

IN PARLIAMENT
HOUSE OF COMMONS
SESSION 2013-14

HIGH SPEED RAIL (LONDON – WEST MIDLANDS) BILL

P E T I T I O N

Against the Bill – Praying to be heard by counsel, &c.

TO THE HONOURABLE THE COMMONS OF THE UNITED KINGDOM OF GREAT BRITAIN AND
NORTHERN IRELAND IN PARLIAMENT ASSEMBLED.

THE HUMBLE PETITION OF
BUCKINGHAMSHIRE COUNTY COUNCIL

SHEWETH as follows:

1. A Bill (hereinafter called “the Bill”) has been introduced into and is now pending in your honourable House intituled “A Bill to Make provision for a railway between Euston in London and a junction with the West Coast Main Line at Handsacre in Staffordshire, with a spur from Old Oak Common in the London Borough of Hammersmith and Fulham to a junction with the Channel Tunnel Rail Link at York Way in the London Borough of Islington and a spur from Water Orton in Warwickshire to Curzon Street in Birmingham; and for connected purposes”.
2. The Bill is presented by Mr Secretary McLoughlin, supported by the Prime Minister, the Deputy Prime Minister, Mr Chancellor of the Exchequer, Secretary Theresa May, Secretary Vince Cable, Secretary Iain Duncan Smith, Secretary Eric Pickles, Secretary Owen Paterson, Secretary Edward Davey, and Mr Robert Goodwill.
3. Clauses 1 to 36 set out the Bill’s objectives in relation to the construction and operation of the railway mentioned in paragraph 1 above. They include provision for the construction of

works, highways and road traffic matters, the compulsory acquisition of land and other provisions relating to the use of land, planning permission, heritage issues, trees and noise. They include clauses which would disapply and modify various enactments relating to special categories of land including burial grounds, consecrated land, commons and open spaces, and other matters, including overhead lines, water, building regulations and party walls, street works and the use of lorries.

4. Clauses 37 to 42 of the Bill deal with the regulatory regime for the railway.
5. Clauses 43 to 65 of the Bill set out a number of miscellaneous and general provisions, including provision for the appointment of a nominated undertaker (“the Nominated Undertaker”) to exercise the powers under the Bill, transfer schemes, provisions relating to statutory undertakers and the Crown, provision about the compulsory acquisition of land for regeneration, reinstatement works and provision about further high speed railway works. Provision is also made about the application of Environmental Impact Assessment Regulations.
6. The works proposed to be authorised by the Bill (“Phase One of HS2”) are specified in clauses 1 and 2 of and Schedules 1 and 2 to the Bill. They consist of scheduled works, which are described in Schedule 1 to the Bill and other works, which are described in clause 2 of and Schedules 2 and 3 to the Bill.
7. Your Petitioners are the local authority for the County of Buckinghamshire and have been invested by Parliament with a number of important powers and duties in relation to the interests of the inhabitants of their area. Amongst other functions of your Petitioners is that of the highway authority for all existing or proposed public highways in their area, except for those which are the responsibility of the Secretary of State. In addition, your Petitioners are the traffic authority for most roads in their area. They are also the local planning authority in respect of minerals and waste, and are thus responsible for preparation of waste and mineral plans as well as being the Lead Local Flood Authority.
8. The Bill would authorise the compulsory acquisition of certain interests in land or property of your Petitioners and in accordance with the standing orders of your honourable House, notice has been served on your Petitioners of the intention to seek such compulsory powers.
9. Your Petitioners allege that they and their property, rights and interests in their area and the inhabitants thereof would be injuriously and prejudicially affected by the provisions of the Bill

if passed into law in their present form and they accordingly object to the Bill for the reasons, amongst others, hereinafter appearing.

Introductory

10. Your Petitioners oppose the Bill in principle. Whilst your Petitioners acknowledge that the principle of the Bill is established at second reading, your Petitioners' views on the subject are so strong, they must be recorded in this petition.
11. Your Petitioners are seriously concerned about the business case for HS2, particularly the fact that it represents poor value for money to the taxpayer and they do not believe that the project is in the best public interest for the UK. Your Petitioners do not believe that all other alternatives to achieve the transport capacity, regeneration and environmental benefits which the scheme is purported to achieve have been fully explored by the Promoters. Instead, your Petitioners support the alternative solutions to HS2 produced by the 51m alliance of local authorities. These alternatives represent a much better business case including lower initial costs, a greater Benefit Cost Ratio and increased benefits for the whole country. The scheme's environmental impacts, as highlighted recently by the Environmental Audit Committee, are also of grave concern.
12. There are many matters, which cause great concern to your Petitioners, arising from the proposals in the Bill. Some of these matters apply generally to the whole length of the line within, and outside, the county and some of the points are specific to particular sites. Your Petitioners are hopeful that many of their concerns can be met by agreement with the promoter of the Bill. Indeed, your Petitioners have sought to engage with the promoters, for instance, sending copies of various documents to them including the proposals for mitigations set out in their Buckinghamshire Blueprint documents.

Part 1: Strategic issues

Lower Speed

13. A fundamental issue with the detailed route set out in the Bill is that the Promoter not only seeks the highest speed achievable, but sets out to 'future proof' the design so that the

maximum line speed is 400km/hr outside cities. The HS2 trains are not planned to be capable of exploiting this maximum speed (being capable of only 360km/hr).

14. The Promoter's justification for the highest achievable speed is the claim that journey time savings are very valuable. Despite the admission that business travellers can and do work productively on trains, business time savings are valued as if the time savings were additional productive time. Your Petitioners (in the company of many others) contend that the Promoter has mistaken the balance between the value of journey time savings and environmental damage.
15. Your Petitioners respectfully request that your honourable House direct the Promoter to adopt a maximum design speed of 300km/hr. The reduction in speed would have major carbon and other environmental benefits (eg. noise reduction), as recognised by the House of Commons Environmental Audit Committee.

Extended Chilterns Tunnel

16. As mentioned above, a large part of the county is taken up by the Chilterns Area of Outstanding Natural Beauty ("the AONB") and it is proposed in the Bill that the railway will be constructed within the AONB between its southerly border, to the north of Chalfont St Giles and your Petitioners' border with the district of Aylesbury Vale. The railway would be constructed in a tunnel in the southern part of the county emerging at a portal at Mantle's Wood, near Little Missenden, and remaining above ground, including a stretch of "green tunnel" for the remainder.
17. The AONB is an area of environmental sensitivity, having been designated in 1965 for the natural beauty of its landscape, its nature and cultural heritage. The above ground railway would dissect areas of ancient woodland and high quality landscape and would pass very close to listed buildings. It would leave a permanent feature upon one of the most attractive areas in Buckinghamshire. It would create severance and intrusion at odds with the purposes of the AONB's designation. The ES which accompanies the Bill ("the ES") (Volume 3, route wide effects) arrives at the fundamentally incorrect conclusion that the effects of the project on the special landscape qualities, natural beauty and landscape character and setting of the wider AONB is "not considered to be significant".

18. It is important to note that the AONB will not just be affected by the permanent railway itself. There will be very substantial construction activities at a number of very large worksites within the AONB over a number of years, bringing with it problems of traffic, noise, dust, air pollution and other harmful effects. The amount of land to be affected by what is called “sustainable placement” by the Promoters is also a very significant issue, particularly in relation to the fundamental change in the landscape that will arise and the loss of agricultural land.
19. As the ES recognises, national planning policy regarding AONBs is set out in paragraphs 115 and 116 of the National Planning Policy Framework (NPPF), which state as follows:
- “115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.
116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”.
20. Furthermore, section 85 of the Countryside and Rights of Way Act 2000 places a general duty on public bodies as follows: “In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”.
21. As the ES also records, following consultation in 2011, there was a review of a number of long tunnel options for the tunnel under the Chilterns. This review was documented in a report

entitled 'Review of possible refinements to the proposed HS2 London to West Midlands Route' which considered extended twin-bore tunnel options. As a result, additional tunnelling was incorporated into the scheme as part of the announcement made in January 2012, namely the tunnel being extended to the portal at Mantle's Wood near Little Missenden. Further consideration was given to longer tunnel options throughout the whole AONB and, as the ES says, these were discounted. A summary of the options assessment is contained in section 2.6 of volume 2 (CFA9 section) of the ES, and in short it can be said that whilst the Promoter agreed that all the alternative suggestions for a longer tunnel performed better than the Bill scheme in environmental terms, the Bill scheme was preferred mainly on the basis of cost. To your Petitioner's knowledge, no costing or detailed engineering work has been done by the Promoters in order to assess the viability of a tunnel extension properly and validate the decisions that led to the current proposal.

22. Your Petitioners acknowledge the desire, in the public interest, to make cost savings but this desire has to be balanced carefully against other matters of public interest. In this case, the adverse effect on the AONB and other significant and avoidable impacts lead your Petitioners to the conclusion that the railway should be constructed in a bored tunnel throughout the AONB in the county and that the additional costs of an extension would be justified to address the concerns and issues that arise from the over-land route proposed in the Bill.
23. Your Petitioners respectfully request that your honourable House should take the opportunity to examine the proposals for the AONB to determine whether adequate regard has been had to conserving and enhancing the AONB and whether the proposals are appropriate in the light of their impact in the area. Your Petitioners also invite your honourable House to examine the options which were considered by the government in reaching their decision on the route in this area and decide whether your Petitioners are correct in their view that the government's decision was flawed in the light of the evidence available.
24. Your Petitioners submit that the proposal to carry the railway overground and in a green tunnel from Mantles Wood northwards, with its associated structures, will give rise to a number of serious adverse environmental impacts, and they include the following:
 - (a) impact on ecology, including ancient woodland
 - (b) impact on the landscape and tranquillity of the AONB
 - (c) planning policy and impact on overall objectives of the AONB
 - (d) impact on heritage features

- (e) impact on agriculture
- (f) impact on drainage and flooding
- (g) impact of noise
- (h) impact on highways
- (i) impact on community assets and public rights of way
- (j) impact on air quality
- (k) impact on council resources

25. Your Petitioners intend to present to your honourable House, with other petitioners, alternative tunnel options for consideration by the select committee of your honourable House as well as a detailed list of the mitigation that would be required to address the impacts as stated above, if the Chilterns tunnel proposal is not accepted. Your Petitioners, in conjunction with other petitioners, commissioned a study of alternative routes and will present its findings to the House.
26. Your honourable House will be shown that one of the alternative routes proposed in particular ("the Green Route") would offer a better operational alignment than the proposed railway and would pass through more consistent ground conditions below the water table, characterised by relatively flint-free and low permeability chalk. It would be constructed mostly below the deeply weathered zones underlying the dry valleys and zones containing solution features and chalk mines and, at the northern portal, would avoid extensive unstable slopes.
27. The study that underlies the alternative proposal of the Green Route concluded that there is a more advantageous alignment than the proposed railway and which will offer more efficient railway operation. The Green Route would also avoid loss of ancient woodland and impacts on listed buildings and scheduled ancient monuments and loss of productive farmland. Operational noise effects would be limited to where the intervention gaps and portal would be located and the tunnelling for the Green Route would be relatively simple as it runs predominantly through the grey marl chalk. Your honourable House will hear evidence to demonstrate that the cost differential for provision of the tunnel ("T2") proposed by the Chilterns Residents Action Group and the Green Route option proposed by your Petitioners would represent less than 2% of the overall cost of Phase One of HS2, including contingencies, and that when assessing costs, the whole life costs of the alternatives (Green Route and T2

compared to proposed railway) must be independently assessed and the non-market effects evaluated .

28. Your Petitioners believe the Green Route option described above is the most appropriate solution if the railway is to be constructed in this locality. Should your House not accept the Green Route, your Petitioners acknowledge that the T2 Option has significant advantages and represents the next best alternative, and your Petitioners further acknowledge that the South Heath (REPA) tunnel is better in many respects than the Promoters' proposed route. Aside from an extended tunnel, alternative proposals involving lowering of the railway and additional tunnelling have been explored but have not so far been proven to be as successful as the Green Route in mitigating the impact of the proposed route within the AONB. Notwithstanding this, your Petitioners have identified a number of areas where, in their respectful submission, the Promoters should make further provision for mitigation of those proposals if your honourable House is content that the Government's decision was correct.

Sustainable Placement

29. Your Petitioners are concerned by the promoter's proposal to dispose of certain waste in the county by "sustainable placement", which is described as follows –

"Where the transportation of excavated material would result in significant environmental effects, sustainable placement will be used. Sustainable placement is the local on-site placement of excavated material to avoid causing environmental effects associated with the transportation of that material. Local sites for sustainable placement have been selected on the basis of their suitability for the disposal of excavated material".

[High Speed Two Information Paper, E3: Excavated Material and Waste Management, paragraph 1.3.4].

30. Sustainable placement of excavated material is, in effect, the on-site disposal of spoil.
31. There are very large areas of sustainable placement proposed within the AONB and elsewhere in your Petitioners' area and this is justified on the basis that it would avoid the environmental impacts of transportation elsewhere. Very little attention appears to have been given by the

Promoters to the inimical nature of the significant artificial changing of the terrain within an area which is designated of national importance because of its natural beauty. Your Petitioners are astonished by this proposal which is contrary to the main objective of the AONB, namely to conserve its natural beauty.

Your Petitioners would submit that there ought to be no sustainable placement in its area and certainly none in the AONB.

32. The Environmental Statement states that "the sustainable placement area will be indiscernible from the existing landscape". Your Petitioners reject this. For example, it is hard to imagine how 1,928,002 tonnes of tunnel spoil near Hunt's Green Farm, South Heath, over an area which is 1.3km long, 450m wide and 5m high will be indiscernible.
33. In respect of the proposed sustainable placement site at Calvert, your Petitioners request that the Promoters consider whether the waste material could be put to alternative uses in the vicinity of the proposed site which would have the effect of reducing land take and other detrimental impacts.
34. Your Petitioners have provided a considerable amount of good quality information to the Promoter concerning permitted sites for the disposal of inert material. Your Petitioners request that the Promoter includes these alternative options in their analysis and further explains the need for waste disposal within the AONB and within Buckinghamshire as a whole.
35. Your Petitioners understand that sustainable placement would constitute the permanent disposal of waste material on land and the rationale provided by the Promoter is to avoid traffic impacts. Your Petitioners request that alternatives scenarios, for all sustainable placement sites, are fully analysed to ensure that the least environmentally damaging option is chosen. These alternatives scenarios should include the transportation of material by rail or along the trace and transportation on short distances on road to permitted sites for disposal of inert material, and the use of waste material in other development schemes which might require it.
36. Your Petitioners request that the analysis for road or rail transportation of material must consider the controls that can be set by authorities to mitigate impacts arising from transportation by road/rail, including phased removals, using the trace/rail, specific routing of vehicles and payload limits.

