Cheshire West and Chester Council

High Speed Rail (Crewe – Manchester) Supplementary Environmental Statement 1 and Additional Provision 1 Environmental Statement Consultation

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Are you responding on behalf of an organisation or group?

Yes

If yes, please include the name of your organisation:

Cheshire West and Chester Council

Please note: if you are providing a response on behalf of an organisation or group, the name and details of the organisation or group may be subject to publication or appear in the final report, unless you have requested confidentiality.

What category of organisation or group are you representing?

Local government

Please tell us whom the organisation or group represents and, where applicable, how you assembled the views of members.

Cheshire West and Chester Borough Council (CW&C) is a unitary local authority formed in 2009. This consultation response is submitted on behalf of the Council by the Director of Transport and Highways.

CW&C highly values the importance of engagement with all stakeholders including residents, businesses, other public entities and Cheshire West and Chester councillors.

Over the many years since it was announced that the proposed route of HS2 would pass through the borough, the Council has worked extensively with these and many other parties on a vast magnitude of relating themes, issues and opportunities.

Building upon this substantial foundation of engagement, the Council specifically engaged with its councillors, town and parish councillors and other representative groups to provide opportunities to input to this submission from the Council to the High Speed Rail (Crewe – Manchester) Supplementary Environmental Statement 1 and Additional Provision 1 Environmental Statement Consultation.

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1.0 INTRODUCTION

1.1 This consultation response from Cheshire West and Chester Council (CW&C) focuses upon the area MA02 – Wimboldsley to Lostock Gralam.

1.2 CW&C submitted a petition against the High Speed Rail (Crewe - Manchester) Bill ("the Bill"), regarding impacts of the Proposed Scheme on the Council's administrative area, as described in the Environmental Statement, Equality Impact Assessment Report and associated documents. Themes of the petition comprise (i) highways and active travel (ii) public transport and public rights of way (iii) Climate Change (iv) equality and diversity (v) landscape and visual (vi) ecology and biodiversity (vii) schools (viii) ground conditions (ix), Crewe North Rolling Stock Depot (x) the need for engagement officers and (xi) waste and minerals.

1.3 The Council also submitted a petition against the First Additional Provision (AP1) to the Bill. Themes of the petition comprise (i) highways (ii) public rights of way (iii) Byley Borrow Pit (iv) waste and (v) minerals.

1.4 There are, therefore, some repetition of comments made in this consultation submission from that of these petitions.

1.5 This consultation submission is structured based upon each of the proposed changes of AP1 affecting area MA02, with exception to comments on waste and material resources which are presented as a bespoke section which is traceable to the specific consultation documents.

1.6 CW&C takes this opportunity to reiterate its fundamental view that design, construction and operation of HS2 through our borough, needs to be driven "inward" from the primary context of ensuring how the scheme will provide effective containment and management of impacts on communities, businesses as well as of the natural and built environment, as opposed to being driven "outward" from the primary context of the whole line of route requirements of the scheme.

2.0 SUMMARY OF HS2 THROUGH THE BOROUGH OF CHESHIRE WEST AND CHESTER

2.1 The route of HS2 to the north of Crewe, traverses northwards from Walley's Green on embankment, passing Middlewich to the east, before crossing the Middlewich branch of the Shropshire Union Canal on viaduct. It continues on embankment, passing Winsford to the west and crossing the River Dane on viaduct. The route continues north towards Lostock Gralam, alternating between embankment and viaduct to cross over Puddlinglake Brook, the Trent and Mersey Canal, Gad Brook,

Wade Brook, Peover Eye and Smoker Brook before continuing into the Pickmere to Agden and Hulseheath area.

2.2 In addition to the route of HS2, the Proposed Scheme also includes the Crewe North rolling stock depot, which will be provided on land between the route of the Proposed Scheme and the West Coast Main Line, north-east of Walley's Green. This operational and maintenance hub will feature 27 sidings of 400 metre length to accommodate up to 54 high speed trains. When operational, the works undertaken at this depot will be more extensive than elsewhere on the Western Leg, ranging from light cleaning to heavy duty maintenance. This depot is where most train drivers would be based and would start and end their shifts.

2.3 Construction and commissioning of the proposed scheme is expected to take place in stages between approximately 2025 and 2035 followed by track laying, systems installation, testing and operation assumed to be from 2038.

2.4 The duration, intensity, and scale of works along the route will vary over this period but will overall be substantial, disproportionate, have permanent changes to lifestyle, impose significant change to the character of the area, impact on economic prosperity and to the natural and built environment.

3.0 Using more land to provide surface water drainage at our planned A530 Nantwich Road and Shropshire Union Canal North construction compounds

3.1 CW&C requests further information from HS2 Ltd. to demonstrate that the Council's ongoing responsibility as Local Lead Flooding Authority (LLFA) is not compromised. The additional provision for surface water drainage must be sufficiently robust to ensure there are no consequential implications on future flood risk management.

4.0 Provision of additional landscape mitigation and hedgerow planting at Wimboldsley

4.1 The Bill provides for landscape mitigation planting, landscape earthworks and hedgerow planting to the east of the HS2 route and west of Wimboldsley Community Primary School. However, the main Environmental Statement (ES) reported residual significant visual effects during construction and operation for various visual receptors in the vicinity of Wimboldsley.

