



**TRAFFORD
COUNCIL**

High Speed Rail – Phase 2b: Crewe - Manchester Environmental Statement Consultation

Response of Trafford Council

31st March 2022



TRAFFORD
COUNCIL

List of Abbreviations

Abbreviation	Meaning
CP1	Control Point 1
CP2	Control Point 2
CP3	Control Point 3
CE	Cheshire East Council
DfT	Department for Transport
EIA	Environmental Impact Assessment
EQIA	Equalities Impact Assessment
ES	Environmental Statement
EZ	Enterprise Zone
GM	Greater Manchester
GMASS	Greater Manchester Archaeology Advisory Service
GMCA	Greater Manchester Combined Authority
GMS	Greater Manchester Strategy
GMSF	Greater Manchester Spatial Framework
HS2	High Speed 2
IEMA	Institute of Environmental Management and Assessment
LA	Local Authority
LPA	Local Planning Authority
MAG	Manchester Airport Group
MCC	Manchester City Council
NPPF	National Planning Policy Framework
NIC	National Infrastructure Commission
NPEIR	Northern Powerhouse Independent Economic Review
NPR	Northern Powerhouse Rail
NTS	Non-Technical Summary
SRF	Strategic Regeneration Framework
TC	Trafford Council
TfGM	Transport for Greater Manchester
TfN	Transport for the North
UU	United Utilities
WMBC	Warrington Metropolitan Borough Council
WC	Wigan Council
WDEQIA	Working Draft Equalities Impact Assessment
WDES	Working Draft Environmental Statement

High Speed Rail – Phase 2b Western Leg Environmental Statement Consultation

Chapter 1

[Section 1: Executive Summary](#)

[Section 2: Structure of the Response](#)

[Section 3: Policy Context](#)

[Section 4: Trafford Council Comments on the Non-Technical
Summary](#)

1 Executive Summary

1.1 Introduction

- 1.1.1 This paper sets out Trafford Council's (TC's) response to HS2 Ltd.'s consultation on the High Speed 2 (HS2) Phase 2b Environmental Statement (ES). A separate paper sets out Trafford Council's response to HS2 Ltd.'s consultation on the Equality Impact Assessment (EqIA). Our responses to both those documents should be read together.
- 1.1.2 For the purposes of this response, "GM Partners" is a collective term to refer to: Manchester City Council (MCC), Greater Manchester Combined Authority (GMCA); Transport for Greater Manchester (TfGM); the directly affected Local Authorities – Trafford Metropolitan Borough Council (TC), Wigan Metropolitan Borough Council (WC), and Manchester Airports Group (MAG).
- 1.1.3 HS2 Phase 2b, along with Northern Powerhouse Rail (NPR), is key to the future success of Greater Manchester and the North, and an essential part of the levelling up agenda. Trafford Council has consistently supported HS2 Phase 2b, whilst maintaining its position that the proposals developed need to be delivered in a way that complements the local objectives of the places they serve.
- 1.1.4 The HS2 Phase 2b (Crewe to Manchester) hybrid Bill was introduced into Parliament on 24th January 2022. The hybrid Bill was accompanied by an Environmental Statement (ES) and an Equality Impact Assessment (EqIA). The ES and EqIA are the subjects of a public consultation which commenced on 25 January 2022 and is due to close on 31 March 2022.
- 1.1.1 The ES reports on the likely significant residual environmental effects of the proposed railway and stations, to inform the decision maker as part of the development consent process. The Trafford Council response focuses on the following community areas which are wholly or partly within Trafford:
- MA04: Broomedge to Glazebrook
 - MA06: Hulseheath to Manchester Airport
- 1.1.2 This report should be read in conjunction with the consultation responses from the individual GM Partners. This response provides consolidation of views and issues in the context of TC and GM policies and strategies for the future.



- 1.1.3 Where the review has identified shortcomings, the need for additional information or concerns regarding design and / or mitigation, these have been translated into asks or requirements of HS2 Ltd. The key issues identified from the ES review are summarised below.

1.2 **The Opportunity from HS2 & Northern Powerhouse Rail**

- 1.2.1 Trafford Council welcomes and fully supports the Government's intention to progress with the proposed HS2 Phase 2b extension from Crewe to Manchester. We also welcome the Government's decision to incorporate provision for Northern Powerhouse Rail (NPR) within the designs for the HS2 hybrid Bill. Trafford Council believes that Manchester Piccadilly and Manchester International Airport are the optimum locations for HS2 and NPR stations, and welcomes the opportunity to work with HS2 and partners to develop these plans to ensure they are integrated with our aspirations for Trafford and the airport areas to capitalise on the economic stimulus of the airport and its growth.
- 1.2.2 The Council recognises the significant potential that HS2 and NPR offers for economic growth in Greater Manchester (GM) and the North. And for the wider agenda for rebalancing the economy in the UK. It is essential that the opportunities afforded by HS2 and NPR are maximised.
- 1.2.3 In March 2018, Trafford Council, along with the GMCA and Manchester City Council (MCC) and input from Manchester Airport Group (MAG), published a comprehensive Growth Strategy for the stations at Manchester Airport and Manchester Piccadilly, which sets out how HS2 can have maximum impact through station planning; wider connectivity; full support for committed and new economic and residential growth and regeneration; and local skills and supply chain benefits.
- 1.2.4 Trafford Council, and our GM partners, will continue to engage with Government, HS2 Ltd and DfT to ensure the appropriate development of infrastructure and to seek opportunities to deliver Phase 2b in a way which is optimally integrated with NPR.

1.3 **Stakeholder Engagement**

- 1.3.1 HS2 Ltd suggests that stakeholder engagement has been an integral part of the process. However, the lack of response to Trafford Council's comments on the Working Draft ES (WDES) and lack of engagement during the preparation of this ES means that the assessment and design of the proposed Scheme is deficient.



1.3.2 Whilst some engagement has taken place with the directly and indirectly affected local authorities in GM as well as MAG since the WDES consultation, this has been limited and high level. Trafford Council is disappointed at the level of detail provided and further meaningful engagement was and is still needed, particularly in relation to ensuring the adequacy of impact assessments and mitigation measures. GM Partners consider that to be essential in terms of the overall approach to scheme development, mitigating the impacts on local communities and assisting the passage of the Bill through Parliament.

1.4 **Compliance with the Environmental Impact Assessment (EIA) Regulations.**

1.4.1 Trafford Council considers that overall, the HS2 Phase 2b Crewe to Manchester's ES fails to meet the requirements of the EIA Regulations and prevailing best practice. The reviews undertaken for each ES environmental topic (e.g. air quality, noise, ecology) have considered the method of assessment, the reporting of the existing and future baseline environment, the impact assessment and the suitability of mitigation and monitoring measures in the context of the 2017 EIA Regulations and topic guidelines. Generally, the review has found that some of these elements were deficient in each of the environmental topics. Examples include methods that do not reflect current industry standards, missing survey information, incorrect values ascribed to receptors and a lack of mitigation to address predicted significant adverse environmental effects.

1.4.2 Other issues identified relate to the lack of consideration of several major largescale committed developments, the method of assessment of flexibility within the scheme design and the results of those assessments, deficiencies in the method for the assessment of alternatives including a robust comparison of environmental effects and a lack of information on the totality of impacts at individual receptors.

1.4.3 These deficiencies within the ES have resulted in an inability to understand the real-life significance of environmental effects of the Proposed Scheme and the appropriateness of proposed mitigation measures.

1.5 **Compliance with Policy**

1.5.1 The review has also considered the impacts of the Proposed Scheme in relation to GM Partners policies and plans which transpose national legislation. The lack of information provided in the ES has made it difficult to assess if HS2 hinders or supports some of these policy objectives. Policy topic areas potentially affected include those relating to:

- 1) Air quality and Clean Air Zones
- 2) Bus priority measures to accord with GM's Transport Strategy
- 3) The integration of active travel provision into the design
- 4) The consideration of planned developments that are anticipated to be delivered before HS2 construction begins or indeed alongside it, including NPR's future demand and access requirements
- 5) Demonstrating a minimum of 10% biodiversity net gain
- 6) Addressing carbon and climate change obligations and
- 7) Delivering local employment.

1.5.2 Trafford Council requests of HS2 Ltd that compliance with these policies and plans are ensured as the Bill proceeds through Parliament.

1.6 Critical Design Issues for the Proposed Scheme

1.6.1 As identified above, issues relating to stakeholder engagement, the assessment of alternatives and appropriateness of mitigation measures means that critical design issues remain to be addressed as the Bill proceeds. The most critical design issues which require further consideration and assessment are as follows:

- **Manchester Airport High-Speed Station including:**
 - Integration into the planned development of the Timperley Wedge proposed allocation
 - Provision for Tram Train Link at the Manchester Airport Station
 - Design of Highways Access to the Station; and
 - Method of disposal of spoil in the Airport Area
- Wigan / Golborne Link; and
- Non-motorised User provision

1.6.2 Some of these issues have been raised in response to previous consultations over several years and remain unresolved.

1.7 Climate Change Issues

1.7.1 HS2 Ltd state on its website that:

“HS2 is being designed and built to be the most sustainable high-speed rail network in the world. Cutting carbon emissions informs our work as we build a climate-

resilient railway that will transform long distance, intercity travel and rebalance the UK economy”.

1.7.2 To this end and in the context of The Climate Change Act 2008 and Trafford Council’s declared Climate Emergency, Trafford Council’s review of the Proposed Scheme and the associated Environmental Assessment have highlighted some critical issues and concerns specific to the borough of Trafford, its communities, and the Council.

1.7.3 These are, namely:

- 1) The net carbon emissions from the Proposed Scheme are positive up to 2050 and over its lifetime. This fails to support the national target of Net zero by 2050 as required under the Climate Change act 2008.
- 2) No consideration for the Trafford Climate Emergency and carbon budget(s) (Net Zero date of 2038) with a 13.4% year on year reduction rate from 2020 has been included within the assessment.
- 3) HS2 Ltd do not appear to consider the use of 100% green energy during the operational phase of the Proposed Scheme as embedded mitigation.
- 4) A cumulative assessment required under the EIA 2017 Regulations does not appear to have been undertaken for the GHG part of the climate change assessment.
- 5) Insufficient mitigation measures have been identified at a local level to combat the potentially effects of the Proposed Scheme on climate change adaptation and resilience.
- 6) The proposed HS2 Airport station must be constructed as sustainably as possible, creating as little carbon footprint as possible and embed sustainable and renewable technologies and principles in its construction and design, so much that it is self-sufficient in terms of heating/ cooling, lighting and energy generation.

1.8 Critical Concerns for the Borough of Trafford

1.8.1 In addition to the above design and climate change critical issues, Trafford Council’s review of the Proposed Scheme and the associated Environmental Assessment have highlighted some critical issues and concerns specific to the borough of Trafford, its communities and the Council.

MA04: Broomedge to Glazebrook Community Area

- 1) Impacts on air quality and associated effects on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, people with existing health conditions),



arising from the construction of HS2, including the significant number of vehicle movements anticipated.

- 2) The Proposed Route will sever the A6144 Paddock Lane link between the two small rural settlements of Warburton village and Moss Brow hamlet and create a sense of isolation.
- 3) Impacts on the community and associated effects on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of communities.
- 4) Impacts on health arising from changes to traffic and transport in terms of air quality, noise and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.
- 5) Scale of vegetation loss including ancient woodland, hedgerows, and grassland.
- 6) Permanent, significant and adverse landscape and visual impact of the proposed viaduct over the Manchester Ship Canal together with the wider landscape and visual effects if the Proposed Scheme
- 7) Lack of understanding in the HS2 assessment of the existing noise and vibration context in MA04, specifically in and around Warburton and insufficient baseline noise modelling for the assessment of traffic noise.
- 8) Concerns around the assumptions used to undertake the airborne construction noise or ground-borne construction vibration assessments.
- 9) Capacity of existing strategic and local highway networks, particularly the A6144 which is already over-capacity
- 10) Volume and length of construction traffic and associated effects on residents, health and well-being
- 11) Capacity of M60 Junction 8
- 12) Use of inappropriate/ unsuitable construction traffic routes
- 13) Proposed Places for Everyone allocation at New Carrington not included within modelling
- 14) Limited traffic modelling for junctions

MA05: Risley to Bamfurlong Community Area

- 1) Concern about the impact of the HS2 route on the Great Manchester Wetlands Nature Improvement Area and the Manchester Mosses Special Area of Conservation (SAC).
- 2) HS2 construction routes which access the M60 at Junction 8, 10 and 11 will be adding additional vehicles to an already very congested network. Any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 currently operates at capacity during peak times and the M60



already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.

- 3) The HS2 Traffic and Transport Assessment assumes that the entirety of the Western Gateway Infrastructure Scheme (WGIS) has been completed. The J10 link at the Trafford Centre is identified as a possible construction route and this link is yet to be constructed.
- 4) Impact of construction traffic, particularly HGVs on the Trafford Centre area and the severance this will cause to NMUs in the area

MA06: Hulseheath to Manchester Airport Community Area

- 1) Impacts on air quality and associated effects on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, people with existing health conditions), arising from the construction of HS2, including the significant number of vehicle movements anticipated.
- 2) Impacts on the community and associated effects on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of communities.
- 3) Impacts on health arising from changes to traffic and transport in terms of air quality, noise and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.
- 4) Lack of active travel measures around the Airport Station
- 5) Lack/loss of pedestrian routes to and in the vicinity of the Airport Station
- 6) Scale of vegetation loss including ancient woodland, hedgerows, and grassland.
- 7) Insufficient baseline noise modelling for the assessment of traffic noise.
- 8) Concerns around the assumptions used to undertake the airborne construction noise or ground-borne construction vibration assessments.
- 9) Concerns that pilling has been scoped out of the assessment, which would give rise to a significant amount of noise and vibration
- 10) The number of roads included within the construction phase traffic assessment is insufficient, other roads will clearly be used during the construction phase.
- 11) Omission of the Manchester Airport High Speed Station from the ES operational phase assessment.
- 12) The significantly increased vertical alignment of the Manchester Airport High Speed station and associated infrastructure.
- 13) The Proposed Scheme's adverse impact on Davenport Green Ancient Woodland through the proposed retaining wall.