37. Consideration must also be given to the type of material which is proposed to be deposited or transported.

A Country Park in the Vale of Aylesbury

38. Your Petitioner request that the Promoter acknowledges the significant impact that the Infrastructure Maintenance Depot (“IMD”) will have on the communities in its vicinity. The IMD will exacerbate an existing shortage of accessible green space in northern Aylesbury Vale, particularly surrounding Calvert and Steeple Claydon. It will also disrupt the footpath network, and have considerable landscape, visual and socio-economic impacts. In consultation with your Petitioners and the local community, provision should be made for a country park (and an endowment for its future maintenance and management) in the vicinity of the IMD in order to address these impacts. Your Petitioners have identified three possible sites for the park and a feasibility study is being commissioned. A proposal for a suitable country park will be presented to the Select Committee.

Mitigation for the impacts from the Infrastructure Maintenance Depot

39. Your Petitioners are concerned by the substantial impacts that will arise from the proposed IMD. For instance, significant impacts on the settlement of Steeple Claydon will arise from the construction and operation of the proposed IMD and the construction railhead that will be required. In particular, there will be significantly worse impacts on residential properties on rural roads that serve the IMD and railhead site if deliveries of materials are made by road rather than rail. Your Petitioners suggest to your honourable House that major improvements to the mitigation measures and compensation arrangements that have been proposed are required. In your Petitioners’ submission, that would need to include a combination of bunding and native species hedging and woodland belt planting. Your Petitioners ask your honourable House to amend the Bill to make provision for such mitigation.
40. Your Petitioners also respectfully ask your honourable House to require the Promoters to undertake that:
- a) wherever possible, deliveries of larger and bulkier goods and materials to the IMD will be made by rail both during the construction stage and when in operation;

- (b) a traffic routing scheme will be implemented that takes into account the environmental impacts of traffic as well as traffic movements, and that the scheme will be agreed with your Petitioners and the relevant district council;
- (c) night time deliveries to the site both during the construction stage and when in operation, will be minimised and that the handling of any materials delivered to the site during the night time period will only be carried out if it can be done without disturbing local residents;
- (d) lighting at the site will be low-level, designed to minimise light-spillage, or activity-initiated;
- (e) the open brook that will be removed during construction will be reinstated after the temporary railhead has been removed.

Impact on East West Rail

- 41. East West Rail is a major project to ultimately establish a strategic railway connecting East Anglia with Central, Southern and Western England. The western section is now a committed, funded scheme to re-introduce passenger and freight services between Bedford and Oxford, and Milton Keynes and Aylesbury. It involves upgrading and reconstructing sections of existing and mothballed rail track, and is to be delivered by Network Rail.
- 42. The East West Rail project is being actively supported by the East West Rail Consortium, which is a group of local authorities (including your Petitioners) with an interest in improving access to and from an arc extending from East Anglia to Bedford, Milton Keynes, Aylesbury, Bicester and Oxford.
- 43. Your Petitioners are concerned about both the physical impacts that the works to be authorised by the Bill will have on East West Rail, where they would cross at Steeple Claydon, and about the potential for delay in its implementation that may be caused by the proposals in the Bill. Your Petitioners respectfully ask your honourable House to amend the Bill so as to provide protective provisions that will ensure that the implementation of East West Rail will not be delayed or its subsequent operation affected unduly or unreasonably by the construction or operation of the works to be authorised by the Bill.

44. Your Petitioners would also ask your honourable House to require the Promoters to ensure that a station is provided (either by building it or funding it) on the East West Rail line at Steeple Claydon, to serve the IMD and surrounding communities. The station's location should be determined following consultation with your Petitioners and the local community. In any event, the station should be accessible for the residents of Steeple Claydon and neighbouring villages. Your Petitioners' note that the promoter's *Framework travel plan* provides that "construction workforce travel plan documents will be produced ... [and] will encourage the use of sustainable modes of transport to reduce the impact of workforce travel on local residents and businesses" (paragraph 2.5.5). Your Petitioners consider that the provision of the station would be consistent with this aim, helping to provide a long-term sustainable mode of transport which would have an enduring, positive impact for local residents and businesses.

Landscape planning: Bernwood Forest

45. With considerable disruption during construction and post-construction from the Infrastructure Maintenance Depot, as well as the mitigation outlined above, your petitioner requests consideration to a holistic landscape planning to the former Bernwood area where a number of major infrastructure projects converge in currently rural environs. Your petitioners request that the promoters work with the petitioners to fund appropriate and integrated land use across this area to increase community and economic benefits as well as environmental to lessen the detrimental effects for local people living close to the IMD.

A Community Benefit Fund

46. Your Petitioners are concerned that, without further protection, the proposed works will leave a negative legacy on the landscape and communities in their area. Whilst the ES contains mitigation for some of the identified adverse impacts, your Petitioners consider that the aggregation of a large number of adverse impacts, which are not considered significant by the Promoter, are not satisfactorily addressed and this will result in further adverse effects on the environment and local communities. Your Petitioners request that the promoters of the Bill should be required to establish a community fund, the form of which should be discussed and agreed with local authorities, and which should be made available for the use of your Petitioners, other public bodies, charities and other organisations as a means to offset the environmental and other damage that will be caused to the inhabitants of your Petitioner's

area, in the absence of any gain. The fund should enable your Petitioners and others to provide for replacement and additional facilities, infrastructure or other mitigation. There is relevant and recent precedent for the establishment of such funds in respect of other major infrastructure projects, for example on HS1 and the Hinckley Point nuclear power station. Your Petitioners consider the proposition now set out in the promoter's information paper that local authorities should not qualify for funds available as part of the community fund to be misconceived.

A linear park, Aylesbury

47. As mentioned above, there is already a green infrastructure deficit in the Aylesbury area. The project will make this worse where, for instance, land will be lost at Hartwell House and Aylesbury Park Golf Club. Owing to this, your Promoters consider that major mitigation or off-setting is required and an endowment in order to manage a new green infrastructure facility.
48. The promoter has identified substantial land take for habitat creation and / or mixed use to the south west of Aylesbury on land owned by the Ernest Cook Trust. Your Petitioners require the promoter to enter into discussions with the Ernest Cook Trust, the National Trust and themselves in respect of the proposed land take with a view to reaching an agreement on both the relocation of the Golf Club, which cannot be reconfigured in situ, appropriate land use for the area, funding for the proposals and an agreed endowment for the management of this green infrastructure.

Vertical limits of the line

49. Your Petitioners note that the Nominated Undertaker is empowered under the Bill to construct any of the scheduled works within the limits of deviation shown on the deposited plans and would be empowered to deviate vertically upwards to any extent not exceeding 3 metres from the level shown for the work in question on the deposited sections. Furthermore, the Nominated Undertaker would be empowered to deviate vertically upwards by any extent in respect of works authorised by the Bill which are not scheduled works. Your Petitioners consider that the upward limits of scheduled works should be limited so that only 1 metre's latitude is allowed and that suitable limits should be imposed in respect of other works. Specific locations where this is particularly important include Aylesbury west and Waddesdon.

Local jobs, skills and economic opportunities

50. The construction of the works authorised by the Bill will provide additional employment in the county, not just directly on the construction sites, but indirectly as well. Your Petitioners requests that the Nominated Undertaker prepare a local procurement strategy which will include a commitment to use the local workforce and supply chain during construction of the scheme, offering opportunity for skill development and apprenticeships. Local colleges and other training providers should be used to host training and skills programmes with a view to providing employment and apprenticeship opportunities.

Highways and Traffic: impacts on the Buckinghamshire road network

51. Your Petitioners consider it is imperative that elements of the Transport Assessment are redone and, as such, an addendum is required to the Environmental Statement. Manual assignments have been undertaken on the highway network throughout your Petitioners' area; however, these do not take account of the redistribution of trips. It is imperative that Aylesbury and Wycombe's specific local models are used to assess the impact of the proposal in those areas. Moreover, the modelling undertaken must properly assess the impacts of multiple working sites and their programmes to identify impacts which have the potential to destabilise the functioning of the highways network, whether that be in a rural or urban location. In addition, all new highway junctions, or those that are significantly impacted by the proposals should be subject to capacity assessment using recorded Manual Classified Count survey data where strategic model data is unavailable. It is not appropriate to estimate junction capacity using link flow data. Given the scale of the scheme, off-peak traffic implications also need to be considered. Your Petitioners wish to highlight that the mitigation proposed in this petition with regard to highways and traffic is based on the proposals as presented in the ES deposited in November 2013; however, given the need to produce an addendum, further highways mitigation may be required.
52. Your Petitioners request that, when determining their transportation needs for both personnel and materials, the Promoter and the Nominated Undertaker consider alternatives to road wherever possible and, in particular, seek to ensure transportation by existing rail services. As local highway authority for the county of Buckinghamshire, your Petitioners have extensive knowledge of the local highway infrastructure. Your Petitioners have identified a

number of key areas of concern with regards to traffic management and these are described in the following paragraphs.

Stoke Mandeville and Aylesbury

53. While your Petitioners recognise the positive benefit to residents in Stoke Mandeville resulting from the provision of the Stoke Mandeville by-pass, your Petitioners are concerned that this may generate a new significant impact on properties in the south west of Aylesbury. Your Petitioners therefore request a noise barrier on this road to mitigate the impact.
54. In addition your Petitioners are concerned that the diversion of traffic around Stoke Mandeville could lead to a significant increase in traffic using the B4443 Lower Road leading into Aylesbury and which could have a significant effect on adjacent properties.
55. Your Petitioners stress that substantial modelling is required to ensure the proposed new /realigned highway does not cause wider impacts. In particular, your Petitioners submit that modelling work should be carried out to ensure that the Stoke Mandeville bypass integrates effectively into the broader highway network. Your Petitioners consider that the link should go further to the A418 Oxford Road and to the A413 Wendover Road and it is considered that the proposed modelling work would confirm whether or not this is the case.

Waddesdon Relief Road

56. It is proposed that a construction compound will be located near Waddesdon village. Owing to the unsuitability of the village roads for construction traffic, your Petitioners request that the promoter provides a full relief road for Waddesdon village. In order to minimise land take and ensure the relief road is appropriate for the rural location, the alignment and design, in particular, where the road re-joins the A41 west of Waddesdon, would need to be agreed with the local community and your Petitioners.

Wycombe

57. Your Petitioners are concerned about the proposed use of Junction 4 (Handy Cross) of the M40 together with the A4010 between High Wycombe and Aylesbury as a construction route. Your Petitioners are concerned that this routing would take construction traffic through the already heavily congested area of High Wycombe, potentially during a time when other major developments and road works in the town centre are taking place. Your Petitioners seek undertakings and assurances that the Nominated Undertaker will work together with your

Petitioners to identify the most suitable methods and routes to serve construction sites and compounds.

58. Your Petitioners are also concerned about the impact of the proposed construction haul routes on the safety and amenity of residents along the route, especially in built-up areas such as Princes Risborough, and on the expeditious movement of traffic including public transport. Wycombe district is already subject to a high number of vehicle movements between Aylesbury, the M40 and M4 putting considerable strain onto the quality of life of residents along these roads. The proposed scheme will add to these pressures. Your Petitioners seek undertakings and assurances that the Nominated Undertaker will work with them to minimise the impact on residents along construction routes by identifying the most suitable methods and routes for construction traffic and by placing restrictions on vehicle size and number of vehicle movements.

Wilton Park Relief Road

59. Your Petitioners are concerned by the proposed construction traffic routing from the M40 to the trace. Your Petitioners foresee significant impacts on the Beaconsfield road network if construction vehicles use Junction 2 of the M40. A relief road, adjacent to the Wilton Park area of Beaconsfield (re-joining the network further north around the outermost part of Beaconsfield) is required in order to avoid this impact on the local highway network.

South Buckinghamshire

60. Your Petitioners request that construction vehicles use the M25 slip roads as far as possible in order to reduce adverse impact on the local communities, including around the A412 in Denham.

Highways: sensitive junctions

61. As mentioned above, further analysis is required by the Promoter in order to understand the impacts on key links or junctions which are required during construction. There are a number of key junctions along the route for which base turning count data has not been collected. Only 20 manual classified counts were carried out for the whole of Buckinghamshire, along with 56 automatic traffic counts. No classified counts were carried out for the Amersham area, and only two were provided for Stoke Mandeville and just one for Aylesbury. Given the scale

of the proposed development and the associated impacts during both the construction and operational phases, considerably more base data is required to enable capacity assessments and the transport impact to be properly understood. As a result, your Petitioners have concerns over a number of junctions identified as being required access during construction. Where changes to junctions are required, the Promoters must supply plans at a reasonable scale with visibility splays and a proper capacity assessment.

Highways: sufficient traffic management

62. Your Petitioners request that the Promoter explains fully (i) its proposed traffic management measures and (ii) any additional measures arising from any further analysis of the scheme's impacts. These steps are necessary to ensure the proposed measures integrate with other traffic management required over the whole County network.
63. Your Petitioners request the provision of other traffic management measures including CCTV provision on all key junctions, the power for your Petitioners, as Highways Authority, to stop or divert HS2 vehicle movements where there is an incident on the network, consideration to the use of ANPR cameras to monitor and identify vehicles, and the offline construction of realigned highway in order to reduce the impacts of diversion or closure.
64. Your Petitioners, as Highways Authority, request that they be fully consulted on all proposals to make temporary or permanent road closures and traffic diversions, changes to traffic flow, and any physical alterations to the highway in their area

Highways: impacts on the road infrastructure

65. The scale and duration of the Phase 1 HS2 construction works will result in considerable construction traffic using Buckinghamshire's highway network between 2017 and 2026. It is essential that measures are put in place to ensure the Nominated Undertaker complies with provisions that are equivalent to any legislation relating to highways and road traffic that are dis-applied by the Bill. In particular that additional highway maintenance required directly as a result of the construction of the Authorised Works is taken into account. This includes ensuring that your Petitioners are able to recover all the costs of damage caused by extraordinary traffic, in accordance with section 59 of the Highways Act 1980 and ensuring that liability can be agreed in advance of the works being undertaken.

Highways and traffic: remedial works

66. Your Petitioners are concerned that many of the roads used in the construction phase will suffer irreparable damage and wish to ensure that the “Environmental guidelines for the management of highways in the Chilterns AONB” are adhered to. Your Petitioners submit that the Nominated Undertaker should be required to carry out and fund all necessary remedial and repair works to the highway and any necessary bridge strengthening to a standard specified by your Petitioners in respect of all highways and bridges for which they are the responsible authority. Your Petitioners submit that the promoter of the Bill should be required to carry out detailed condition surveys before and after the construction period on land in their ownership which is to be and is affected by the proposals, particularly on highways which are to be used as worksites or which will be heavily used by construction traffic. The promoter should also have full responsibility for embankments and security fencing required for remedial works.
67. Your petitioner wishes the Promoter’s Nominated Undertaker to discuss and agree the appropriate treatment of redundant stretches of road with the local Highway Authorities and local communities. Your petitioner should not be forced to maintain excess road nor should these areas encourage fly tipping.