4.2 AP1 proposes a reduction in the area of grassland habitat creation, additional landscape mitigation planting and hedgerow planting to provide additional screening of the construction and operation of the HS2 route and overhead line equipment, Crewe North RSD and borrow pits. This is to provide additional screening for residents east and west of the A530 Nantwich Road and staff, pupils and visitors to Wimboldsley Community Primary School. In addition, this is to help screen construction works the landscape mitigation and hedgerow planting which will be included as part of the advance works.

4.3 The amendment will result in the planting of landscape mitigation areas and hedgerow being brought forward to within the advance works period set out in the main Environmental Statement and the indicative construction programme. The amendment will result in the permanent requirement for an additional 476m2 of land.

4.4 Although CW&C acknowledges that these additional measures seek to provide additional screening for residents east and west of the A530 Nantwich Road for staff, pupils and visitors to Wimboldsley Community Primary School, the Council (and local stakeholders) should receive further details to objectively assess the phasing and effectiveness of these measures, with commitment for any further reasonable and proportionate measures identified, to be fully committed to.

4.5 The significant and combined scale of impacts from works associated with AP1 not removing Borrow Pit A (300m to the southwest of the school) and Borrow Pit B (85m to the north-west of the school) are likely to be of greatest concern to parents and staff of Wimboldsley Community Primary School and nearby residents, land-owners & land users.

4.6 The Council seeks an assurance of compensatory revenue funding to the school should pupil numbers fall during the construction phase of the Proposed Scheme and for these locations for borrow pits not to proceed if reasonable and proportionate mitigation measures cannot be provided.

5.0 Realignment and extension of the Smoker Brook viaduct in Lostock Gralam.

5.1 The Council has no comment on this proposed amendment

6.0 Provision of temporary traffic signals around the M6 junction 18, to reduce the potential impact of construction traffic on the A54 Middlewich Road.

6.1 Issue

6.1.1 This location is within the borough of Cheshire East. HS2 Ltd. would need to ensure that temporary traffic signals are managed to ensure they do not have a detrimental impact on the traffic flows on the A54 Holmes Chapel Road, which is the responsibility of CW&C. Close collaboration by HS2 Ltd. with both Cheshire East Council (CEC) and CW&C will be critical, particularly with regard to the phasing of the temporary traffic signals to minimise adverse traffic impacts. As part of our responsibility under the Traffic Management Act 2004, S.16 expeditious movement of traffic must be maintained.

6.1.2 CW&C supports comments made by Cheshire East Council's petition against AP1, seeking an understanding of why temporary modifications are proposed at this National Highways Road when the HS2 Ltd. transport assessment concludes there is no construction impact on this junction, showing that the

junction will continue to operate adequately. The temporary traffic signals proposed on the A54 Middlewich Road (west) do not appear to be mitigation that is required by the Transport Assessment. The Council is concerned that this proposal is unnecessary for the AP1 works and will serve only to add to the anticipated high levels of driver frustration from delays along the A54 corridor.

6.2 Solution

6.2.1 CW&C shares the request by CEC for an assurance from HS2 Ltd. that it will not deliver the signals unless it can provide the results of an assessment that demonstrates the operational impacts of AP1 at this junction. Should the assessment demonstrate impacts, then HS2 must consult with the CEC and CW&C and commit to providing appropriate mitigation measures.

7.0 Changes to the diversion route planned for an 11kv Scottish Power Energy Network overhead line at Birches Lane.

7.1 This provides for the permanent underground diversion of a Scottish Power 11kV overhead power line for 1.3km, to pass under the HS2 route and the A556 Shurlach Road realignment 95m north of Birches Lane.

7.2 The Council has no objection to this amendment based upon the information provided.

8.0 Highways, shared-use cycle & pedestrian paths, changes to the designs of several highway junctions, to increase their capacity and/or reduce potential impacts of construction traffic

8.1 Highways

8.2 Issue

CW&C considers that revisions detailed in AP1 will not address its concerns regarding the traffic impacts as detailed in the petition against the Bill ("the Bill petition").

8.2.1 CW&C remains concerned that HS2 Ltd. has not confirmed (i) how it intends to undertake the A556 Shurlach Road works including traffic management (lane and road closures etc), (ii) proposed diversions routes and (iii) the proposed duration of construction. This information will have a significant impact on the traffic assessments undertaken and will assist in determining whether further mitigation or land take is required. The following junctions are still a concern and further issues arising from AP1 have been included below.

- **A556 Shurlach Road / A530 King Street** – during the peak periods this junction is already near or at full capacity, without the predicted additional construction traffic. AP1 future scenarios show that this roundabout will be sent over capacity, especially during the AM peak periods, particularly at the eastbound approach. This could have a negative effect on the neighbouring junction at Gadbrook Business Park.
- **A556 Chester Road / A559 Manchester Road** - CW&C is concerned by the potential implications for this junction due to the A556 works and the location of the railway line. No traffic impacts were reported in the documents which accompanied the Bill; however, in AP1, the future scenarios show this junction being pushed over capacity during all PM peak periods.
- **A559 Manchester Road / A559 Hall Lane** – during the peak periods this junction is already near or at full capacity without the predicted additional construction traffic. AP1 future scenarios show this junction being pushed over capacity during PM peak periods and it will be close to being over capacity during the AM peak periods as well.
- **Station Road –** in the documents which accompanied the Bill, Station Road was identified as a 'commuter route to the site compound at A556 Shurlach Road / Station Road junction. However, AP1 now identifies Station Road as carrying construction traffic. Station Road at its junction with A559 Manchester Road is narrow and lined by terraced properties. There is limited off-street parking which results in significant on-street parking that causes issues for through traffic. Designating Station Road as a construction route as well as a commuter route will have adverse effects in the capacity of the signalised junction and will impact on residents, businesses and pedestrian safety.
- **A54 Middlewich Road / Road One / Clive Lane** – This junction is very close to capacity currently in the AM peak and over capacity during the current PM peak period. AP1 shows that this junction will be over capacity in both peak periods in all future scenarios.

