

HS2 Phase 2a By email only Our ref: NSIP 0027 Your ref:

Telephone 01604735433

28 March 2019

Dear Sir/Madam

HS2 Phase 2a Additional Provision 2 Environmental Statement and Supplementary Environmental Statement 2 Consultation (February 2019)

Thank you for consulting Historic England on the Phase 2a SES2 and AP2. We have the following comments to make.

<u>CA1 AP-001-015 Additional Land and Change in Bill powers required for a grid supply point</u> connection to National Grid Parkgate substation.

This Additional Provision represents a significant change in the Bill powers, substituting a 7.7km length pair of power lines on steel pylons for a 4km length on wooden poles. Crucially, and unfortunately, the new supply cuts across countryside which is otherwise unaffected by the Proposed Route.

A number of options are discussed in the Community Area Report (5.15.30), including an Option 4 which would have been mostly underground. Little detail is given there as to why this option was dismissed, but we understand that the issues relate to programming and the health and safety risks of having the supply adjacent to the construction of the route. It is not explained how the balance of public benefits of each scheme was weighed against the harm that would be caused. It may well be that an underground option was felt to have greater impact on buried archaeological assets, but this is not stated.

With respect to the historic landscape, the appendix to the volume 5 Cultural Heritage Baseline Report assesses the impact on the Blyth Valley and Bromley Historic Landscape Character Area of AP-001-015. It identifies a significant temporary effect but not a significant permanent effect.

But with respect to the Grade II Newlands Farmhouse the impact from overhead wires and pylons, associated with AP-001-015 and affecting the historic rural setting of the structures, is described as permanent moderate adverse.

Similarly, in assessing landscape impacts, the Landscape and Visual Assessment reported for AP-001-015 in the CA Report in Chapter 2 identifies impacts of moderate adverse significance at 15 years and 60 years.





It is not therefore clear why the impact on the Grade II structure is considered permanent, and the visual landscape impact is effectively considered permanent, whereas the impact on the historic landscape is considered temporary for the construction period only.

We would welcome the opportunity to engage with HS2 to see how the impact of the Parkgate proposal might be reduced.

CA1 Para 2.2.18 Change in depth to borrow pits.

We note the potential increase in extraction depth from the proposed borrow pits, and we note also that the potential for a permanent major adverse effect on deeply buried archaeological remains has been recognised (3.4.11). Figures 1-4 of the Water Resources Assessment included in Volume 5 for CA1 suggest that the potential area over which this might have an impact is very wide indeed, although we recognise that the actual levels involved are likely to diminish with distance from the location of the dewatering.

There are two main types of potential archaeological resources that might be impacted.

- a) near surface waterlogged archaeological materials, adjacent to rivers or other surface water, or preserved where the water table lies close to the surface.
- b) deeply buried Pleistocene deposits that might contain waterlogged materials, for example peat or organic channel fills.

We do not have any information about the presence of any of these features, but there is a reasonable expectation based on past experience that both might be present in this area. An enhanced deposit model of the Pleistocene deposits in this area would be helpful in determining any potential harmful impact. Combined with an understanding of the depths of dewatering and the timescale over which it might take place, an appropriate programme of mitigation should be drawn up.

At an early stage, therefore, we recommend the following:

- 1. Identify possible and potential water dependent heritage assets within the Borrow Pit Dewatering Potential Zone of Influences, and produce a deposit model of the Pleistocene deposits in this area
- 2. Identify the current water level across these areas / at the locations of any water dependent heritage assets
- 3. Identify the depth and duration of dewatering across these areas / at the locations of any water dependent heritage assets

On this basis a programme either for the prevention of harm from dewatering or for mitigation of unavoidable effects might then be produced, and we are happy to advise further on this as necessary.

CA2 AP2-002-001 Additional land required for the provision of a replacement facility for Mayfield Children's Home

We note that the assessment assumes that the Grade II listed Moreton House will either remain as a residential property or be subject to a suitable management regime during HS2 ownership, but it would be helpful if it could be confirmed that the building will remain in HS2 ownership and management until an owner is found.

CA2 AP2-002-010 Additional land required for the reconfiguration of Ingestre Park Golf Club

We note the commitment at 5.10.7 that the design of the replacement course will take into account views in and out of Ingestre Conservation Area and we welcome this. We note that the proposal will leave a part of the former golf course isolated on the south side of the route, and the future of this area





within a sensitive landscape needs to be considered. The views of the Trent Sow Parklands and Cannock Chase AONB HS2 Group might usefully be sought on this.

We understand also that Ingestre Park Golf Club intend to petition for an alternative site rather than the reconfigured arrangement proposed here. If that petition were to be successful this could leave the area between the Proposed Route and the Grade II* listed Ingestre Hall (and thus within the setting of the latter) as an area of potential enhancement. We would be happy to advise further on this.

CA3 AP2-003-013 Additional land required for a water treatment facility at the Severn Trent Water Limited Mill Meece Pumping Station

We note that the assessment acknowledges that there will be a significant effect on the listed Mill Meece pumping station (5.15.19), but as the need for the alternative supply is temporary we cannot understand why the new treatment facility (and the associated harm) is required to be permanent.

Your sincerely

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