- 14) Lack of full integration of Metrolink infrastructure from day one of HS2 services operating.
- 15) Severance created by the Proposed Scheme with future planned development at Timperley Wedge and the need to integrate the station with adjacent planned development.
- 16) Quantum of proposed car parking and lack of consideration of active travel and sustainable transport modes in the station area and on the surrounding road network.
- 17) Closures and diversions to existing Public Rights of Way resulting in significantly increase journey lengths.
- 18) The proximity of construction compounds to surrounding residential areas.
- 19) Fundamental issues with the baseline information used to inform the Highways modelling. It does not includes Places for Everyone allocations – including Timperley Wedge, Manchester Airport growth or Northern Powerhouse Rail.
- 20) The scale of the junction and highway infrastructure for Manchester Airport is not appropriate.
- 21) The changes to M56 Junction 6 do not provide an acceptable solution to accommodate existing trips, a situation which is further exacerbated when additional growth is added to the network.
- 22) Limited engagement with National Highways and the Department for Transport (DfT) on M56 Junction 6 issues.
- 23) HS2 will be adding significant additional trips to an already saturated highways network, particularly on the Hale Road gyratory and Hale Road
- 24) Opportunity for the realigned Thorley Lane / Tunnel service road junction to include provision for the Timperley Wedge Spine Road.
- 25) Significant concern about the number of HGV vehicles accessing the construction compounds in the MA06 area
- 26) Use of inappropriate/ unsuitable construction traffic routes

1.9 Requests and Requirements

- 1.9.1 The critical issues listed above, have led Trafford Council to make various requests and/or requirements of HS2 Ltd and/or the Proposed Scheme, namely:

MA04: Broomedge to Glazebrook Community Area

- 1) Further mitigation measures and resources be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme



- 2) Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including assessment of height and elevation
- 3) Advanced planting provided well in advance of construction to mitigate significant adverse construction and Yr1 effects.
- 4) Require additional mitigation planting at various locations in Trafford within the MA04 area – see Landscape plans.
- 5) Design improvements to the viaduct to be non-generic and be designed to add visual interest to allow better integration into the otherwise open landscape.
- 6) Additional mitigation and/or compensation measures to be provided to affected residents and businesses from both the construction of the route and the associated construction traffic, the latter of which will affect a large geographical linear area between Warburton, Partington and Carrington
- 7) Contribution to the Carrington Relief Road (CRR) and use of the route approved during construction
- 8) Financial contributions to facilitate improvements to the adopted highways for both vehicles, cyclists and pedestrians
- 9) Advanced planting and public realm improvements adjacent to the proposed construction routes in Partington and Warburton
- 10) Contributions towards local public transport improvements/ provision during the construction
- 11) Contributions and improvements at M60 J8
- 12) Alternative footpaths and crossings where PRoWs are being closed/ diverted
- 13) Amend construction routes to avoid use of inappropriate/ unsuitable routes

MA05: Risley to Bamfurlong Community Area

- 1) Assurance required from HS2 that any impact on the Great Manchester Wetlands Nature Improvement Area and Manchester Mosses Special Area of Conservation (SAC) is fully assessed and appropriately mitigated.
- 2) Review of construction routes to and from M60 giving particular emphasis on removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle. Construction traffic routes to be primarily on A57 to and from the west to M6 Junction 21.
- 3) As a minimum, Trafford Council will require a restriction to the hours of operation of construction traffic on this route.
- 4) HS2 to model a 'without full-WGIS' scenario and assess the impact on the existing network / identify suitable mitigations.

MA06: Hulseheath to Manchester Airport Community Area

- 1) Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including assessment of height and elevation
- 2) Further mitigation measures and resources be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme
- 3) Provision of active travel measures and designs within the Airport Station including cycle parking, showers and lockers etc.
- 4) Alternative provision/ re-alignment of diverted/ closed foots
- 5) Advanced planting provided well in advance of construction to mitigate significant adverse construction and Yr1 effects.
- 6) Additional mitigation and/or compensation measures to be provided to affected residents and businesses from both the construction of the route and the associated construction traffic, the latter of which will affect a large geographical in the south of Trafford
- 7) The Manchester Airport Station must be included within the ES operational phase assessment
- 8) M56 Junction 6 and Hale Gyratory to be redesigned to be fit for purpose for both HS2, the SRN and LRN taking into account planned and committed developments and growth of Manchester Airport
- 9) Need to re-establish South Manchester Highways Group with HS2, DfT, National Highways, GM Partners, Manchester Airport and Cheshire East. The issues on the M56 corridor need to be considered in the wider context.
- 10) HS2 to construct the section of spine road through the HS2 tunnel construction compound, linking to Roaring Gate Lane.
- 11) Financial contributions to facilitate improvements to the adopted highways for both vehicles, cyclists and pedestrians
- 12) Advanced planting and public realm improvements adjacent to the proposed construction routes and CCB
- 13) Contributions towards local public transport improvements/ provision during the construction
- 14) Alternative footpaths and crossings where PRowS are being closed/ diverted
- 15) Amend construction routes to avoid use of inappropriate/ unsuitable routes

1.10 Code of Construction Practice (CoCP)

- 1.10.1 The CoCP document is high level and lacking detail in many areas which need specific measures/strategies. The document focuses on the environmental impacts of the construction process rather than dealing with the full range of impacts.



- 1.10.2 The CoCP discusses mitigating, monitoring, managing environmental issues but does not adequately address the key areas of avoidance or protection. HS2 Ltd must to review and update the CoCP to include a requirement to avoid or protect environmentally sensitive locations in preference to mitigating, monitoring or managing.
- 1.10.3 The generic nature of the document does not recognise the statutory duties of the Manchester Airports Group (MAG) to safeguard the travelling public under the Air Navigation Act. A formal process for consultation, discussion and approval is essential for the airport. HS2 Ltd must provide a clear commitment to recognise MAG as a statutory consultee. Furthermore, any lessons learnt from HS2 works with Birmingham Airport should also be reflected in the latest CoCP.
- 1.10.4 Trafford Council and partners would like to understand how the CoCP will ensure technicalities of process and design requirements are picked up, particularly to facilitate interaction with Trafford Council. The CoCP is high level leading to a concern that contractors will approach delivery in very different ways. HS2 need to update the CoCP to provide strategy and direction to contractors, to ensure consistency between different HS2 contractor submissions to public and local authorities, including a detailed minimum standard.
- 1.10.5 Trafford Council would like HS2 to update the CoCP to provide a commitment to share lessons and best practice examples throughout the supply chain.

1.11 Alternatives

- 1.11.1 The Alternatives Report simply summarises the historic sifting of alternatives without giving the necessary data to allow an independent evaluation of that process. It describes those which have been dismissed by HS2 Ltd on the way to arriving at the Proposed Scheme.
- 1.11.2 It is evident that, the current proposals do not always represent the best option as derived from the sifting process, and consequently, the proposed route seeks to deliver the government's objectives irrespective of whether elements of the route are outperformed on cost or environmental terms by better alternatives.
- 1.11.3 The Alternatives Report understandably reflects a point in time, and Trafford Council would therefore welcome a continued dialogue with HS2 Ltd, GMCA and the Partner Authorities to assess and determine accommodate emerging alternatives that meet current and future requirements on a fair and objective basis.

1.12 Planning Data and Committed Developments

- 1.12.1 The Planning Data and Committed Developments appendix highlights the committed and proposed planning applications and development plan allocations which have been used in the baseline assessment for the Environmental Impact Assessment within the Environmental Statement (ES).
- 1.12.2 Trafford have a number of concerns with the data identified, specifically that it is unclear how the ES has concluded the anticipated completion dates for each development and have provided no explanation or commentary on why the cut-off point of the 30 November 2020 was chosen, or any criteria for the applications identified.
- 1.12.3 This length of time between the data cut off point and the publication of the ES, 15 months apart, is considered to be significantly outdated. Whilst Trafford appreciate that there will always be a data cut off point and a delay between this and publication this time lag has seen a number of applications excluded from the listings.
- 1.12.4 Trafford have identified that a number of relevant and significant approved applications which fall within the specified base date have not been included. Trafford therefore request that HS2 review and update this baseline appropriately to reflect the current up to date position.
- 1.12.5 Trafford is particularly concerned that Place for Everyone Plan (PfE) and draft allocations, are omitted from the ES and the planning data. The draft allocations in Trafford (New Carrington and Timperley Wedge) are of particular relevance to the Proposed Scheme and should be included within the baseline data.
- 1.12.6 Both of these sites are likely to come forward for development within the same time period as HS2. They will likely have considerable implications in terms of highways, air quality, impact on residential amenity and other planning matters which need to be considered in conjunction with HS2.
- 1.12.7 It is therefore considered that both the proposed New Carrington and Timperley Wedge allocations will be operational receptors during the HS2 construction period.

1.13 Conclusion

- 1.13.1 Overall, Trafford Council is supportive of HS2, and believes it reinforces Trafford and Greater Manchester as the best place to live and do business in the city region,

providing that the right level of regional and local connectivity is provided through the proposed Manchester Airport Station transport hub.

- 1.13.2 The investment in a high-speed rail connection (HS2) will confirm Trafford and Greater Manchester as the most connected city region in the UK and will support existing businesses, inward investment and job creation in and around the borough.
- 1.13.3 Trafford Council together with GM Partners have a number of critical issues and concerns about the construction and operation of HS2 Phase 2b, and the level of information provided in the deposited Environmental Statement. Much work and collaboration will be needed to satisfactorily overcome these issues.
- 1.13.4 However, notwithstanding this, Trafford Council and GM Partners welcome the opportunity to continue to engage with HS2 Ltd and DfT to develop the Proposed Scheme and associated plans to ensure they are integrated with both local and the wider Greater Manchester aspirations whilst minimising the effects on local communities and environments.
- 1.13.5 Consequently, Trafford Council and GM Partners reiterate the importance of a truly collaborative approach to the delivery of the HS2 proposals, particularly where there are major interfaces between schemes and developments. Failure to work effectively in a joined up, transparent manner will significantly increase – unnecessarily in Trafford Council’s view - cost and programme risk for the HS2 programme.

2 Structure of Response

2.1.1 This response has been structured in to 7 Chapters and reflects the manner in which the Phase 2b ES is presented. This is structured as follows:

Chapter 1

- [Section 1 – Executive Summary](#)
- [Section 2 – Structure of the Response](#)
- [Section 3 – Policy Context](#)
- [Section 4 – Trafford Council Comments on the Non-technical Summary](#)

Chapter 2

- [Section 5 – Trafford Council Comments on Volume 1: Introduction and Methodology](#)
- [Section 6 – Trafford Council points raised to ES consultation which are common across Community Areas](#)

Chapter 3

- [Section 7 – Trafford Council Comments on Volume 2: MA04 \(Broomedge to Glazebrook\) Community Area report and Map Book](#)

Chapter 4

- [Section 8 – Trafford Council Comments on Volume 2: MA05 \(Risley to Bamfurlong\) Community Area report and Map Book](#)

Chapter 5

- [Section 9 – Trafford Council Comments on Volume 2: MA06 \(Hulseheath to Manchester Airport\) Community Area report and Map Book](#)

Chapter 6

- [Section 10 – Trafford Council Comments on Volume 3: Route-wide effects](#)
- [Section 11 – Trafford Council Comments on Volume 4: Off-route effects](#)
- [Section 12 – Trafford Council comments on Cross-topic Technical Appendices: EIA Scope and Methodology Report](#)
- [Section 13 – Trafford Council comments on Cross-topic Technical Appendices: Code of Construction Practice](#)
- [Section 14 – Trafford Council comments on Cross-topic Technical Appendices: Alternatives Report](#)
- [Section 15 – Trafford Council Comments on Cross-topic Technical Appendices: Planning Data](#)
- [Section 16 – Trafford Council Comments on Cross-topic Technical Appendices: Wider Effects Report](#)
- [Section 17 - Trafford Council Comment's on Cross-topic Technical Appendices: Borrow Pits](#)

Chapter 7

- [Section 18 – Summary and Conclusions](#)

3 Policy Context

3.1 Introduction

3.1.1 Trafford Council is part of the Greater Manchester Combined Authority (GMCA) and has proactively collaborated with GM Partners in responding to this consultation.

3.1.2 Consequently, this response should be read in conjunction with the GMCA response which sets out the wider City Region policy position on the consultation.

3.2 Trafford Council (TC)

3.2.1 Trafford Council has set out the borough's policy context in previous consultations, however for ease and robustness, the overarching policy approach to health, jobs, housing, skills, the environment, climate change, economic growth and transport are set out in the following paragraphs.

3.3 Trafford Council Adopted Development Plan

3.3.1 This response is set within the context of the following adopted planning policy documents where appropriate, and due regard should be had in consideration of the proposed scheme.