8.2.2 There will also be impacts on the following junctions:

- A559 Manchester Road / A530 Griffiths Road
- A530 King Street / B5082 Middlewich Road
- A530 Nantwich Road / Chapel Lane

8.2.3 CW&C considers that the AP1 amendments will not address the impact on local communities such as Rudheath, Lostock, Byley, Lach Dennis, Lostock Green, Wimboldsley and Davenham. CW&C is concerned that the impacts on these parishes, with increased traffic volumes using these areas as 'rat runs' or alternative routes, will increase road safety issues and cause journey time delay to residents and public transport.

8.3 Solutions

1. To make up for the absence of detailed information, CW&C is procuring specialist external advice to better understand the impacts of the scheme on its highways. This work will assess and verify the data of HS2 Ltd. and the capacity / operation of the junctions which will be affected by the Proposed Scheme.
2. CW&C considers that additional mitigation measures including land take may be required at the junctions stated above. However, CW&C has been unable to fully assess the impact on these junctions, as detailed junction modelling has not been provided.
3. CW&C requests that HS2 Ltd. (i) confirms that that the AP1 Transport Assessment has fully assessed the impact on these junctions and (ii) provide traffic modelling and junction analysis to demonstrate there will be no detrimental effects on the network.
4. If junction modelling shows that the construction works will have a major impact on traffic movements, CW&C will expect HS2 Ltd. to provide additional mitigation measures to address these impacts. It is possible that these might require the acquisition of additional land.
5. In respect of the A559 Manchester Road / Station Road, CW&C seeks reassurances that HS2 Ltd. considers alternative routes for construction traffic and does not use Station Road as it is unsuitable for HGVs. If Station Road is still to be used as a construction route, HS2 Ltd. must undertake junction remodelling at the A559 Manchester Road / Station Road, which will need to include additional land take. Improvement measures on Station Road will also be required in terms of parking provision, speed and safety management including carriageway alignment as it is undulated in places.

8.4 Issue

HS2 Ltd. has updated the base line traffic data in AP1 which has raised further concerns over the future capacity of junctions detailed below that were not identified in Bill petition.

The data shows that the following junctions' capacities have increased significantly. However, HS2 Ltd. has confirmed that there will be no mitigation measures in respect of them.

- **B5074 Swanlow Lane / Townfields Road**: - This junction is shown as over capacity in future PM scenarios and very close to being over capacity during future AM scenarios. If this becomes a diversion route, then the junction will be even more adversely affected.
- **A556 Chester Road / London Road** - This junction is shown to go over capacity in multiple future scenarios.
- **A530 King Street / Crowders Lane** - This junction is shown to go over capacity in future scenarios.

- **Apple Market Street / Carpark Egress** - Future scenarios show this junction being pushed over capacity.
- **A559 Leicester Street Roundabout** - Future scenarios show this junction being pushed over capacity during the PM peak periods.
- **A559 Manchester Road / Stubbs Lane** - Future scenarios show this junction being pushed over capacity during PM peak periods.
- **A559 Marston Lane / Dark Lane** - Future scenarios show this junction being pushed over capacity in both AM and PM peak periods.
- **A533 Town Bridge / A533 Dane Street / Weaver Way** - Future scenarios show this junction being pushed over capacity during the AM peak.
- **A530 Griffiths Road / B5082 Middlewich Road / Penny's Lane** - Future scenarios show this junction being pushed over capacity during both peak periods.
- **A54 Wharton Gyratory** - Future scenarios show this junction being pushed over capacity in PM peak periods.

8.5 Solutions

CW&C considers that additional mitigation measures (including land take) may be required at the junctions stated above. However, CW&C has been unable to fully assess the impact, as detailed junction modelling has not been provided.

CW&C requests that HS2 Ltd. (i) conforms that the AP1 Transport Assessment has fully assessed the impact on these junctions and (ii) provides traffic modelling and junction analysis to demonstrate there will be no detrimental effects on the network arising from the AP1 proposals.

If junction modelling shows that the construction works will have a major impact on traffic movements, HS2 Ltd. will need to provide additional mitigation, which could require the acquisition of additional land.

A559 Manchester Road / A530 Griffiths Road

8.6 Issue

CW&C supports the need for junction improvement at this location based on predicted construction traffic and diversion routes. However, CW&C still has concerns about the available design space for this junction alteration within the highway boundary.

8.6.1 AP1 has not addressed the suitability of A530 Griffiths Road as a diversion route with the low bridge near its junction with A559 Manchester Road.

8.6.2 It is stated that there will be a temporary layout at this junction for 12 months which will have a significant impact on CW&C's principal network, and it is unclear how this will be managed as detailed modelling has not been provided.

8.7 Solution

8.7.1 CW&C seeks confirmation that the proposed junction alteration at A559 Manchester Road / A530 Griffiths Road can be undertaken within the highway boundary without compromising design standards and that it does not require additional land take.

8.7.2 CW&C also requires confirmation on how, for 12 months, the temporary junction layout and the impact on the wider network will be managed to ensure disruption is kept to a minimum.