Highways and traffic: construction routes

68. Each of the construction sites in your Petitioners’ area will be centres to and from which large quantities of construction materials and equipment will be transported, together with staff. There will also be the problem of removal of spoil from the working sites. The matters which your Petitioners submit should be subject to their control in this respect are the routeing of lorries and other vehicles, access to work sites, hours of operation, number of vehicle movements and size of vehicles and miscellaneous related matters. This includes details of how the extra traffic and noise will impinge on trade in each of the major towns in your Petitioners’ area.
69. Your Petitioners submit that the Nominated Undertaker should be required to use every endeavour to utilise rail for transport purposes. The promoter of the Bill and subsequent Nominated Undertaker should confirm the numbers and type of vehicles on specific routes and assess impacts accordingly, particularly cumulative impacts. The Nominated Undertaker should also be required to minimise the cumulative impact of lorry movements by properly

managing lorry movements, keeping the number of movements to a minimum, using the strategic road network and confining movements to normal worksite hours. This may include the use of consolidation centres. Your Petitioners are concerned about the proposal to use Junction 4 (Handy Cross) of the M40 together with the A4010 between High Wycombe and Aylesbury as a construction haul route. Your Petitioners are concerned that this routing would take construction traffic through the already heavily congested area of High Wycombe, potentially during a time when other major developments and road works in the town centre are taking place. Your Petitioners seek undertakings and assurances that the Nominated Undertaker will work with it to identify the most suitable methods and routes to serve construction sites and compounds. For instance, your Petitioners consider that Junction 8 would be more suitable than Junction 4.

70. Your Petitioners have prepared a list of other inappropriate routes which are proposed for the project which have been given to the Promoter. Moreover, your Petitioners have also sent to the promoter a list of junctions within its area which need to be improved if they are to be used by construction traffic. Your Petitioners will seek to secure those improvements by assurances and undertakings but reserve their right to present a case in respect of them before your honourable House if it is not possible to obtain the necessary assurance or undertaking from the promoter.
71. Once proposed construction haul routes have been notified to your Petitioners, safety considerations relating to the access and egress to and from the highway must be subject to a further comprehensive appraisal. Your Petitioners respectfully request your honourable House to require that the Promoter or Nominated Undertaker should conduct such an appraisal in relation to every new haul route required for the construction of the works, and any alterations to such haul routes.
72. Your Petitioners respectfully request your honourable House to require that before commencement of the construction of the authorised works, the Promoter or Nominated Undertaker should produce a construction travel plan, to be agreed with your Petitioners. The travel plan must reflect and build on the various sustainable transport opportunities along the route in your Petitioners' area.

Highways and traffic: bus routes

73. Your Petitioners are concerned by the prospect of bus services levels being lessened as a result of the project. Owing to this, your Petitioners request that the Promoter funds a full

impact study to assess the potential effects on commercial and tendered bus services in the county. Your petitioners request that this study includes analysis of routes which would suffer from traffic displacement and from increased journey times.

74. Once the impacts are clear, your Petitioners request that funding be provided for the additional resources needed to maintain the timetables and service levels of bus services as well as the resources required in order to communicate diversions to the travelling public. Your Petitioners also request that the Promoter assesses the scheme's impact on the viability of services in the long term and fully compensates any such impact.
75. Your Petitioners also request that a full impact study is conducted in respect of home to school transport to manage the impacts on home to school transport such as school catchments from severance.

Highways and traffic: emergency service routes

76. Your Petitioners, together with the South Central Ambulance Service and the Buckinghamshire & Milton Keynes Fire Authority are concerned about the use of key emergency service routes by the Nominated Undertaking during construction, particularly the A4010, A413 and A41 and also between the two hospitals on the Aylesbury to High Wycombe road.

Highways and traffic: construction impacts on communities

77. Your Petitioners request that the Promoter provides sufficient mitigation for homes, schools, businesses, care homes and hospitals located along construction routes. Each site will require a specific set of measures, but consideration should be given to implement some/all of the following; traffic calming measures, speed limit reductions and avoidance of peak school times. The schools that are principally affected, should the current proposal proceed unchanged, include, Hyde Heath Infant School, Great Missenden C of E Combined School, Wendover Campus, Stoke Mandeville Combined School and Booker Park School. The Berryfields Major Development Area (MDA) is situated to the north-west of Aylesbury and there is planning permission for the provision of a new primary school and nursery which could also be affected.

Highways and traffic: cycle routes and pathways

78. Your Petitioners understand that a number of dedicated on-road cycle routes in the county, for instance National Cycle Network Routes 50 and 51, are required for HS2 construction traffic. This will alter the current type and volume of vehicles using the routes, causing safety concerns for cyclists. Since cyclists can find out about changes to cycle routes online from websites such as the Sustrans website, your Petitioners request that Sustrans and similar organisations, such as CTC, are consulted in advance of cycle routes being used by construction traffic and that they then be provided with up to date information of cycle route use by construction traffic so that they can update their websites accordingly. These measures should assist in minimising the risk to cyclists' safety by this use and also reduce the traffic's impact on the cycle network.

Highways and traffic: design of realignments and structures

79. Your Petitioners note that a number of roads are proposed to be realigned due to the scheme. Your Petitioners request that, as a general principle, roads must be aligned as close to the original as possible. Your Petitioners, as local Highway Authority, must approve each realignment. For example, on Station Road at Quainton, within CFA 12, further consideration must be given by the Promoter for a closer alignment to ensure provision is made to allow lorries and other large vehicles to access Buckinghamshire Railway Centre. The local community must also not be subject to longer than necessary journeys and realignment will assist with this. Your Petitioners request that, in order to ensure the specification is adequate, they are involved in the design of new structures which will accommodate highways. Owing to the fact that, 12 months after the structure is completed, your Petitioners will become responsible for the structure's maintenance, this request is considered reasonable and essential.

Highways and traffic: maintenance

80. Your Petitioners are concerned about the maintenance of the road network required by the Promoter during the construction of the scheme. Your Petitioners request that condition surveys are completed to establish a baseline condition and a programme to monitor, report and implement mitigation and improvement works is agreed between Your Petitioners and the Promoter and or the Nominated Undertaker.

81. Your petitioner does not believe it to be justified for the maintenance responsibility for embankments, security fencing or new drainage pumps associated with the highway to be the responsibility of your petitioner.

Highways and traffic: communication

82. Communication will be vital before and during construction. Your Petitioners request that clear, timely and accurate information regarding the use of the road network by the Promoter/Nominated Undertakers should be provided. This should include a Communication Plan to cover how your Petitioners (as local highways authority), local residents, road users and businesses will be informed of when, and for how long roads will be used during construction .
83. Your Petitioners also request that the Nominated Undertaker / Promoter explore the use of the existing locally used communication channels, such as Buckinghamshire's Local Area Forums, in order to ensure information is appropriately relayed to communities regarding highways and traffic. Where existing channels are most appropriate, the Promoter must ensure that sufficient resources are contributed. Your Petitioners also requests high profile, clearly branded signage adjacent to the highway, agreed by your petitioners, in order to ensure that road users understand the purpose of any highways disruption or change

Public Rights of Way

84. Your Petitioners are concerned by the detrimental impacts that the proposed scheme will have on the public rights of way ("PRoW") in its area. Around 88 PRoW across Buckinghamshire will be affected in total. For example within the Central Chilterns area 14 PRoW will be closed or diverted during the construction period. Footpaths are often routed along the line with no provision to protect users from noise, either on the footpath or where the footpath crosses the line. A detailed paper explaining these impacts and the proposed mitigation and compensation measures sought by your Petitioners has been sent to the Bill's promoters. Your Petitioners hope to gain undertakings or assurances from the promoters in respect of their PRoW. If such undertakings or assurances are not forthcoming, your Petitioners reserve their right to present to your honourable House a detailed case on these impacts and the mitigation and compensation measures sought.

Code of Construction Practice: drafting

85. Your Petitioners are concerned that the draft CoCP that has been published is inadequate in a number of respects, and that the wording used is often too imprecise. Your Petitioners will discuss the detailed concerns with the Promoters but in the event that agreement is not reached, your Petitioners will ask your honourable House to require the Promoters to amend the draft CoCP accordingly. In addition, your Petitioners respectfully ask your honourable House to require the Promoters to undertake that where the Nominated Undertaker or its contractor complies with the control measures set out in the final CoCP and those measures prove to be ineffective, flexibility will be given to explore alternative control measures and the most suitable option adopted. The term, 'reasonably practicable' has been used frequently throughout the CoCP but it is not clear who will decide what is 'reasonably practicable'. Your Petitioners seek assurances that corners will not be cut and 'practicable' is not used as an excuse for cost saving. It is notable that in the Environmental Minimum Requirements and supporting documents, the requirements on your Petitioners are more stringent, being framed in terms of "best endeavours", etc. Your Petitioners are concerned that time and monetary constraints may unduly influence this definition.

Code of Construction Practice: engagement and compliance

86. Your Petitioners are concerned to ensure that the level of community engagement by the Promoters will be much better during the construction process than it has hitherto. Effective community engagement and a mediation mechanism must be put in place to shape emerging details and smooth the implementation stage. Your Petitioners request your honourable House to require the Promoters to ensure that a refocused and more effective mechanism for the Promoters and the Nominated Undertaker is put in place, working with the community through the design and construction stage (including the evolution of detailed designs for elements and also LEMPs) and resolving issues that emerge. Your Petitioners also believe that independent arbitration or mediation arrangements should also be put in place.

Code of Construction Practice: Ecology

87. Your Petitioners are concerned that the draft CoCP does not include sufficient detail to give confidence that adequate Ecological protective measures will be adopted when the works are carried out or that those measures will be informed by relevant expertise or incorporate

appropriate techniques. The proposed Environmental Minimum Requirements (EMRs) and Environmental Management System are also very general. Your Petitioners ask your honourable House to require assurances that the Promoters and the Nominated Undertaker will follow BS42020 and that local planning authorities will have a meaningful role in LEMP preparation.

Code of Construction Practice: Local Authority Costs

88. Your Petitioners note that the Bill and the supporting documents adopt similar regimes to those which were established for the construction of the Channel Tunnel Rail Link and Crossrail. Your Petitioners will wish to ensure that the CoCP is complied with properly and, in that respect, your Petitioners will incur a great deal of expenditure. Your Petitioners wish to ensure that all of their reasonable expenses in monitoring construction sites are met by the Nominated Undertaker, together with expenditure incurred by your Petitioners in planning and programming activities related to the CoCP and in enforcing them. This point is developed in Part 2 in the paragraphs headed “Recouping other authority costs”.

Code of Construction Practice: Maintenance and Monitoring

89. Your Petitioners require assurance that a minimum of five years aftercare from the time of planting or restoration will be provided in order to support the establishment of newly planted habitats and landscape planting, and that during this period dead or defective material will be replaced or remedial measures taken to secure the mitigation proposed. Your Petitioners also seek assurance that in addition long term management and habitat monitoring will be secured so that the mitigation incorporated into the project is sustainable. Your Petitioners recognise that aftercare has been dealt with in one of the Information Papers produced by the Promoters, but your Petitioners would ask that the proposals contained in the paper be incorporated into a binding undertaking.

Local environmental management plans

90. Your Petitioners cautiously welcome the proposals to provide local environmental management plans (“LEMPs”) to supplement the more general COCP; however, your Petitioners have not seen a substantial draft of a LEMP and they need to be satisfied that they will be fit for purpose. Your Petitioners request your honourable House to require the

Promoters to provide an undertaking that the LEMPs will be thorough in their design and truly reflect local circumstances by agreeing the outline criteria prior to your Petitioners' appearance before the select committee of your honourable House. Your Petitioners also seek an undertaking that all of their reasonable expenses in monitoring construction sites will be met by the Nominated Undertaker, together with expenditure incurred by the Council in planning and programming activities related to the construction codes and in enforcing them.

Ecology: quality of baseline and surveying

91. The lack of good quality surveys conducted by the Promoter has resulted in a lack of quality baseline data against which to assess the impacts of the project. Missing surveys must be carried out as soon as possible to gain an accurate understanding of habitats and species. Accurate baseline data should then be used to inform the mitigation and compensation required. Secondary data should be used alongside primary data to verify data and identify possible errors.
92. Your Petitioners wish to highlight that the cumulative impacts on Ecological receptors during construction and operation are not fully considered. For example although impacts at a local/parish scale may not be significant, their cumulative impacts along the route may be. This is particularly important given the scale of the proposal. Your Petitioners request that cumulative impacts must be adequately considered and addressed and, where mitigation and or compensation has been proposed for each individual element, this should be clear and transparent.
93. The Nominated Undertaker may deviate from Plans and Sections. No assessment has been carried out for example if they lower/ raise the vertical limit. Your Petitioners request that if the Promoter does deviate from the current Plans and Sections, surveys and impact assessments of the new areas impacted are carried out and impacts mitigated accordingly.
94. Your Petitioners are concerned about what is considered 'significant' in terms of whether impacts will significantly affect the conservation status of species. The ES states that when defining thresholds of significance, relevant policies, guidelines, legislation, industry accepted practice, and experience and judgements of specialists has been used. However, your Petitioners consider that the Thresholds for Significance are inappropriately set in some cases, and where 'no significant adverse effects' are predicted following mitigation or compensation,

this assertion is often speculative and without support of evidence. Your Petitioners request that the Promoter defines what is considered 'significant' for each species, including each bat species. This should reflect the different risks due to population status, habitat preference and behaviours. There should be clear evidence of how this was calculated.

95. Your Petitioners are concerned about the impact of construction on streams, specifically those associated with the River Misbourne and Shardeloes Lake local wildlife site (LWS), both globally rare habitats. The River Misbourne has been identified as supporting otters, water voles and bullheads among other species. However, the potential for ground settlement and loss of water flow from the river to the chalk aquifer due to fractures in the chalk has been deemed insignificant. Your Petitioners do not agree that this is appropriate. Your Petitioners request that the Promoter undertakes comprehensive monitoring of the River Misbourne flow levels and monitoring of levels within Shardeloes Lake. Conservation trigger levels should be set, which if surpassed, would require immediate further investigation and mitigation as appropriate. Monitoring of aquatic macroinvertebrates and water quality should be incorporated as indicators of chronic or acute water pollution. Furthermore, your Petitioners request that surveys be carried out independently at the promoters' expense to inform the current ecological value of these habitats, and these surveys should be continued during construction and operation. Your Petitioners request that if surveying demonstrates adverse impacts, construction in the areas should stop immediately until the cause is identified and negative impacts rectified.
96. The Promoter considers that habitats within 15m of each other are considered 'contiguous'. However, your Petitioners believe that there is no evidence that 15m is an appropriate value to use in order to represent the many species of flora and fauna, each of which has differing dispersal traits and abilities. Your Petitioners request that the Promoter provides evidence that 15m is an appropriate 'gap' between habitats or refrains from this approach altogether, thus returning to a metric more akin to that used in the pilot study.

