

Canal & River Trust response to the Consultation on the Working Draft Environmental Impact Assessment Report



High Speed Two Phase 2a: West Midlands to Crewe

Response to Working Draft Environmental Impact Assessment Report

Please find below the response of the Canal & River Trust. The Trust is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK, maintaining the nation's third largest collection of listed structures, as well as museums, archives, navigations and hundreds of important wildlife sites.

The Trust has a range of charitable objects:

- to preserve, protect, operate and manage Inland Waterways for public benefit:
 - for navigation;
 - for walking on towpaths; and
 - for recreation or other leisure-time pursuits of the public in the interest of their health and social welfare;
- to protect and conserve for public benefit sites, objects and buildings of archaeological, architectural, engineering or historic interest on, in the vicinity of, or otherwise associated with Inland Waterways;
- to further for the public benefit the conservation protection and improvement of the natural environment and landscape of Inland Waterways;
- to promote, facilitate, undertake and assist in, for public benefit, the restoration and improvement of Inland Waterways;
- to promote and facilitate for public benefit awareness, learning and education about Inland Waterways, their history, development, use, operation and cultural heritage by all appropriate means including the provision of museums;
- to promote sustainable development in the vicinity of any Inland Waterway for the benefit of the public, in particular by:
 - the improvement of the conditions of life in socially and economically disadvantaged communities in such vicinity; and
 - the promotion of sustainable means of achieving economic growth and regeneration and the prudent use of natural resources; and
- to further any purpose which is exclusively charitable under the law of England and Wales connected with Inland Waterways;

provided that in each case where the Trust undertakes work in relation to property which it does not own or hold in trust, any private benefit to the owner of the property is merely incidental.

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We believe that our canals and rivers are a national treasure and a local haven for people and wildlife. It is our job to care for this wonderful legacy – holding it in trust for the nation in perpetuity and giving people a greater role in the running of their local waterways. **The key objective for the Trust in responding to the consultation is to protect our assets and interests and to ensure that as the proposal develops the impacts of the scheme on our inland waterways network or affecting third party restoration projects are appropriately mitigated.**

The Trust hopes that the following comments are helpful and looks forward to further dialogue with HS2 Ltd to ensure that the developing proposal addresses the impacts on and opportunities for the canal network and third party restoration projects.

Please direct any queries to Peter Walker, National Infrastructure Services Manager, Canal & River Trust, First Floor North, Station House, 500 Elder Gate, Milton Keynes, MK9 1BB. Telephone: 07733 124609.

Question 2

Please let us know your comments on the documents that form Volume 1 of the working draft EIA Report.

Volume 1: Introduction and Methodology

We comment that we have found that the extreme fish eye photomontages (used previously in Phase 1) are not helpful in assessing the visual impacts of the proposals.

Volume 1: Appendix: Alternatives Report

We note that section 6.1 states that “the alignment has been reviewed to ensure that the proposed scheme draws the appropriate balance between engineering requirements, cost and potential environmental impacts”. However, Section 6.2 does not appear to explain the reason why the route has been raised. This is of concern in relation to visual impact and noise intrusion in the Woodend Lock area of the Trent and Mersey Canal. We would like to understand the reasons for the increase in height of the route.

Section 6.3 does not appear to explain the reason why the route has been raised which is of concern in relation to visual impact and noise intrusion in the Great Haywood area of the Trent and Mersey Canal where the viaduct has been raised by 3.3m over the canal. We would like to understand the reasons for the increase in height of the route.

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Volume 1 Appendix: Draft Code of Construction Practice (CoCP)

