal whilst providing almost the same benefits. It is stated to be worthy of consideration because it avoids the need to carry out what is described as being the very expensive and complex section of HS2a north of Baldwins Gate. This Option 1 involves sliding the HS2 line into the existing West Coast Mail Line (WCML) at a point between Stableford and Baldwins Gate, and then continuing on, using the WCML, to Crewe. It would clearly avoid almost all the HARM that the current plan would cause to Whitmore Parish and to the adjacent Madeley Parish. In particular, it would avoid the very complex and expensive operations of raising the A53 and of tunnelling under "The Heath" through sand and gravel instead of the solid sandstone that HS2 had expected - **the necessity for these two costly operations was not known about at the time that the study comparison "HS2a v High cost option number 1" was carried out, having only very recently become apparent to HS2.**

**WPC urges HS2 to revisit the comparison to take into account these two new costly complications since they will have significantly altered the cost/benefit balance between the two solutions, perhaps enough for the High Cost Option 1 to become the preferred solution, thereby simplifying the build program, increasing its cost advantage even further, and saving the Parishes of Whitmore and Madeley from serious devastation.**