



The countryside charity  
Lancashire, Liverpool City Region  
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HS2 Community Engagement

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31 March 2022

Patron

Her Majesty The Queen

President

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Dear HS2 Community Engagement Team,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester and CPRE Cheshire (herein CPRE) concerning the **High Speed Rail (Crewe-Manchester) Environmental Statement Consultation**. [HS2 Phase 2b: Crewe – Manchester Environmental Statement Consultation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/hs2-phase-2b-crewe-to-manchester-environmental-statement-consultation)

## CPRE

CPRE, the countryside charity. We work with communities, businesses, and government to ensure that our countryside and green spaces can thrive.

You might remember us as ‘The Campaign to Protect Rural England’ and for 90 years we have brought about countryside protection and we are proud of our achievements including the establishment of National Parks, Areas of Outstanding Natural Beauty, Green Belt, Hedgerow Regulations, Quiet Lanes amongst other important planning policy tools.

Our aim is for a thriving, beautiful countryside, and greenspace for everyone. Harm from pollution, litter, irresponsible development, and a host of other pressures are challenging rural areas. CPRE’s campaign helped to persuade the Government to scrap its proposed planning white paper, which threatened democracy, nature, and the provision of much needed rural affordable housing, among other harms. We support a transparent and democratic planning system to yield sound development and investment decisions whilst achieving environmental goals and rural protection and enhancement.

## HS2 Phase 2b: Crewe – Manchester Environmental Statement Consultation

CPRE agrees that electrification of rail is important and the most efficient means of mass transportation, but many of the services on the network serving northern towns and cities are still obsolete diesel and a priority for levelling up must be to improve the conventional rail system. CPRE has urged the Government to increase investment in strategic rail to tackle unsustainable car travel dominance and its associated negative impacts, such as greenhouse gas emission, congestion, air, and noise pollution leading to high incidence of respiratory disease and early death. That said, although CPRE is supportive of strategic investment in rail, CPRE has consistently flagged problems with HS2 and environmental impacts including, among other critical issues, harm to tranquillity, landscape character, visual amenity, and ecology. We previously queried why alternative options including investing in the existing rail network with less environmental harm than that associated with Phase 2b: Crewe to Manchester route, stations, and other associated development in rural areas, therefore, CPRE remains opposed.

The Lancashire branch of Campaign to Protect Rural England

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The Government is choosing to proceed regardless, so CPRE offers below its views in a constructive way on the Environmental Statement reports on the environmental impacts.

CPRE is impressed with the accessible nature of the Environment Statement from Non-Technical Summary, Community Area (CA) reports and maps and technical appendix. There is a comprehensive body of work, and it has helped us understand the effects arising from construction and operation of HS2 Phase 2B.

### **Question 1 Please let us know your comments on the Non-Technical Summary (NTS).**

CPRE has considered the 172-page Non-Technical Summary and makes the following observations.

CPRE asks if it is accurate to call HS2 a network as Figure 1 on Page 6 shows a much lesser scheme with a single branch with the scrapping of the eastern section connecting London with Leeds.

### **Revisit the case for HS2 Phase 2B**

CPRE supports the Government's commitment to building a stronger, more balanced economy capable of delivering lasting growth and widely shared prosperity and agrees that rail transport needs investment. However, CPRE disputes the case for HS2 Phase 2B on several of the grounds and queries whether HS2 is the right vehicle. The scrapping of HS3 or Northern Powerhouse Rail is likely to have diminished the overall benefit derived from this white elephant project.

A refresh of the need and economic case is recommended due to continuing economic uncertainty arising from Brexit, Covid and the illegal invasion of Ukraine by Russia that has led to more pessimistic outlooks for the economy, including future rail passenger and freight capacity, travel to work patterns and an increase in working from home meaning people are not travelling as often for work meetings and instead rely on online meeting platforms.

England was already experiencing inflation because of Brexit, and this was added to by supply chain issues arising from the global pandemic. The invasion of Ukraine has led to economic sanctions on Russia with the effect of spiralling energy and material costs. The impacts for the rates of growth for the economy and population and effect on rail capacity needs should be investigated. This will better show how much future rail capacity should be planned. The cost benefit analysis should be revisited.

### **Reasonable alternatives**

CPRE has considered the section 6 Strategic, route wide and local alternatives, and it notes the summaries of the reasonable alternatives studied (including local alternatives studied prior to the Government's announcement of the preferred route in July 2017) after July 2017 in the Alternatives report.

Although CPRE agrees improved rail connectivity is needed it does see other reasonable alternatives that should be implemented in preference to HS2, namely, an improved conventional rail network between northern towns and cities rather than just London, which is already well connected. It is considered that this would be at a fraction of the financial cost, but also at lower environmental costs.

When the impacts of TGV on France are considered, it is clear there is a strong hub and spoke effect with Paris being the focus of economic activity. Many regional offices in smaller towns and cities have closed as shortened journey times displaced economic activity to the capital. There is concern that HS2 will do the same and be counter to the levelling up promised by Government.

Reversing some of the worst offences of the Beeching cuts to railway lines in the 1960s that severed off many towns from the rail network causing economic hardship and unsustainable car dominance would in CPRE's view be better value for money when compared to HS2 Phase 2B.

### **Lack of strategic approach to strategic rail freight**

There is no strategic approach to rail freight in Cheshire, Lancashire, Liverpool City Region, and Greater Manchester area. The expansion of Liverpool Port to triple the throughput of containers was done on a speculative basis. Currently there is no means of access to serve the added capacity. Currently only 2% of Liverpool Port's current transportation is via rail and the remaining 98% is by road. Compare this to London's equivalent port with 40% of freight moved on rail.

To illustrate the lack of strategic thinking, HS3 or Northern Powerhouse Rail was recently scrapped.

Furthermore, the Secretary of State recently granted consent by for a speculative proposal for over one million sqm of road-based logistics use, with a separate consent for a new link road at the Parkside Strategic Rail Freight Interchange site in St Helens, which was allocated for multi-modal freight transportation in the North West Regional Spatial Strategy. The Parkside site was unique for a location on two rail lines (north-south and east-west) and two motorways (north-south and east-west). CPRE, the local MP and local community were opposed to development to the speculative proposal due to the fact the rail freight use should have been supported, and the harm to Green Belt and other environmental harms. Even if HS2 is built, CPRE seriously doubts there would be any real increase in freight on rail due to a lack of commitment by Government to promote freight on rail.

### **Environmental harm**

Our knowledge of the climate and biodiversity emergency is much more advanced than when the HS2 scheme was conceived. The National Capital Committee has reported on widespread ecological collapse associated with degradation across all natural capital asset types, yet the route will cause the loss of mature woodland and other important habitats.

We echo the concerns of the Cheshire and Lancashire, Manchester and North Meseryside Wildlife Trusts, about the ecological impacts of the HS2 routing of track from Crewe to Manchester and Warrington as we are also of the opinion that the scheme will result in an unacceptable loss of wildlife in the Cheshire, Lancashire, Liverpool City Region and Greater Manchester regions, carving up hundreds of valuable areas of irreplaceable ancient woodlands, felling ancient trees and destroying hundreds of ponds. Several hundred local wildlife sites are under threat, with Wigan's rare Willow Tits and Manchester's Peat Mossland that are proposed to be severed.