Ecology: valuation of habitats

97. Your Petitioners consider that habitats and species are undervalued by the promoter owing to the fact that insufficient mitigation is being provided in respect of the harm that will be caused to them. For example, orchards in CFA 10 are considered to be only of district / borough value despite being a Biodiversity Action Plan priority habitat; the assessment of eels

and bullheads underestimates their value despite them being identified as threatened species by International Union for Conservation of Nature; and in some cases the value of habitats is not consistent. Your Petitioners request that all habitats and species are accurately valued, and a habitats value is based on the most valuable species or habitat it supports.

98. Your Petitioners are also concerned that details of biodiversity offsetting calculations have not been provided, making it impossible for your Petitioners to judge whether or not mitigation proposals are appropriate. Your Petitioners are concerned that, currently, mitigation measures do not always compensate for losses. Your Petitioners request that details of the calculations used, and all works are provided before your Petitioners are expected to comment on how appropriate mitigation measures are. Your Petitioners request that the Promoters clearly detail what mitigation/ compensation is intended for which losses.
99. The inclusion of irreplaceable habitats within biodiversity offsetting is misleading and is not based on sound scientific evidence. Your Petitioners requests that irreplaceable habitats are not included in the offsetting metric and are considered separately from the overall calculations. Failure to do so significantly undermines the biodiversity offsetting approach.
100. Your Petitioners request that an independent body comprised of statutory and non-statutory consultees, including local authorities, be formed in order to oversee development of the biodiversity offsetting metric as lessons are learned from the pilot study and biodiversity offsetting Green Paper consultation to which the Government is yet to respond.

Ecology: adequacy of mitigation and compensation provided

101. The proposed Ecological mitigation measures are often insufficient, and do not come close to replacing what is lost. For example there is lack of evidence that translocation of ancient woodland is successful; areas of new planting will take many years to become functionally mature; and mitigation is rarely like-for-like with a net gain in biodiversity. Furthermore, details of mitigation measures are often lacking, and there is insufficient, if any detail regarding the long term maintenance of mitigation, and surveying to ensure that mitigation is effective. The Promoters' approach to mitigation often fails to make use of good practice techniques. For example the terms 'where practicable' or 'where reasonable to do so' suggest a lack of commitment to Ecological mitigation, and there is limited evidence that the mitigation hierarchy is complied with. The lack of monitoring before, during and after

construction further undermines the Promoters' commitment to adopting a good practice approach. Your Petitioners request that the Promoter demonstrates that mitigation is consistent with one of the principles identified by Sir John Lawton in his 2010 report on England's wildlife and Ecological network, namely that it provides more, bigger, better and joined up habitats than those that are lost. This must be additional to what is already present, and designed specifically for Ecological gains.

102. Your Petitioners' wish to highlight that the scheme would prevent the use of the nature reserve at Calvert Jubilee. Your Petitioners request that compensation for the loss of the nature reserve is provided, in consultation with Berks, Bucks and Oxon Wildlife Trust. As part of the compensation, your Petitioners request that the Promoter focusses on ensuring the community have access to the wider countryside. This could be in the form of a Country Park.
103. Your Petitioners are concerned about the Ecological impact of diverting the River Colne. Similarly, your Petitioners are concerned about the diversion and culverting of the Stoke Brook and the associated impacts on ecology, hydrology and the landscape. Your Petitioners request that the diversion of the River Colne and establishment of riparian habitats is carried out prior to any work being carried out on the existing channel. The diversion should provide Ecological enhancement to ensure a net gain in biodiversity. This must be demonstrated by ongoing monitoring, as agreed with relevant stakeholders. With regards to the Stoke Brook, your Petitioners requests that a low viaduct is used instead of an embankment. Throughout the route, your Petitioners request that floodplains should be managed to increase biodiversity and, where suitable, floodplains should be managed as ecological wet grassland mitigation areas.
104. Your Petitioners are concerned that the ES gives insufficient consideration to the time between the loss of habitats and the creation of new habitats. This should be given greater weighting, given that long term temporary effects can have a profound impact on species population, which may not survive years of disruption. Furthermore, the idea that the Promoter can create new habitats and translocate species into these new habitats successfully in 'up to two years' is flawed. Your Petitioners request that the duration of temporary impacts is given more consideration and, if this duration is likely to result in adverse impacts on species populations, this must be mitigated against. In order to reduce the lag time between habitats being lost and created, the Promoter should consider phased restoration during the

construction process. Where possible, habitat creation should begin prior to construction. If this is not possible, reasons as to why this is the case should be provided.

105. The creation of a railway will act as an obstacle to lateral wildlife movement. Furthermore, the ES states that the rail corridor will be continuously fenced, further impeding the movement of species. This conflicts with the Lawton Principle to create 'more, bigger, better and joined up' habitats. Your Petitioners are concerned that there is insufficient habitat connectivity across the route and the measures in place will not permit sufficient movement of species through the landscape. Your Petitioners believe that this scheme presents an excellent opportunity whereby habitats could be created and connected along the length of the line, improving the prospect of species movement in response to climate change. Your Petitioners request that the Promoter takes advantage of this opportunity, for example by creating a mosaic of habitats running the length of the line. In order to increase movement across the line, your Petitioners request that green crossing points are significantly increased in size and number, and designed specifically for wildlife. Your Petitioners request that further evidence is provided to show that species will not be channelled towards roads at 'pinch-points'.
106. Your Petitioners are concerned that many mitigation and compensation measures are vague and lack detailed design. Furthermore, the lack of detailed design for the whole proposal is at odds with the mitigation hierarchy which requires developers to seek suitable alternatives, or reduce impacts through proposal design. Your Petitioners request that further design details are provided on mitigation and compensation in order to assess whether or not these are sufficient. Furthermore, your Petitioners request further design details for, among other aspects: mitigation and compensation areas; tunnel entrances; vent access points; green bridges; viaducts and landscaping. This will allow your Petitioners to understand whether the opportunity to provide ecological enhancement within structures has been taken.
107. The proposed scheme will cross Grendon and Doddershall Meadows LWS on the Doddershall embankment, immediately west of the Aylesbury Link railway line that already crosses the site. To the west, additional land is required for a landscape earthwork that will be parallel to the proposed scheme. In the eastern part of the site-which contains the most diverse grassland habitat-there will be a balancing pond and a small area of flood compensation, both required for the nearby Quainton autotransformer feeder station. Your Petitioners request that the mitigation hierarchy is applied in all cases, and the Promoter should commit to avoiding impacts on the LWS and relocate the balancing pond elsewhere.

Ecology: climate change

108. Your Petitioners believe that the Promoter makes unsupported assumptions about the ability of species to adapt to climate change. In England many species will be unable to adapt to climate change due to the fragmented landscape and insufficient and poorly distributed semi-natural habitats. Your Petitioners believe that this further supports the suggestion that the Promoter should take the opportunity to restore habitat connectivity along the length of the line. This would improve the prospect for species movement in response to climate change.
109. The ES states that the Promoter will plant trees for carbon sequestration; however, your Petitioners believe that no assessment of how many trees and other vegetation types will be lost due to the proposal has been conducted. Your Petitioners request that this information is provided and the Promoter provide net calculations of carbon capture, taking into account the vegetation lost as a result of HS2.

Ecology: maintenance of mitigation provision

110. Your Promoters request that a comprehensive scheme be developed to ensure the maintenance of ecological mitigation provided by the Promoter or Nominated Undertaker. One option would be the establishment of a Trust to manage, at the Promoter or Nominated Undertaker's cost, the provision and maintenance of such mitigation in perpetuity along the railway line.

Ecology: minimum requirements and "no net loss"

111. The ES states that there will be no net loss of biodiversity. This is not supported by a transparent and consistent assessment of habitat and species impacts. Other statements regarding the scope of mitigation and compensation are not justified. Your Petitioners are concerned that the basis for compensation for habitats that will be affected detrimentally is not clear and has not been published as part of the ES. Your Petitioners request that the promoters should be required to supplement the ES to meet this failing.
112. Your Petitioners request that nonet loss must be considered an absolute minimum. An increase in biodiversity should be the target in all cases. This is particularly important considering the lack of evidence that many mitigation measures will work as intended.

113. Your Petitioners understand that the promoters have surveyed only 60% of the land covered by the Bill. This is unacceptable and your Petitioners submit that the whole route must be surveyed.
114. Moreover, your Petitioners request that the promoter and Nominated Undertaker's approach to biodiversity offsetting should be in accordance with the principles proposed by Professor Sir John Lawton in *Making Space for Nature*. To this end the strategic placement of habitats to be created should be agreed with Local Authorities in partnership with other relevant stakeholders and given greater weight in the biodiversity offsetting metric.
115. Your Petitioners also request that the promoter be required to (i) hold a ring fenced budget for environmental safeguards and (ii) clearly demonstrate how the budget had been calculated and that it is sufficient to cover all costs.
116. Your Petitioners consider that the provision of biodiversity offsetting measures, for instance, the provision of replacement land for habitat land and woodland being taken as a result of the construction of the works could be provided outside of the Bill's line of route. Your Promoters would expect to be consulted in advance of any proposal to use land for this purpose in its area.

Ecology: Impacts on specific species and habitats

117. Your Petitioners have a number of major concerns regarding the impact that the proposal will have on specific habitats, including hedgerows and ancient woodlands, and species, including great crested newts, black hairstreak butterflies, terrestrial invertebrates, barn owls, and bats. Your Petitioners are concerned about, amongst other things, the inadequate surveying conducted by the promoters which has resulted in poor quality baseline data; the insufficient mitigation and compensation which is being proposed and the lack of detail and commitment to monitoring and ongoing maintenance. Your Petitioners have produced a detailed paper setting out their main concerns and the appropriate mitigation and compensation. This paper has been sent to the Promoter to seek to agree improvements to the scheme. If no agreement is reached, your Petitioners reserve their right to present a detailed case on the scheme's impacts on habitats and species to the Select Committee

Ecology: Ancient Woodland

118. The Promoter correctly describes ancient woodland as 'irreplaceable'. It is not clear how the loss of irreplaceable habitats can be mitigated. Your Petitioners are concerned that replacing ancient woodland with new planting will result in 50 years of a net loss in biodiversity, in which time species dependent on ancient woodland will inevitably decline in conservation status. This does not comply with nonet loss. The Promoter proposes translocation of ancient woodland. However, there is no clear evidence that this can be successful, and more evidence that it is likely to be unsuccessful. Your Petitioners request that the route is modified or tunnelled to minimise the loss of ancient woodland. If this does not happen, your Petitioners request that further details are provided as to how the loss of 'irreplaceable' habitats can be mitigated. This should include biodiversity calculations demonstrating which mitigation corresponds to which losses. If the Promoter considers translocation to be appropriate, your Petitioners request that they provide evidence that this will deliver target habitat conditions. Your Petitioners request that when valuing plantation ancient woodland, it should fall under the 'very high' distinctiveness category, as a large degree of its value is within the seedbank, which should not be undervalued.

Ecology: Monitoring and enforcement

119. Your Petitioners are concerned about the limited detail and assurance that monitoring will take place to ensure that mitigation and compensation measures are achieved. This includes both how monitoring will be undertaken, funding for monitoring, and what will happen if monitoring shows that target conditions have not been achieved. Furthermore, currently, monitoring is confined to mitigation and compensations areas, rather than all areas affected by HS2. Your Petitioners are also concerned by the fact that the National Environmental Forum will not continue to meet regularly post-commissioning. Your Petitioners request that an appropriate mitigation plan is produced and approved by local authorities. This should include details of the ongoing monitoring, target levels, and what will happen if targets are not achieved. Details of indefinite funding should also be provided. Your Petitioners requests that the Promoter monitors all areas affected by HS2 rather than just mitigation and compensation sites, and the National Environmental Forum continues to meet much more than annually post-commissioning until it is clear that no-net loss in biodiversity has been achieved, and it is has been established that mitigation has been successful.

120. Your Petitioners request that the Promoter provides details of the enforcement options available if the agreed mitigation is not carried out and agreed compensation not provided.

Water: water resources and flood risk assessment

121. Your Petitioners fundamentally disagree that the promoters have considered the true extent of impacts on flooding and water resources. The areas that are evaluated in the ES rely upon general assumptions and are covered only at a superficial level. There are a number of waterways that cross the path of the proposed rail line and with the recent flooding of several of these areas in early 2014 and the heightened risks identified by numerous authorities including the Environment Agency, this is a major concern for the your Petitioners. The Promoter must provide greater clarity on the detailed maps of the flood risk from fluvial and surface water flooding both in the baseline situation and post construction.
122. In the ES, the Promoters identify major risks and activities that could lead to “catastrophic” impacts on groundwater quality as a result of construction activities. This is worrying. In addition, the Promoters have given priority to designing the line to withstand flooding, but not sufficiently assessed nor mitigated for the effect the line will have on the surrounding area. Further connectivity is required to allow surface water to cross the line. The Promoter should show an integrated approach and include good practise land management through the catchment which seeks to help flood management.
123. Your Petitioners suggest, for instance, that further research is required on the River Misbourne and the River Colne, so that the impacts of the construction of the railway on it are properly understood before sufficient mitigation can be recommended. The Chilterns chalk aquifer accounts for a considerable percentage of the water supply to both the Chilterns and outer London which should not be put at risk. The absence of a management strategy and having not reached agreement with Affinity Water, highlight the shared concerns that your Petitioners and shared community have.
124. Your Petitioners are also concerned that the rationale for the selection of the most appropriate water infrastructure such as culverts, embankment changes and viaducts remain unclear and unjustified in many areas. Long culverts are challenging to clear and the longer term maintenance of surface water storage areas has not been considered by the Promoters, so far as your Petitioners understand. Your Petitioners request that the Promoter provides justification as to how water infrastructure was selected, and avoids the use of culverts unless

these are demonstrated to be the only suitable option. Your Petitioners request that the Promoter is responsible for ensuring that all new infrastructure is appropriately sized, and that the Promoter is responsible indefinitely for managing and clearing all infrastructure and waterways affected in any way by the proposal. Drainage strategies for all parts of the route should be submitted to the Environment Agency and your Petitioners as Lead Local Flood Authority. Your Petitioners have not been involved in the identification of mitigation measures and request that they should now be so involved. Moreover, your Petitioners request that the promoters consult your Petitioners on the preparation of a scheme for monitoring groundwater boreholes and also for carrying full Hydrology surveys.

125. Your Petitioners are concerned over the impact on drainage patterns adjacent to and more distant from the construction corridor. The 2007 Catchment Abstraction Management Strategies (CAMS) exercise concluded that the Colne catchment, which includes the Misbourne and Chess chalk streams, was already “over-abstracted”. The presence of vertical joints and fractures within the chalk provide major water conduits throughout the underground aquifer system and therefore present both an ecological and aesthetic risk. Your Petitioners therefore request your honourable House that the Promoters be required to fully model this and assess the impact of the tunnels on water resources.
126. Your Petitioners request that discharge rates are monitored pre-construction, during construction and post-construction to ensure that discharge rates are secured at Greenfield Runoff Rates, and no new flooding has been caused downstream. Your Petitioners request that mitigation measures are put in place if post-construction monitoring shows that discharge rates have increased. These measures should be agreed with relevant stakeholders and local authorities.