Clive Green Lane – Multi User Path

8.8 Issue

CW&C supports HS2 Ltd.'s proposal to retain the Clive Green Lane Bridge and Canal towpath which will provide a safe pedestrian/cycling access to help promote active travel and long-term community benefits.

CW&C also supports the proposed multi-user path parallel to Clive Green Lane and the proposed ramp between the lane and towpath; however, the design specification needs to take account of Equality Act 2010. [Paragraph 5.4.1 of *Supplementary Environmental Statement 1 and Additional Provision 1 Environmental Statement; MA02: Wimboldsley to Lostock Gralam*].

8.9 Solution

CW&C requires HS2 Ltd. to confirm that the proposed multi-user path parallel to Clive Green Lane and the proposed ramp between the lane and towpath will be designed in accordance with the Equality Act 2010.

A556 Shurlach Road - Cycle and pedestrian provision

8.10 Issue

CW&C supports provision by HS2 Ltd. of a cycle and pedestrian route along the A556 Shurlach Road. However, there is a current provision alongside both sides of the carriageway, and it is strongly recommended that the current provision is maintained to promote active travel and provide community connections between Lostock Green and Lostock / Rudheath.

8.10.1 This route is an essential part of promoting safer routes to schools from Rudheath and Davenham to Leftwich and is currently a well-used community recreational route.

8.11 Solution

8.11.1 CW&C requests that HS2 Ltd. commits to making this provision.

Community severance at Lostock Green

8.12 Issue

8.12.1 AP1 has not addressed the community severance that the Proposed Scheme will have on the community of Lostock Green. It is acknowledged that HS2 Ltd. proposes to provide a diversion route to mitigate the effects of severance; however, the length of the route is disproportionately long and will not encourage use of active modes.

8.13 Solution

8.13.1 CW&C requests a new and fully accessible footbridge directly linking Lostock Green with Lostock Gralam with cycling and walking provision to ensure that the community of Lostock Green are not isolated. The Council requires HS2 Ltd. to provide this vital facility for the community of Lostock Green to ensure that there is a direct link to other communities and amenities which promotes active travel in line with our Health and Wellbeing strategy. This facility will need to be lit for safety reasons and help protect lone walkers and cyclists at night.

Public Rights of Way (PROW)

Retention of FP1 Wimboldsley

9.0 Issue

CW&C notes, and fully supports, the proposal in AP1 to retain FP1 Wimboldsley. The retention of this route provides a vital active travel link connecting rural communities and Wimboldsley School.

9.0.1 However, the Council notes that the 'residual section of Footpath Wimboldsley 1/1 between the Crewe North RSD access road and the A530 Nantwich Road will remain closed, as proposed within the original scheme.' [Paragraph 5.3.2 of *Supplementary Environmental Statement 1 and Additional Provision 1 Environmental Statement; MA02: Wimboldsley to Lostock Gralam*].

9.1 Solution

9.1.1 CW&C requests that HS2 Ltd. ensures that FP1 Wimboldsley is accessible for all users and not just used as a local construction access and that it connects directly to the A530 Nantwich Road and Wimboldsley.

Birches Lane to RB1

9.2 CW&C supports the proposed new PROW connecting Birches Lane to RB1 and requests that it is incorporated into the Bill scheme in due course.

Bridleway 6 connection with Sutton Lane

9.3 CW&C requests that HS2 Ltd. considers an improvement to the Bridleway 6 connection with Sutton Lane, which would provide an active travel route with community benefits linking Middlewich to Wimboldsley including the school. It would also provide a sustainable connection for construction works travelling to the Rolling Stock Depot from Middlewich.

10 Removal of Byley borrow pit / other borrow pits

10.1 Issue

10.1.1 In the Bill petition, CW&C set out its concerns regarding the Proposed Scheme's impact on Byley Primary School, including the impact on air quality from construction works and borrow pits. Under AP1, it is proposed that MA02 Borrow Pit D will be removed from the Proposed Scheme. Owing to this removal, it is likely that CW&C's concerns regarding the borrow pit at this location would fall away, though CW&C would welcome discussions with HS2 Ltd. on this point.

10.2 Solution

10.2.1 CW&C would welcome the inclusion of this part of AP1 within the Bill scheme. In the event this part of AP1 is not included within the Bill scheme, CW&C's concerns, as articulated in the Bill petition, remain. As mentioned above, CW&C would welcome discussions with HS2 Ltd. about the impact on Byley Primary School of the removal of Borrow Pit D from the Proposed Scheme.

10.3 Issue

10.3.1 The SES identifies that other excavated material from construction, material from MA02 borrow pits A, B and C and material imported from quarries will provide sufficient material for the AP1 revised scheme.

10.3.2 Insufficient research and background information has been provided to show that the Proposed Scheme will minimise impacts on mineral supply and safeguarding and will maximise re-use of minerals.

10.3.3 The potential for prior extraction of minerals in safeguarded areas and the potential for the use of marine aggregate have not been considered fully. The potential for use of material from commercial quarries does not consider the existing quarries within the borough.

10.3.4 Decisions on the need for borrow pits, the likely material to be extracted from the borrow pits and the impacts of the borrow pits have been made on limited information and assumptions. For instance, SES1 identifies, at paragraph 2.2.17, that the assessment of effects associated with the borrow pits was based on an assumed average depth of mineral extraction, including an average topsoil and subsoil depth. The assessment also considered the effects of excavating to a greater maximum depth which could reduce the footprint of the borrow pit and reduce potential sterilisation. Relatively little information has been provided to justify the choice of borrow pit sites.