The overall effects for species will be significant if insufficient new habitat is created. Many of the species such as bats, birds, water voles, brown hares, common lizards, and grass snakes that will be impacted have

already suffered shocking declines in recent years and Phase 2b of HS2 will only exacerbate this. CPRE thinks insufficient new mitigation and compensatory (offset restoration) is proposed for the +10% Biodiversity Net Gain required by the Environment Act 2021.

### **Environmental Minimum Requirements**

CPRE wishes to understand more about what Environmental Minimum Requirements that the Environment Statement Technical Summary refers to in Section 5.3. Developing HS2 Phase 2B infrastructure over 85km of habitat that currently supports species to feed, and breed will undoubtedly result in the loss of vulnerable species from certain parts of the region.

### **Biodiversity Emergency: Independent Expert Scrutiny**

CPRE thinks it is vital for thorough independent expert ecology scrutiny of the claims made by HS2 in their Environmental Statement to ensure the Environmental Impact Assessment has been conducted with objectivity. No matter how qualified and professional those who drafted the reports are, there is a natural tendency when commissioned by those promoting the scheme to focus on the beneficial effects and downplay the adverse effects of the project.

Similarly, to ensure that rigorous monitoring is implemented if the HS2 Phase 2B scheme is implemented in the future, independent professionals should advise on design solutions, mitigations, and compensations. It is regrettable that at the same time the 25-Year Environment Plan was being drafted, there were severe cuts to the regulatory bodies, including statutory consultees whose staff resource is now only a third of the size as before. Ecology units that provide third party assessments in recent years have also limited resources and their teams are stretched due to Government's growth agenda meaning further development proposals are coming through the pipeline, limiting their ability to properly oversee the process. This is a worrying situation, and it is likely it will lead to further environmental and ecological degradation in the future.

### **Climate Emergency**

The Climate Change Committee has published its 6<sup>th</sup> Carbon Budget and warns of the urgent action required. CPRE is concerned that to run the trains at the highest speeds of 250mph the level of energy required involves considerable greenhouse gases and it is not a carbon zero technology. CPRE doubts that HS2 Phase 2B is compatible with our national climate change commitments and recommends that expert organisations, such as The Tyndall Centre, should be consulted to gauge accurate information on the lifecycle modelling of the greenhouse gas emissions arising from HS2 Phase 2B, compared to the greenhouse gas emission savings if a similar level of investment was targeted at electrifying and extending the capacity of the conventional network in the north.

### **Question 2 Please let us know your comments on Volume 1 – Introduction and methodology.**

CPRE has noted the description of HS2, the environmental impact assessment (EIA) process and the approach to consultation and engagement. It is worth pointing out that notable environmental organisations have raised concerns about the fragmentation of ecology from eighty-five kilometres of operational rail corridor, rural stations, and associated infrastructure (depots, bridges, viaducts, power supply, ventilation

shafts, drainage features, environmental mitigation and landscape works such as cuttings and embankments during the consultation and engagement stages. This has not altered the decision to press ahead with HS2.

CPRE understands the details of the permanent features of the Proposed Scheme and general construction techniques. It notes additional phases for system testing and the need for servicing and maintenance properties.

CPRE is familiar with the scope and methodology used for the environmental topic assessments. It has considered the findings and conclusions on effects and the general approach to mitigation.

We have considered HS2 Limited's approach to monitoring the effects of constructing and operating the Proposed Scheme, and the effectiveness of mitigation after construction, as well as the approach to monitoring during the operational phase.

### **Construction Stage**

There are five stages observed in the main construction activities. CPRE welcomes the Code of Construction Practice and use of local environmental management plans. Core working hours will be from 08:00-18:00 on weekdays (excluding bank holidays) and from 08:00-13:00 on Saturdays.

Tunnelling and directly associated activities (such as removing excavated material, supplying materials, and maintaining tunnelling equipment) will be conducted on a 24-hours a day, seven days a week basis. Where reasonably practicable, excavated material will be stored within the compound boundary for removal during core working hours.

### **Question 3 Please let us know your comments on Volume 2: Community Area (CA) reports and map books.**

CPRE has considered each Community Area report and map. We provide comments as appropriate on each area, the description of the construction and operation of the Proposed Scheme within the area, and the environmental baseline. We consider a tendency of reports purporting more beneficial effects and downplaying the adverse effects of the HS2 project.

Where relevant we recommend ways of avoiding, reducing, or managing the likely significant adverse effects. We note the proposed monitoring during construction and operation.

The maps show the existing environment, proposed construction, and operation stages, of the Proposed Scheme. We have considered the viewpoint and photomontage locations in conjunction with Section 11, Landscape and visual of the Volume 2, Community Area reports and the maps showing the operational noise and vibration impacts and likely significant effects in conjunction with Section 13, Sound, noise and vibration of the Volume 2, Community Area reports.

It is important that the impacted parish councils are consulted along with residents, businesses, and other local stakeholders such as schools, health providers and community organisations, particularly those with an interest in the environment.

## MA01 - Hough to Walley's Green

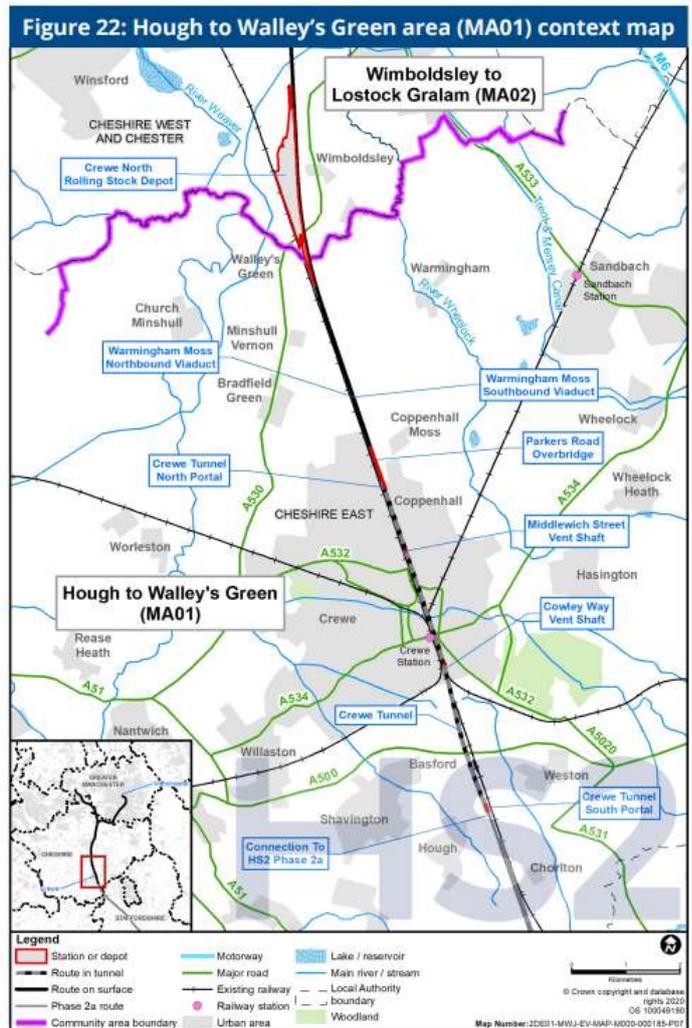
The 10.8 km length of route is set out in Figure 22 and is in Cheshire East and Cheshire West and Chester. The area North of Crewe is rural in character and of importance to the agricultural sector.