3.3.2 The Development Plan for Trafford comprises:

- Trafford Local Plan: Core Strategy, January 2012
- Trafford Revised Unitary Development Plan, June 2006 (many policies are replaced by the Core Strategy)
- Greater Manchester Joint Waste Plan, April 2012
- Greater Manchester Joint Minerals Plan, April 2013
- Altrincham Town Centre Neighbourhood Business Plan, Adopted November 2017

3.4 **Trafford Council Emerging Development Plan**

Trafford's Local Plan – Regulation 18 Version February 2021

- 3.4.1 Trafford Council is currently in the process of updating its local plan. A Regulation 18 Local Plan Consultation Draft was published for public consultation between 4 February 2021 to 18 March 2021.
- 3.4.2 The draft plan Local Plan (Regulation 18) which covers the period up to 2037, was prepared in the context of the Greater Manchester Strategic Framework (GMSF) 2020. It reflected the GMSF's spatial strategy and strategic policy framework, which includes a number of strategic allocations which are proposed to be removed from existing Green Belt.
- 3.4.3 Following Stockport Council's decision (in December 2020) not to approve the GMSF for Regulation 19 consultation or submission, the remaining nine Greater Manchester local authorities approved progression of a revised Joint Development Plan - Places for Everyone.
- 3.4.4 Places for Everyone – Joint Development Plan – Submitted 14th February 2022
- 3.4.5 The Places for Everyone (PfE) plan of nine Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) is a long-term plan for jobs, new homes, and sustainable growth.
- 3.4.6 Once adopted, the PfE will become part of the statutory development plan for each of the nine Greater Manchester authorities, including Trafford.
- 3.4.7 The Publication Version (Regulation 19) PfE was published for public consultation between 9 August to 3 October 2021. The plan was then formally submitted to the Secretary of State for the Department for Levelling Up, Housing and Communities on 14th February 2022.
- 3.4.8 As GM's spatial strategy, Places for Everyone will ensure that all new developments are sustainably integrated into Greater Manchester's transport network or joined by new infrastructure. It has been developed alongside Transport for Greater Manchester's (TfGM) Greater Manchester Transport Strategy 2040, ensuring that all new residential and commercial sites are supported by good quality transport infrastructure, including Metrolink stops and active travel routes.
- 3.4.9 Integration of transport with spatial planning is critical in influencing people's travel choices. The transport network will need to connect the places people live with the places where they study, live, work and visit.



- 3.4.10 Many of the negative impacts of transport, such as congestion, high emissions, noise and road traffic casualties, are a consequence of over-reliance on cars, and the decisions that make car use the most convenient, or the only choice for some journeys. The design of developments, e.g., the availability of parking, safe and direct walk/cycle routes, secure cycle parking and EV charging points, also influences travel choices.
- 3.4.11 The policy approach as related to HS2 can therefore be summarised as:
- Reducing the need to travel by car.
 - Maximising accessibility by sustainable modes.
 - Maximising opportunities to provide additional public transport.
 - Designing to encourage active travel.
- 3.4.12 The Places for Everyone plan proposes a number of strategic allocations across the plan area, in Trafford these are Timperley Wedge and New Carrington.

Timperley Wedge – Manchester Airport High Speed station

- 3.4.13 Land to the west of the proposed Manchester Airport High Speed station has been proposed for development under Policy JP Allocation 3.2 'Timperley Wedge' of Places for Everyone. The plan expects to deliver around 2,500 homes and 60,000 sqm of office employment land, with a mixed employment and residential area being set out for land closest to the proposed Manchester Airport High Speed station.
- 3.4.14 To ensure a coordinated approach to the development of the site, Trafford Council is committed to working with stakeholders to bring forward a detailed Masterplan or SPD to provide a framework for the sustainable delivery of a new community at Timperley Wedge. A high level masterplan has been produced (September 2021) as supporting evidence for the Places for Everyone Plan.
- 3.4.15 The strategic importance of development at Timperley Wedge is clear for both plan making within Trafford, but also the wider sub-region. It is therefore essential that the proposed station integrates well with the Timperley Wedge development site and avoids creating either physical or perceived issues of severance or barriers to development.
- 3.4.16 Significant changes in levels between the proposed station and surrounding ground level (as a result of the shallow cut station design) present significant challenges to



integrating the development site with the station. The construction of HS2 and the associated construction compounds will also impact the phasing of the Timperley Wedge allocation and will prevent some development parcels from coming forward until after the completion of HS2.

- 3.4.17 The HS2 transport modelling does not currently include the Timperley Wedge allocation, as well as other significant development sites in the area. The proposed mitigations in the hybrid Bill for the local road network and the M56 Junction 6 must therefore be tested against the full quantum of development proposed for the area to ensure that the infrastructure improvements are delivered in a sustainable manner and reflect the 'build it once, build it right' approach.
- 3.4.18 The future spine road for the Timperley Wedge development is expected to connect with the realigned Thorley Lane to the north of the station. Whilst the precise alignment of the spine road will be determined by a future Masterplan / planning application, it is imperative that HS2 Ltd is fully aware of the proposals for Timperley Wedge and plans for their incorporation and integration accordingly. In addition, traffic generated from the HS2 construction compounds could impact the transport mitigation identified to support the Timperley Wedge allocation and they must therefore be assessed as part of the HS2 modelling.
- 3.4.19 Delivery of new and improved public transport and active travel infrastructure will also be integral to the success of the Timperley Wedge allocation. Well planned interventions will help enable a modal shift away from car travel to sustainable modes of travel. The Western Leg Metrolink extension and a Metrolink stop close to or within the Timperley Wedge will also provide links to Manchester Airport, Medipark (another PfE employment allocation in Manchester adjacent to Timperley Wedge), Wythenshawe Hospital as well as employment areas in Trafford Park and other main employment areas in the borough and Greater Manchester.
- 3.4.20 Further comments relating to the Timperley Wedge allocation have been included under the relevant Environmental Statement Topic Areas.

New Carrington – Golborne Link and Carrington Relief Road

- 3.4.21 Development at New Carrington, in the western part of Trafford, provides a significant opportunity to deliver a transformational mixed-use development. Redevelopment of the extensive former Shell Carrington industrial estate forms a key component of Places for Everyone Policy JP Allocation 33 'New Carrington'.
- 3.4.22 The allocation is expected to deliver around 5,000 homes and around 350,000 sqm (gross) of employment opportunities for industry and warehousing. Various



infrastructure improvements are required to support the development, this includes a new east – west link which is required to support existing development, as well as that proposed as part of Places for Everyone. The Carrington Relief Road will provide additional capacity to the existing A6144 and a strategic link through Carrington.

- 3.4.23 HS2 Ltd’s proposals for the Golborne Link include a significant viaduct across the Manchester Ship Canal to the south of Partington. During construction of the viaduct, and associated route alignment, there is potential for a significant amount of construction traffic which will place an additional strain on the already heavily congested A6144 route towards the M60. Concerningly, the proposed allocation at New Carrington has not been included within HS2 Ltd’s transport modelling.
- 3.4.24 Construction traffic relating to some of the main and satellite compounds in the MA04 Community Area is proposed to use the A6144 to/from the M60 J8. There are existing capacity issues on the A6144 and the transport modelling work completed to PfE identified capacity constraints at M60 Junction 8. It is therefore essential that the HS2 construction traffic is assessed in the context of the New Carrington allocation.
- 3.4.25 Beyond the existing A6144 to the north of Partington, a vast majority of the highways in the surrounding area are rural lanes which would be unsuitable for large scale construction vehicles.
- 3.4.26 The forementioned, combined with the lack of construction worker parking contained within identified construction compounds and footpath / PRoW severance of communities from local facilities, mean that the potential detrimental highways related impacts of the Golborne Link construction could be significant for a number of local communities.
- 3.4.27 Further comments relating to the New Carrington allocation have been included under the relevant Environmental Statement Topic Areas.

3.5 Trafford Council Relevant Plans, Strategies and Priorities

- 3.5.1 In addition to the adopted Development Plan, Trafford Council has a number of other plans and strategies which the Proposed Scheme should be aware of.

Our Trafford, Our Future 2021-24

- 3.5.2 The corporate plan describes Trafford Council’s strategic vision, outcome and priorities for the borough, with the priorities being key to its delivery. The plan’s focus is the delivery of the following three priorities:

- Reducing health inequalities
- Supporting people out of poverty
- Addressing our climate crisis

3.5.3 The third of the above priorities has a number of associated Key Performance Indicators which may be directly impacted by the Proposed Scheme. These include reducing borough wide carbon dioxide emissions, reducing vehicle miles travelled on Trafford's roads and reducing the annual mean concentration of nitrogen dioxide levels.

Carbon Neutral Action Plan (December 2020)

3.5.4 Trafford Council declared a Climate Emergency in November 2018. Since then, a Carbon Neutral Action Plan has been developed which sets out a wide-ranging series of actions which combined will help Trafford Council achieve its target of achieving carbon neutrality in the borough by 2038.

3.5.5 The plan includes short, medium and long-term actions under the following themes:

- Governance, Engagement and collaboration
- Production and Consumption of Resources
- Transport and Travel
- Heat and Energy
- Natural Environment
- Skills and Green Growth
- Homes, Workplaces and Buildings

3.5.6 The Proposed Scheme has the potential to adversely impact a number of the stated actions within the Carbon Neutral Action Plan, and therefore hinder the Council's stated ambitions for carbon neutrality.

Emerging Walking and Cycling Strategy

3.5.7 Trafford Council has an ambition to increase the numbers of people walking and cycling across the borough. To help achieve this, the Council is developing a strategy



with a 10-year vision, and series of associated initiatives, to significantly improve the popularity and ease of walking and cycling for both transport and leisure.

- 3.5.8 Provision of suitable active travel routes and facilities is of particular importance in and around the proposed Manchester Airport High Speed station. Trafford Council and its partners would want to see a substantial number of station passengers accessing the HS2 services via sustainable modes of travel. This requires dedicated, safe, walking and cycling routes and secure, free, covered cycle parking close to the station entrance.

3.6 Greater Manchester Policy Context

- 3.6.1 The GM policy context is set out in detail in the submitted Trafford Council response, however as above, as part of the Trafford Council, Trafford's response should be in the context of the City Region, which in terms of policy context includes taking into consideration the following:

- Greater Manchester Strategy (2017)
- Greater Manchester Transport Strategy 2040 (2040 Strategy)
- The GM Rail Prospectus (2019)
- Change a Region to Change a Nation: GM's Walking and Cycling Investment Plan 2020
- Streets for All
- The City Centre Transport Strategy
- HS2 and Northern Powerhouse Rail Growth Strategy "The Stops Are Just the Start"
- Greater Manchester Enterprise Zone (GMEZ)
- Manchester Airport, Airport City and Enterprise Zone
- Five-Year Environment Plan
- Emerging GM Clean Air Plan

3.7 Northern Powerhouse Rail (NPR)

- 3.7.1 Northern Powerhouse Rail (NPR), along with HS2 Phase 2b, is key to the future success of Greater Manchester and the North. They are both vital to increasing the capacity and connectivity of Britain's rail network, transforming city-to-city links, releasing capacity on the existing rail network and ultimately acting as a catalyst for sustained and balanced economic growth across the UK.
- 3.7.2 Trafford Council welcomes and strongly supports the integration of NPR service capacity at the Manchester Airport High Speed station. The integration of HS2 and NPR services is considered to be a critical factor in ensuring that the socio-economic benefits of HS2 are maximised.

3.8 HS2 and Northern Powerhouse Rail Growth Strategy

- 3.8.1 The GM Growth Strategy sets out GM's view on infrastructure requirements to maximise the benefits of HS2 and NPR. It is well-aligned with the ambitions for rail, also set out in our long-term statutory local transport plan. The Strategy sets out proposals for complementary investments to bring about regeneration around the two new GM HS2 stations, as well as wider connectivity investment to spread the benefits throughout the conurbation and beyond.
- 3.8.2 In the 2018 Growth Strategy, The Stops Are Just the Start, called on Department for Transport, HS2 and Network Rail to prepare a single integrated strategy to support an HS2 approach; and that this should be integrated with NPR to create maximum transformational benefit for the economy of the city-region and the North.
- 3.8.3 In line with the National Infrastructure Committee recommendations, the Growth Strategy was developed around a framework of four pillars:
- Station design and infrastructure requirements
 - Wider connectivity to ensure benefits are shared beyond the immediate vicinity
 - Regeneration around the stations
 - People, skills and employability
- 3.8.4 The above include requirements to 'build it once, build it right' with minimum blight, fully integrated stations and integration with local transport.

3.9 Expectations of HS2 Ltd going forward

3.9.1 The Proposed Scheme will bring transformational growth and socio-economic benefits to Greater Manchester and beyond. It is therefore essential that wherever HS2 passes through and alights within Trafford, that it does so in accordance with Trafford Council and GMCA policies and strategies.

3.9.2 Both Trafford Council and GMCA are committed to maximising the socio-economic benefits the Proposed Scheme can bring, whilst minimising wherever possible the potential detrimental impacts for local communities, environments and landscapes.

3.9.3 Trafford Council therefore expects HS2 Ltd to engage and work with the Council and its partners throughout the Hybrid Bill petitioning process and beyond. The following sections of this response set out the concerns which the Council has regarding the Proposed Scheme. These concerns are accompanied by requested mitigation which is considered necessary. In summary the requested mitigation outlines:

- A build it once, build it right approach
- Reinstatement of the 'deep cut' option for the Manchester Airport High Speed station
- Future-proofed underground high speed station at Manchester Piccadilly
- Capacity for full integration of Metrolink services to the station from day one of HS2 services
- Greater emphasis on active travel to and from the stations and discouragement of private car use through a significant reduction in the proposed car parking provision
- Amendments to the highway network which reflect existing capacity issues and fully consider future planned development
- Greater consideration of potential severance issues for local communities

3.9.4 Failure of HS2 Ltd to work with Trafford Council and its Partners to deliver the requested mitigation would represent a missed opportunity to ensure that HS2 within Trafford forms a highly valued and user-friendly feature of both the built and wider natural environment.