10.3.5 Additional information could result in significant changes to mineral demand and potential provision. Overestimates of the demand for minerals resulting from the Proposed Scheme could result in unnecessary development of borrow pits, with associated impacts on local communities.

10.4 Solution

10.4.1 Additional information should be provided to justify and explain the decisions and to ensure that mineral requirements are reduced as much as possible. Ground investigations should be undertaken to provide further information and to show likely levels of minerals to be provided from the proposed borrow pits. Information should also be provided on associated transport and carbon impacts resulting from alternative methods of minerals provision.

10.5 Issue

10.5.1 Volume 2: Community Area reports, MA02 Wimboldsley to Lostock GralamSection 7.3 Traffic and transport, page 171, para 7.3.25 state that construction of the AP1 revised scheme will result in substantial changes in traffic flows.

10.5.2 Full details of traffic flow impact changes due to removal of Borrow Pit D are requested including confirmation of whether there will be any consequential additional impacts of movement of minerals at other sites.

10.6 Solution

10.6.1 As Borrow Pit D was required for construction of the Golborne Link, confirmation is sought that there will be no additional movements of minerals from alternative borrow pits. Assessing alternative options to the Golborne link must include assessment of construction impacts of movement of minerals

11.0 Waste and Material Resources

11.1

Ref.	Document	Section of document	Comment	Proposed solution
(i)	Non-technical summary	Waste and material resources, page 96	This identifies that the quantity of inert waste arisings from the construction of the AP1 revised scheme that will require off-site disposal to landfill will be	Details should be provided of the amount of inert waste arisings requiring disposal to landfill resulting from the removal of

			approximately 5.4 million tonnes, an increase of 839,375 tonnes over the quantity identifies in the main ES. It states that this is largely due to the removal of the WCML connection. What impact has this had in tonnes of inert waste? What else has impacted on this additional requirement? Is there any way that the additional landfill requirement could be avoided or reduced?	the WCML connection and the amount resulting from other AP1 changes. Alternative options and their implications should be considered in terms of landfill requirements.
(ii)	Non-technical summary	Waste and material resources, page 96	This identifies that off-site disposal to landfill of waste will result in a minor adverse effect, the same level of effect as reported in the main ES, which is not significant. The Council disagree with the assessment of the impact as a minor adverse effect and not significant. The loss of 5.4 million tonnes of inert waste landfill capacity (which comprises an 87% reduction in the North West according to the SES) is a huge reduction in landfill capacity and will result in major additional demands on authorities within the North West. Landfill sites require large areas of land and can potentially result in significant impacts on local areas and communities. As a result, potential suitable sites are	The impact of this loss should be reassessed, and the SES should be amended to identify a 'high adverse' impact, which would take account of the impact on lost capacity and the difficulty replacing this capacity. The plans should also be revisited to identify additional opportunities for reductions in waste generation and increased re-use rather than disposal to landfill. Alternative methods of treatment or disposal should also be considered in more detail to prevent such a huge impact on landfill capacity in the North West.

			extremely difficult to identify (especially given extra pressures on land for alternative uses such as housing or renewable energy) and are unlikely to be supported by local communities. The 87% reduction in inert waste landfill capacity in the North West will have major implications for all North West authorities. It will compromise their ability to plan for and provide sufficient facilities for management of inert waste. If existing and planned facilities are filled with waste from HS2, additional facilities will need to be provided in the future. The identification and allocation of new landfill sites is a difficult, time consuming and controversial process and will impact on the resources and timescales required for the preparation of Local Plans.	
(iii)	Volume 3 – Route-wide effects	Section 22 Waste and material resources page 61 and 62, para 22.2.14 and Table 11	This states that table 11 provides baseline landfill void space capacity data for the North West region based on permitted capacity for the year 2020, as published by the Environment Agency. The table provides landfill void space capacity in tonnes, but the Environment Agency data linked in footnote 21 is provided in cubic metres. The conversion factor to convert the waste from	Details of the conversion factor used to change the Environment Agency data from cubic metres to tonnes should be provided and justified. If the figures have just been transferred incorrectly without being converted this needs to be

			cubic metres to tonnes hasn't been provided and would depend upon the exact nature of waste to be disposed of. If incorrect figures have been used or an incorrect conversion factor this means that the basis for assessing landfill capacity is incorrect and the impacts on local authorities in the North West could be even higher than quoted.	resolved as soon as possible.
(iv)	Volume 3 – Route-wide effects	Section 22 Waste and material resources, page 62 and 63, para 22.2.18	This states that inert waste landfill capacity has been projected for the future baseline period 2025 to 2038 and the year 2039. It identifies that by 2039 there is forecast to be approximately 5.3 million tonnes of inert waste landfill capacity remaining in the North West, slightly less than the 5.8 million tonnes of capacity forecast to be remaining in the main ES. The forecasting has been based on Environment Agency landfill capacity trends data, but this is very variable over time and would be greatly impacted by the period of data chosen. How was the data period chosen? If the forecast is inaccurate, the assessment of the potential impact on NW authorities and the significance of the impact will also be inaccurate. Most authorities find it very difficult to allocate new landfill sites and as	Additional detail should be provided to explain why the data period was chosen to forecast future capacity to ensure that it accurately reflects the picture in the North West.