There are unresolved funding issues for Crewe Hub Station, and the proposed Northern Powerhouse Rail (NPR) services were recently scrapped, reducing the overall value of HS2.

CPRE notes the measures to Crewe Tunnel to avoid direct effects on Mere Gutter with Bashford Brook Local Wildlife Site, deciduous woodlands at Crewe Station sidings and the watercourse of Bashford Brook, Gresty Brook and Valley Brook.

The landscape mitigation planting is welcomed to provide visual screening for residents in Coppenthal Moss, Warmingham Moss, at Moss Farm and Moss Fields Farm.

CPRE is pleased that there is to be provision of continued access to the Crewe and Nantwich Circular Walk during construction.



The noise fence barriers should help reduce disturbance for residents along Parkers Road and Broughton Road, and for Spring Farm, White House, Springfield Cottage, and Barrows Green.

The Environmental Statement summarises no likely adverse residual effects have been identified as arising during operation for agriculture, forestry and soils, air quality, historic environment, land quality and water resources and flood risk and these should be ratified by local farmers, the Environment Agency, and Natural England.

CPRE is concerned that 133ha of agricultural land will be required, including 6ha is high quality agricultural land. Although a proportion of this land will be restored following construction, 81ha is permanently required, 1ha of which is high quality agricultural land that CPRE campaigns for retention for future generations. During construction twelve farms will be significantly affected with eight holdings permanently significantly affected due to the proportion of land required and loss of assets. Three holdings: Bridge Farm and Moss Bridge Farm (Winton Equestrian Centre) will be significantly affected by property demolitions due to the loss of residential property and buildings, and Moss Farm due to the loss of a solar farm.

Eight residential properties on the B576 North Street/ Bradford Road and on Broughton Road will have further air pollution due to construction traffic and the HGV movements will cause a nuisance (traffic, air

quality, noise, vibration, visual and other) to the local community including the pupils and staff at Oakfield Lodge School. During operation there will be noise to sensitive receptors including Bentley Manor Care Home. There are also visual effects from vent shafts above the tunnelled sections.

In terms of ecology and biodiversity, during construction there is an assumed loss of veteran trees from Moss Bridge Marsh Local Wildlife Site and Spring Plantation Grassland Local Wildlife Site, which will result in a permanent adverse residual effect that is significant at the national level. CPRE agrees that wherever reasonably practicable, measures should be implemented to protect veteran trees. CPRE notes that on a precautionary basis, it is assumed that there will be a net loss of 17.9km (9.3 miles) of hedgerow, resulting in a permanent adverse residual effect. It recommends that restoration of land required only for the construction of the Proposed Scheme to its current use should require agreement with landowners and occupiers to ensure additional retention and generous replacement of hedgerow lengths.

The construction impacts will result in permanent effect to three non-designated heritage assets including archaeological features at Warmingham Moss; Bridge Farm and former farmstead, Parkers Road; and Moss Bridge Farm, Parkers Road. CPRE is disappointed that the construction of HS2 Phase 2B will result in permanent impacts to Crewe Mossland Historic Landscape Character Area by removing characteristic features such as field boundaries, and affect the character and heritage value, which will result in an adverse significant effect.

CPRE is alert to the salt resources and seven salt caverns that will be lost because of development.

In terms of landscape and visual effects of significance is the construction will result in adverse effects on two landscape character areas (LCA), Wimboldsley Plain LCA and Crewe Fringe Mossland LCA, due to changes in landforms and impacts on the tranquillity of this predominantly agricultural landscape.

There are seventeen viewpoints identified, the majority in rural areas. During operation, the effects on the character and appearance of the local landscape will reduce over time but, some effects will remain significant.

CPRE agrees there will be residual adverse effect on Wimboldsley Plain LCA due to uncharacteristic built structures in the area. Operation will result in significant visual effects in at least six representative viewpoints, potentially more that are yet to be fully understood.

See Extract:



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

## MA02 - Wimboldsley to Lostock Gralam

The 14.6km route is in the Wimboldsley to Lostock Gralam area in Cheshire West and Chester and Cheshire East areas as shown in Figure 23.

The area is a mix of rural and urban areas, with agriculture being the main land use. The main settlements are Middlewich and Winsford, located in the south of the area, and Northwich, Lostock Green, and Lostock Gralam, located in the north of the area.

The low-lying agricultural land is interspersed with occasional woodland including ancient woodland, the smaller settlements of Wimboldsley, Stanthorne, Bostock Green and Lach Dennis and isolated dwellings and farmsteads.

During the development of the design, measures have been incorporated to avoid or mitigate adverse impacts and CPRE welcomes them, including the use of viaducts to avoid direct effects on the Shropshire Union Canal (Middlewich Branch), the River Dane, the Trent and Mersey Canal and other watercourses and allow free passage for wildlife beneath them.

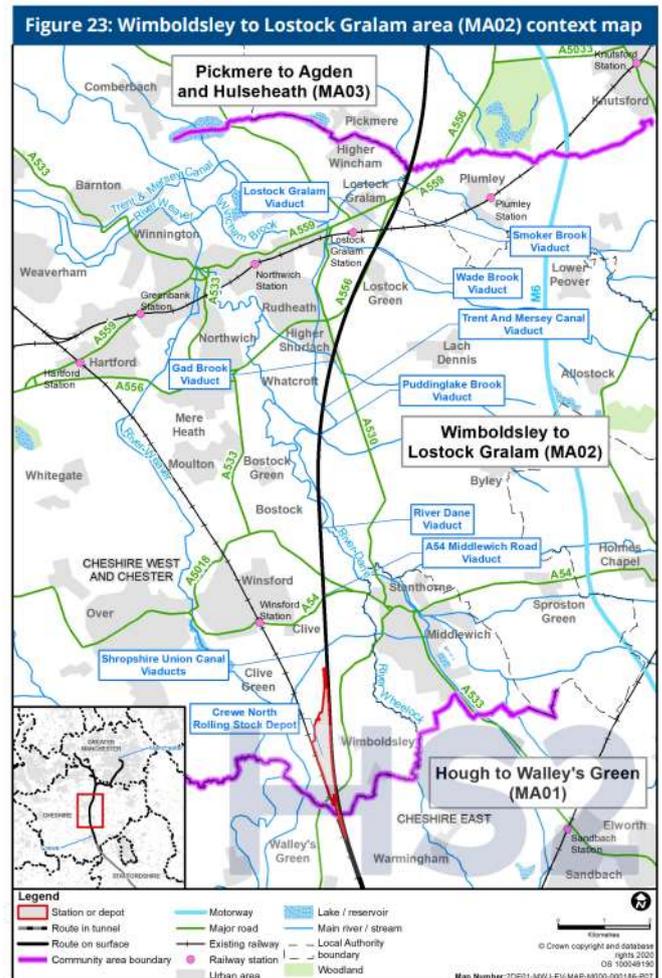
The design of drainage associated with the Crewe North RSD to avoid impacts on the saline spring habitat at Wimboldsley Wood SSSI is also an improvement as is the compensatory woodland habitat creation such as at Long Wood near Lostock Gralam and Stove Room Wood near Wimboldsley, providing habitat connectivity and enhanced landscape/green infrastructure connectivity.