Please find our comments, on the following paragraphs, below:-

- 3.3.1 – The Canal & River Trust (the Trust) is a Statutory Body and we would like to see the Trust identified throughout the CoCP as such a body.
- 4.4.1 – please add “..and cultural heritage..” after “..the environmental..”. The Trust would like to see Advance Environmental Mitigation added to the minimum list of method statement activities.
- 5.1.4 – we feel that the advance notice of works should be given at least six months before any work activity is due to commence, to allow a constructive dialogue to be established with affected parties.
- 5.3.1. – bullet point ten – we would like to add “..or long term mooring sites” after “..residential property..”. This is because there could be residential moorings or locations where people are spending a significant period of leisure time and the impact on their amenity should be considered.
- 5.3.1 – bullet point 9. Volume 2: Mapbook CA2: Colwich to Yarlet Map CT-05-212 shows the main construction compound being proposed to the east of the canal. The working draft environmental impact assessment CA2 report says that bats are recorded within 100m of the land to be taken for the project. There are also moorings in the vicinity of the compound. We welcome the proposal that there will be controls on lighting/illumination to minimise visual intrusion or any adverse effect on sensitive ecology.
- 5.6.2 – The Trust would expect to be consulted on the design of any hoarding on or adjacent to its property.
- 5.12.2 & 5.12.3 – We would like The Canal & River Trust to be specifically mentioned here along with the Environment Agency due to the proximity of our canals to the proposed worksites.
- 8.1.3 - the Trust would like to feed in to the GWSI.
- 9.1.3 – the Trust would like to be part of the Ecological Review Group and we fully support the proposal to carry out preparatory work ahead of the start of construction.
- 12.2.1 – please add “including advance planting where appropriate”, after “..planting works;”
- 13.2.12 – we would like it to be made clear that people living on their boats at designated residential mooring sites will be classed as residents
- Page 57, Table 2 and footnote 4 – we would like it to be made clear that boats at designated residential mooring sites will be classed as “Eligible dwellings”.
- 14.3.1 – we would like to talk to HS2 and its construction contractors about the opportunities for using the Trust’s network of towpaths as part of a sustainable workforce travel plan.

Question 3

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Please let us know your comments on Volume 2: Community Area (CA) reports.

The Trust wishes to comment on matters relating to the Trent & Mersey Canal in CA1 – Fradley to Colton and the Trent & Mersey Canal and the Staffordshire & Worcestershire Canal in CA2 - Colwich to Yarlet. Our detailed comments can be found below.

CA1 – Fradley to Colton

Chapter	Comment
2. Overview of the area and description of the proposed scheme	<p>Volume 2: Mapbook CA1: Fradley to Colton Map CT-05-202-L1 shows approximately 140m of the Trent & Mersey Canal falling within the land potentially required during construction. The Trust objects to this designation as 1. Closure of the canal would have an unacceptable impact on our customers. The Trent & Mersey canal is a strategic north south canal route; and 2. The requirement to take the land is not justified as practical planning of demolition/construction operations would remove the requirement for acquisition of the canal. Such arrangements have been secured in the Colne Valley area of HS2 Phase 1 where demolition/construction of a pylon has not required the canal to be taken.</p> <p>Paragraph 2.2.10 refers to the route gradually returning to a height above ground level of approximately 2m. The profile plan drawing C861-ARP-CV-DPP-000-012001 Revision P01 indicates a height of 4.5m.</p> <p>Paragraph 2.217 refers to a noise fence barrier approximately 3m in height beginning at Bourne Brook viaduct. Volume 2: Mapbook CA1: Fradley to Colton Map SV-01-102 however shows this as up to 2m in height.</p>
11. Landscape and visual	<p>The visual impact of the proposed embankment on the Trent and Mersey Canal corridor should be mitigated by additional landscape planting. This should take the form of fragmented pockets of woodland to reflect the local character and to assist with habitat creation. We request that the planting takes place in advance of construction to provide mitigation at the earliest possible stage. The Trust has suggestions for such planting and we would also be happy to discuss with HS2 any opportunity for planting on land owned by the Trust.</p>
13. Sound, noise and vibration	<p>We note that Kings Bromley Marina is identified as a “non-residential receptors identified for assessment”. There are other long term mooring sites within the area identified as potentially affected by noise. These should also be assessed as receptors and we are happy to work with HS2 to identify these.</p>
15. Water resources and flood risk	<p>The Trust has not assessed the impact on the route of any failure of the Trusts infrastructure. There is the potential for flood water release to affect the railway and the Trust would be happy to work with HS2 to identify this risk and any mitigation measures.</p>