4 Trafford Council comments on Non-Technical Summary

4.1 Introduction

4.1.1 This chapter specifically details the Trafford Council consultation response comments in respect of issues which have been identified within the Non-technical Summary (NTS).

4.1.2 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Part 5 -18 (a to e) set out the minimum elements which an ES and the NTS must cover. An ES and should contain at least;

a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;

(b) a description of the likely significant effects of the proposed development on the environment;

(c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;

4.1.3 Paragraph e) states ‘a non-technical summary of the information referred to in sub-paragraphs (a) to (d);’. This list of fundamental requirements provides a starting point for the Trafford Council review of the NTS.

4.1.4 The NTS chapter confirms that it is simply a summary in non-technical terms of; the Proposed Scheme, the reasonable alternatives studied, the public and other stakeholders that have been consulted and engaged, the likely significant effects, proposed means of avoiding, preventing, reducing, offsetting the adverse effects and how the effects of the project will be monitored. Trafford Council acknowledge that the NTS provides material on each of these elements, therefore, fulfilling the minimum requirements.

4.2 Purpose and Presentation of the NTS

- 4.2.1 The NTS is 172 pages in length. It states that the ES enables anyone with an interest in the project, including the public, to understand how it will affect them and to express their views on the effects of the project. **Trafford Council consider that the NTS should have gone further in facilitating and maximising consultation, by better signposting and/or providing links to the consultation documentation.**
- 4.2.2 It is also noted that the NTS generally uses non-technical language, and where technical language cannot be avoided explanations are provided. However, the document is lengthy and would have benefited from better navigation and more consistency in references and links to help non-technical readers and the community to respond. For example, the draft Code of Construction Practice (CoCP) is an important document and whilst it is summarised in section 4.2 (Page 35), better links out to specific documents would have been of benefit to the reader.
- 4.2.3 The NTS claims that stakeholder engagement has been 'an integral and ongoing part of the process of designing and assessing the Proposed Scheme from its inception' and that 'a key stage in this process was the engagement and consultation with stakeholders on a working draft ES'. That overstates the actual position in respect of the working draft ES to which Trafford Council and GMCA provided many comments, to which HS2 confirmed that they were not going to respond.
- 4.2.4 Trafford Council has welcomed the limited opportunities to engage with HS2, to listen to the HS2 plans, but the nature of such engagement has very much been HS2 transmitting information rather than listening to and acting upon stakeholders inputs. **Trafford Council require that the Proposed Scheme is integrated with and complementary to the long-term goals, plans and ambitions of Trafford Council as well as the wider aspirations of Greater as a whole.** However, only very limited dialogue has been offered by HS2 and there are numerous areas where the proposals do not currently achieve this. These areas have been highlighted within the HS2 Design Refinement Consultation (December 2020) and the Working Draft ES (December 2018) and remain unresolved.
- 4.2.5 Trafford Council also has significant concerns that studies which are said to have been undertaken to gauge the potential for alternative options have not been made available. Consequently, HS2 is being advanced in a manner that will not meet the aspirations of Trafford Council or GM partners and preferable options do not have status within the hybrid Bill.
- 4.2.6 Trafford Council and GM Partners have raised specific issues in response to the WDES consultation which should have been addressed in the formal ES and final

designs. **Trafford Council has been clear in previous responses and continues to require that it expected that HS2 Ltd to fully engage with GM Partners to inform the design, minimise impacts and inform the formal ES ahead of the HS2 Phase 2b hybrid Bill submission.**

- 4.2.7 Whilst some engagement has taken place with the GM Partners since the WDES consultation, this has been limited and high level. The GM Partners have been disappointed at the detail provided and further meaningful engagement was and is needed, particularly in relation to ensuring the adequacy of impact assessments and mitigation measures. **Trafford Council consider that to be essential in terms of the overall approach to scheme development, mitigating the impact on local communities and assisting the passage of the Bill through Parliament.**
- 4.2.8 While Trafford Council recognises that there has been a volume of engagement in relation to the HS2 Phase 2b, there has not been a truly collaborative approach, particularly in developing solutions to issues that meet the needs of strategic stakeholders, including the GM Partners.
- 4.2.9 The NTS generally follows the structure of the ES providing chapters covering;
- The case for HS2;
 - Description of the Proposed Scheme;
 - Construction and Operation of the Proposed Scheme;
 - Preparation of the Environmental Statement;
 - Strategic, Route Wide and Local Alternatives;
 - Approach to Environmental Mitigation and Monitoring;
 - Summary of Environmental Effects by Community Area;
 - Summary of Route-Wide Effects; and
 - Summary of Off-Route Effects.
- 4.2.10 That structure is also mirrored in the Introduction and Methodology Chapter. Trafford Council have provided detailed comments in the specific chapters and technical/community chapters of their response. Trafford Council do not propose to provide further detailed comment on all sections of the NTS, only where specific

issues have been identified. **To reiterate, the Trafford Council response should be read as a whole.**

4.2.11 Trafford Council is concerned with summary information set out in the NTS. The detail of assessments has not been provided and it is not clear where much of the mitigation will be provided. It is not considered credible that so many significant impacts can be held as being addressed and therefore not residual. For example, the Ecological Registers of local level effects for each community area provide a summary of adverse effects against which it is merely stated that these impacts will be addressed by mitigation.

4.2.12 There is no cross-reference back to what or where this mitigation will be. Trafford Council believes it has not been demonstrated that sufficient mitigation measures will be put in place for the scheme to remove residual impacts.

4.3 **Conclusion**

4.3.1 The NTS provides material on each of the fundamental topics set out in the regulations, therefore, it fulfils the minimum requirements.

4.3.2 However, Trafford Council is concerned that in some cases evidenced above, the NTS overstates matters such as the impact of consultation undertaken to date on the details in deposited scheme and in providing summary information the NTS fails to provide clarity around the assessments and mitigation required.

High Speed Rail – Phase 2b Western Leg

Environmental Statement Consultation

Chapter 2

Section 5: [Trafford Council Comments on Volume 1: Introduction and Methodology](#)

Section 6: [Trafford Council Points raised to the ES Consultation which are Common Across Community Area](#)

5 Trafford Council comments on Volume 1: Introduction and Methodology

Section 5: Table of Contents

Introduction	29
Proposed Scheme	30
Permanent Features of the Proposed Scheme	33
Construction of the Proposed Scheme	36
Environmental Impact Assessment	38
Scope and Methodology	39
Strategic, route-wide and route corridor alternatives	70
Local and Regional Alternatives	70
Conclusion	71

5.1 Introduction

- 5.1.1 The following section sets out Trafford Council comments on Volume 1: Introduction and Methodology in terms of its purpose and presentation. Trafford Council comments on the specific technical scope and methods are provided in detail in other sections of this report and are therefore not repeated here. As such the Trafford Council response should be read as a whole.
- 5.1.2 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.
- 5.1.3 Volume 1: Introduction and Methodology presents a high-level overview of the Environmental Impact Assessment (EIA) and outlines the need for EIA and the role of this as part of the Hybrid Bill. In line with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Volume 1 also summarises the description of the development, the location and its characteristics, evolution of the development design and alternatives considered and introduces the scope and methods used for individual topics assessed as part of the EIA.
- 5.1.4 Volume 1 therefore provides an overview to the full EIA in order to fulfil the statutory requirement and inform the reader on the content of the EIA, whilst offering some limited background information on the EIA scope and methodology, scheme design and engagement undertaken to date.



- 5.1.5 However, whilst Volume 1 provides high-level summary of the EIA, it also includes statements which rely on technical assessments and findings of these. An example of this would be, paragraph 1.5.19 (Page 30):

‘Building on existing commitments, HS2 Ltd is working to accelerate progress towards a more environmentally sustainable railway as it builds and brings HS2 into operation. From day one HS2 will be capable of delivering carbon free journeys as a significant part of a multimodal zero carbon transport network and, working with the supply chain, is considering how to accelerate the ambition of the construction industry to realise net zero during the construction phase of the Proposed Scheme.’

- 5.1.6 Whilst Trafford Council appreciate that the above is a high-level statement, it provides clear indication on the sustainability credentials of the Proposed Scheme, but the claim is unevidenced without sufficient information / assessment which is anticipated to be presented / outlined in other volumes / chapters of the ES. On this basis, the Trafford Council response on Volume 1 aims to outline where insufficient detail on the technical scope and methods, the Proposed Scheme design commitments and the consultation and engagement undertaken to date; has been provided which does not allow for appropriate assessment of the Proposed Scheme, outlining any discrepancies between the detailed information provided in the technical assessments and information provided in Volume 1.

5.2 **The Proposed Scheme (Background to HS2 and Stakeholder Engagement and Consultation)**

Background to HS2

- 5.2.1 Volume 1, Section 2 provides a list of milestones of the Proposed Scheme development and outlines the need for them within the location selected, including opportunities for faster journeys between key locations, i.e., London Euston to Manchester Piccadilly and more employment and trading opportunities. As well as the operational stage opportunities, paragraph 2.3.23 identifies that (page 39):

‘At its peak, the construction of the Proposed Scheme is expected to support over 17,500 jobs in 2029/30 and at least 1,000 apprenticeships will be created on the full Phase 2b scheme’



- 5.2.2 Trafford Council recognises that employment opportunities may be available locally, however, no evidence on the proportions of local employment and confirmation on how the estimated construction jobs will be accommodated from the supply chain is provided. **Trafford Council therefore requires the opportunity to engage with HS2 Ltd to discuss the local requirements for construction employment and seeks to secure the training opportunities provided by HS2 Ltd to allow for local employment to be secured at the scale identified. Trafford Council would also request that HS2 Ltd confirm if they will work in collaboration with other bodies such as the Trafford Council and the Education and Skills Funding Agency; whether a Training and Employment Opportunities Management Plan will be developed; what opportunities will be considered to prioritise local employment; and the timeframe for the provision of new training and employment opportunities.**
- 5.2.3 Trafford Council notes that the shift to sustainable modes of transport is key for achieving the Government carbon budgets., It is appreciated that HS2 Ltd.'s Net Zero Carbon Plan includes net zero aspirations for the construction sector, but Volume 1 does not identify the options which are considered achievable within the proposed construction timeframes. Similarly, it is noted that the assessments in Volume 3 confirm that the aspirations to be zero carbon as targeted within the Net Zero Carbon Plan is not achievable. GM has an aim to be a carbon neutral city region by 2038 as set out in the 5 Year Environment Plan for Greater Manchester. **This is further endorsed in the Submission version Places for Everyone - Joint Development Plan Document (2021), specifically Policy JP-S 2 with an expectation that all new development will be net zero carbon by 2028.**
- 5.2.4 Therefore, we seek further commitments from HS2 Ltd to demonstrate how they intend to ensure HS2 is constructed and operated in the most sustainable manner possible.

Stakeholder Engagement

- 5.2.5 Volume 1, Section 3 acknowledges that stakeholder engagement has been 'an integral and ongoing part of the process of designing and assessing the Proposed Scheme from its inception' and that 'a key stage in this process was the engagement and consultation with stakeholders on a working draft ES'. This Volume 1 section lists how and when engagement was undertaken, and parties involved in the process.
- 5.2.6 This section does not provide any specific detail of main issues raised via consultation nor on how the main issues pertinent to the EIA have been considered.



- 5.2.7 Whilst some engagement has taken place with the GM Partners since the WDES consultation, this has been limited and high level. The GM Partners have been disappointed at the detail provided and feel that further meaningful engagement is needed, particularly in terms of understanding the outcome of impact assessments and developing mitigation measures. It is therefore considered that **the ES is deficient in respect of providing details of consultation and engagement undertaken to date and in respect of a framework strategy for undertaking consultation with all parties in the future, including, key stakeholders, Trafford Council and partner authorities, as well as local businesses and communities affected by the scheme. Trafford Council therefore requests that HS2 Ltd provide an engagement strategy which details the ongoing strategy for engagement and consultation with stakeholders, Local Authorities, local communities and organisations / businesses impacted by the Proposed Scheme. This process is expected to be ongoing prior to the construction phase and during the construction works and must be in writing with Trafford Council and all affected partner authorities.**
- 5.2.8 The Oakervee Review of HS2 in 2020 concluded that HS2 can be part of transformational change, but only if properly integrated with other transport strategies, especially those seeking to improve inter-city and intra-city regional transport, and with national, regional and local growth strategies. HS2 therefore needs to be delivered in a manner that fully complements the place-making, local employment and sustainable growth objectives of Greater Manchester.
- 5.2.9 Trafford Council and GM Partners reiterate the importance of a truly collaborative approach to the delivery of the HS2 proposals, particularly where there are major interfaces between schemes and developments. Failure to work effectively in a joined up, transparent manner will significantly increase – unnecessarily in Trafford Council’s view - cost and programme risk for the HS2 programme.
- 5.2.10 Trafford Council has welcomed the limited opportunity to engage with HS2, to develop the design of the Proposed Scheme to ensure that it is integrated with the wider Greater Manchester aspirations. However, there are a number of areas where proposals do not currently achieve this. These areas have been highlighted within the HS2 Design Refinement Consultation (December 2020) and the WDES (December 2018) and remain unresolved. Trafford Council and GM Partners have raised specific issues in response to the WDES consultation which should be addressed in the formal ES and final designs. Trafford Council and the GMCA raised many issues in the WDES consultation but were subsequently told by HS2 that they would not be entering into dialogue to discuss or negotiate those issues. Three and a half years on and despite design changes, many of those issues still remain.

Trafford Council therefore requires that the outstanding issues are considered as part of future design iterations the details of which are to be consulted upon with Trafford Council and partner authorities.