The noise fence barriers will provide acoustic screening for the communities of Wimboldsley, Clive, Stanthorne, Whatcroft, Pear Tree Farm Cottages, Rudheath, Lostock Green, Lostock Gralam and Ascol Drive, and Plumley.

The use of borrow pits to reduce the need for longer distance transport and import of engineering materials, thereby reducing the volume and impact of road traffic on local roads and communities is also welcome. However, CPRE is concerned that these measures may impact the cost/benefit analysis of the project.

The Environmental Statement summaries that there are no likely adverse residual effects identified arising during operation for agriculture, forestry and soils, land quality, socioeconomics and water resources and flood risk.

There are however likely significant residual environmental effects identified for the Wimboldsley to Lostock Gralam area in terms of:



Agriculture, forestry, and soils - During construction, 639ha of agricultural land will be required, 243ha of which is high quality agricultural land. Some of this land will be restored following construction, with 296ha permanently required, 77ha of which is high quality agricultural land. CPRE objects to the loss of high-grade farmland due to its value to future generations. Construction will result in temporary significant effects at 24 farm holdings, fourteen of which will be permanently significantly affected due to the proportion of land required and/or farm severance and disruption. Four holdings will have property demolitions, at Yew Tree Farm, Greenheyes Farm, Higgins Lane Farm and High House Farm.

Air quality is impacted during construction.

Community impacts arise from construction and operation. There is temporary use of 1.2ha of the 12ha of land at Winnington and Peas Wood Local Wildlife Site. Of the 1.2ha of land required temporarily, 0.4ha will be required permanently. The construction of the Proposed Scheme will permanently prevent access to the woodland from the A559 Manchester Road, which will mean that most of the walking track and woodland will be inaccessible. CPRE welcomes that HS2 Ltd proposes to re-instate the permissive path through Winnington and Peas Wood Local Wildlife Site during operation. However, it is disappointing that construction will permanently require all 2.2ha of land at the Lostock Green picnic area.

Construction of the Proposed Scheme will lead to the loss of 1.3ha of ancient woodland from the following Ancient Woodland Inventory sites: Stanthorne Hall Farm; Bull's Wood; Winnington Wood; and Leonard's and Smoker Wood. Ancient woodland is irreplaceable, and its loss will result in a significant permanent adverse residual effect. CPRE is concerned that an increase in measures is needed to deliver a +10% Biodiversity Net Gain.

The cumulative effects of the Scheme and committed development will result in a significant adverse effect on barn owl at Wimboldsley and north-west of Middlewich, which CPRE objects to.

CPRE considered that there are more viewpoints adversely impacted than those identified in the Environmental Statement. Construction will result in adverse effects on five LCAs and significant visual effects at 55 representative viewpoints. Residual adverse effects in the Winsford and Middlewich Fringe Farmland LCA; Dane Valley LCA; Whatcroft and Billinge Green Flashes LCA due to uncharacteristic built structures in the area and significant visual effects at 35 representative viewpoints within the area. Extract:



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

### MA03 - Pickmere to Agden and Hulseheath

The route of the Proposed Scheme and the WCML connection is 10.6km, and a 3.3.km section of the HS2 Manchester spur. It divides west of Hoo Green into the HS2 WCML connection and the HS2 Manchester spur. This area will also include provision for a connection between HS2 and a future NPR route between London and Liverpool. The route is in Cheshire East Council as shown in Figure 24.

The area is predominantly rural in character with agriculture being the main land use. The main settlements are Knutsford, Pickmere and High Legh. There are rural villages in the area including Tabley, Mere and Little Bollington and several isolated farms throughout the area. Leonard's and Smoker Wood, an ancient woodland, is in the southern part of the area.

The proposed route is considered, and the key design changes welcomed, particularly the ability to connect to Northern Power Rail in the future (despite the Government scrapping it).

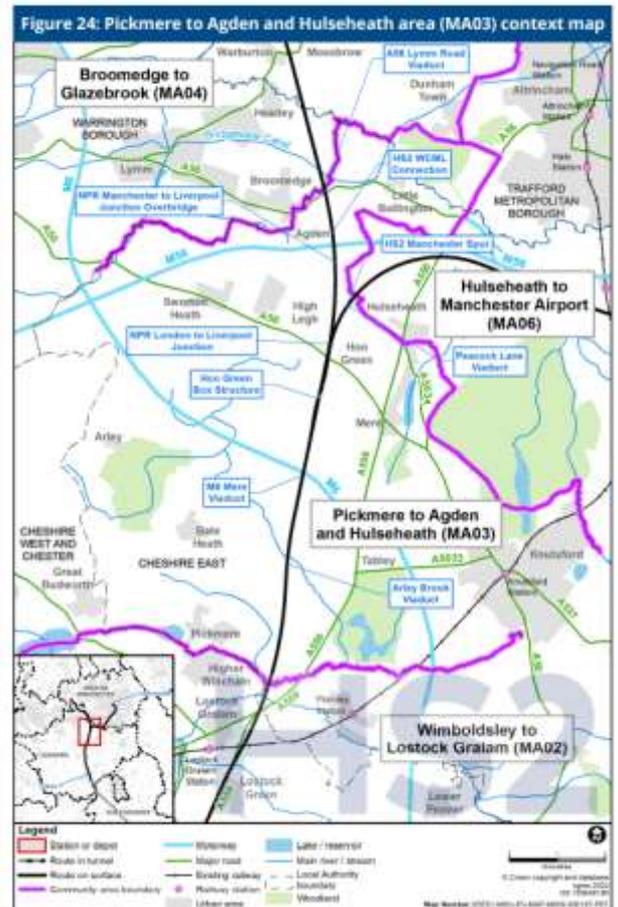
CPRE welcomes the design and mitigation measures in response to overcoming adverse impacts, such as woodland habitat creation to replace woodland lost from Leonard's and Smoker Wood, Belt Wood, Bongs Wood and along Waterless/Arley Brook to provide connectivity between habitats and provision to maintain vehicular and pedestrian access to the Cheshire Showground during construction of the Proposed Scheme, to enable the showground to continue to function and hold events.

The likely significant residual environmental effects identified for the Pickmere to Agden and Hulseheath area include the following:

During construction, 402ha of agricultural land will be required, 273ha of which is high quality agricultural land. Some of this land will be restored following construction, with 156ha permanently required, 101ha of which is high quality agricultural land. CPRE believes high grade farmland should be retained for the benefit of future generations.

Temporary significant effects at 33 farms and, in some cases, severance during construction. Eighteen of these farm holdings will also be permanently significantly affected due to the proportion of land required, severance and/or demolition of farm buildings. Six holdings will have property demolitions.