Water: balancing ponds

127. There are a number of balancing ponds and land drainage areas shown on the maps contained within the ES. These are alien features in the area and will have an environmental impact of their own which has not been assessed. Your Petitioners believe that alternative Sustainable Urban Drainage Systems (“SuDS”) techniques should be favoured over balancing ponds. Your Petitioners therefore request that the Promoter considers other SuDS techniques, and if they are not considered appropriate, justification for this decision should be provided. If balancing ponds are to be used they should not be artificially lined, their impacts must be considered

and mitigated, and they should be used to support imaginative ecological enhancements and maintained with some water and vegetation at all times.

128. If the balancing ponds are clearly demonstrated to be necessary, your Petitioners request that consideration is given by the Promoters to whether they could be used to contribute positively to an overall reduction in flood risk across the county. The Hydrology of the Chilterns, in particular, is complex and a number of drainage patterns exist and can impact on both surface and groundwater.

Water: wider drainage improvements

129. Your Petitioners believe that there are opportunities for the Promoters to align works with the Environment Agency's River Basin Management Plan actions, in order to secure improvements in both ground and surface water bodies, and your Petitioners would ask your honourable House to encourage the Promoters to do so.

Water: watercourses and siltation

130. Your Petitioners consider that a number of significant earthworks to be carried out during the construction phase will present a risk of silt pollution to local watercourses. Your Petitioners therefore request that all site run off is captured and adequately treated.

Water: survey methodology

131. Your Petitioners disagree with the Promoter's survey methodology in numerous cases and are concerned that the survey methodology does not always follow best practice. Furthermore, your Petitioners believe that impacts have not been mitigated in some cases. For example, no numerical modelling of surface water or groundwater interactions has been undertaken; no details have been provided as to how the tunnelling methodology will attempt to prevent ground settlement around the River Misbourne; and mitigation options have not been suggested if dry valleys close to the Chalfont St Giles and Amersham vent shafts flood. Your Petitioners request that the Promoter makes corrections to the methodology to ensure all impacts are accurately assessed, and ensures all impacts are mitigated.

Water: construction/operational impacts

132. Your Petitioners have a number of concerns in respect of the proposal's impacts during construction and operation. For example, your Petitioners do not agree that pumps for surface water are appropriate. Similarly, your Petitioners do not agree that siphons for Ordinary Watercourse crossings are appropriate. Your Petitioners request that alternative options are considered, and if pumps and/or siphons are used, evidence of why alternative options have been disregarded is provided.
133. Your Petitioners are concerned about the loss of hedgerows which will adversely impact the flow of surface water. Your Petitioners request that further mitigation is required for the loss of hedgerows, and this should focus specifically on planting more hedgerows.
134. Good water management design should look at whole catchments. Your Petitioners are concerned that the design and location of water management features including drainage areas, flood compensation areas, diversion channels, and drainage channels appears to have been designed in a piecemeal basis. Your Petitioners request that the Promoter considers river and drainage area basins, and designs water management according to sustainable principles, considering the flow of water, geomorphology, and ecology on a catchment basis. The design, impacts and interactions across the whole catchment should be considered and given a high weighting. When designing drainage channels, sustainable design principles taking account of flows, flood regime, geomorphology and sediment transport should be considered. In all cases, design should take the opportunity for ecological enhancement.

Water: maintenance, monitoring and enforcement

135. In your Petitioners' view, the promoter has failed to consider adequately future maintenance requirements of water infrastructure. A number of examples show land (i.e. with a new balancing pond) being returned to the existing landowner, however no mechanism for payments or methodology for maintenance has been suggested. Your Petitioners request that the Promoter covers all maintenance and management costs for all new infrastructures indefinitely, and a maintenance plan setting out how this will take place is drawn up in agreement with all stakeholders.
136. Your Petitioners are concerned about the lack of assurance that monitoring and maintenance will take place. Your Petitioners therefore request that the Promoter provides a monitoring and maintenance plan setting out the ongoing monitoring and maintenance that will be carried out. This should include both a groundwater and surface water monitoring plan, and

indicators to show if objectives and mitigation measures have been successfully achieved. It should set out the measures that will be taken if these indicators are not achieved, and should cover both mitigation areas, and areas where mitigation has not been carried out but will be affected by HS2. Details of funding should also be included in the plan. The monitoring plan should be prepared in consultation with, and subject to agreement of, statutory undertakers, local authorities and other relevant bodies.

137. Due to the lack of evidence that mitigation compensation will be carried out, your petitioner requests that the Promoter provides details of enforcement options available if the Promoter does not carry out all of the agreed mitigation and compensation.

Part 2: General

Production of a waste strategy

138. Your Petitioners require the promoter to produce a waste strategy that promotes waste prevention and safeguards existing waste management capacity within Buckinghamshire.
139. This strategy must be comprehensive and recognises that the greatest environmental benefits and cost savings will be delivered by producing less waste in the first place and one that includes a wide range of re-use and recycle options for unavoidable waste.

Contaminated land

140. The proposed works include a railway cutting immediately adjacent to the operational Calvert Landfill site and will require excavation into what is expected to be natural ground. There is, however, the potential to encounter landfilled materials and caution should be taken when undertaking these works. If such material is encountered there is also the potential to come across ground (landfill) gas and leachate.
141. Your Petitioners respectfully request your honourable House to require that the Nominated Undertaker should inform your Petitioners and the Environment Agency immediately if such material or ground gas is encountered. Also, if it is necessary to install ground (landfill) gas and leachate control systems at this area to ensure that ground (landfill) gas and leachate migrations pathways are controlled and do not adversely affect the proposed scheme or the wider environment as a consequence of the proposed scheme then such a system must be installed during the construction of the proposed scheme and all details of the system must be submitted to your Petitioners for approval.

Recouping other authority costs

142. Your Petitioners note that the Bill and the supporting documents adopt similar regimes to those which were established for the construction of the Channel Tunnel Rail Link and Crossrail. In addition to the CoCP, mentioned above, the regime will include the agreement of local area management plans (“LEMPs”). Your Petitioners will wish to ensure that the CoCP is complied with properly, and in that respect, your Petitioners will incur a great deal of expenditure. Your Petitioners wish to ensure that all of their reasonable expenses in monitoring construction sites are met by the nominated undertaker, together with expenditure incurred by your Petitioners in planning and programming activities related to the CoCPs and in enforcing them.
143. As part of this alternative consent regime, your Petitioners must be able to recover from the promoter of the Bill or the Nominated Undertaker their full costs of processing any applications. Your Petitioners note that the Bill provides the Secretary of State with the power to make an order relating to the payment of fees to the local planning authority in respect of requests for detailed planning consent. Your Petitioners are pleased to note this, but seek assurances from the promoter of the Bill about the level of those fees and the ability of the promoter of the Bill to cover their costs of dealing with all applications, not just those directly related to the planning provisions in the Bill, and taking enforcement action where necessary.

Traffic authorities and street works

144. Under clause 3 of and Schedule 4 to the Bill the Nominated Undertaker may stop up and otherwise interfere with various highways in connection with the authorised works. Schedule 4 disapplies a range of highways and street works legislation. The proposed removal of these controls over such a major series of highway works has the potential to render your Petitioners powerless in its ability to manage its own highway network. For example, there would be no powers available to your Petitioners under section 74 of the New Roads and Street Works Act 1991 to charge for the occupation of the highway where works are unreasonably prolonged. The key principle in the street works legislation contained in the 1991 Act is to provide for coordination and parity across street works undertakers. The proposed disapplication of these provisions would remove this principle and the replacement arrangements proposed under the Code of Construction Practice between the relevant

highway authority and the Nominated Undertaker will have no sound legal or contractual basis. Your Petitioners are particularly concerned about set down fees which other developers may impose on your Petitioners should the Promoter / Nominated Undertaker stipulate that their street works take precedence over existing authorised and programmed works.

145. Therefore your Petitioners seek an amendment to the Bill omitting or qualifying the disapplication of the 1991 Act and other relevant highways and street works legislation.

Business rates relief

146. Your Petitioners' area is one of the most prosperous, productive and entrepreneurial parts of the UK. The economy is worth £11.8 billion per annum, with 29,485 businesses offering 218,600 jobs. There are more than 3,100 businesses within 3km of the HS2 route, meaning that up to ten per cent of Buckinghamshire firms could be severely impacted by both the construction and operational phases of the project, not least from changed traffic patterns and flows.

147. Your Petitioners submit that business affected by the construction and operation of the project should be entitled to business rates relief. Your Petitioners should subsequently be compensated by the promoter or Nominated Undertaker for the impact on its revenue.

Land: acquisition of council land

148. A great deal of land in the ownership of your Petitioners is liable to compulsory acquisition under clauses 4 to 9 of the Bill. The limits of deviation and of land to be acquired and used are drawn very widely in certain cases and your Petitioners are unsure in every case as to why that is. Your Petitioners may seek undertakings from the promoter of the Bill that the extent of compulsory purchase should be limited in certain cases either geographically or so that acquisition and use of your Petitioners' land is on a temporary basis only. Your Petitioners also wish to ensure that they are properly compensated as respects the acquisition and use of their land, and are concerned to note that by virtue of clause 9 of the Bill the subsoil of some of their highway land can be taken and used by the Secretary of State without the need for him to acquire it.

Provision of information and consultation

149. Your Petitioners have serious concerns over the provision of information supplied by the promoter of the Bill, both prior to the deposit of the Bill and up to the date of the deposit of this petition. This has meant that thorough and detailed assessments of the proposed project, its impacts and benefits have been impossible to compile. Your Petitioners are concerned that requests for further information and responses to specific requests remain outstanding. In particular, your Petitioners are still to be satisfied about the adequacy of the Environmental Statement. Baseline assumptions made over a number of generic issues have still to be substantiated. Ancillary documentation such as the proposed Code of Construction Practice remains in a draft form which is neither acceptable in principle, nor in its presumptions, proposals and extent of detail.

Planning: conditions

150. Clauses 19 to 23 of and Schedule 16 to the Bill put in place an alternative regime for planning permission, overriding many of the controls ordinarily operated by your Petitioners as local planning authority. Your Petitioners are concerned that this process, supplemented by the Environmental Minimum Requirements, does not give your Petitioners as a local planning authority significant time to make proper decisions on what may be very significant items of development, including stations and depots. As such your Petitioners seek an undertaking from the Promoter that in respect of specified significant development proposals (including all stations and depots, and any proposals that will be subject to public consultation and consideration by your Petitioner's planning committee), the relevant determination period shall be 13 weeks.

151. Your Petitioners have similar concerns that the technical approvals process as proposed in the Bill and its supporting documents, which allows for 28 days for approvals, does not give your Petitioners as a relevant local authority sufficient time to give appropriate consideration to what may be highly complex approvals. Your Petitioners seek an undertaking that complex items of work will be subject to long approval periods than 28 days, such periods to be agreed with your Petitioners.

152. Your Petitioners have already noted that the planning regime set out in the Bill is very similar to that contained in both the Channel Tunnel Rail Link Act 1996 and the Crossrail Act 2007. However, there is one significant difference that causes your Petitioners considerable concern, namely sub-paragraph 6(6) of Schedule 16 to the Bill. That sub-paragraph says that the relevant planning authority may impose conditions on approval of arrangements only with

the agreement of the nominated undertaker. This tautological provision could render the planning authorities unable to impose conditions and should be struck from the Bill. Your Petitioners' concern applies to any other provision in the Bill in which authorities are given powers to impose conditions or other matters, only with the agreement of the nominated undertaker.

Socio-economic: tourism

153. Tourism is critical for your Petitioners' area, providing 20,000 or 8.9% of jobs. The AONBs are particularly significant tourist attractions as are the area's cycling and walking routes, which have a significant positive impact on your Petitioners' economy. For instance, users of the Chilterns Cycleway spend an average of £71 each a day when they visit, and visitors to the Chilterns AONB (last estimated in 2007 as 55 million leisure visits per year) contribute £471.6m to the economy.
154. The project will have a major visual impact across your Petitioners' area. Its reputation as a tourist destination could be damaged forever, as access to both the Chilterns Cycleway and Ridgeway may be disrupted during construction. Wendover and Great Missenden will suffer intrusive visual impacts and access to facilities, such as Wendover Woods, will be hampered, further reducing footfall. Public transport users, cyclists and walkers spend more in the local economy than visitors who drive, so frustrating access to the countryside will reduce use by the groups expected to spend most. Other detrimental effects have been described in your Petitioners' response to the ES and in correspondence and meeting with the promoter.
155. Owing to the significance of tourism to Buckinghamshire, your Petitioners consider that the promoter of the Bill should be required either to provide replacement facilities where community assets are lost and / or to establish a community fund which should be made available for the providers of community facilities in their area as a means to offset the environmental damage that will be caused to the inhabitants of your Petitioner's area, in the absence of any gain.

Socio-economic: compulsory acquisition of land for regeneration or relocation (clause 47)

156. Your Petitioners have specific concerns about clause 47 of the Bill. It provides the Secretary of State with power to acquire land compulsorily if he considers that the construction or operation of Phase One of High Speed 2 gives rise to the opportunity for regeneration or

development of any land. Your Petitioners are particularly concerned about this clause because land which is in its area lies in close proximity to the railway. There are already adequate powers of compulsory acquisition in other legislation, notably the Town and Country Planning Act 1990, to enable compulsory purchase powers to be exercised by local authorities. This new power is unqualified, meaning there is nothing in the Bill that would ensure it is only used as a matter of last resort, and your Petitioners are concerned that the existence of this power significantly undermines their own role in promoting the regeneration of its own local authority area. Your Petitioners do not understand why this clause is required at all and believe that it should be removed from the Bill or be dis-applied from their area.

Socio-economics: impact of highway works on economy

157. Your Petitioners are concerned that there appears to be no reference within the ES to the cumulative effects of construction on the ability of transporters of goods and providers of services to use the highway network during construction. The network will be impacted by increased construction traffic, road closures, diversions and other traffic management measures. Such impacts can have an effect on the local economy by impeding the free flow of such goods and services. Your Petitioners requires an assurance that the promoter will consider these cumulative impacts and provide clear detailed information on how this will be addressed when they implement highway measures under the powers of the Bill.

Emergency services: resources and training

158. Your Petitioners submit that the emergency services will need resources and training to deal with any accidents within the new infrastructure being created by the scheme.

Construction: proper provision for workers

159. There will be a number of construction sites in the county, some of which will accommodate workers overnight. Your Petitioners do not consider the provisions of the Bill, and in particular Schedule 16, provide your Petitioners with sufficient control over their location and how they will operate. Proper provision needs to be made for construction workers' accommodation that does not overwhelm smaller rural communities or result in anti-social behaviour, or have an undue impact on landscape or lead to significantly increased levels of traffic generation on

rural roads. Your Petitioners respectfully ask your honourable House to require the Promoters to enter into an undertaking that accommodation arrangements, including their scale and detailing and plans to revert them back to their original state will be agreed with your Petitioners following meaningful consultation.