			such, an increase in capacity is rare. The same comments apply to the forecasts of non-hazardous and hazardous waste landfill capacity, waste recovery infrastructure capacity and waste treatment infrastructure capacity.	
(v)	Volume 3 – Route-wide effects	Section 22 Waste and material resources, page 65 and 66, para 22.2.27 and para22.2.29	This states that the overall effect is of a decrease in opportunities to reuse excavated material, and a subsequent increase in surplus excavated material. It is not clear why there has been a decrease in opportunities to reuse excavated material. Are there alternative options, methods of additional treatment that could increase opportunities for reuse of excavated material? Para 22.2.29 identifies that there will be 5,404,064 tonnes of general fill and landscape fill not required for use in the AP1 revised scheme, which will require off-site disposal to inert landfill. Sending general fill and landscape fill which could be used within HS2 in some way or on other sites is not in line with the waste hierarchy and alternative uses should be found. Paragraph 22.2.29 also identifies that there are 179,768 tonnes of chemically unacceptable U1B materials which cannot be treated on-site and will require off-site disposal to non-	Alternative methods of reuse, processing or disposal should be considered to accord with the waste hierarchy and prevent the impact on landfill sites in the North West.

			hazardous landfill. Again, disposal of this material is not in line with the waste hierarchy, with disposal as the last resort. Why is this material not being treated off-site so it can be re-used?	
(vi)	Volume 3 – Route-wide effects	Section 22 Waste and material resources, page 67, para 22.2.34	This identifies that based on the current level of design and excavation to the mineral depth required to supplement any shortfall of material, it is forecast that 1,538,374 tonnes of material will be excavated from the borrow pits. How has this been forecast? Have any ground investigations been undertaken to assess the depth, thickness or quality of the material? If not, the amount provided could be significantly different and other sources may be required. If the borrow pit is not excavated to the anticipated depth it will not be possible to use the same amount of inert waste to backfill, which will then impact on landfill requirements.	Ground investigations should be undertaken at all borrow pits in order to accurately assess the amount, type and quality of material to be extracted and to ensure that this is sufficient to meet the requirements.
(vii)	Volume 3 – route-wide effects	Section 22 Waste and material resources, page 77, para 22.2.68 and 22.2.69	This identifies that off-site disposal of inert surplus excavated material to landfill will result in an overall reduction in inert waste landfill capacity of approximately 5.4 million tonnes and this will be equivalent to an 87% reduction in inert waste landfill capacity in the North West.	The plans should be revisited and additional opportunities for reductions in waste generation and increased re-use rather than disposal to landfill should be identified. Alternative methods of treatment or disposal should be

			It also identifies that there will be sufficient inert waste capacity to accept the forecast quantity, albeit with a significant decline in capacity. The original amount of waste to be generated and requiring disposal is likely to adversely affect the ability of the Council and all waste planning authorities in the North West to manage their waste arisings over the Plan period. The additional increase in inert waste arisings resulting from AP1 will exacerbate this position further. The Council's Waste Needs Assessment 2016 identifies that there was sufficient capacity for inert waste management including landfill. This does not account for HS2, which could potentially have a huge impact on inert waste levels requiring disposal in CW&C. The calculation of existing and future landfill capacity within the North West as set out in the SES is questioned. It appears to be based on Environment Agency data from 2021, but the Environment Agency data is provided in cubic metres and the SES data is provided in tonnes and no details have been provided regarding conversion factors used. The loss of 87% of the capacity in the North West will clearly impact on CW&C and the other	considered in more detail.

			North West authorities and will significantly compromise their ability to plan for and provide sufficient facilities for management of inert waste.	
(viii)	Volume 3 – route-wide effects	Section 22 Waste and material resources, page 77, para 22.2.70, page 78, para 22.2.76 and page 82, para 22.2.97	The loss of 5.40 million tonnes of inert waste landfill capacity (which comprises the 87% overall reduction in the North West) is described in the SES as resulting in a 'minor adverse' effect, which is stated in the SES not to constitute a significant effect. The SES identifies that the significance criteria for inert landfill is based on the difficulty and complexity of replacing the lost capacity, rather than focusing on the percentage of available capacity forecast to be occupied. It also states that inert landfill is easier to replace than non-hazardous and hazardous landfills and this is reflected in the higher upper threshold values for adverse effects. CW&C disagrees with this approach to deciding significance and considers that provision of sufficient additional landfill sites to meet existing future demands plus the huge additional demands from HS2 will be extremely difficult for authorities in the North West. Landfill sites require large areas of land and can potentially result in significant impacts on local areas and communities.	The SES should be amended to identify a 'high adverse' impact, which would take account of the impact on lost capacity and the difficulty replacing this capacity.

			As a result, potential suitable sites are extremely difficult to identify (especially given extra pressures on land for alternative uses such as housing or renewable energy) and are unlikely to be supported by local communities. The 87% reduction in inert waste landfill capacity in the North West will have major implications for all North West authorities. It will compromise their ability to plan for and provide sufficient facilities for management of inert waste. If existing and planned facilities are filled with waste from HS2, additional facilities will need to be provided in the future. The identification and allocation of new landfill sites is a difficult, time consuming and controversial process and will impact on the resources and timescales required for the preparation of Local Plans.	
(ix)	Volume 3 – route-wide effects	Section 22 Waste and material resources, page 77, para 22.2.71	This states that the inert waste landfill capacity in West Midlands and Yorkshire and Humber regions substantially exceeds the available capacity in the North West and these areas could be easily accessed by rail and their use would mitigate the reduction in available landfill capacity in the North West. There is no evidence that the waste planning authorities in these regions have been	The plans should be revisited and additional opportunities for reductions in waste generation and increased re-use rather than disposal to landfill should be identified. Alternative methods of treatment or disposal should be considered in more detail. Details of any opportunities for