Ancient woodland is irreplaceable and the loss of 0.3ha of this habitat from Ancient Woodland Inventory sites at Leonard's and Smoker Wood, Daisybank Wood and Belt Wood will result in a permanent significant



adverse effect upon ancient woodland at each location where this habitat is lost. CPRE is concerned that the proposed compensation is inadequate and will cause a permanent adverse residual effect.

There will also be a net loss of 46.8km (29.1 miles) of hedgerow, which will result in a permanent adverse residual effect. CPRE supports the agreement of HS2 Limited with landowners to restore land to its current use with additional retention and replacement of hedgerow lengths.

The impact to heritage assets, particularly those of rural parts of Cheshire is noted. Construction of the Proposed Scheme will result in permanent physical impacts on the Tabley Historic Landscape Character Area due to changes in landform and the removal of historic features in the landscape.

Construction will result in adverse effects on the Arley Lower Wooded Farmland LCA due to changes in landforms and impacts on the tranquillity of this predominantly agricultural landscape and will result in significant visual effects at 34 representative viewpoints in this area. During operation, the significant effects on the character and appearance of the local landscape will reduce over time as mitigation planting grows and matures. However, effects will have a residual adverse effect on Arley Lower Wooded Farmland LCA due to uncharacteristic built structures in the area. CPRE is concerned that operation of the Proposed Scheme will result in significant visual effects at more than the identified thirty-four representative viewpoints in this area.

An extract:



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

## MA04 - Broomedge to Glazebrook

The 7.3km route in the Broomedge to Glazebrook area falls within areas of Trafford, Warrington, and Salford Councils, as shown in Figure 25.

The area is predominantly rural in character with agriculture being the main land use. There are rural hamlets and villages in the area including Broomedge, Little Heatley, Heatley, Mossbrow, Warburton and Glazebrook. These settlements are interspersed with areas of woodland, isolated dwellings, and farmsteads.

CPRE is concerned about residual harms and echoes the concerns of Culcheth and other Parish Councils.

CPRE is opposed to the Golborne Spur due to the excessive environmental harm, and harm to Chat Moss. It is understood that Natural England, Statutory Undertakers are opposed. If it is not, it should be.

During construction, 229ha of agricultural land will be required, 193ha of which is high quality agricultural land. Seventy-one hectares of farmland is permanently required, 56ha of which is high quality agricultural land that ought to be saved for future generations.

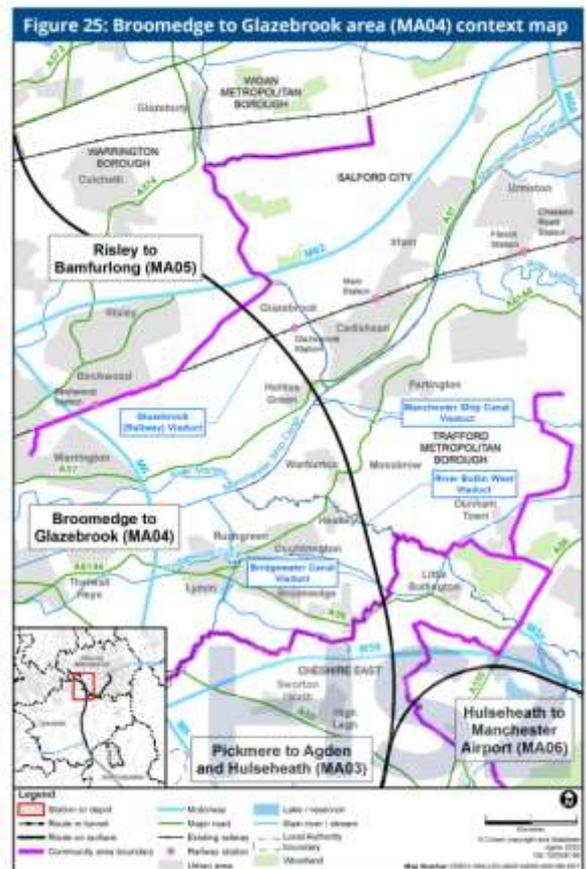
Temporary significant effects will arise at 18 farm holdings, nine of which will also be permanently significantly affected due to the proportion of land required and demolition of farm buildings.

Ancient woodland is irreplaceable and the loss of 0.5ha of this habitat will result in a permanent adverse residual effect upon ancient woodland at Coroners Wood. CPRE believes additional compensation is necessary by the Proposed Scheme.

There will be a net loss of 22.1km (13.7 miles) of hedgerow resulting in a permanent adverse residual effect and CPRE recommends agreements with landowners to ensure restoration of land required only for the construction to its current use offers potential for additional retention and replacement of hedgerow.

The adverse effects to the local heritage assets and settings are observed.

The temporary effects from construction on the landscape are noted and result in significant adverse effects on three LCAs: River Bollin Meadowlands; Warburton Settled Sandlands; and Rixton Undulating Enclosed Farmland due to changes in landforms and impacts on the tranquillity of this predominantly agricultural landscape.



During operation, the significant effects of HS2 on the character and appearance of the local landscape will reduce over time as mitigation planting grows and matures, however, effects may remain significant. The Proposed Scheme will have a residual adverse effect on three LCAs: River Bollin Meadow Lands; Warburton Settled Sandlands; and Rixton Undulating Enclosed Farmland due to uncharacteristic built structures in the area. The operation of high-speed trains will result in significant visual effects from at least nineteen representative viewpoints within the area.

See extract:



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

## MA05 - Risley to Bamfurlong

The 12.7km section extending north-west from the east of Risley to the south of Bamfurlong where it will connect to the WCML. The area falls in the areas of Warrington and Wigan Councils as shown in Figure 26.

The area is predominantly rural in character with agriculture being the main land use. There a number of villages in the area including Culcheth. These settlements are interspersed with woodland, isolated dwellings, and farmsteads throughout the area

CPRE echoes the concerns of the Parish Councils that are located along the route with all the environmental harms and none of the benefits.

The design changes are noted and the reduction in harm to the Holcroft Moss SSSI needs to be balanced with any increase in landscape and visual harm.

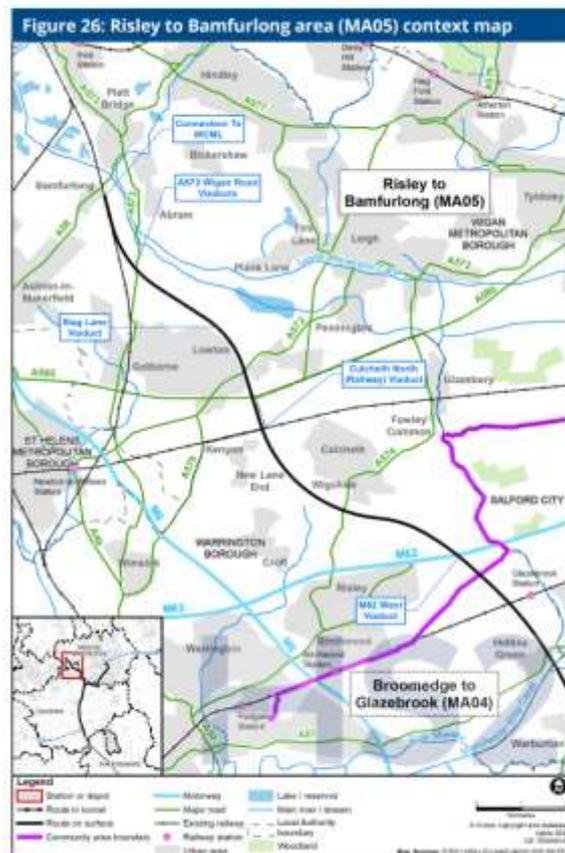
Although the mitigation measured are welcomed, such as landscape works at Culcheth, Wigshaw and Lowton, realignment of public footpaths to maintain public access for pedestrian routes through Byrom Wood, and compensatory woodland planting in areas of loss at Viridor Wood and Byrom Wood to maintain connectivity between existing habitats it is considered additional measures should be forthcoming.