160. The ES sets out which camps will be used as sleeping accommodation and which will not. Your Petitioners respectfully ask your honourable House to require the Promoters to enter into an undertaking that those not described as being used for overnight will not be.

Heritage: listed buildings and features of architectural significance

161. The district councils within your Petitioners' area are responsible for a number of important functions and are under certain duties as respects listed buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990. A number of listed buildings within your Petitioners' area are liable to be adversely affected by the proposals under the Bill. These include important Grade I buildings for example, Waddesdon Manor, Claydon House and others all in either residential or business use. Your Petitioners are concerned to ensure that the impact on all listed buildings is minimised and that demolition is carried out only as a last resort.

162. It is important to emphasise the richness of the heritage in your Petitioners' area. There are many listed buildings that could suffer serious negative impact. Demolition of any such building would only result in a net loss to the heritage of your Petitioner's area. Proper safeguarding measures should be carried out to all listed buildings and buildings within conservation areas, having particular regard to their special interest and special interest should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas in accordance with the said 1990 Act. Where appropriate, your petitioners request that the promoter gives proper consideration to reusing the materials to rebuild the structure or building in an alternative location. Your Petitioners are also concerned about the impact of construction works and permanent new buildings on the setting of existing listed buildings and their environs. All such works and buildings should be designed sympathetically with special regard to their impact on the surrounding areas.

Heritage: archaeology

163. Your Petitioners are concerned by the impact that the scheme will have on the cultural heritage assets within Buckinghamshire. Your Petitioners recognise that this is an opportunity

to undertake important archaeological investigations but wish to ensure that this is done in the correct way. Therefore your Petitioners ask the house to consider the following amendments to the proposed scheme.

164. Your Petitioners consider that insufficient field work has been carried out to assess the archaeological impact of the proposals. Your Petitioners have a deep concern about commitment to, and timing of, further archaeological investigations to inform the appropriate mitigation that is missing from the ES. Your Petitioners consider that promoter should complete a programme of preliminary archaeological investigations as soon as possible to inform the mitigation strategy. A timescale is required showing exactly when surveying will be carried out. The promoter must commit to undertaking all surveys.
165. The ES lacks sufficient information about heritage investigations and arrangements for public access to archaeological investigations. A coherent strategy is required outlining the provision of information in respect of these points, together with a commitment to the dissemination of the results in appropriate ways.
166. The ES does not contain detail on which approved repositories are able to accept and curate the artefacts and documents resulting from further investigations. This information is required within the overarching Written Scheme of Investigation. Your Petitioners request that any curation and display occurs within a suitable location within Buckinghamshire, for example, in a dedicated museum whose management would be funded by the promoter.
167. Your Petitioners are concerned over the dumping of spoil on significant sites. Excavated spoil material should not be dumped on designated or significant undesignated heritage assets or landscapes. The promoter should undertake to ensure this is the case, and ensure areas identified for the disposal of spoil are investigated archaeologically in advance of the ground work phase of construction.
168. The location and scale of the development compounds have not been fully disclosed. The promoter should ensure that these are archaeologically investigated prior to the ground work phase.
169. The Nominated Undertaker should provide adequate opportunity and funding for archaeological investigation in respect of each of the construction and work sites in your Petitioner's area, for example works affecting Stoke Mandeville Old Church Site. In your Petitioners' submission the appropriate authority should be required to agree a programme of

such work with your Petitioners and English Heritage. Your Petitioners also submit that the funding of this should be borne by the Nominated Undertaker and the remains should be housed in a permanent new store within the parish and made available for future research.

Heritage: specific local issues

170. Doddershall deserted medieval village would be greatly affected by the current plans for the line. The construction of the line would destroy a proportion of the extant village earthworks, and the designation in the ES of a further 60 per cent of the deserted village is 'required for construction' along with further areas designated for 'habitat creation' would also have a detrimental impact on the village. Your Petitioners request that suitable mitigation and or compensation is provided and that your Petitioners are consulted on the proposed mitigation and compensation.
171. Grims Ditch is an Iron Age bank and ditch significant as a long cross-county linear feature. It runs from just behind Cottage Farm, off the Wendover Road, past Three Bears Cottage, to the crest of the hill slope just above the line of HS2. It is likely that the end third of this section will be obliterated. Your Petitioners request your honourable House to require the Promoters to ensure that the Ditch is subject to the terms of a heritage deed, and in particular that it is properly recorded before its destruction.
172. The site of the former medieval and post-medieval parish church and churchyard of St Mary's, Stoke Mandeville will be completely destroyed by construction of HS2. The site should be fully excavated prior to the ground work phase of construction. There is potential for gaining significant archaeological information about a complete medieval village population. HS2 Ltd should be required to make a commitment for detailed scientific analysis, full publication and archival storage following excavation. Your Petitioners also request that the creation of a 'Stoke Mandeville Legacy Garden' is implemented. This would contain the new store noted above together with recovered gravestones and significant architectural fragments from the old church, and be set in land where a new wildlife area could eventually be created to replace that lost within the area. All of this should be funded by the promoter.
173. Near Calvert there is a small corrugated metal Tabernacle (between the bus shelter and the Old Station House). It appears that this building will be demolished but it is not referenced at

all in the ES. This is the oldest building in Calvert and was provided for brick workers as their Methodist Chapel. Although the building is not of such quality that it should be listed, your Petitioners suggest that it should be noted in the heritage baseline survey and fully recorded prior to any demolition in accordance with level 3 of the English Heritage publication "Understanding Historic Buildings". If practicable, your Petitioners also suggest that the Tabernacle should be relocated to the nearby recreation ground

174. Your Petitioners are concerned about the impact the scheme will have on the grade one listed medieval church at Chetwode and the grade one listed Twyford St Mary's Church. These are important heritage and community assets which will be directly affected by the scheme. The promoter must work with Church Officers and with the Church Buildings Council to mitigate the impacts (especially sound, noise and vibration). This should include significant compensation for long term maintenance.

Heritage: general

175. Your Petitioners are concerned that the historic environment information included in the ES is not suitable for devising appropriate mitigation. Further studies must be undertaken to ensure that mitigation is based on complete and accurate baseline data. The full mitigation strategy must be agreed with the relevant local authority.

176. The cumulative impacts of the proposal on the setting of historic assets have not been fully addressed within the ES. There is insufficient assessment of the visual impacts of the scheme on the setting of historic assets within the wider landscape. The promoter should undertake further studies to ensure that all visual impacts on historic assets are considered. The promoter should ensure that cumulative impacts are considered in detail, particularly given the scale of the proposal.

Heritage: viability of heritage assets

177. Your Petitioners are concerned that the impact of the works will be so detrimental on some listed buildings and other heritage assets that are close to construction sites or the railway

itself that they may become unoccupied, or in the case of business occupiers, unviable. Your Petitioners have seen this happen before in relation to road schemes. Your Petitioners request your honourable House to require the Promoters to take responsibility for the upkeep of such buildings which fall into disuse or disrepair, or take other measures, where it can be demonstrated that the reason is the proximity of a construction site or the railway. Your Petitioners would like to enter into discussions with the Promoters as to how this could be achieved. The process should, in any event, involve pre-construction and post-construction surveys of the viability of the buildings in question in relation to potential uses.

Heritage: setting of heritage assets

178. Your Petitioners are also concerned about the impact of construction works and permanent new buildings on the setting of heritage assets and their environs. All such works and buildings should be designed sympathetically with special regard to their impact on the surrounding areas and the significance of these assets. This matter is to be subject only to the Environmental Memorandum, which currently takes no specific account of heritage. Your Petitioners suggest that it should more properly be accommodated in the scope of the Heritage Memorandum, with clear declaration of the intention to minimise harm, and provision to consult with local planning authorities in timely manner before design details are finalised.

Heritage: heritage deeds

179. Your Petitioners generally welcome the proposed use of heritage deeds in substitution for statutory controls and the principle of a Heritage Memorandum to set out the Promoters' commitments to the historic environment. However, your Petitioners have identified a number of deficiencies in the current drafting in both documents, which are under discussion with the Promoters. Your Petitioners may ask your honourable House to make recommendations about the drafting of the deeds if they cannot be resolved before your Petitioners appear before the select committee of your honourable House.

Design: Standards and Quality

180. Your Petitioners have concerns about the design standards that will be applied in relation to the works to be constructed across the county. Your Petitioners respectfully ask your

honourable House to require the Promoters to enter into an undertaking to ensure there will be a design review, by a recognised independent design review panel, of main structures, earthworks and landscape (including major cuttings and embankments, viaducts, bridges, noise barriers, tunnel portals, ventilation shafts, maintenance depots and the landscape proposals associated with them). This could be modelled on the body that was set up for the Olympics or that recently set up by Network Rail. The undertaking should also provide that a design code or design manual will be prepared, with the agreement of your Petitioners and the other local planning authorities along the line of the proposed railway and for it to be reviewed by a recognised independent design review panel

Design: integrating works into existing landscape

181. Your Petitioners are concerned that the works authorised by the Bill will be completely alien to the landscape character of your Petitioners' area, particularly in rural and semi-rural locations. The commitments contained in the draft Planning Memorandum relate to the processing of detailed approvals rather than actual design. It is recognised that there is an apparent commitment that individual elements of the project, such as major bridges, viaducts, and ventilation shafts will be designed to ensure that they are in keeping with the local landscape and that detailed design, materials and finishes will be subject to approval by the local planning authority under the provisions of the Bill. However the ability to "impose" conditions is subject to the agreement of the Nominated Undertaker, so is not an ability to impose conditions at all, and the combination of all these factors does not amount, in your Petitioners' view, to a strong enough commitment to really working on a locally appropriate design solution. For example, your Petitioners wish to discuss design that facilitates the minimisation of land take by using fully retained cuttings and lowering the track depth, where appropriate, to reduce noise, light pollution and visual impacts. Your Petitioners respectfully ask your honourable House to require the Promoters to enter into an undertaking to work with your Petitioners and other local planning authorities to agree detailed proposals and on how the agreed "generic" design principles mentioned above will be applied to reflect local distinctiveness.
182. Your Petitioners request that special consideration is given to the integration of the autotransformer stations into the landscape, given their size and the unlikelihood of being able to significantly alter their design without compromising their function. Where design

cannot be altered, mitigation must be provided to address the autotransformers' visual impacts and to integrate this infrastructure into the local landscape character.

Design: green bridges and tunnels

183. Although your Petitioners support the case for a fully bored tunnel through the Chilterns Area of Outstanding Natural Beauty ("the AONB"), they welcome the provisions in the Bill for green bridges and tunnels and would respectfully submit that if no tunnel is provided there should be further green bridges. These need to be designed in a way that makes them worthwhile. Your Petitioners respectfully ask your honourable House to require the Promoters to enter into an undertaking that, where there will be benefits for wildlife and landscape, green bridges and tunnels will be designed to be capable of supporting growth of native trees and shrubs to maturity. The design of crossing points must also be fit for the purpose of each case and not compromised by multi-functionality (for example landscape or ecological mitigation works being used to accommodate diverted roads).

Ventilation and escape shafts: general

184. It is proposed that there will be ventilation and escape shafts at various locations in the county. Your Petitioners fully accept that an underground railway requires ventilation and escape shafts. However, the proposals for such shafts need to be considered carefully in consultation with your Petitioners and in particular your Petitioners should, in their respectful submission, be entitled to prescribe requirements as to the design and external appearance of the shafts, their precise location and relationship to existing buildings, etc. and the extent to which the environmental impacts should be reduced to an acceptable level.

185. In particular, all such shafts must be subject to a fixed upwards vertical limit of deviation and must not be able to be constructed under the powers of clause 2 of the Bill. Given that the vent shafts are located in very different areas, it is important for the specific impact of the proposal to be considered in that local context and not just a route-wide standard. Your Petitioners would therefore expect exceptional design standards including but not limited to green roofs, visually sympathetic signage and security measures, use of local sustainable materials and the smallest footprint possible. Consideration should be given to lowering the line so that the shaft structures can also be lowered in height as far as possible.

186. Other concerns relating to the ventilation shafts are as follows:

- (a) given the sensitive nature of the areas in which the shafts are to be located, your Petitioners wish to ensure that the proposed above ground structure causes minimal visual impact;
- (b) your Petitioners seek assurances that the number of trees lost will be kept to a minimum and any that are lost should be replaced with mature trees;
- (c) the Nominated Undertaker should have regard to the operational noise levels of the ventilation shafts as to not negatively impact on the community.

Minerals and Waste

187. As the minerals and waste planning authority for its area, your Petitioner is concerned that:

- (a) inert waste arising from the HS2 construction works should be re-used on site wherever practicable and that, where it cannot be so re-used, transportation routes and disposal sites are agreed with your petitioners
- (b) appropriate provision is made, including necessary forward planning, for mineral extraction to meet the demands of the construction of HS2; and
- (c) the exploitation of minerals in the county is not unduly compromised or prejudiced by HS2 construction activities.

Air quality and dust

188. Your Petitioners are concerned about the wider impact of construction related activities on the public realm, for example the impact that dust generated from worksites would have on properties in the vicinity. Property maintenance would need to be carried out on a more regular basis. Your Petitioners submit that the cost of this should be borne by the promoter. This is particularly important for the buildings in conservation areas.

189. Your Petitioners submit that all worksites should be screened to reduce the visual impact of the sites upon the residents and businesses within your Petitioners' area, as well as to help reduce the impact of noise and dust from the worksites. Your Petitioners request that they should be consulted upon the design and structure of the planned screens for each worksite so as to ensure, as far as possible, that the screens are effective and do not impact upon the

local amenity. Particular consideration should be given to crop loss and livestock affected by dust and appropriate mitigation provided.

190. Effective mitigation measures against noise, dust, dirt and light pollution should be provided for residential premises located in the vicinity.

191. Your Petitioners are very concerned that the true air quality impacts have not been adequately assessed by the Promoters both from direct and indirect sources. Your Petitioners question the adequacy of the methods used, the lack of any actual monitoring data and also the validity of the inputs used which are not presented in the ES. In particular:

- a) the Promoters appear not to have undertaken any air quality monitoring and have not adequately utilised existing monitoring data to consider localised hotspots, existing failures of air quality standards and also areas that are reaching the thresholds to become an Air Quality Management Area (“AQMA”)
- b) the impact through road closures, rat running and diversion of localised traffic is not adequately assessed;
- c) the impact of the loss of trees and vegetation in relation to existing air quality has not been considered;
- d) cumulative traffic impacts are not adequately considered, nor have preparatory and utility works.

Your Petitioners ask your honourable House to require the Promoters to provide assurances and undertakings that would alleviate your Petitioners’ concerns, including but not limited to the following:

- a) an undertaking to use bio screening or green walls to reduce particulate levels around construction zones and the additional planting of species that specifically remove air pollutants from ground level;
- b) an undertaking to fund or undertake additional comprehensive monitoring in relation to nitrogen dioxide and particulates before any preparatory works commence, during and after construction;
- c) an undertaking to contribute towards Air Quality Action Planning across the County and in particular, funding actions that reduce the impact of transport related pollution

- d) an undertaking to carry out air quality offsetting in a similar way to biodiversity offsetting.