- 5.2.11 Trafford Council has been clear in previous responses that it is expected that HS2 Ltd should fully engage with GM Partners to inform the design, minimise impacts and inform the formal ES ahead of the HS2 Phase 2b hybrid Bill submission. While Trafford Council recognises there is a volume of engagement in relation to the HS2 Phase 2b, GM Partners do not believe that a truly collaborative approach has been taken, particularly in developing solutions to issues that meet the needs of strategic stakeholders, including the GM Partners and the Manchester Airport Group. **Trafford Council would therefore request that HS2 detail the process and outline the steps followed to identify the initial comprehensive list of stakeholders and confirm how was this approved or verified. In addition, Trafford Council would request that HS2 demonstrate records or a consultation tracker to identify how/when stakeholders were approached or consulted directly.**

5.3 Permanent Features of the Proposed Scheme

- 5.3.1 The Permanent Features of the Proposed Scheme section sets out nine design principles all applied within the limiting requirements to be cost effective and sustainable. The design principles are also given under the caveat that the operational and maintenance requirements of a high-speed railway must also be respected.
- 5.3.2 Given that the Consultation to which this response is being prepared relates to the ES it is of significant note that only one of the nine design principles relates to *“the natural world”*. That design principle is that the proposals should *“demonstrate a commitment to the natural world”*.
- 5.3.3 The Permanent Features section then offers overview descriptions across different categories. It is notable that the comments which HS2 set out in this section are very generalised. For example, in paragraph 5.5.18 (Page 78) it is stated that:

“Rivers and streams will be reinstated where reasonably practicable with a natural looking appearance...”

- 5.3.4 Trafford Council, or indeed any Consultee cannot provide specific comments in response to such generalised statements.

- 5.3.5 However, of relevance to this ES consultation are the following comments:
- 5.3.6 The Green Corridor states that mitigation will be needed to reduce and compensate for the impacts of constructing the railway and those mitigations include the creation of wildlife habitat, screened spaces, footpaths and bridleways. A further green corridor element is *“the provision of additional funds to help stakeholders adjacent to the route of the proposed scheme realise their own green infrastructure projects with a view to create an environment that is healthier, bigger, better and more joined up”*. No specific details are provided in respect of the Trafford Council area. **Trafford Council requests that HS2 engage with the Trafford Council Partner Authorities and Manchester Airport Group to ensure that such additional funds are allocated to environmental projects in each of those Partner areas.**
- 5.3.7 In relation to Design Standards, HS2 state that relevant design standards and guidance will be considered during the detailed design stages. Just that one non-definitive sentence is offered to cover this most important aspect. **Trafford Council seeks confirmation from HS2 that they will rigorously apply current and future design standards and guidance, including adopting the standard approaches and thresholds of acceptability for designing in highway capacity and levels of operational performance during the peak hour periods. Those should be applied to cover both the long-term highway operational conditions and the conditions associated with construction traffic.**
- 5.3.8 HS2 describe how the heights of embankments are given from the existing ground level up to the top of the rail of the Proposed Scheme. In measuring that way, the stated heights of embankments do not take into account the additional heights of overhead line equipment, (8.5m), the telecommunications masts (15-20m high) nor the noise fence barriers which are up to 4m high, nor the trains themselves.
- 5.3.9 Similarly, the heights quoted for viaducts are again only to the top of the rail, even though the most visually intrusive of the proposed structures will be the continuous noise barrier elements and train derailment barrier elements.
- 5.3.10 Figures 18 and 20 illustrate how the height aspect of the visual impacts will be significantly more than just the height of the embankments and viaducts. **Trafford Council requests confirmation from HS2 that their assessment of visual impacts has gauged the impacts arising from the full heights of the permanent installations rather than just the heights of viaducts and embankments.**
- 5.3.11 Paragraph 5.4.8 (Vol 1, Page 75) describes how the quantity of surplus excavated material is not known at present. Similarly, Section 2.3 of community area assessments identify that:



'Material excavated from tunnels, cuttings and other earthworks as part of the construction of the Proposed Scheme may be used to backfill or restore the borrow pits. This material will, where reasonably practicable, be transported via site haul routes. However, some of the material may be provided from more distant locations across the Proposed Scheme. As such it may be necessary to transport some of this material along public roads'.

- 5.3.12 No information on the total amount of construction, demolition and excavation required to be transported on public roads within each community area is provided and that casts doubt on the traffic movement assessments associated with the potential effects from excavated material removal. The ES is therefore considered deficient of appropriate traffic movement assessment during the construction phase of the development. It is therefore unclear if HS2 Ltd EIA assessed the worst-case scenario of traffic movements during the construction phase to comply with the requirements of the EIA Regulations 2017. **Trafford Council acknowledges that traffic impacts will be reduced by identifying clear controls on vehicle types and hours of operation and agreed routes for HGV. However, Trafford Council requests that the extent of the mitigation measures proposed are implemented via a Construction Traffic Management Plan, the extent and detail of which are to be agreed in writing with the local planning authority.**
- 5.3.13 Paragraph 5.17.2 (Vol 1, Page 93) states that "land used only for construction purposes will be restored as agreed with the owner of the land and the relevant planning authority once the construction works on that land are complete". Trafford Council seeks clarification on who the "relevant planning authority" is. Approval for HS2 is not given by Local Planning Authorities and it is unclear whether they will have any role in conditioning or approving schemes to restore construction land.
- 5.3.14 Paragraph 5.17.3 (Vol 1, Page 93) notes that there will be restored areas to compensate for, replace or enhance resources adversely affected during construction such as habitat for wildlife species. There is likely to be a significantly detrimental impact on wildlife species if their restored areas and compensation only takes place perhaps years after they have been affected. **Trafford Council requires confirmation from HS2 that necessary habitat replacement and creation is undertaken prior to disturbing sensitive habitats.** This may have important timing and programming implications given that some of the replacement habitats will take time to mature to an effective level, new woodland for example
- 5.3.15 Paragraph 5.13.3 (Vol 1, Page 88) describes how the design of stations will integrate with local development plans and strategies but there is no indication that the traffic or pedestrian flows associated with such future strategies have been included within

the assessments. **Trafford Council requests confirmation that future local development plans and strategies are being considered within traffic flows for the scheme.**

5.4 Construction of the Proposed Scheme

- 5.4.1 Trafford Council sees the Code of Construction Practice (CoCP) as a cornerstone document to support minimising disruption during the delivery of the Proposed Scheme, therefore early engagement with Trafford Council Partners on the development of the LEMPs in respect to Greater Manchester is essential. **Trafford Council would request that HS2 sets out the quality management arrangements for the LEMPs, the extent of which are to be agreed in writing with the relevant local authority / authorities; in particular if there are areas that Trafford Council feel that a LEMP does not adequately address.**
- 5.4.2 Trafford Council requires that HS2 appropriately considers the specific details of Phase 2b and its constraints and do not proceed on the assumption that findings and the approach from previous phases will automatically address Phase 2b issues. Accordingly, the Council requests that the approach is tailored to the particular issues of Phase 2b.
- 5.4.3 At paragraph 6.2.2 (Vol 1, Page 100), it is identified that the temporary stockpiles could contain contaminated soils. Trafford Council requests more information as to how the stockpiles will be managed to prevent contamination from leaving the compounds, in the form of dust or leachate as the ES is currently considered deficient of this information. This will ensure that the land beneath the compounds does not become contaminated as a result of the temporary storage (prevention of contamination is mentioned in paragraph 6.3.38). Dust and leachate control measures will be required for any stockpiles of contaminated spoil. Specific controls will need to be given in the Remediation Strategies, Construction Management Plan and/or CoCP. In addition, Trafford Council requests that proposals are made for the remediation of any contamination resulting from the construction compounds/ stockpiles.
- 5.4.4 With regard to paragraphs 6.2.26 – 6.2.27 (Vol 1, Pages 105-106), Trafford Council would expect that any soil embankments for noise control or landscape reinstatement will need to be suitably constructed with capping soils validated as suitable for use. It is noted that this will be covered as part of the remediation strategy, however, soil sampling frequencies and validation procedures will need to be agreed.



- 5.4.5 Trafford Council is aware that site investigations will be required as part of the advance works of the Proposed Scheme which will in turn determine the need for advance mitigation as listed in paragraph 6.4.4 (Vol 1, Page 114). **Trafford Council require detailed site investigation data, detailed risk assessments and any remediation/validation requirements to be submitted to the Local Planning Authority under 'Schedule 17 Planning Schedule'. Appropriate consultation with the regulators is to be maintained throughout this process with the extent of mitigation proposed to be agreed in writing with Trafford Council.**
- 5.4.6 Paragraph 6.7.5 (Vol 1, Page 119) relates to construction compounds. In this section it is stated that a temporary railhead will be used to receive (by rail) and stockpile material required for the construction of the Proposed Scheme. **If rail is being used to transport aggregate, Trafford Council would request clarification as to whether an analysis of the existing capacity on the railway line has been undertaken and what the findings and implications are.**
- 5.4.7 Trafford Council welcomes the requirement for contractors to produce and submit monthly reports on noise, dust and air quality data. In the event of complaints or exceedances, details must be shared with Trafford Council within 48 hours.
- 5.4.8 Detail on plant assumptions for the construction assessment are not provided. It is necessary to understand how the noise levels in the construction assessment are derived. Given the duration of the construction period, impacts could still be considered long term even if they don't continue through to commencement of the operational phase. The relevant details should be provided, and the potential impacts defined. Trafford Council should be consulted again when details are available to ensure that forecast impacts are accurately identified, and that appropriate mitigation is secured.
- 5.4.9 The existing highway network in the area between Hale Barns, the airport and M56 J6 is unsuitable for construction traffic. Thorley Lane is currently signed as not suitable. There is concern over the suitability of Mill Lane in its existing condition as a route for HGV movements. Volume 1 offers no detail on highway mitigation or the consequent environmental impacts. There is no mention of improvements required to address width and gradient issues nor to improve the junction of Mill Lane / A538. Consequently Trafford Council request a package of measures to address these issues.
- 5.4.10 Section 6.3.63 – Ground Settlement. A response on this matter is referenced in the [Chapter 6 - Section 13: Code of Construction Practice.](#)

5.5 Environmental Impact Assessment

- 5.5.1 Section 7 of Volume 1 provides a staged overview of the EIA process and has been provided to fulfil the statutory requirements. The aim of that section is to provide an objective and systematic account of the likely significant environmental effects of the Proposed Development and identify how these are used throughout the EIA.
- 5.5.2 Volume 1, Section 7 does not make it clear which assessments, if any, were based on local policies and baseline information. Trafford Council requests clarification on the extent to which stakeholders were engaged as part of the baseline gathering process and whether the baseline information was supported by GM partners' input if requested.
- 5.5.3 Volume 1, Section 7.2 does not identify if or why the decommissioning phase is not included within the temporal scope identified. **Trafford Council requests a breakdown of the Proposed Scheme lifecycle and consequent temporal scope included, in addition to justification on why any phases of development are omitted. This is a requirement of the EIA Regulations 2017.**
- 5.5.4 Trafford Council notes that intra-projects effects have been considered as part of the EIA (Volume 1, Section 7.4) and this is evidenced in some technical assessments such as climate change. However, there is limited evidence throughout the remainder of the technical assessments undertaken at route-wide and / or community area level that an in-combination assessment has been undertaken. **Trafford Council requests that HS2 Ltd confirm if in-combination assessment with other technical topics on the receptors identified has been undertaken. Should this not be the case, Trafford Council requests that HS2 Ltd clearly identify the reasoning for not including this assessment throughout the ES assessments.**
- 5.5.5 Trafford Council welcomes the inclusion of committed developments between 2025 and 2038 and notes that where limited information on a committed development is available, an appropriate assessment has not been carried out. However, **Volume 1, Section 7 does not include the selection criteria for committed developments and the potential zone of influence chosen for individual topic chapters which may be different throughout the ES. Trafford Council therefore requests that HS2 Ltd provide details on the selection criteria for committed developments.**
- 5.5.6 It is also noted that no information on the geographical scope of the cumulative assessment is provided, specifically on whether a cumulative assessment has been undertaken at route-wide level, within individual community areas, or both. Similarly, there is no detail on whether topic sections include or do not include a cumulative assessment. Trafford Council requests that HS2 explain where such an

assessment is not undertaken in any topic section and provide a justification to comply with the requirements of the EIA Regulations 2017.

- 5.5.7 In addition, whilst the ES identifies existing and committed developments as part of the cumulative assessment, Trafford Council requires information on how any future developments will be considered. It is recognised that under the EIA Regulations (2017) HS2 are not required to consider future developments. However, **there is a requirement for the assessment to be as up to date as possible at the point of determination. Given the fact that a significant amount of technical work and further assessment is required, Trafford Council requests that HS2 define the cut off points for further assessment and update the cumulative assessment(s) accordingly. Furthermore, Trafford Council requests that HS2 confirm the guidance used to determine the appropriate list of cumulative developments.**
- 5.5.8 Volume 1, Section 7.5, identifies that where surveys have not been carried out, assumptions were made. Trafford Council requests confirmation that should further surveys identify that additional / more significant effects are anticipated for the receptors assessed, that additional information and supplementary assessment in the form of a revised ES will be deposited to Parliament, and also that further consultation process and appropriate amendments in accordance with the comments provided is expected.

5.6 Scope and Methodology Summary for Environmental Topics

- 5.6.1 Volume 1, Section 8 provides an overview for the scope and methodology selected for individual topics assessed as part of the EIA, with detailed information on these provided in Volume 5: Appendix CT-001-00001 Environmental Impact Scope and Methodology Report (SMR). Trafford Council comments on the specific technical scope and methods are provided in detail in **Trafford Council comments on Cross-topic Technical Appendices – EIA Scope and Methodology Report** and are not repeated here therefore it is advised that the Trafford Council response is read as a whole. Any additional comments which are specific to the information provided in Volume 1 are provided below.