In addition to the identified likely significant residual environmental effects identified for the Risley to Bamfurlong area, CPRE considers there are several harmful effects yet to be identified and it echoes the issues identified by residents and local parish councils along the route.

254ha of agricultural land will be required, 86ha of which is high quality agricultural land. Some of this land will be restored following construction, with 165ha permanently required, 48ha of which is high quality agricultural land. CPRE recommends high grade farmland is retained for the benefit of future generations. Construction will impact twenty-seven farms, twenty-two of which will also be permanently significantly affected due to the proportion of land required, through farm severance and/or property demolitions.

In addition to air quality and community concerns, the impacts on ecology and biology are of particular concern. During construction, there will be a net loss of 24.8km of hedgerow, which will result in a permanent adverse residual effect. The restoration of land required only for the construction of the Proposed Scheme to its current use, offers potential for the additional retention and replacement of hedgerow. Agreements should be sought with landowners.

The heritage impacts are noted.



There are a number of effects to the landscape. Construction will result in a residual adverse effect on the Hey Brook to Aspull Common Farmlands and Flashes LCA due to the severance of public rights of way and the introduction of construction works. Thirty-four representative viewpoints within the area resulting in significant effects. During operation, the significant effects on the character and appearance of the local landscape may reduce over time as mitigation planting grows and matures, however, many of these identified effects are likely to remain significant.

For example, the residual adverse effect on the Hey Brook to Aspull Common Farmlands and Flashes LCA due to the introduction of large-scale infrastructure and landform modifications in the area are negative. Operation will result in significant visual effects from sixteen representative viewpoints, possibly more, within the area resulting in significant effects.

Extract:



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

## MA06 - Hulsheath to Manchester Airport

The 10.7km route from Hulsheath to Manchester Airport. The area falls within the areas of Chester East, Trafford, Manchester, and the Greater Manchester Combined Authority areas as shown in Figure 27.

In the south the area is predominantly semi-rural in character with agriculture and recreation being the main land uses. There are also a number of rural villages in the area including Hulsheath, Ashley, Rostherne, Mobberley, Thorns Green and Halebank. These settlements are interspersed with isolated dwellings and farmsteads. Manchester Airport is located to the south-east of the route of the Proposed Scheme.

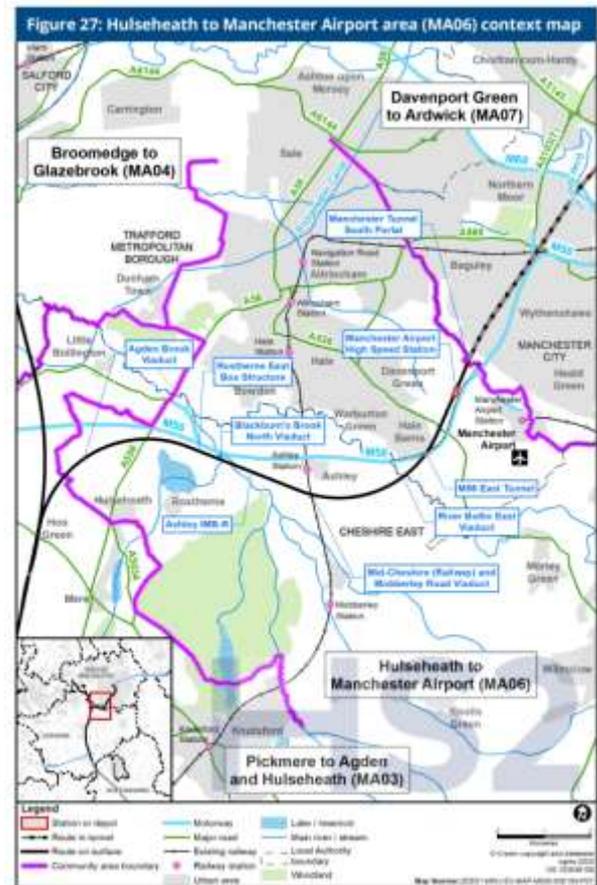
CPRE acknowledges the changes in the design of the Proposed Scheme in this area since the working draft ES and the incorporation of measures to avoid or mitigate adverse impacts in this area. Of note is habitat creation such as native broadleaved woodland planting to compensate for the partial loss of woodland at Millington Clough, Blackburn's Brook, along the River Bollin, and at Davenport Green and the creation of species-rich grassland east of Birkin House.

CPRE welcomes the landscape planting to reduce the effect of changes to setting at Mere Covert Cottage and landscape earthworks, and planting to integrate the Scheme into the surrounding landscape and to provide visual screening for the communities of Hulsheath North, Millington, Ashley, Thorns Green, Hale Bank, Warburton Green, and Davenport Green.

The likely residual effects include construction, as 339ha of agricultural land will be required, 56ha of which is high quality agricultural land. Some of this land will be restored following construction, with 158ha permanently required, 28ha of which is high quality agricultural land. CPRE campaigns for high quality farmland to be preserved for future generations.

Construction impacts twenty-six farms for a temporarily period, eighteen will also be permanently significantly affected due to the proportion of land required, farm severance and property demolition in some cases. Four will have property demolitions, at Cherry Tree Farm, Bowden View Farm, Higher Thorns Green Farm and Hale Bank Farm.

CPRE is particularly concerned about the impact of the development on ecology as in recent years there has been an increased focus of development at Manchester Airport Enterprise Zone, such as total loss of farmland at Sunbank Farm for a large logistics development. Therefore, the loss of a further 3.3 ha of ancient woodland from Millington Clough, Hancock's Bank, Ryecroft Covert, Birkin Bridge Lodge, Arden House Wood, Sugar Brook, East Arden House Wood, Hennesley Bank, Bollin Bank and Davenport Green Wood will



result in a permanent adverse residual effect at the national level. CPRE does not accept that the loss of ancient woodland will be properly compensated through the range of measures identified.

It is noted that where 'reasonably practicable,' measures will be taken to protect veteran trees that are assumed to be lost.

There will be a net loss of 46.1km of hedgerow resulting in a permanent adverse residual effect. However, restoration of land required may provide opportunity for replanting and CPRE recommends agreements with landowners.

The effects on heritage assets and settings are noted.

The effects of construction of the landscape and visual harm is noted. During operation, the significant effects of the Proposed Scheme on the character and appearance of the local landscape will soften over time as mitigation planting grows and matures, however, effects are likely to remain significant. A residual adverse effect on the Ringway Lower Wooded Farmland LCA and the Altrincham and Hale Urban Fringe Farmland LCA will occur due to uncharacteristic built structures in the area.

