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

CPRE Oxfordshire's Response to Consultation on HS2 Phase One Environmental Statement, February 2014

The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) exists to protect and promote the landscape and rural communities of the county. Whilst we are affiliated to the national CPRE charity, we are an independently registered charity and therefore wish to submit our specific individual response to this consultation.

We are opposed to HS2 as we are not convinced that the case is proven that the extent of benefits to the national economy and relief of development pressures in the South East would outweigh the unquantifiable harm to the rural area that would be damaged by the proposal.

Should it go ahead, HS2 will have a serious impact on the area of Oxfordshire through which it passes, particularly in terms of the tranquillity of hitherto quiet village communities and countryside. It is therefore vital that environmental mitigation follows best practice rather than simply looking for the cheapest minimum option.

Following our submission on the draft Environmental Statement many of our detailed and procedural concerns about mitigation and land acquisition have been addressed. New information now published for the first time is how quality of life would be harmed by maximum noise levels as trains pass and the quantities and arrangements for disposal of surplus excavated material.

1) Consultation - The short extension to the timescale for this consultation is appreciated. However, given the amount of information and the complex nature of much of the material, it is very hard for laypeople to understand and engage with the detail in such a short time period. The deposit of documentation in the public libraries at Bicester, Oxford and Brackley has been mishandled with many key documents missing or only available on un-indexed computer memory sticks making it impossible to review technical issues thoroughly. This relates particularly to noise and vibration covered in Chapter 5, its appendix, annex, and drawings that were not available for consultation when the draft ES was published.

2) Earthworks - It has been clear from the inception of this project that the intention has been to produce a design incorporating higher standards of landscaping and environmental sensitivity than in previous major transport projects both here and abroad. By integrating landscape design and civil engineering the designs now published go a long way towards achieving this. We particularly welcome the provisions for all land needed for construction, landscaping and mitigation to be included in 'The Act Limits'. The limits shown on plans should be sufficient to allow many local improvements to be achieved in the detailed design.

It is now apparent that there are likely to be some 165,000 tonnes of surplus, unsuitable or contaminated material to be disposed of off site in the Newton Purcell to Brackley area. This would take up a significant proportion of licensed landfill capacity in the area and generate much unnecessary road traffic. So far, additional acoustic screening has only been proposed to reduce noise to below the statutorily required averaged Leq thresholds. It would be both economic and environmentally desirable to use this surplus material to improve the noise protection generally afforded to the countryside and to particular dispersed properties near to embankments. We had understood that the intention of the designers had been to use earth banks to form noise and visual screens along the tops of cutting slopes and embankments. Should this require extra land in a few locations it is essential that the Act limits take this into account at this stage.

3) Mitigation for Noise Nuisance in Rural Areas - The undertaking to take into account the very quiet nature of tranquil areas and rural communities is welcomed (See ES Chapter 5 Appendix SV-001-000 Annex A 1.6.1) The local Plan for Cherwell District Council now on deposit with the Secretary of State, includes as well as comprehensive policies on HS2 in Policy SLE 15, a specific Policy ESD 13 (P78) on Landscape Protection that includes not permitting developments if they would "impact on areas judged to have a high level of tranquility". The seminal work by CPRE identified remaining tranquil areas for the whole country on the Tranquillity Maps published in February 2007. It identifies the part of Oxfordshire through which the route passes as one of the most tranquil areas, a quality demanding special protection. This is immediately apparent when walking the route. Here the route passes through the Shelswell and Turweston Wooded Estate Lands and Farmland Plateau Landscape Character Area (LCA).

The average equivalent noise energy LAeq noise standard used to assess potential interference with communication within buildings (but calculated for convenience at façade) is not considered a satisfactory measure to assess the impact of high-speed train noise in relatively tranquil rural areas. (See the recommendations of the 1993 Mitchel Report to Parliament that assembled extensive research on which the current standards are based and differentiated between city and rural populations.) These standards mask the actual experience of frequent intense noise incidents and there are apparently no established standards for acceptable levels of outdoor noise. Where this can be mitigated at modest cost, we believe this should be done to protect those working outdoors and the general public for example, those taking part in both formal and informal sport and recreation in the countryside and using public rights of way.

There is still inadequate recognition of the intrinsic value of the countryside and the need to protect its use for recreational and amenity purposes such as walking, horse

riding, nature study and traditional country sports. Designated open spaces are rare in most of rural England away from the main conurbations. However, children and others often enjoy informal or permitted access to woods, streams and fields. These spaces are valued by local people as much, if not more than, formally designated open spaces.

Rights of way are identified as destinations in their own right as a recreational resource but this does not always appear to have been followed through with appropriate mitigation measures.

The quality and character of every local landscape are different and are values cherished by people living in rural areas who often make trade-offs in favour of a different quality of life compared with those of city dwellers. These are highly subjective issues not readily amenable to measurement and quantification. However, now that assumptions about maximum noise from passing trains and the averaged 5-minute maximum noise levels have been published, it is very apparent that the effect on quality of life will be severe in areas beyond the average 65dBA contour.