Agriculture, Forestry and Soils

- 5.6.2 Paragraph 8.2.1 (Vol 1, Page 166) mentions the assessment includes '*local rural businesses*' as well as farm/agricultural businesses. However, **only '*farm and agricultural holdings*' are mentioned in paragraph 8.2.9.** There is some ambiguity as to **what business impacts are covered in this chapter and to what extent they are covered in other topics. Trafford Council would therefore request clarification on this matter.**

5.6.3 Paragraph 8.2.8 (Vol 1, Page 167) states that:

‘...primary functions provided by soils, other than for food and biomass production, such as flood water attenuation, carbon storage or the support of ecological habitats, are identified in this topic.’

5.6.4 There is limited evidence that either of the above has been addressed within the community area reports, with soil function limited to that of supporting food production. Trafford Council would therefore request clarification on this matter.

Air Quality

5.6.5 The AQ monitoring does not appear to have taken into account the Clean Air Plan (CAP). The CAP was approved by the 10 Districts within the Trafford Council in July 2021 and should therefore have been given considered by HS2 Ltd within the assessment. Although the Government has since rescinded the original legal direction and issued a revised one with an extended deadline of 2026, the issue remains a live one. Greater Manchester has until 1 July to submit updated proposals for the Clean Air Zone. The reports detailing monitoring undertaken to support development of the CAP have been made available and provided to HS2 Ltd. **Trafford Council requires HS2 Ltd to provide justification regarding the omission of the CAP monitoring data, and request that any further assessment should include the CAP monitoring data within any baseline review or modelling works where appropriate.**

5.6.6 Volume 1, Section 8.3, states that dispersion modelling of point sources has been undertaken and provides an example of combustion emissions from energy centres. **Trafford Council requires HS2 Ltd to provide details in relation to modelling of ventilation and intervention shafts (if required) within the stretch of tunnelled railway.**

5.6.7 Whilst it is noted that electric locomotives will be used during the operational phase of the development, which produce no pollutants as a result of combustion, no reference has been made regarding non-exhaust pollutant emissions. **Trafford Council requests that HS2 Ltd consider emissions of particulate matter caused by non-combustion sources, such as braking and friction between wheels and the tracks, within the assessment.**

5.6.8 DMRB guidance has been used to inform where further air quality assessment is required. However, across Greater Manchester, criteria contained within the IAQM



(Land-Use Planning & Development Control: Planning For Air Quality 2017 Guidance) for air quality should be applied due to the requirement of the local planning guidance. DMRB guidance appears to be more conservative and hence more extensive assessment may be required. **Trafford Council requires that HS2 Ltd address the requirements of the Local guidance or identify the limitations of the provided assessment and seek to provide mitigation where assessment may be subject to increases in the significance of effects.**

- 5.6.9 IAQM Guidance (Land-Use Planning & Development Control: Planning For Air Quality 2017 - Table 6.2) requires an AQA to be undertaken where a change in vehicle movements of 500 AADT (100 HDV) outside of an AQMA or 100 AADT (25 HDV) inside an AQMA. The use of DMRB rather than IAQM could potentially result in an underestimation of affected roads, and therefore an underestimation of potential impacts as a result of the Proposed Scheme. **Trafford Council requires HS2 Ltd to provide justification regarding why the IAQM guidance documents were not included within the road traffic assessment screening process. The number of roads potentially affected by the IAQM criteria should also be provided and appropriate mitigation sought where assessment may be subject to increases in the significance of effects.**
- 5.6.10 The air quality assessment has included future year background concentrations sourced from DEFRA's background mapping database. Background concentrations have been sourced for the construction year of 2025 and operational year of 2030 (2030 has been used within the operational phase assessment as background concentrations are not available beyond this year). The use of these background concentrations does not represent worst-case predictions and may result in significant underpredictions of future concentrations. **Trafford Council therefore requires that HS2 Ltd identify this as a significant limitation and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.**

Climate Change

- 5.6.11 Volume 1, Section 8.4 provides a breakdown of assessments undertaken in relation to climate change. It is noted that a three-staged assessment was undertaken, including Greenhouse Gas (GHG) emissions, In-combination Climate Change Impacts and Climate Change Resilience. It is however not made clear whether similar methodologies for identifying effects was applied for the three assessments.
- 5.6.12 It is noted that de-construction (Stage C) is excluded from the assessment of GHGs which is understood given the long-life of the Proposed Scheme. However, Volume 3, Section 4 includes this phase whilst a de-commissioning assessment is not



provided. This is assumed to be human error, however, Trafford Council seeks clarification and would also request that HS2 Ltd clarify if any assets are required to be demolished and replaced within the 120-year lifecycle and whether the GHG emissions assessments associated with these have been taken into account. Further assumptions are therefore required to be included to identify any assets which may have a shorter timescale than the 120-year lifecycle. Similarly, it is not identified whether the GHG emissions associated with the destruction of the rolling stock which is replaced every 30 years is included within the use stage calculations. Trafford Council requests that this is included in the carbon calculations for the decommissioning phase, should these not be included in the use stage figures.

- 5.6.13 Volume 3: Route-wide effects (M32), Section 4.2, Table 16 includes construction lifecycle emissions within 120-year lifecycle column. Given that the construction works are due to end by 2038, Trafford Council requests that all construction emissions are displayed within the 'up to 2050' column to clearly illustrate the overall emissions generated by the construction of the Proposed Scheme from 2025 to 2038 programme.
- 5.6.14 In accordance with the 2017 EIA Regulations, a cumulative assessment in relation to committed developments is to be undertaken for all technical topics forming the scope of the EIA. **Trafford Council notes that a cumulative assessment was not undertaken for the GHG section of the climate change assessment. Trafford Council therefore requests that this assessment is either included or a justification for scoping this out is provided.**
- 5.6.15 Employment estimates are for 6,060 FTE based at the proposed construction compounds and the travel associated with those is considered significant in respect to the potential GHG emissions, however, this element was not included in the carbon calculations and assessment presented in Volume 3. **Therefore, Trafford Council requests that these are included in the lifecycle assessment or a stronger justification for scoping this aspect out of the assessment is provided.** Particular areas of concern are compounds located in proximity to the busier areas such as M56 J6 and Manchester city centre where transport related issues are identified to be the most significant. **Trafford Council would also request that HS2 justify the exclusion of plant transportation to and from construction compounds as done in Volume 3 paragraph 4.2.12. If this has been excluded because it is deemed to be insignificant then the same scale for deciding inclusion/exclusion should be applied to any load/benefits included in the assumptions.**

Community

- 5.6.16 A summary of the topic scope is provided in Volume 1, with detail information included in the SMR. Given the high-level information provided in Volume 1, the Trafford Council comments on the specific technical scope and methods are provided in detail in other sections of this report and are therefore not repeated here.

Ecology and Biodiversity

General comments on the structure of the ecology documents

- 5.6.17 While Trafford Council appreciates the scale and complexity of presenting ecological baseline information, the documents are difficult to navigate, preventing a more complete sense of linking mitigation to loss. Examples of these are provided below:
- Trafford Council believes there is still a lack of detailed ecological survey information across the Proposed Scheme which needs to inform decision making with some sections being poorly written. An example of this is paragraph 2.4.162 from BID EC-011-00001 Ecological baseline data – bats Part 2 of 2 which, based on the way the paragraphs are written suggests that 24 and 190 buildings were surveyed. **Trafford Council would therefore request that clearer information is provided to identify if the proposed mitigation measures are appropriate for the assessment provided.**
 - Trafford Council notes that the text is often unclear in places and badly written, which makes understanding the extent of surveys and impacts of the Proposed Scheme extremely difficult.
 - Trafford Council believes splitting the line into what appears to be random Community Areas makes difficult to assess the impacts of the proposals in the relevant local authority areas. **Trafford Council therefore requests that summary data is provided for each local authority area, particularly as the boundaries between them are usually physical features such as rivers.**
 - Trafford Council notes that using place names alone makes it difficult to locate areas under discussion, particularly where the names can be commonly used e.g., Fox Covert or Moss Wood. Adding in grid references to identify locations would help the end users considerably. Some places don't even appear as place names on Google Maps e.g., Ashlar. This is compounded by the description of places as being "*north of*" or "*to the east of*" when the map books are not orientated north to south, as normal maps should be.



5.6.18 Trafford Council believes it is imperative for HS2 to clearly demonstrate the Proposed Schemes ability to integrate and deliver local strategic environmental priorities including those highlighted in:

- Trafford's Local Plan sets out Trafford's approach to development and is used to guide decisions on planning applications across the borough. It is made up of the following:
 - Trafford's existing local plan (The Core Strategy 2012- 2026)
 - Revised Unitary Development Plan (UDP) (Adopted June 2006)
- GM Joint Waste Plan (Adopted 2012),
 - GM Joint Minerals Plan (Adopted April 2013) and
 - Altrincham Town Centre Neighbourhood Business Plan (Adopted November 2017).
- The emerging Draft Local Plan (Regulation 18) contains the latest policy direction and will replace the existing UDP and Core Strategy plan once adopted.

5.6.19 In addition to the above, the consideration of the following documents soon to be published:

- Manchester Biodiversity Strategy (delivery of a citywide Nature Recovery Network)
- Managing Manchester's Trees (comprehensive function and capacity assessment of the City's TreeScape)

5.6.20 Trafford Council does not consider the following a reasonable assumption to make: "Based on current best evidence, it is considered unlikely that ecological features will be significantly different by either 2025 (construction baseline) or 2038 (operational baseline). The EIA therefore concentrates on reporting the likely effects of climate change at the route-wide level within Volume 3 of the ES". **The extended period of construction itself will in some cases significantly alter the baseline for some ecological features. It is not clear within the assessment or the mitigation how this is accounted for. Trafford Council therefore requests clarification on this matter.**

Biodiversity Net Gain

- 5.6.21 The UK Government has now made a [policy commitment](#) to aim to deliver a net gain in biodiversity on this phase of HS2. Trafford Council believe the habitat losses are not adequately compensated for in the proposals and would expect a minimum of National Biodiversity Net Gain requirements, which at present isn't clearly demonstrated. **Trafford Council therefore requests that BNG is clearly demonstrated by "a development that leaves biodiversity in a better state than before" (Baker, 2016) with reference to GMCA Biodiversity Net Gain Guidance (2021) and relevant local policies.**
- 5.6.22 Volume 5, SMR reports 1 and 2, of the ES state that no net loss of Biodiversity Net Gain is being sought when it should reference that a net gain will be secured (with an aim of 10% net gain). **Trafford Council therefore request to see clearer references to the Environment Act Priorities and the above relevant policies and guidance in terms of articulating how Biodiversity Net Gain is being delivered through the Proposed Scheme, and how the GM Local Nature Recovery Network and opportunity mapping is being used to positively identify ecological receptors.**

Protected Species

- 5.6.23 Trafford Council notes that identification of ponds up to 500m from Proposed Scheme boundary was completed through a desk exercise. The Phase 1 habitat survey methodology only surveyed the Proposed Scheme construction area plus a 100m buffer (where access permitted). Waterbodies are not always detectable from desk studies and so there is potential for ponds to have not been recorded between 100m and 500m from site. Great Crested Newt survey methodology acknowledges this and notes that there was i.e., addition of 'new ponds discovered during other survey'; however, that still leaves uncertainty, and it is therefore possible that not all ponds within 250m captured. **This level of detail is required to assess suitability of proposed mitigation regarding isolation and fragmentation of great crested newt populations in line with Trafford's Core Strategy Policy R2. Trafford Council would therefore request that HS2 Ltd identify this as a significant limitation and consider appropriate mitigation measures which may be considered more appropriate than assessed at this stage.**
- 5.6.24 Trafford Council notes that the British Trust for Ornithology (BTO) has published the fifth edition of Birds of Conservation Concern (BoCC) December 2021. This has upgraded species to the red list which were previously not present. The bird assessment methodology refers to BoCC 2015. Given the rate of species decline and the proposed application by HS2 of a future baseline which has a reasonable worst-case scenario, Trafford Council believes that that assessment methodology does not

account for the likelihood that there will be an increased number of birds on the red list in need of conservation interventions. **Trafford Council therefore requests that HS2 Ltd identify this as a significant limitation and consider appropriate mitigation measures which may be considered more significant than assessed at this stage.**

- 5.6.25 Trafford Council note that Polecat is featured in the survey methods explicitly but no other NERC Section 41 species such as hedgehog or common toad are. The rationale for this distinction is not clear. Further, given the notable decline of hedgehogs Trafford Council consider that this is a species which should be included in the baseline assessment. **In line with Trafford's Core Strategy Policy R2, Trafford Council requests that HS2 provide a detailed impact assessment with appropriate mitigation/compensation for these species.**

Habitats

- 5.6.26 Trafford Council notes that newly planted hedgerows have been excluded from mapping within the Phase 1 and hedgerow surveys. In terms of the Proposed Scheme construction phase is 2025 – 2038, it is considered that within that timeframe many of the newly planted hedgerows will be in a condition worthy of record and note as part of the overall network of ecological connectivity. By excluding these and not accounting for them within other calculations i.e., biodiversity net gain, the figures reported for overall hedgerow lost over the life of construction period are not reflective of actual losses. **Trafford Council requests that HS2 Ltd identify the exclusion of certain hedgerows as a significant limitation and provide hedgerow assessments for any impacted hedgerows which have not currently been assessed, including whether the hedgerow is Important under the Hedgerow Regulations (1997). Should effects be identified, Trafford Council requests that HS2 Ltd provide appropriate mitigation or compensation to reduce these effects as far as practicable.**

Electromagnetic Interference

- 5.6.27 Vol 1, Page 180, Paragraph 8.7.2 states:

‘The primary source of EMF will come from the traction power system, comprising the overhead line equipment, 25 kilovolts (kV) trackside traction power cables along the route and supporting infrastructure such as feeder stations. The level of EMF diminishes with distance from the source, so the extent of any potential interference or harmful effects will be limited to only a short distance horizontally and vertically from the



railway boundary or the boundary of any traction power sub-station or switching station.'