Diversion and reinstatement of high voltage power lines and pylons

192. The ES describes the diversion of high voltage overhead power lines. Your Petitioners request that the opportunity should be taken to remove overhead power lines and pylons and place diverted lines underground. This would result in a beneficial landscape impact and should apply to all instances throughout the route where such power lines are affected. The proposed scheme does not provide for underground lines and the diversion of overhead power lines and consequent increase in number of pylons in some instances has not been adequately assessed. The National Grid has released a “Visual Impact Provision” report showing a commitment to tackling the impacts of existing lines.

Noise: interpretation of the national planning policy framework noise guidance

193. Your Petitioners have worked closely over the last few years with other local authorities affected by the proposed construction and operation of the railway and there are concerns shared by many of those authorities and upon which common ground has been reached. One of these is a concern that the assessment of the potential noise impacts within the ES has not been conducted on a basis that is consistent with relevant national policy. There are a number of material aspects of the ES appraisal framework which are not consistent with national noise policy. With reference to the Noise Policy Statement your Petitioners are of the view that the Lowest Observed Adverse Effect Level (“LOAEL”) and the Significant Observed Adverse Effect Level (“SOAEL”) may not have not been correctly identified. These terms are adopted in the Government’s planning guidance on noise. The guidance links them directly, in increasing severity, to four levels of effect:

- a. effect;
- b. adverse effect;
- c. significant adverse effect; and
- d. unacceptable adverse effect.

194. Your Petitioners are concerned that that the Promoters may not have mapped this clearly onto the EIA methodology and as a consequence may have underestimated significant adverse effects. As a consequence, your Petitioners have concerns that the proposed noise and vibration mitigation may not be adequate. In the context of planning guidance, your Petitioners are concerned about the adoption by the Promoters of LOAELs and about the SOAELs that are standardised across the route, irrespective of the local circumstances. As a result, your Petitioners are concerned that this project could set a precedent in determining LOAELs and SOAELs which could impact on your Petitioners' ability to control future planning applications. These concerns are shared by other local authorities on the HS2 route.
195. Furthermore, the adoption of a route wide system of LOEALS and SOAELs appears to go against the guidance on application of the National Planning Policy Framework, which recommends that the existing noise climate around the site of the proposed operations, including background noise levels at nearby noise-sensitive properties, should be assessed. Your Petitioners suggest that the Promoters should be required to follow that guidance.

Noise: basis of LOAEL

196. From the Health Impact Assessment published alongside but not as part of the ES it can be seen that the LOAEL set by the Promoter is based partially on dose response curves related to annoyance. These curves are based on the total noise experienced not just the noise from a particular source.
197. In addition, the method of identification of significant effects in relation to individual and small groups of properties means that a significant effect will only be identified where SOAELs set by the Promoter are exceeded. Below the SOAEL the method will not enable consideration of a change in noise levels (even though it has been assessed as a possible impact). Your Petitioners are concerned that when assessing significance for individual dwellings the Promoters do not take change in levels into account. The Council has concerns regarding the assessment methodology for operational airborne and groundborne noise. According to the Promoter's methodology, individual or isolated properties are only identified as automatically constituting significant effects in their own right when certain absolute noise levels, set as SOAELs, are exceeded. The Council is concerned that between the LOAEL and SOAEL the Promoter's approach to determining significant effects relies on judging the proportion of a community or clusters of properties subject to adverse impacts, and as such isolated or individual properties are automatically disadvantage.

Noise: mitigation proposals

198. Your Petitioners have concerns in relation to the noise mitigation proposals put forward by the Promoters in the ES. The mitigation proposals have been designed on the basis of a timetable where the maximum speed is 360 kilometres per hour, yet the railway is designed to accommodate speeds of up to 400 kilometres per hour. In Appendix 5 to the ES, the fact that these higher speeds will generate higher noise levels is recognised by the Promoters. Your Petitioners seek an undertaking or assurance from the Promoters that should the project become operational, a fresh assessment of sound noise and vibration effects be carried out to demonstrate that such effects are no greater than those predicted in the ES. Your Petitioners consider that the Promoters should compensate local authorities for the cost of checking compliance with noise and vibration design standards.

Noise: use of 16 hour LAeq

199. Whilst it is accepted that the Promoters' use of a sixteen hour day time LAeq is standard practice, your Petitioners are concerned that this may mask the significance of impacts generated by the project in the evening when residents in your Petitioners' area have a reasonable expectation of peace and quiet and in the early morning. This principle also applies to the Promoters' use of an eight hour night time LAeq. Indeed, HS2 trains will only operate for three hours of this period. Your Petitioners are concerned that smoothing the data over an eight hour night time period may mask the significance of impacts particularly in the period between 11pm and midnight when many residents are trying to get to sleep and five and seven in the morning when sleep patterns may be adversely affected. Your Petitioners would like a re-assessment in their area for daytime, evening and night time periods as well as a spate assessment of shoulder hour operation.

200. Your Petitioners believe that a practical way to mitigate this effect would be to apply a speed restriction to trains in the evening period. Your Petitioners ask your honourable House to require that the Promoters undertake that a speed restriction of 300km/h or less will be applied to all trains running through the county between the hours of 8pm and midnight. Furthermore, your Petitioners ask that the Promoters be required to carry out an assessment of the reduction in noise levels that would arise from reducing train speeds in the period from 8pm to midnight and 5am to 8am to a range of speeds between 275 and 300 km/h.

Noise: dBALmax night time criteria

201. Your Petitioners question the Promoters' proposal to use the 80/85dBALmax criteria to identify significant effects, at individual properties. World Health Organisation Night Noise guidelines and BS8233 both identify that an internal level of no greater than 45dBALmax is required to prevent sleep disturbance. For this standard to be achieved, the HS2 prediction model levels need to be reduced to 65dBALmax outside properties. Reducing this criteria would result in a significant number of properties within the Chiltern District (CFA9) being significantly affected. Properties thus identified as significantly effected should be reported to Parliament and where appropriate additional mitigation applied.

Noise: methodology used for significance criteria in construction phase

202. When considering sound, noise and vibration from construction your Petitioners' key concern is that the Promoters are using their consultant's method for setting significance criteria in relation to the provision of noise insulation and temporary re-housing. Your Petitioners are concerned that the methodology adopted by the Promoter for the identification of significant construction airborne noise impacts in certain baseline noise conditions. This is due in part to the rounding of baseline values and the Promoter's policy of presenting noise levels resolved on a monthly basis. The current methodology potentially hides significant effects that might arise if alternative methods applied on other recent major infrastructure projects were to be used. Your Petitioners do not believe that the mitigation provisions currently proposed for noise insulation under the ES are sufficient and wish to see the introduction of a discretionary noise insulation scheme under suitable control which would entail the Nominated Undertaker offering proper noise insulation to residents in appropriate cases.

Noise: barrier design

203. No proper information has been made available to your Petitioners about the design of noise barriers. Your Petitioners have a particular concern about this, because whilst barriers can be an effective way of mitigating noise, they can also be visually intrusive. Your Petitioners have some limited control over barrier design, but would also want the Promoters to ensure that local residents who will be significantly affected will have the opportunity to influence the barrier design.

Noise: ground borne operational noise and vibration

204. There are a number of buildings in the county which are above the proposed line of the railway or nearby and which are likely to be sensitive to noise and vibration during the construction period and when the railway comes into operation. These buildings include residential and commercial properties. Not only are there issues concerning the quality of life for residents, but businesses could suffer significant financial loss. Your Petitioners respectfully submit that the promoter of the Bill should be required to ensure that groundborne noise and vibration during the construction period is kept to an absolute minimum by the use of the most advanced tunnelling technology and machinery.
205. Your Petitioners are concerned that noise and vibration, while meeting design standards put forward by the Promoter of the Bill, may still be radiated into buildings to an unacceptable extent. In your Petitioners' submission the Nominated Undertaker should be subjected to stringent design standards and where the railway passes near to noise sensitive buildings the Nominated Undertaker should be required to install additional appropriate procedures and design methods to inhibit the transmission of noise and vibration into such buildings. In your Petitioners' submission, the Bill should also provide that the Nominated Undertaker should put in place a comprehensive consultation exercise with regard to noise and vibration monitoring. Such a scheme should be subjected to a compensation code where agreed noise and vibration standards are breached.

Noise: airborne operational: best practice

206. There are a number of buildings in the county which are near the proposed line of the railway or nearby and which are likely to be sensitive to noise and vibration when the railway comes into operation. Your Petitioners respectfully submit that the promoters should be required to ensure that airborne noise is kept to an absolute minimum by the use of the most advanced rail and rolling stock design techniques. Your Petitioners are concerned that the airborne noise standard does not represent current best practice in rail design and noise mitigation.

Noise: airborne construction and operational: standards and compensation

207. Your Petitioners respectfully submit that the promoters should be required to ensure that noise and vibration both during the construction period and afterwards is kept to an absolute

minimum by the use of the most advanced technology and machinery. Your Petitioners are concerned that noise and vibration, while meeting design standards put forward by the promoters, may still be transmitted into buildings to an unacceptable extent. Where the railway passes near to noise sensitive buildings the Nominated Undertaker should be required to install additional appropriate procedures and design methods to inhibit the transmission of noise into such buildings. Those standards should adopt your Petitioners' own best practice approach in relation to these matters. In your Petitioners' submission, the Bill should also provide that the Nominated Undertaker should put in place a comprehensive consultation and noise monitoring scheme and be subjected to a compensation code where agreed noise standards are breached.

Noise: operational: maintenance of track and rolling stock

208. Your Petitioners are concerned to ensure that high standards are met in terms of the lifespan and maintenance of the running tracks, trains and rolling stock. Appropriate standards should be incorporated in the contracts between the Secretary of State and the Nominated Undertaker to ensure that the Nominated Undertaker meets those standards, that rail grinding activities will be carried out at a minimum frequency consistent with ensuring that no significant deterioration in operational train noise will occur and the only 'state of the art' equipment is used. Your Petitioners request that the Promoter provides a long term lifecycle assessment of noise and vibration variation with time to enable an appreciation of the likely fluctuations either side of maintenance activity.

Noise and vibration: impact on listed buildings

209. There are a number of listed buildings in the county which will be affected by noise due to the operation of the railway. Your Petitioners anticipate that owners of these buildings will request the installation of double glazing and other noise proofing. Vibration impacts of train lines can also be felt at some distance away. Many historic buildings do not have deep foundations and as such are particularly vulnerable to damage from vibrations nearby.

210. No compensation package has been put forward to help owners to mitigate against noise in a manner which is appropriate for the significance and importance of their listed building, nor has any compensation package been put forward to support owners of buildings which may be found to be structurally compromised by the vibrations of the high speed trains.

Underpinning and repairing historic buildings can be extremely delicate and costly work, and so a system of financial aid and expert advice needs to be offered to mitigate.

211. Your Petitioners seek undertakings from the Promoters to alleviate their concerns, including undertakings that:

- (a) where listed buildings are exposed to noise levels requiring the installation of insulation measures that the solutions will need to be tailored to the buildings concerned and that compensation to property owners will need to be greater to reflect these non-standard costs;
- (b) where such works will require any element of the listed building to be removed or covered up, that full recording to the present building will be carried out before works take place;
- (c) your Petitioners' conservation professionals will be consulted on any specific proposals, and the mitigation or alleviation of harm to listed buildings.

Electro-magnetic interference

212. Your Petitioners are concerned by the prospect, during the construction and operation of the project, of electromagnetic fields adversely affecting electrical equipment and human health. Owing to this, your Petitioners request that the promoter or Nominated Undertaker produce a statement of the method which will be used to monitor electromagnetic fields before, during and after construction, and that such statement will be adhered to.

Environmental Statement

213. In accordance with the standing orders of your Honourable House, comments on the ES were invited in the newspaper notices that were published in accordance with the standing orders of your honourable House when the Bill was deposited. Your Petitioners, along with the district authorities located in Buckinghamshire – namely Aylesbury Vale, Chiltern, South Bucks and Wycombe – sent detailed comments to the promoter on the Bill and these have been the subject of a report by the independent assessor appointed by your honourable House. Your Petitioners are concerned about the adequacy and accuracy of the ES.

214. For instance, the ES contains a large number of inaccuracies which have led to an incorrect assessment of the 'worst case scenario'. This has meant that it has not been possible to conduct a thorough and detailed assessment of the project. Your Petitioners are particularly concerned that baseline assumptions have still not been substantiated.
215. Fundamental deficiencies in the Environmental Statement identified by your Petitioners include the following:
- (a) Your petitioners are concerned that the true air quality impacts have not been adequately assessed both from direct and indirect sources. There is a lack of any actual monitoring data and the validity of the inputs used are not presented in the Final ES. Existing data produced by local authorities has not been utilised.
 - (b) The lack of good quality Ecological surveys means there is no quality baseline data against which to assess the impacts of the proposal. Survey methods, the timing of surveys, the limited duration of surveys, and the limited number of surveys all contribute to the lack of reliable baseline data. Often poor quality surveying is acknowledged by HS2 Ltd, yet efforts to overcome this were lacking.
 - (c) Your Petitioners are concerned that significant effects from stationary and static noise sources have been "scoped out" of the ES. For example, this means that the noise from tunnel vent shafts has not been assessed. We are also concerned that the effect of the project on tranquillity in the AONB has not been properly assessed. A further concern is that the promoters have used a method to predict significant effects which masks possible disturbance in the evening and in the early morning when the train noise will be more noticeable.
 - (d) HS2's Transport Assessment within the ES does not follow Department for Transport guidance and we conclude that the Transport Assessment does not include sufficient detail to allow the impact of the scheme on Buckinghamshire's transport network to be properly considered and consequently mitigated. Therefore, the Transport Assessment does not show an accurate picture of the extent of the impact
 - (e) It is not clear how the high rates of recycling in the ES will be achieved. 128 million tonnes of waste will be generated by HS2 and HS2 Ltd say they will reuse 90%, with five million tonnes going to landfill.
 - (f) Your petitioners fundamentally disagree that HS2 have considered the true extent of impacts on flooding and water resource. The areas that are evaluated rely upon general assumptions and are covered only at a superficial level. There are a number of

waterways that cross the path of the proposed rail line and with the flooding several of these areas in early 2014 and the heightened risks identified by numerous authorities including the Environment Agency this is a major concern

- (g) Incompleteness of the historic environment baseline provided in the ES and the lack of assurance that sufficient time will be allocated for completion of this and for the execution of appropriate mitigation measures before construction commences.