Significant visual effects have been identified at 20 representative viewpoints within the area resulting in significant effects, including on views from: Footpath Millington 2/1; Millington Hall; Millington Lane; Ashley Road; Ashley Road bridge over Mid-Cheshire Line; Mobberley Road; and the A538 Hale Road. Of these, residents at one representative residential viewpoint will also experience adverse night-time effects, namely in respect of the view south-east from Brooks Drive. Light pollution can be harmful to human health and that of a variety of wildlife.

See extract of the photomontage during construction.



The socio-economic, sound and vibration, traffic and transportation and water resources and flood risk effects are also noted.

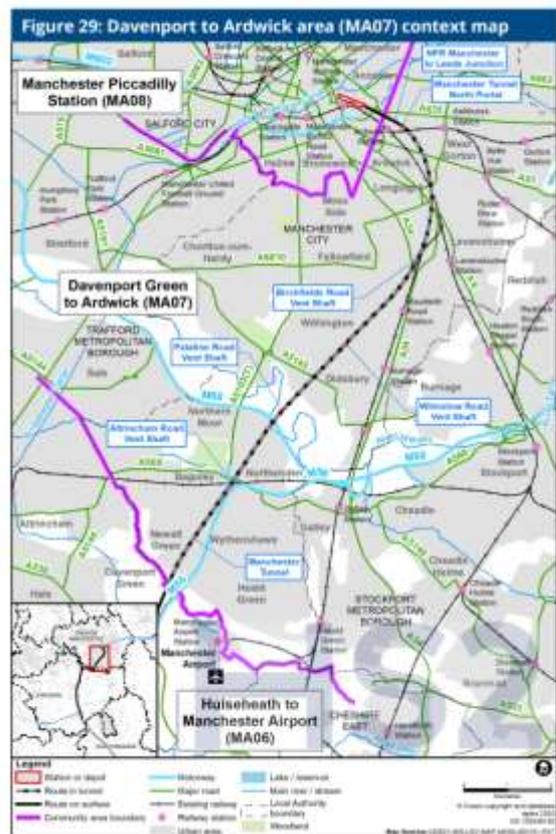
## MA07 - Davenport Green to Ardwick

The 13.4km route in the Davenport Green to Ardwick area falls within the areas of Trafford, Manchester, and the Greater Manchester Combined Authority, as shown in Figure 29.

The area is predominantly suburban in character becoming more urban towards the north, with land use comprising dense residential development alongside recreational grounds. The area is interspersed with parkland and woodland and includes a section of the River Mersey.

As mentioned, CPRE is concerned at the cumulative impacts of HS2 with other recent developments at Manchester Airport and other development sites in the planning pipeline, including sites proposed as allocations in the Greater Manchester 'Places for Everyone' Joint Development Plan of the nine local authorities that was submitted to the Secretary of State for Examination on the 14<sup>th</sup> of February 2022.

The cumulative impacts must be thoroughly understood and there is concern that the Environmental Statement does not sufficiently cover this important consideration. This relates to climate change, biodiversity, loss of farmland, air quality, noise, landscape, and visual impact and to traffic and transportation, among other important considerations.



### MA08 - Manchester Piccadilly Station

The 1km route to Manchester Piccadilly Station falls within the local authority area of Manchester City Council and the Greater Manchester Combined Authority, as shown in Figure 30).

The area is entirely urban, with land use comprising light industrial, commercial, road and rail infrastructure throughout.

If HS2 Phase 2B is implemented this final link from Manchester Airport to the Centre of Manchester at Piccadilly Station is vital to maximise the number of people who can access the service using public transport, and by walking and cycling.



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

CPRE has considered the route-wide effects of the Proposed Scheme. Key comments are below.

#### Green Belt

The HS2 Phase 2B Scheme will incur harm to the Green Belt, which is a nationally significant designation, to an substantial extent. We all benefit from having permanently open greenspace for our health and well-being along with the five functions set out in Section 13 of the National Planning Policy Framework. The infrastructure will bring prominent structures into very rural areas and into the fringe of the Greater Manchester conurbation and other towns of Cheshire, Lancashire and may reduce the spatial and visual openness of Green Belt and promote future development that otherwise would not happen. CPRE disagrees that the claimed benefits enough to outweigh Green Belt and other harms.

#### Agriculture, Forestry and Soils

Construction will temporarily require approximately 1,995ha of agricultural land in England, of which a staggering 856ha is high quality agricultural land. CPRE notes that some agricultural land is required on a temporary basis and then is to be returned to agricultural use following the Code of Construction Practice. Enforcement of this aspect is crucial in the future to guard against poor practice and degradation of our land assets. CPRE recommends that land is returned to at least the same or improved condition, and it must not be classified as previously developed.

The area of land that will be permanently removed from agricultural use in England will be approximately 927ha, of which approximately 311ha will be high quality agricultural land. CPRE thinks it is disingenuous to represent it as only a small fraction of high-quality agricultural land in England and is a good illustration of how the Environment Statement tends to downplay harm to our environmental assets.

### **Air Quality**

Although CPRE welcomes a modal shift from road to rail, due to the station location many people will drive cars to access them. There will be considerable air pollution from HGV vehicles and dust from construction stage of the development.

### **Climate Change**

CPRE supports the Government in its aim for a future low-carbon transport system and will support the overall carbon objectives in achieving net zero by 2050. CPRE does want the transport sector to be decarbonised. However, it questions the appropriateness of the claim that high speed rail offers some of the lowest carbon emissions per passenger kilometre versus other transport modes during operation. When operating at the highest speeds the carbon emissions per passenger kilometre are likely to be much higher.

The impacts from construction and destruction of ancient woodland, peat mossland, and other environmental harms such as development of our farmland must be considered in the round. The public is tremendously concerned about the route across peat mossland and the loss of carbon from the natural stores. These peat mossland contain biodiversity of rarity that should be preserved and restored, not developed. The way the emissions are contextualised serves to underplay the harm being caused.

### **Ecology and Biodiversity**

CPRE notes that the Rochdale Canal Special Area of Conservation, a site designated as being of international importance for nature conservation, will be affected by the construction and/or operation of the Proposed Scheme. It is right that a Habitat Regulations Assessment has been undertaken and it has recorded that it is not possible to rule out adverse effects from nitrogen deposition, thus a conclusion that there may be an adverse effect on this internationally significant designation.

Sixteen ancient woodlands in England, and a further one in Scotland, totalling 5.7 hectares would incur direct loss of this habitat due to the construction of the Proposed Scheme. This loss is significant at a national level. CPRE is concerned that the level of woodland compensation is insufficient, and the magnitude of harm should be scored higher due to the fragmentation and fact that replanting areas will take hundreds of years to recover. Native tree and shrub species of local provenance should be selected.

CPRE understands the scale of veteran tree loss is likely to exceed the identified twenty-four veteran trees, which is significant at the national level. A higher number are likely to be lost when construction is on site.