- 5.6.28 Trafford Council agrees with the above paragraph, however, would request that the magnitude of the '*short distance*' where potential interference or harmful effects could occur is outlined. This is an important detail which would help give an indication of the areas on the route of the Proposed Scheme that could be affected.
- 5.6.29 The scope and methodology of the electromagnetic interference (EMI) assessment is based on desktop modelling, therefore Trafford Council requests that real-world baseline and post-construction/operational surveys are undertaken at dwellings/receptor sites closest to the route of the Proposed Scheme to verify the desktop modelling of electromagnetic field (EMF) emissions undertaken for the ES.
- 5.6.30 Page 227, Paragraph 9.7.3 (Vol 1) outlines that features such as tower cranes can cause temporary interference to TV reception. Trafford Council request that the locations where this could occur are identified and highlighted, with interference zones determined by direction of signal transmission (for terrestrial and satellite TV) also outlined. Appropriate mitigations for areas with predicted adverse impacts should be agreed with the council and implemented in a timely manner.

Health

- 5.6.31 Trafford Council have no comments in relation to the scope and methodology summary provided in Volume 1.

Historic Environment

- 5.6.32 Trafford Council disagrees with the methodology used within the heritage assessment, in particular the application of the ICOMOS criteria [Vol 1, paragraph 8.9.8] d to assessing significance and impact of works on heritage assets across the Trafford Council area. A particular concern is that all Grade II Listed Buildings have been assessed as having moderate significance, rather than high. **The result is the downgrading of impact when the matrices are applied, with a resulting lack of required mitigation. This is considered to undervalue significance and does not align with NPPF paragraphs 194 & 200. Trafford Council requests that HS2 Ltd identify this as a significant limitation and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.**
- 5.6.33 Trafford Council is concerned with the lack of agreement regarding the baseline of affected designated and non-designated heritage assets with heritage stakeholders



with the likelihood of a number of heritage assets being missed from the assessment. **Trafford Council requests that HS2 Ltd provide a clear strategy for stakeholder engagement before and throughout the construction of the proposed scheme. Should any additional assets be identified which have not been provided as part of the ES assessment, Trafford Council requests that HS2 Ltd provides appropriate mitigation to reduce effects on these as far as practicable in accordance with Trafford's Core Strategy Policy R1, the extent of these measures to be agreed in writing by the Local Planning Authorities and key stakeholders including Historic England.**

- 5.6.34 Curtilage listed structures and buildings have not been included in the assessment of designated heritage assets, which would normally be the case in heritage statements and desk-based assessment as baselines for ES. **Trafford Council requests that these assets are either included in the updated heritage assessments and appropriate mitigation measures sought, or clear justification for scoping these out is provided. Any agreed mitigation measures shall be fully implemented in a timeframe to also be agreed with the Council.**
- 5.6.35 Similarly, the assessments undertaken do not comply with the steps sets out in Historic England GPA 3. **Trafford Council requests that HS2 Ltd provide reasoning for this.**
- 5.6.36 Trafford Council notes that not all areas required for construction have been adequately assessed due to access, particularly in more rural areas. HS2 Ltd has admitted that this has been an issue in some cases. It has been proposed that a programme of further (intrusive) investigation is required for much, if not all, of the proposed route across Greater Manchester. **Trafford Council require HS2 Ltd to provide a clear strategy and programme for these investigations with procedures for outcomes being shared and appropriate updated methodology or mitigations proposed for any given heritage asset to be agreed with the Council and other relevant stakeholders.**
- 5.6.37 The baseline data provided in support of assessment is considered to be insufficient, in particular given that historic map regression has been raised, in particular. As a result, it is unclear how significance and setting has been sufficiently assessed. **Trafford Council requests that HS2 Ltd provide reasoning for this and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.**
- 5.6.38 Whilst non-designated heritage assets (NDHA) have been identified on the maps within Volume 5 Topic Map Book - Historic Environment, the NDHA's have been omitted from the maps within Volume 2 Community Area Map Book. This



- inconsistency provides an opportunity for error in assessment. **Trafford Council requests that HS2 Ltd provide reasoning for this and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.**
- 5.6.39 Red lines on the topic maps are too difficult to differentiate between (temporary): Land potentially required during construction and (permanent) Depot, station, headhouse or portal. **Trafford Council would therefore request that HS2 Ltd consider more user-appropriate mapping tools.**
- 5.6.40 It is noted that detailed historic environment investigations have been included within 'Advance Works' (6.4 of Introduction and Methodology) but, by this stage, detailed assessment, including archaeological evaluation, would be too late. Any increase in significance or discovery of previously unknown heritage assets as a result of investigations would not be easily accommodated by the proposals. **Trafford Council therefore requests that HS2 Ltd provide appropriate mitigation to reduce effects on these, the extent of these measures to be agreed in writing by the relevant Local Planning Authority and key stakeholders, including Historic England.**
- 5.6.41 It is noted that all future works to designated heritage assets will not go through the normal planning process. It is indicated that Heritage Agreements will be set up with the Local Authorities. The implications are that usual consultation processes will not be applied, and amenity societies will not have the opportunity to comment.
- 5.6.42 The Code of Construction Practice, para. 8.1.5 (Page 38) relates to Heritage Agreements. More details are required relating to the 'project-specific regime' which HS2 Ltd is intended to establish. It is noted that method statements will be a requirement of the Heritage Agreements, but heritage statements should also be required so that there is a full understanding of the significance of the asset prior to works commencing.
- 5.6.43 The Planning (Listed Building and Conservation Areas Act) 1990 is not referenced as a core legislation document. Whilst it is understood this is to be specifically 'disapplied', detail is lacking on how this will apply and for how long this will be the case. For example, will the disapplication cease if the works do not proceed? Will those listed buildings which would have fallen within the works no longer be covered by the listed building legislation? Would this need to be 'reapplied' by another Act? Will those buildings to be affected be specifically identified? Or will the area of the works be defined as a catch all? **Trafford Council requests clarification on this matter and requests that further information relating to the extent of**



disapplication is provided in order to identify potential effects and provide detailed comments.

5.6.44 Paragraph 4.2.2 of Heritage Memorandum states that:

“The design of new and modified structures, landscape works, and noise mitigation will be developed during detailed design. It is recognised that this work may have implications for the setting of nearby heritage assets, and the desirability of reducing harm to the significance of those assets through impact upon their setting will be a key consideration of the design process. Mitigation measures will be developed in consultation with other disciplines”.

5.6.45 However, it must be recognised that detailed design can only do so much, and there is a step missing that would seek to avoid complete / partial loss of heritage assets and it appears, from the evidence presented, that this has not been adequately explored or detailed within any of the documentation provided. Indeed, it is not entirely clear what measures have been taken to avoid harm in the first place. MCC require HS2 Ltd to produce a robust strategy/procedure to demonstrate to the Council, and other relevant stakeholders, how detailed design stage will seek to avoid complete or partial loss of any heritage asset. **Trafford Council require the strategy/procedure to allow for agreement at a local level of works to heritage assets, before any works on said assets commence. All reasonable measures to avoid the total or partial loss of heritage assets should be explored or justified before works commence to any heritage asset. Trafford Council will require mitigation to be proposed by HS2 Ltd for the total or partial loss of any heritage, which should be agreed by the Council and thereafter implemented by HS2 Ltd in full in a timeframe also to be agreed with the Council.**

5.6.46 **Trafford Council is concerned that it appears amenity societies may not have the ability to comment on proposals affecting heritage assets, as would be usual practice through normal planning processes. Trafford Council may directly consult with, or require HS2 Ltd to directly consult with, said societies when developing, designing or implementing the full and final works where they impact any heritage assets, within reason (i.e. as would be usually expected for any other development under the Arrangements for Handling Heritage Applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021).**

5.6.47 Paragraph 4.6.3 of the Heritage Memorandum states that:



“Where preservation of heritage assets in situ is necessary, design changes will be made in consultation with the relevant local planning authority and subject to any necessary consents and, if necessary, the submission of a revised application for approval under Schedule 17 to the Bill”.

- 5.6.48 Trafford Council requests that more information setting out the process is provided, including how consents will operate and when should it be applied for.

Land quality

- 5.6.49 Paragraph 6.2.2 (Vol 1, Page 100) relates to construction land requirements. Trafford Council expects HS2 to provide further information in relation to the control measures in place to manage potential contamination within temporary material stockpiles during the earthworks stage of the Proposed Scheme. In particular, mitigation in the form of leachate which will ensure that land beneath the stockpiles does not become contaminated as a result of temporary storage. Specific, detailed controls will need to be presented in the Remediation Strategies, Construction Management Plans and/or CoCP.
- 5.6.50 Trafford Council is aware that site investigations will be required as part of the advance works of the Proposed Scheme which will in turn determine the need for advance mitigation as listed in paragraph 6.4.4 (Vol 1, page 114). **Trafford Council would expect detailed site investigation data, detailed risk assessments and any remediation/validation requirements to be submitted by HS2 to the Local Planning Authority under ‘Schedule 17 Planning Schedule’. Appropriate consultation with the regulators is to be maintained throughout this process. Consequently, Trafford Council will require additional resources to be provided by HS2 Ltd to the review and assess the site investigation data and subsequent remediation/validation information if required.**
- 5.6.51 Paragraph 6.7.5 (Vol 1, page 114) sets out information on construction compounds. In this section it is stated that a temporary railhead will be used to receive (by rail) and stockpile material required for the construction of the Proposed Scheme. **The Council supports the use of rail transport over a road based alternative. However, if rail is being used to transport aggregate, this should be done sustainably under Policy 9 (Sustainable Transport of Minerals) of the Greater Manchester Joint Minerals Plan. Trafford Council would like clarification as to whether an analysis of the existing capacity on the railway line has been undertaken, so that the concept can be delivered.**



- 5.6.52 Regarding paragraphs 6.26 and 6.27 (Vol 1, Page 151), the ES states that where embankments/bunds are used for noise control or landscape reinstatements that they are suitably constructed with capping soils validated as suitable for use. **Trafford Council requests that this requirement is covered as part of the Remediation Strategy and any soil sampling frequencies and validation procedures are agreed in writing with the regulators.**
- 5.6.53 With regard to the Land Quality baseline set out in paragraph 8.10.6 (Vol 1, Page 187), Trafford Council recommend reference to information from the British Geological Survey (BGS) 'Collation of the results of the 2019 Aggregate Minerals Survey for England and Wales, 2021' document to inform the baseline information for Land Quality.

Landscape and Visual Impact Assessment

- 5.6.54 The methodology in Volume 1 states that landscape and visual receptors within 1.5km of the route have been considered (paragraph 8.11.9, Page 190). It then states that the study area varies locally to take account of variations in visibility as indicated on the ZTV. A 2km study area would be considered normal unless agreed with the Local Planning Authorities, however, this information is not provided. **Trafford Council requests to see a statement on the consultees and stakeholders with whom the study area has been agreed.**
- 5.6.55 Para 8.11.15 (Vol 1, Page 191) states that 'Impacts on selected views have been illustrated by preparing verified photomontages from locations discussed with the competent authorities for the ES'. **This statement should be supported by a consultation tracker detailing these agreements, which is not provided. Trafford Council would welcome to see a statement on the consultees and stakeholders agreements.**
- 5.6.56 Paragraph 8.11.18 (Vol 1, page 192) states that the ZTV does not take into account overhead gantries or lighting columns. While this is explained as they '*rarely give rise to significant effects*' (or in Volume 5 explained as they are '*excluded due to its potential to take emphasis away from the understanding of significant effects*') **Trafford Council requests the inclusion of a separate ZTV which illustrates the theoretical visibility of these taller structures to identify of any additional effects are likely as a result. Trafford Council would request that HS2 Ltd provide reasoning for the exclusion.**

Major Accidents and Disasters

- 5.6.57 Paragraph 8.12.9 (Vol 1, Page 193) states that assessment has been undertaken with reference to the regulatory requirements, legislation. **Trafford Council and Partners request that HS2 confirm that this includes the Civil Contingencies Act (2004).**
- 5.6.58 Paragraph 8.12.11 (Vol 1, Page 193) states that; "The Framework for the environmental risk assessment follows a standard source pathway receptor approach where sources and pathways are based on existing risk assessments and receptors". Trafford Council are required to keep and maintain a Greater Manchester Community Risk Register (GM CRR) as part of their compliance with the Civil Contingencies Act (2004). It is therefore not clear how the statement can be made without the reference to the GM Community Risk Register. **Trafford Council requests clarification on this matter.**
- 5.6.59 In paragraph 9.12.1 (Vol 1, Page 234), Trafford Council request that HS2 confirm that one of, "*A number of legislative and regulatory requirements must be complied with...*" includes the Civil Contingencies Act (2004).
- 5.6.60 Trafford Council requires clarification on how will HS2 ensure that; "Measures to mitigate health, safety and environmental risks related to the potential for major accidents and disasters during construction and operation of the Proposed scheme will be embedded through the detailed design, technical standards and specifications for the Proposed scheme" (Vol 1, paragraph 9.12.2, Page 234). Trafford Council requires clarification on authorities consulted in relation to MAaD and what plans will be reviewed.
- 5.6.61 Paragraph 9.12.3 (Vol 1, Page 234) states; "*... contractors and suppliers to prepare plans and protocols that address accident and disasters risk issues*". **Trafford Council requests clarification on the mechanisms by which nominated contractors and suppliers will deliver these plans/ protocols, who will they consult with to obtain local information, information on existing plans and local response procedures.**

Socio-economics

- 5.6.62 In paragraph 8.13.8 (Vol 1, Page 195), it is noted that the socio-economic assessment is based on the assessed businesses and employees available as of October 2020 and all businesses which may have closed following this date due to Covid-19 effects have been included into the assessment. This approach is welcomed. However, it is not clear why a later date (for example, October 2021) was not also analysed to ensure the inclusion for any new businesses which may be affected by the Proposed



Scheme. If no information is available after 2020, Trafford Council request that this is identified as a limitation to the assessment.