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CA2 – Colwich to Yarlet

Chapter	Comment
2. Overview of the area and description of the proposed scheme	<p>Volume 2: Mapbook CA2: Colwich to Yarlet Map CT-05-212 shows approximately 100m and a further 20m of the Trent & Mersey Canal falling within the land potentially required during construction. The Trust objects to this designation as 1. Closure of the canal would have an unacceptable impact on our customers. The Trent & Mersey canal is a strategic north south canal route and 2. The requirement to take the land is not justified as practical planning of construction operations would remove the requirement for acquisition of the canal.</p> <p>The diversion of the high pressure gas main, Map CT-05-212, will need to be in accordance with the Trust's Code of Practice for Works Affecting the Canal & River Trust, which can be found on the Trust's web site.</p> <p>In the CA2 Community Area Report the canal is only recognised in relation to the towpath given that this is part of the canal walk. The Trent & Mersey Canal should be recognised as a recreational facility in its own right, as it is in the CA1 Community Area Report paragraph 2.1.17.</p> <p>Volume 2: Mapbook CA2: Colwich to Yarlet Map CT-05-212 does not show how access will be gained to construct the Great Haywood viaduct between the River Trent and the Colwich to Macclesfield railway. This section includes the Trent & Mersey Canal. We would like to understand how access will be gained as any access proposal could have an adverse impact upon the canal.</p>
8. Ecology and biodiversity	Paragraph 8.3.14 should include the Trent & Mersey Canal especially in view of paragraph 8.4.14.
11. Landscape and visual	<p>Volume 2: Map book CA2: Colwich to Yarlet Map CT-06-212. The abutment to the east of the Great Haywood Marina and east of the existing railway will be approximately 15m in height. This is large and potentially highly visible from the canal to the north of the proposed viaduct. It requires an appropriate detail and finish, and possibly some buffer planting. In addition the viaduct crossing here benefits from existing woodland along the canal corridor. It is unclear as to how much of this vegetation will be retained. Mitigation for the removal of vegetation should be provided to afford sustainable cover which along with the application of the Trust's HS2 Bridge Design Principles (including the positioning of the piers of the viaduct) should lead to the result of the impact on the immediate canal corridor being limited to the bridge beam between the tree line. For navigational safety reasons consideration will also need to be given to craft sightlines to and from the marina access. Additionally, planting between the canal and the river along the western side of the Trent & Mersey Canal towpath would be beneficial mitigation. Consideration</p>

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	<p>of the distribution of noise barriers and design of noise barriers is required, in accordance with the approach for waterway crossings developed for HS2 Phase 1. We would expect to see noise barriers along the whole of the northern side of the viaduct. Stopping the noise barrier immediately to the east of the canal would create an incongruous element in the overall design of the viaduct when viewed from the canal. The noise barrier should be extended to the eastern edge of the viaduct.</p> <p>There are limited filtered views of the proposed HS2 line from the Staffordshire & Worcestershire Canal (in vicinity of Trent aqueduct). The Trust would like to work with HS2 to look at the possibility of creating a framed view of the HS2 viaduct complemented by possible additional planting/landscape management where appropriate. This would also benefit the long views from the Shugborough Estate.</p> <p>The working draft EIA Report Paragraphs 11.4.16, 11.5.14 and 11.5.28 all appear to exclude reference to viewpoints 009-0-023 and 009-03-21. The reason for this is unclear. We also consider that, due to the presence of the viaduct abutment, viewpoint 009-03-004 should be a photo montage.</p> <p>We note the proposed location of the main compound on map Map CT-05-212. This has the potential to impact on the canal. It is located to the east of the existing railway that has some woodland providing a degree of visual buffer. However it is necessary to retain all woodland and to supplement this as necessary.</p>
13. Sound noise and vibration	<p>Volume 2: Map book CA2: Colwich to Yarlet. Map CT-06-212 Consideration of the distribution of noise barriers and design of noise barriers is required, in accordance with the approach for waterway crossings developed for HS2 Phase 1. We would expect to see noise barriers along the whole of the northern side of the viaduct to reduce the adverse impact on our customers using the canal corridor.</p> <p>We note that Great Haywood Marina is identified as a “non-residential receptors identified for assessment”. There are other long term mooring sites within the area identified as potentially affected by noise. These should also be assessed as receptors.</p>
14. Traffic and transport	<p>All HS2 related traffic accessing the main compound should be required to use the A51 rather than Hoo Mill Lane, to minimise the impact on the canal environment at Hoo Mill Lock and wear and tear on the Trust owned, Grade II listed, Hoo Mill Bridge.</p>
15. Water resources and flood risk	<p>The Trust has not assessed the impact on the route of any failure of the Trusts infrastructure. There is the potential for flood water release to affect the railway and the Trust would be happy to work with HS2 to identify this risk and any mitigation measures.</p> <p>The surface water discharge from the pond shown on Map CT-06-211 in grid B6 may run into a watercourse that then passes under the Trent & Mersey canal via the Trust’s Culvert 72 (our reference TM-089-006). Any additional</p>

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	flow through this culvert could accelerate its deterioration requiring earlier intervention by the Trust, which we would expect to be mitigated.
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Question 4

Please let us know your comments on Volume 3: Route-wide Effects

6. Cultural Heritage.

6.1.3 Refers to two conservation areas being significantly affected but this should also include the Trent & Mersey Canal Conservation Area. This also needs correcting in Table 21 on page 92.

11. Major accidents and natural disasters.

Paragraph 11.6.3. We suggest that operational inland waterways and reservoir breach flood paths are included in this section. The Trust has not assessed the impact on the route of any failure of the Trusts infrastructure. There is the potential for flood water release to affect the railway and the Trust would be happy to work with HS2 to identify this risk and any mitigation measures.

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