The maximum noise will be higher and travel further than averaged Leq sound energy would suggest, particularly across open plateau countryside. Short loud noise incidents from each passing very high speed train will be perceived very differently to the more continuous road traffic noise with lower maxima.

We welcome the setting of Minimum Environmental Standards (EMRs) in due course to ensure continuation of the provisions of the ES over time. A standard limiting the absolute maximum noise from trains is needed in relation to higher speeds. Such standards should be kept under periodic review so that as technology develops adverse effects that might have to be tolerated initially can be reduced.

4) Lighting - To prevent light pollution in this area of essentially dark skies, full cut-off lighting should be specified for any temporary or permanent lighting installations. In Oxfordshire, there are three construction compounds where lighting could be an issue but there is no information in the draft Environmental Statement about how light pollution will be tackled. The general proposals in Section 5.4 in the draft Code of Construction Practice are noted, but these do not go far enough and a higher standard is needed in this area.

6) Road Closures. The impact of road closures and diversions on rural economy during construction period needs to be reconsidered. The extra cost of keeping minor roads open for local traffic alongside construction traffic is expected to be small and hardship arising from protracted road closures could be avoided.

7) Wildlife. To encourage wildlife and mammals in particular to cross the line where green bridges are not planned, narrow grass verges should be incorporated on road and accommodation bridge decks. We support the detailed observations on this topic covered by Oxfordshire County Council's submission.

Specific Local Mitigation Proposals

CFA13

Godington. Retention and planting of the disused railway embankment to provide a sound and visual screen is welcomed as is accommodation of the footpath / bridleway that can now pass under the line at Godington Viaduct no 2. This latter change would expose walkers and riders to high noise levels if the noise barriers were not extended along both sides of the structure and approach embankments.

CFA14

Newton Purcell. It is now clear from the site-specific noise calculations that the cottages at location 277261 will be severely affected by maximum and nighttime noise levels. There are also several other isolated houses and farms that form part of the village community north of the line that would be significantly affected by noise as would walkers and riders using the Chetwode to Newton Purcell minor road.

The plans appear to indicate the line in cutting where it crosses A4421. However, the 'cutting' is removal of the old embankment down to near the former ground level. Retention of some of the embankment material to form an earth noise screen would be very beneficial in this location and could either be achieved at minimal cost or could actually save expenditure as the material would not need to be hauled to tip. The old railway material is classed as possibly contaminated but this is highly unlikely on anything other than the old track bed.

The length of the road diversion between closure points of about half a mile is reasonable by motor vehicle but a convenient diversion is also needed for the other classes of road user. Pedestrians and riders should be accommodated for instance on two new sections of gently sloping, paved bridleway between the old and new roads parallel to the railway leading to and from the new road bridge. This could be achieved within the Act limits and could be created by dedication without formal Orders.

Dwellings here will be exposed to noise from the road diversion and the request from the parish representatives for quiet asphalt surfacing is endorsed.

Finmere. The Warren Farm group of dwellings (receptor 277403) will be affected by noise from both the railway and the diverted A421. This small residential community could be further shielded by use of surplus excavated material to provide earth noise screens alongside both the road embankment and the top of the railway cutting. This road was formerly the B4031, a quiet minor road until, with the development of Milton Keynes and the construction of M40 and the connecting A43, a new strategic route was designated by diverting the A421 from the present A4421 through Newton Purcell and Bicester. The road over the humped bridge over the closed GCR railway was lowered and moved south. The re-alignment of the road on a raised embankment will add significantly to noise nuisance.

The closure of Featherbed Lane for a long period during construction should be reconsidered.

Mixbury. The detailed measurements of ambient sound at specific locations show this to be a particularly quiet location where the intrusion of the maximum noise from the frequent passage of trains will change the quality of life of residents who are particularly appreciative of its relative isolation.

The line passes between the villages of Fulwell and Mixbury in cutting except where it crosses a small tributary valley of the Ouse on a 200m viaduct and embankment from which noise will spill out into open country. It is understood that a trackside containment barrier will be installed on all viaducts and there is an opportunity to line this with sound absorbing material. Noise spillage along the minor valley towards the village of Mixbury could be reduced at minimal cost. A trackside earth barrier using surplus material that would otherwise need to be hauled off site could do much to mitigate the spillage of noise from wheels and bogies. This is an example of where joining up the effective containment achieved by lowering the line in shallow cuttings would benefit the countryside and local community.

Following consultation on the draft ES, the modifications to reduce the exposure of users of the diverted Mixbury BR5 bridleway at Westbury Viaduct are welcomed. However, the suggestion is also endorsed of an additional all weather alternative from the old Buckingham railway to the new accommodation bridge to the south using the new private road that is to be provided. This new right of way could be created simply by dedication.

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26/2/14