CPRE observes at the regional level, 53.5ha of semi-natural broadleaved woodland, 27.8ha of grassland and 313 ponds will be lost due to the construction of the Proposed Scheme. Overall, approximately 87ha of habitats of principal importance will be lost as a result of construction. This is a significant effect at a national level. Where these habitats of principal importance will be lost, opportunities for the creation of

compensatory habitat have been identified. A total of approximately 240ha of habitats of principal importance will be created, consisting mainly of lowland mixed deciduous woodland and lowland meadow with some wetland habitats. In addition, there will be further areas of landscape planting of native broadleaved woodland, which will contribute to habitat creation. CPRE echoes the concerns of the Wildlife Trusts that more mitigation and compensation measures are required to ensure a +10% Biodiversity Net Gain as required by recently introduced environmental law. We have widespread ecological collapse and cannot afford to let HS2 Phase 2B exacerbate the problem by underestimating the reality of the harm caused.

The harm to Barn Owls from HS2 is noted and the provision of owl nesting boxes to increase populations away from the development.

Sadly, the full hedgerow impacts have not been identified. CPRE understands when combining the lengths identified for the eight sections that 220.9km of hedgerows will be lost. CPRE recommends that when restoring land impacted by construction agreement is made with landowners to replace in full the 220.9km with an additional 88.3 hectares, equal to 40% for nature, climate, and economic recovery. This means the Proposed Scheme should plan for 310 hectares of replacement and new hedges with native species.

In recent, commissioned by CPRE, the countryside charity, and undertaken independently by the Organic Research Centre, we provide an evidence-based overview of the impact of increasing the extent of UK's hedgerow network by 40% – for nature, climate, and the economy. We then make recommendations on how the government, local authorities, farmers, and land managers can maximise the potential of the humble hedgerow. [Hedge fund: investing in hedgerows for climate, nature, and the economy - CPRE](#)

### **Electromagnetic Interference**

CPRE acknowledges the issues of significant effects electromagnetic interference effect arising and the planning and design responses.

### **Health impacts**

All health impacts should be properly identified and designed or mitigated. The adverse impacts to heritage assets, conservation areas, and their settings are understood. Construction will result in significant residual effects with respect to sterilisation of some salt resources.

### **Historic environment harm**

CPRE recommends that all the proposed impacts on heritage assets are fully recorded, and local civic societies consulted. Rural heritage is important to place such as Cheshire, Lancashire, Liverpool City Region, and Greater Manchester where distinct traditions enrich our places and cultural identities.

### **Landscape and visual harm**

Landscape matters to everyone. Rural landscapes are particularly enjoyed for health and well-being benefits and are experienced when occupying space or travelling through an area by whatever mode of transport.

Harm to landscape and visual amenity is an important aspect of planning and it should be avoided and minimised. We recommend the use of the latest Guidelines for Landscape and Visual Impact Assessment.

CPRE notes the level of temporary residual effects that will arise from construction, including night-time light pollution, particularly in rural areas, and change to the existing landform and vegetation patterns that will change the character of the local landscape. These changes, in the main, will be permanent, even with early planting to reduce the visibility of the Proposed Scheme. CPRE welcomes the proposed mitigation measures, including those in the draft CoCP, to reduce landscape and visual effects further throughout the construction works. Construction of the Proposed Scheme will result in significant effects on two landscape character areas (LCA), the River Sark Flats LCA and the Southern Flow Plateau LCA due to changes in landforms and impacts on tranquillity.

In terms of long-term operation, the prominent new features, including the depot and sidings will result in substantial changes to the character of the area. Significant effects on the character and appearance of the local landscape will lessen over time as mitigation planting grows and matures, however, effects may remain significant. For example, there will be a residual adverse effect on the River Sark Flats LCA and the Southern Flow Plateau LCA due to changes in landforms and impacts on tranquillity associated with the agricultural and river valley landscape. Operation of the Proposed Scheme will result in significant visual effects at seven viewpoints within the area, which includes views from: The Mill Forge hotel and wedding venue and Redhouse Farm House and cottage; Cranberry Cottage; and Bensmoor Wood to Douglas core path.

### **Sound, noise, and vibration**

Tranquillity is a key characteristic of countryside and HS2 will harm this in a wide range of locations along the route. CPRE acknowledges the design, mitigation and compensation measures proposed to avoid and minimise sound, noise and vibration arising. It is especially important that the views of local people are listened to as the Proposed Scheme is progressed.

### **Traffic and transport**

CPRE notes that during the construction and operation periods, there will be increases in traffic, which will make it more difficult for non-motorised users at various locations. Rural areas are enjoyed by everyone and ensuring Public Rights of Ways are appropriately diverted or realigned is important. It is noted that PROW will normally follow the shortest route that is reasonably practicable, considering safety, pedestrian, cyclist and horse rider flows, motorised traffic flows, construction duration and local environmental effects. Every effort should be made to ensure the way people enjoy the landscape character in terms of visual amenity and tranquillity is protected and enhanced.

### **Water resources and flood risk**

CPRE notes that it is foreseen that a residual effect will remain on two potential springs 200m west and 300m north-west of Redhall Castle due to the Proposed Scheme interrupting groundwater flow. During operation it is believed that significant residual effects would remain on surface water quality in Ewes Burn during operation of the Proposed Scheme.

**Inland Waterways** - There needs to be greater attention to avoiding and mitigating environmental and community damage, including minimising impacts on the users, heritage, and restoration of the inland waterways. CPRE echoes the concerns of the IWA:

- Landscape, noise, and heritage impacts on the Trent & Mersey Canal in the Dane valley north of Middlewich
- Noise and visual impacts on the Middlewich Branch of the Shropshire Union Canal
- Threats, uncertainty, and delay to the restoration of the Ashby Canal at Measham
- Threats, uncertainty, and blight to the restoration of the Chesterfield Canal at Staveley and Norwood

### **Site Restoration**

CPRE considers site restoration as a key issue and it agrees that all temporary plant, materials, equipment, buildings, access roads and vehicles should be removed by contractors from site when construction is complete. Where agricultural and forestry land is used for construction purposes, it should be restored to enable its former use or as agreed with the landowner and the relevant local planning authority and CPRE recommends it is not considered previously developed land.

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

Due to capacity issues CPRE has been unable to respond to this section, but reserves the right to do so in the future/

### **Question 6 Please let us know your comments on Volume 5: Technical appendices and map books.**

CPRE is impressed with the comprehensive and accessible nature of the Environment Statemen and in the supporting technical information and associated map books. The information has helped CPRE to better understand the effects arising from construction and operation of HS2 Phase 2B.

### **Summary**

CPRE hopes that the comments are useful in progressing to the next stages. Whilst it remains opposed to HS2 Phase 2B due to flaws in the business case, spiralling costs, both financial and environmental. However, if the project is progressed it should be in a manner that best protects and enhances our rural areas and achieves significant biodiversity net benefit, which is not assured as things currently stand. Increased investment will be required in providing replacement habitat from the proposed routes, stations, and other paraphernalia.

CPRE considers that it is important that the impacted parish councils are consulted along with residents, businesses, and other local stakeholders such as schools, health providers and community organisations, particularly those with an interest in the environment. Adequate design solutions, mitigation and compensation is required. If you require anything further, please do not hesitate to contact me.

Yours sincerely

**Jackie Copley MA, BA, (Hons), PgCert, MRTPI**

Planning Manager