216. Your Petitioners would request that an addendum to the ES be produced. In addition to addressing the points mentioned in the previous paragraph, it should –

- (a) Cover traffic modelling using local transport models, which would be agreed with local highways authorities;
- (b) Address the overuse of the qualifying terms “where practicable” and “where reasonably practicable” throughout the ES which, when used, indicates a lack of commitment to ecological mitigation;
- (c) Omit those public right of way links from the project for which an in-principle agreement had been reached with your Petitioners before the ES was deposited;
- (d) Address the fact that the project will cause significant temporary adverse effects on groundwater resources and yet no full mitigation plan has been prepared; and
- (e) Address the anomaly that even though the ES acknowledges an increase in traffic volumes and traffic displacement, it fails to link this adequately to an increase in air pollution.
- (f) Address the inconsistencies with the County Historic Environment Record information. Historic environment information included in the Environmental Statement documentation is not suitable for devising appropriate mitigation

217. Your Petitioners are also concerned that the assessment set out in the ES allows a number of permanent environmental and community impacts to remain unmitigated within your Petitioners’ area. For example, a number of important community assets are permanently lost to make way for the proposed works, including Hillingdon Outdoor Activity Centre, Ellesborough Road Cricket Club, Aylesbury Park Golf Course and part of Turweston Playing Fields. The Environmental Statement identifies the loss of each of these community assets as a major adverse impact. However, no mitigation (either in association with a specific asset or cumulatively) is proposed.

218. Moreover, the implementation of the proposed works will result in permanent impacts for which mitigation to “nil detriment” is not possible. For example, the railway will have a permanent adverse effect on the character of the AONB by introducing a predominantly raised, linear, urbanising feature, the screening of which through tree planting is also out of character with the local area. As such, the character of your Petitioners’ area will be permanently and negatively affected.
219. Further, the methodology applied in the ES in considering impacts on communities is considered by your Petitioner to be inadequate. It assumes that certain effects are unlikely to persist as communities will adjust to the presence of HS2 and it discounts certain receptors (e.g. for the purposes of reporting amenity and isolation effects, residential properties where the total number of dwellings affected is fewer than five, are not considered). The disaggregation of community effects in such a manner leads to a number of localised impacts being classed as minor, or ignored, and the cumulative impact of these effects throughout your Petitioners’ area is not considered.
220. It is vital that the deficiencies in the ES identified by your Petitioners are remedied by the promoter of the Bill, presumably by way of an addendum to the ES. One reason this is so important is that the Environmental Minimum Requirements, which have been produced by the promoter of the Bill in draft, contain important obligations which will fall on the Nominated Undertaker when constructing and operating the railway and a number of those obligations are specifically tied in to the ES and depend upon its accuracy.

Part 3: Local

Introduction

221. Your Petitioners are concerned by the following local issues that have not been covered in the technical paragraphs above. Your Petitioners request that the promoter changes the following issues within the Bill in order to provide appropriate mitigation and, or, compensation for the harm which will be caused.

Colne Valley

Colne Valley Viaduct

222. We note the view of the London Borough of Hillingdon that the railway should be constructed in a tunnel under the Colne Valley and concur that this would be preferred to the construction of a viaduct. However, should this option not be adopted then your Petitioners request that the Promoter provides the mitigation described below..
223. The viaduct would be a hard engineered and dominant structure and the Promoter has failed to assess adequately its impact on the Colne Valley It would be extremely intrusive when viewed from public areas such as local footpaths, the 'Colne Valley Trail', bridleways, the canal towpath and residential, leisure and commercial sites within South Buckinghamshire. Assuming there would be electric power lines and supporting structures and lighting, the impact would be even greater than shown in the Environmental Statement.
224. Your Petitioners request that the Promoters be required to pursue an international architectural competition for a world class design for the Colne Valley Viaduct which ensures that its impact on the locality, and the sensitivity of the Colne Valley, are essential components of its design. Appropriate mitigation should also be provided. For instance, your Petitioners request that an integrated landscaping scheme for the viaduct at both high and low levels should be provided, together with appropriate and effective measures for noise barriers. In terms of the wider landscape, your Petitioners request your honourable House to require that the promoters commission a detailed independent landscape assessment of the HS2 proposals which can form the basis of comprehensive proposals to ensure that the landscape character of the area is retained. Your Petitioners believe that the proposals as they stand make no provision to protect the landscape character of the area and provisions necessary for its protection have been omitted.

Recreation of facilities in the Colne Valley

225. The Hillingdon Outdoor Activities Centre (HOAC) has a 45-acre lake and provides water sports and land-based activities for all ages. HOAC is extensively used by sailing enthusiasts and schools from Buckinghamshire and further afield. It is run by a long-standing outdoor and environmental education charity, focussing on specialist activities for disadvantaged and disabled youth, serving well over 22,000 visitors each year. The promoter's scheme will essentially obliterate this site, with possession required from as early as mid-2015. Even if the promoter seeks to fund a temporary re-location of HOAC during the construction phase, the quality of the site and its fitness for purpose will be permanently lost. Therefore your Petitioners request that the promoter relocates the Centre to a suitable nearby location

paying for all costs that are required, with specific attention to the specialist activities which are difficult to relocate. Any new location must have comparable facilities to ensure no loss of the important services that HOAC provides. In the unfortunate event that it remains likely after that that HOAC's facilities will have to be closed, and that no suitable alternative location can be secured, your petitioners consider that it would be reasonable for HS2 Ltd to be required to compensate the landowner and HOAC fully for all losses incurred.

226. Denham Water Ski Club would also be adversely affected by HS2. The construction of the piers for the Colne Valley viaduct would require land to the north-east of the A412 Denham Way/North Orbital Road, off which the Denham Water Ski Club is accessed. The ES suggests that the construction works could be undertaken to enable access to be maintained to the water ski club through the implementation of traffic management measures. The nearby jetty used to construct the Colne Valley viaduct would require some land that forms part of the car park for the club. The clubhouse is used for instruction and tuition, as well as being the focus for events and the adverse noise impact and the damage to views to the south, west and north from the club of the construction activity for at least one and a half years will, as the ES acknowledges, significantly affect the club. In spite of these combined impacts, no mitigation is proposed in the ES. This is unacceptable to your Petitioners; proper mitigation must be supplied.

The Chalfonts and Amersham

Impacts on Amersham Hospital and Crematorium

227. Your Petitioners have particular concerns about the shaft and construction materials stockpile that are intended to be located in Amersham and are not convinced that the location next to Amersham Hospital and Crematorium is appropriate. The impact of long duration construction activities on Amersham hospital and the Chilterns Crematorium through dust and direct noise generation will be substantial and will negatively affect visitors and patients by virtue of the proximity of the site and its construction. These two sensitive receptors require peace and quiet in their surroundings which construction activities will disturb. This location is already close to a traffic hotspot with significant queuing at peak times. Your Petitioners ask your honourable House to amend the Bill so that the shaft and stockpile are relocated to another more appropriate site in the vicinity.

Central Chilterns

228. The Non Technical Summary within the ES (section 7.4) singles out South Heath as the only community in Buckinghamshire to suffer community-wide adverse effects “whereby a substantial number of local people are significantly affected by the construction of the project”. This statement should not merely be stated. Appropriate mitigation should also be agreed with your Petitioners.
229. In addition, your Petitioners have grave concerns due to the location of the scheme within an Area of Outstanding National Beauty. The promoter should ensure that the best possible mitigation is achieved. Your Petitioners therefore ask that the promoter adopts the measures put forward by your Petitioners with regards to the extended Chilterns Tunnel outlined in Part 1 of this petition.

Dunsmore, Wendover and Halton

Impact on Wendover Cricket Club

230. The Wendover Cricket Club is an important community asset. Your Petitioners request that any impacts on the club caused by the promoter should be properly compensated and mitigated against. If the club is unable to continue in its present location as a result of the scheme a new site should be paid for by the promoter.

Stoke Mandeville and Aylesbury

Proximity of HS2 to the west of Aylesbury

231. As the proposed railway passes to the west of Aylesbury, it will run close to relatively concentrated areas of housing including Coldharbour, Hawkslade, The Willows and Fairford Leys, and it will also cut through the end of the registered park and garden forming part of the National Trust property known as Hartwell House. Outside of London, your Petitioners believe this is the closest densely populated area to the line.
232. Your Petitioners share the concerns of the National Trust in relation to the adverse impact on Hartwell House and its gardens, and they support the proposal that the Trust is putting forward in its petition for a ‘land bridge’ at the place where the railway cuts through the gardens, and moving the proposed footbridge that would cross the railway nearby to a less

intrusive position. As well as providing protection for the House and Gardens, the 'land bridge' would also provide a better connection between Aylesbury and the area to the west of the proposed railway.

233. In addition to the 'land bridge', your Petitioners would also require some additional bunding to mitigate the effects of the railway on Aylesbury residents.

Bucks Goat Centre

234. The Bucks Goat Centre at Stoke Mandeville will be severely affected by the scheme. Your Petitioners ask that the promoter provides adequate mitigation and/or appropriate compensation in order to ensure that this valuable business continues without any negative effects on its commercial activities.

Maintenance Loop

235. Your Petitioners are concerned about the noise and light pollution impacts arising from the placement of a maintenance loop at Stoke Mandeville. It is the view of your Petitioners that the case for the loop's siting at Stoke Mandeville has not been made. HS2 Ltd has stated there is a need for a loop every 60 km. However, no cost justification in terms of efficiency benefits has been put forward by HS2 Ltd. Consequently, there is a potential £10m cost saving available if the maintenance loop is not built at Stoke Mandeville. The promoter should demonstrate a maintenance strategy which calls for maintenance loops. Even if this is proved then a saving could still be achieved by locating it in a more appropriate location which has the space and is closer to the maintenance need.

Aylesbury to Princes Risborough railway

236. The construction of the HS2 railway will have an impact on the Aylesbury to Princes Risborough railway. In particular there will need to be closures for construction works and potential conflict may arise between the regular passenger services and freight service movements that would need to carry spoil to the proposed "sustainable placement" site at Calvert. Your Petitioners seek assurances that any periods of closure of the line or reductions in passenger services will be kept to a minimum and for short periods and that infrastructure

improvements (for example a passing loop, upgrades to the ungated level crossing at Marsh and improved signalling) to facilitate the increased use of the line will be made.

Waddesdon and Quainton

Quainton Railway Centre

237. Your Petitioners are concerned about the impact of the proposed works on the Buckinghamshire Railway Centre in Quainton, which is a significant tourist attraction of importance to the local economy. The construction of the works will require the closure of a substantial part of the centre's parking area for up to 2 years, and the permanent reduction by 160 spaces (almost halving its capacity). In addition to the significant detrimental effect on this important tourist facility the loss of parking has clear potential to lead to widespread parking problems and other environmental effects on minor roads and verges around Quainton as visitors seek overspill parking. Your Petitioners request your honourable House to require the Promoter to ensure that proper provision will be made for replacement parking in an appropriate location on both a temporary and permanent basis, including if necessary making provision in the Bill for the taking any additional land.

Calvert, Steeple Claydon, Twyford and Chetwode

238. As mentioned above, the Bill makes provision for very significant works at Calvert, and in particular a new IMD and a very large area of what is euphemistically called "sustainable placement". There is also planning permission in place separately for a major energy from waste plant at Calvert, near to the proposed works as well as the construction of a new line from Oxford to Bletchley known as East West Rail. Your Petitioners are concerned about the cumulative effect of these proposals and in particular the disturbance that will be caused to residents in Calvert and Calvert Green. Your Petitioners seek appropriate mitigation to alleviate these impacts. In addition, there are a number of outdoor based businesses and amenities that require suitable mitigation and compensation for impacts, including the Greatmoor Sailing Club and Calvert Jubilee Reserve

239. Your Petitioners respectfully request your honourable House to require the Promoter to demonstrate that all the proposals and mitigation and landscape integration measures can all be accommodated within the land authorised to be acquired under the Bill, and in particular

accounting for land which will be required for East West Rail and existing developments in the vicinity or under construction (for example the energy from waste plant). As part of this, the Promoters should, in your Petitioners' respectful submission, be required to carry out 3-D modelling of the proposals.

Relocation of Energy from Waste Plant Rail Sidings

240. Your Petitioners are greatly concerned about the potential community impacts within Calvert. These concerns would be mitigated to some degree by the relocation of the proposed rail sidings serving the energy from waste plant to the south of Sheephouse Wood, and your Petitioners ask your honourable House to amend the Bill so as to make provision for that, taking into account the ecological mitigation that will be provided for the bat population and not compromising the functionality of other proposed mitigation measures proposed by your Petitioners. In addition, lighting at the proposed sidings must be low-level, designed to minimise light-spillage, and activity-initiated. The sidings must be screened by planted landscaping that will supplement existing proposals for habitat connectivity for bats in the wider landscape and linking to green tunnel or underpass crossing points. Vehicle movements from the sidings must be restricted so as to avoid sensitive times for bats to avoid disturbance.

Use of the new Calvert Access road

241. The Promoters propose to use an access road in Calvert that has been provided for the new Energy from Waste ("EfW") plant that is being built. This is a single track road with passing places which has been constructed along an environmentally sensitive corridor. The EfW planning permission conditions imposed a traffic restriction limiting the number of HGV movements via the New Calvert Access and required the developer to provide and manage extensive long-term bio-diversity habitats along the entire route. Your Petitioners are concerned about the impact from additional HS2 HGV movements in an already sensitive area that has traffic movement conditions imposed on existing developers. Owing to this, appropriate mitigation or alternatives must be agreed with your Petitioners, the company running the EfW plant and local communities.

Newton Purcell to Brackley

Turweston Playing Fields

242. The construction of the Authorised Works will result in the loss of the recreation ground at Turweston. The ground is an important local facility for your Petitioners' residents. In addition, there will be adverse effects on residents arising from the cutting that is proposed in the village. Whilst this deep cutting will undoubtedly reduce noise and visual impact in the wider landscape it will still have a substantial adverse landscape impact.

243. To mitigate these effects further, your Petitioners ask your honourable House to amend the Bill so that the Turweston green bridge or green tunnel should be extended in a north-westerly direction to allow for the reinstatement of the recreation ground and reduce the harm to the landscape setting of the village. At the very least, a replacement for the recreation ground must be provided in advance of its removal.

Westbury Cricket Club

244. The Westbury Cricket Club is an important community asset. Your Petitioners request that any impacts on the club caused by the promoter should be properly compensated and mitigated against.

General

245. There are other clauses and provisions in the Bill which, if passed into law as they now stand, will prejudicially affect the rights and interest of your Petitioners and other clauses and provisions necessary for their protection and benefit are omitted therefrom.

YOUR PETITIONERS THEREFORE HUMBLY PRAY

your Honourable House that the Bill may not pass into law as it now stands and that they be heard by themselves, their counsel, agents and witnesses in support of the allegations of this petition, against so much of the Bill as affects the property, rights, and interests of your Petitioners and in support of such other clauses and amendments as may be necessary and proper for their protection and benefit.

AND YOUR PETITIONERS will ever pray, &c.

SHARPE PRITCHARD LLP

Agents for Buckinghamshire County Council

HOUSE OF COMMONS

SESSION 2013-14

HIGH SPEED RAIL (LONDON – WEST
MIDLANDS) BILL

P E T I T I O N

of

BUCKINGHAMSHIRE COUNTY COUNCIL

AGAINST,

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