			approached to ascertain whether this is a feasible option. In any event, the Council would be concerned with the sustainability and climate change impacts of utilising these facilities and would not want to be forced to send waste to these areas due to a significant reduction in capacity in the North West.	managing inert waste arisings for use as fill or in site restoration should be provided. Details regarding landfill capacity in the West Midlands and Yorkshire and Humber regions should also be provided, along with confirmation from those areas as to whether this is a feasible option.
(x)	Volume 3 – route-wide effects	Section 22 Waste and material resources, page 78, para 22.2.73	This states that waste planning authorities have a statutory responsibility to make provision of sufficient waste infrastructure capacity and it is therefore likely that they will continue to plan for new inert waste landfill sites and / or to identify other suitable placement locations to enable continued capacity to be available as landfill void space is occupied. Local authorities and promoters of new schemes also have a responsibility to drive waste management up the waste hierarchy. As identified in the National Planning Policy for Waste, local planning authorities should ensure that the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the	Greater importance should be given to the waste hierarchy and minimisation, re-use and treatment of waste to ensure that landfill is only undertaken as the last resort.

			implementation of the waste hierarchy and / or the efficient operation of such facilities. The current HS2 proposal prejudices the implementation of the waste hierarchy due to the amount of inert waste generated that is proposed to be landfilled and due to the impact on landfill capacity. Provision of sufficient additional landfill sites to meet existing future demands plus the huge additional demands from HS2 will be extremely difficult for authorities in the North West. Landfill sites require large areas of land and can potentially result in significant impacts on local areas and communities. As a result, potential suitable sites are extremely difficult to identify (especially given extra pressures on land for alternative uses such as housing or renewable energy) and are unlikely to be supported by local communities. The 87% reduction in inert waste landfill capacity in the North West will have major implications for all North West authorities. It will compromise their ability to plan for and provide sufficient facilities for management of inert waste. If existing and planned facilities are filled with waste from HS2, additional facilities will need to be provided in the future.	

			The identification and allocation of new landfill sites is a difficult, time consuming and controversial process and will impact on the resources and timescales required for the preparation of Local Plans.	
(xi)	Volume 3 – route-wide effects	Section 22 Waste and material resources, page 78, para 22.2.75	This states that significance criteria for inert waste landfill capacity state that a local scale reduction in inert landfill void space capacity, and a need for additional small-scale disposal capacity of up to 2,000,000 tonnes per annum may be judged to be of low importance. How has this 'low importance' been decided? 2,000,000 tonnes per annum is not small scale from a local authority perspective	Further information should be provided to justify the identification of 2,000,000 tonnes per annum as small scale and low importance.
(xii)	Volume 5: Appendix WM-001-00000 Waste and material resources	Page 8, table 1, page 9, table 2 and page 10 para 2.1.10	Table 1 sets out Construction, Demolition, Excavation and Waste (CDEW) arisings and management methods in Cheshire West and Chester in 2022. Table 2 sets out future baseline (2025-2038) CDEW arisings and management methods. It is stated in para 2.1.10 that the Waste Management Needs Update does not specify how much waste is sent to landfill. Does this mean the 2016 Waste Needs Assessment? If so, this identifies in section 3.5-11 that of the CDEW managed through	The baseline and future baseline information on disposal of waste to landfill should be reviewed to ensure it includes accurate and up to date information.

			permitted facilities, 9% went to landfill in 2014. This is significantly different to the 25% disposal to landfill rate set out in the tables. It is also very likely that the position has changed since 2014. If the figures in the tables are incorrect, they could result in inaccurate assumptions of future landfill impacts and requirements. Similar comments apply to the other tables relating to types of waste and percentages sent to landfill.	
(xiii)	Volume 5: Appendix WM-001-00000 Waste and material resources	Page 19, para 2.3.3, para 2.3.4 and para 2.3.6.	This states that projected landfill capacity is based on the average percentage change in permitted landfill capacity for the years 2005 to 2020 as reported by the Environment Agency. Why has the period from 2005 to 2020 been chosen? If the period from 2010 to 2020 was chosen, the average would be very different. Paragraph 2.3.4 states that use of an average value provides a reasonable allowance for potential future increases in permitted capacity and takes account of waste generation trends. This only takes account of past waste generation and capacity provision trends, not anticipated future trends. Paragraph 2.3.6 identifies those outliers which have been removed.	Further information should be provided to justify the calculation of projected landfill capacity and to ensure that it is as realistic as possible.

			Which outliers were removed and why? What impact did this have on the calculation of average percentage change and the future projections?	
(xiv)	Volume 5: Appendix CT-008-00000 Borrow pit report	Page 13, para 3.5.3	This identifies that the use of quarries as a sole source of high quality and general fill engineering materials is not considered feasible and that this assessment considers the information provided by quarry operator, the distance of quarries from the identified areas of demand and the potential impacts of traffic. Which quarry operators have been contacted and which quarries have been considered? Prior to AP1 not all quarry operators in the Cheshire West and Chester area had been contacted and quarries within Cheshire had not been considered as potential sources of supply. If this is still the case then a throughout assessment of the options for use of quarries to provide the required materials has not been undertaken.	All quarry operators within Cheshire West and Chester should be contacted about potential provision of the required materials. The quarries located within the Cheshire area should be considered, not just quarries much further away (as was done previously).
(xv)	Volume 5: Appendix CT-008-00000 Borrow pit report	Page 13, para 3.5.4	This identifies that the deficit of high quality granular engineering fill materials that cannot be sourced from within the land required for construction or borrow pits will need to be sourced from quarries located close to the scheme.	Further detail should be provided to confirm the amount of high quality granular engineering fill and where it will be provided from. The quarries within the Cheshire area should be contacted to inform

			What amount of material will need to be provided by the quarries? Is this 1.9 million m3? If so, that is a large requirement and would represent around a third of Cheshire West and Chester's current sand and gravel reserves. This information is required to enable CW&C to accurately predict future demand. Para 3.5.3 states that use of quarries for the sole source of materials is not feasible for various reasons. As such, on what grounds is it feasible to provide the remaining requirement? Has this been discussed with quarry operators? Which quarries have been considered as potential suppliers? Insufficient research and background information has been provided to show that the scheme will minimise impacts on mineral supply and safeguarding and will maximise re-use of minerals. The potential for prior extraction of minerals in safeguarded areas and the potential for the use of marine aggregate have not been considered fully. The potential for use of material from commercial quarries does not consider the existing quarries within CW&C.	them of the requirement and understand the likelihood that they will be able to provide the required amount, type and quality of material. Additional information should be provided to justify and explain the decisions and to ensure that mineral requirements are reduced as much as possible. Ground investigations should be undertaken to provide further information and to show likely levels of minerals to be provided from the proposed borrow pits. Information should also be provided on associated transport and carbon impacts resulting from alternative methods of minerals provision.

12.0 Community Severance / Embankments / Viaducts

12.1 Issues

12.2 The route of HS2 through our borough is either on embankment or viaduct with the vast infrastructure including the Crewe North Rolling Stock Depot, which will be provided on land between the route of the Proposed Scheme and the West Coast Main Line, north-east of Walley's Green. This operational and maintenance hub will feature 27 sidings of 400 metre length.

12.3 The section of route between to the north east of Broken Cross and north east of Lostock Gralam features a concentration of major infrastructure comprising Rudheath Embankment, Wade Brook Viaduct (height 20 metres, length 285 metres), immediately followed by Lostock Gralam South Embankment (height 14 metres, length 353 metres), Lostock Gralam Viaduct (height 9 metres, length 62 metres), Lostock Gralam North Embankment (height 14 metres, length 655 metres) and Smoker Brook Viaduct (25 metres height, length 827 metres if this Additional Provision is passed).

12.4 In addition to the physical (potentially also psychological) and intrusive severance impacts of embankments to residents, visitors and land users, these also significantly adversely impact upon habitat and the natural environment. Within the petition submission by Lostock Gralam Parish Council against the High Speed Rail (Crewe - Manchester) Bill, the parish council asked that the HS2 scheme replaces the Rudheath embankment, Lostock Gralam south embankment and Lostock Gralam north embankment with one viaduct straight through from the Gadbrook Viaduct to the Smoker Brook Viaduct (Page 12 CTR2.0 – 2.3), adding that this should have a shorter construction period than currently proposed.

12.5 Solutions

12.6 CW&C recognizes the potential wider benefits of this proposal from Lostock Gralam Parish Council which can include provision of a new and fully accessible footbridge directly linking Lostock Green with Lostock Gralam with cycling and walking provision to help ensure that the community of Lostock Green are not isolated as referred to within CW&C's petition (also by Lach Dennis Parish Council) and within paragraph 8.12 above.

12.7 A commitment is sought for a full feasibility assessment of this option, in addition to other similar locations in the borough, working with CW&C and relevant local stakeholders.

13.0 Conclusion

13.1 The Council's overarching key themes are orientated around adverse impacts on communities including severance, active travel and highways (during construction and operation of HS2) and upon the natural environment.

13.2 The HS2 scheme, including features set out within CW&C's petition against AP1 will adversely affect many communities including Rudheath, Lostock Gralam, Byley, Lach Dennis, Lostock Green, Wimboldsley and Davenham.

13.3 CW&C recognizes the magnitude and complexity associated with the Government's scheme for the construction and subsequent operation of HS2 Phase 2b. Although extensive work has already been undertaken by HS2 Ltd. to determine this chosen route and infrastructure, CW&C requests that there continues to be meaningful scope for changes to be made, which may require future Additional Provisions to the Bill. This will become more apparent as technical work develops and confirms that further mitigation measures and amendments will be required to continue to minimise adverse legacy impacts on communities, businesses and the environment.

13.4 HS2 Phase 2b is already having a major adverse impact on communities, businesses, the natural and built environment and construction will magnify the scale of these environmental impacts. Government and HS2 Ltd. need to keep a firm focus on the project from this perspective, ensuring that the decisions now being made, which will have lifelong impacts, will be fair. As mentioned within the Council's response to the High Speed Rail (Crewe – Manchester) HS2 Phase 2b Environmental Statement Consultation (31st March 2022), Government is urged to establish a regional ombudsman function to help ensure reasonable and proportionate measures are taken by the scheme.

13.5 Although beyond the remit of this Additional Provision, the Government is also urged by CW&C, to ensure that there are periodic and ongoing meaningful public review opportunities of the emerging environmental and equality impacts of HS2 Phase 2b, structured so that all people, including under-represented groups, understand impacts and what decisions they can influence.