- 5.6.63 Paragraph 8.13.10 (Vol 1, Page 196) states 'it has been assumed that 88% of the business occupiers displaced by the scheme will successfully relocate to alternative locations and no employment will be lost. The other 12% of occupiers are assumed to close rather than relocate'. It is noted that this assumption was based on the research into the relocation of companies and jobs on account of the London 2012 Olympic Games. Given the potential effects of this estimate and for the purposes of assessing the worst-case scenario, it is considered that the London-based case study does not represent the base case for the NW and Crewe to Manchester route. Similarly, the assumption that a proportion of the 88% of the businesses (which are largely located within the rural areas of Trafford Council, which will exhibit their own unique challenges and operating models given their rural location or are users specific) impacted by the Proposed Scheme will be able to re-locate is not considered representative of the worst-case scenario for loss of FTEs. **Trafford Council would therefore request that HS2 Ltd use evidence which can be related to the locality and use existing experience from the ongoing construction of the earlier phases of HS2 to identify the actual loss of FTEs as a result of business displacement.** This is specifically important due to many businesses within Trafford Council area being affected by the impacts of Covid-19 making them less resilient to any changes which may affect footfall and trading.

Sound, Noise & Vibration

- 5.6.64 Trafford Council notes the usage of $L_{Aeq,16\text{ hour}}$ as the determining metric used to prescribe noise insulation. This is contrary to the guidance outlined within The Noise Insulation Regulations (1975), which requires the use of $L_{A10,18\text{hour}}$. HS2 should provide further clarification and assurance that assessments remain robust in this instance.
- 5.6.65 HS2 should provide further details on Noise Insulation measures proposed, and the process for agreeing offers for affected residents – in particular Trafford Council seeks clarification on the involvement of local authorities in this process.
- 5.6.66 It is considered that the transitory nature of works does not justify the scoping out of vibratory rollers or pneumatic breakers, particularly given that the duration of these works is stated as '*often less than one month*' (implying that these works will exceed one month in a number of cases (Vol 1, Paragraph 8.14.21, Page 201)). **Trafford Council therefore considers that the ES is deficient as it does not include the influence of vibratory rollers and pneumatic breakers. Appropriate assessment**

should be provided, and appropriate mitigation should be sought if significant adverse effects are identified.

- 5.6.67 While Trafford Council is in general agreement with the methodology outlined within 8.14.23 – 8.14.25, for completeness, Trafford Council requests information regarding the *'full timetable'* referenced within Paragraph 8.14.25 (Vol 1, Page 202).
- 5.6.68 Paragraph 8.14.28 (Vol 1, Page 204) makes mention of diesel-powered specialist engineering trains undertaking maintenance from 0000-0500. It appears that no assessment is to be undertaken beyond the statement *'it is assumed that engineering trains will be specified and operated so that any adverse noise effects are no greater than those for the night-time passenger services'*. **While it is understood a full assessment of these vehicles may not be possible at this time, Trafford Council considers it insufficient to assume the vehicles will not exceed these limits without any evidence, particularly given the sensitivity of operational hours. Trafford Council therefore requests that these are considered as part of any future assessments and appropriate mitigation should be sought if significant adverse effects are identified.**
- 5.6.69 Trafford Council request that HS2 provide evidence supporting the claim of 3dB reduction in noise emissions compared to current standards outlined within paragraph 8.14.29 (Vol 1, Page 204).

Traffic and Transport

- 5.6.70 Trafford Council have no comments in relation to the scope and methodology summary provided in Volume 1.
- 5.6.71 Trafford Council comments on the specific technical methodology assessment and suggested mitigation measures are provided in detail in other sections of this report.

Waste and Material resources

- 5.6.72 Waste and Materials Resources have been considered a route wide effect (Volume 3) with no consideration given to individual map book areas. Paragraph 15.2.10 of Volume 3 Route-wide Effects indicates that district and borough level planning policies have not been given consideration within the assessment. **Trafford Council require that the proposals for waste management are considered against each individual local planning authority's policies relating to waste management. In respect of policy, there is also no reference or account given to relevant National Planning Practice Guidance (NPPG), including NPPG for Waste (2015).**



- 5.6.73 As there has been no assessment of waste capacities at a district level there is potential that there will be a significant and disproportionate impact on certain sections of the route – as generally figures for the northwest have been used. **Trafford Council require that further assessment is given to the anticipated locations for disposal of excess waste arisings and a subsequent re-evaluation of the significance criteria. A project plan for Waste Management is required. With reference to the opening paragraph of this section, there are numerous local waste policies (including L6 Trafford Core Strategy) of the GM authorities that require Site Waste Management Plans. The project plans should be informed by the consolidation of baseline information and through local (to the route) study, and for example, should reference any development features that may generate significant quantities of waste or that could present management challenges.**
- 5.6.74 Paragraph 15.6.50 of Vol 3 Route-wide Effects states that *“Waste Planning Authorities have a statutory responsibility to make provision for sufficient waste infrastructure capacity.”* Paragraph 15.6.46 of the ES also states that each of the waste planning authorities have been consulted regarding the issue of inert waste capacity. **Trafford Council request further detail on this consultation and it is that details on future engagement should be proposed and provided.**
- 5.6.75 Volume 5 Appendix L Section 2.5.2 discusses the development of the significance criteria for inert waste disposal capacity used within the Volume 3 assessment. The degree of significance for a Minor Adverse effect has been set at 2,000,000 tonnes and Moderate Adverse effect of 10,000,000 tonnes per annum loss of inert landfill disposal capacity. 2 million tonnes per annum represents a loss of 24% of the northwest inert disposal capacity per annum and 10,000,000 tonnes would represent a complete loss of capacity. It is unclear as to how these figures, and degrees of significance, have been derived other than through professional judgement. **Trafford Council requires that a more robust explanation as to how significance criteria have been derived and agreed upon is provided. Trafford Council also requires more information on the estimated levels of inert waste that would be produced between 2025 and 2038 to have a better understanding of capacity requirements. More information on the professional judgement that has derived the significance criteria for non-hazardous and hazardous waste disposal capacity is also sought. Without this information it is not possible to assess whether there is a potential breach of EIA Regulations.**

Water Resources and Flood Risk

- 5.6.76 Paragraph 9.17.2 (Vol 1) on page 245 states that climate change will be assessed to the 1% AEP event. However, Trafford Council note that by the time of construction,



climate change may have been realised in different ways / assessment methods may have changed and subsequently result in different effects which may be considered significant in EIA terms. **Trafford Council requests that additional allowances are included in scheme design to accommodate changes in climatic conditions.**

5.6.77 Construction monitoring does not outline approach to manage flood events during construction for both the site and off-site impacts to others. **Trafford Council requests that HS2 Ltd provide reasoning for this.**

5.6.78 Climate change has been assessed based on February 2016 guidance (Vol 1, paragraph 8.17.10, page 213). Guidance has been revised twice since this time which will now be more representative of catchment characteristics. **Trafford Council requests that HS2 Ltd provide reasoning for using guidance which is now out of date and consider amending the assessment using the latest guidance to identify if additional mitigation is required.**

5.7 Approach to Mitigation and Monitoring

5.7.1 The EIA Regulations 2017 require an ES to include “a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment”. **Trafford Council recognises that primarily high level / generic set of mitigation measures can be presented for the Proposed Scheme, however, as these are heavily reliant on the implementation of management plans and construction practices, Trafford Council requires the opportunity to engage in the preparation of the detailed management plans supporting the design evolution and construction works for the scheme.**

Agriculture, Forestry and Soils

5.7.2 Trafford Council have no comments in relation to the mitigation and monitoring measures outlined in Volume 1.

Air Quality

5.7.3 Trafford Council requests that additional resources are provided to local authorities to assist with the regulatory burden, dealing with complaints and regular liaison with chosen contractors working with HS2 Ltd.

5.7.4 Trafford Council requests that all appointed construction contractors are subject to audits carried out by HS2 Ltd or appropriate appointed parties throughout the construction phase to ensure that CoCP is adhered to.



- 5.7.5 It is noted that only permitted crushing, screening, concrete batching plant shall be used within compounds. Trafford Council requests that it is notified in advance of the permitted plant being brought onto site, the detail of which should be agreed in writing with the relevant Local planning authority.
- 5.7.6 It is noted that construction phase mitigation measures will be implemented to ensure negligible impact of fugitive dust emissions on sensitive receptors. **Trafford Council requests that standard mitigation measures outlined within the CoCP and other relevant management plans are implemented throughout the entirety of each phase of demolition and construction, the extent of which should be agreed in writing with the relevant Local Planning Authority.**
- 5.7.7 The CoCP states that exemptions will be sought for plant and machinery that is not compliant with Greater Manchester's Clean Air Plan (CAP) and Clean Air Zone (CAZ), however, it should be noted that exemptions within the CAP and CAZ will be statutory, and thus additional exemptions cannot be applied for. Although the Greater Manchester Clean Air Plan is under review, the CoCP will need an obligation for HS2 contractors to comply and account for any associated charges at the time. If this is to become part of a LEMP, then HS2 need to update the CoCP to require contractors to comply with local policy. **Trafford Council therefore requests that all plant and machinery used within the construction phase of the development is compliant with the CAP and CAZ.**
- 5.7.8 Trafford Council requests that Air Quality Action Plans are produced to provide detailed mitigation measures to be implemented where significant adverse air quality effects are anticipated during the construction phase of the development. Paragraphs 7.2.12 to 7.2.18 of the CoCP (CT-002-00000, Page 39) state that reviews will inform Air Quality Action Plans, however, Trafford Council requests that the Air Quality Action Plans are submitted to the relevant Local Authorities for review and agreement prior to any construction works and reviewed by HS2 Ltd regularly.

Climate Change

- 5.7.9 It is noted that 'The draft CoCP includes a requirement for the nominated undertaker's lead contractor to monitor extreme weather events during construction' and this mitigation applies to each stage of the climate change assessment. **Trafford Council recognises that the mitigation approach to construction uses the industry standard PAS2080 and implies a detailed carbon management plan will be produced at a later stage, with the plan being benchmarked against the worst-case scenario calculation presented in the ES. However, Trafford Council requests that HS2 provide adequate reporting of GHG**

emissions during the construction phase and the parties responsible for auditing carbon emissions against the assessed base levels.

- 5.7.10 Similarly, Trafford Council requires the operational phase of the development to commit to the use of 100% green energy at all HS2 assets as embedded mitigation and should therefore be considered as part of the base case calculations instead of the sensitivity testing.
- 5.7.11 Trafford Council welcomes proposals for carbon sequestration. However, the Council would request further clarification on the planting strategy, specifically, in relation to planting timing and locations selected for carbon sequestration, species chosen and management of these locations during the lifecycle of the project.
- 5.7.12 Trafford Council agrees with mitigation plan outlined Appendix CL-002-00000, Table 4, page 22: (Plant procurement strategy) to select species from a range of latitudes to increase resilience, and therefore reduce watering. **Trafford Council also requests that selection of plant species should also take into account the climate impact on local areas/communities and where appropriate should provide shading & cooling and enhance water retention.**

Community

- 5.7.13 Appropriate mitigation, compensation and support will be required for residents, businesses and community groups whose properties or land are to be demolished or significantly impacted. **Trafford Council requests that HS2 Ltd confirm that necessary mitigation measures are provided and agreed in writing with the relevant Local Planning Authority.**
- 5.7.14 Where loss of property is unavoidable, Trafford Council requires a commitment from HS2 Ltd to providing a comprehensive, fair and timely financial compensation package alongside appropriate support services for each affected landowner and business. Trafford Council also requests that HS2 Ltd set out in more detail their approach to engagement and support which will be provided to affected businesses and organisations. Principally, a detailed programme needs to be provided which will establish when directly impacted businesses, landowners and residents will be informed as to if they will qualify for compensation. This is not currently provided in the 'C8: Compensation Code for compulsory purchase'.
- 5.7.15 Trafford Council requests that HS2 Ltd financially support through an existing or new agency, a service to assist existing impacted businesses to find suitable alternative premises, and not just where HS2 limited consider there to be 'sufficient demand'.

Trafford Council requires HS2 to put this service in place within 3 months of the Bill's Royal Assent.

- 5.7.16 Trafford Council requests that HS2 Ltd provide appropriate resourcing through the Communities and Environmental Fund and Business and Local Economy Fund for all impacted communities. This should be intelligently informed by a quantitative cumulative assessment of the impacts upon community assets/businesses in each area.
- 5.7.17 It is critical that greater certainty is provided in respect to mitigating the impacts upon public open space and community facilities. A high-level policy methodology is provided within Information Paper E22; however, this is insufficient and provides uncertainty for many community facilities and services. Trafford Council requests that where 'significant' effects on public open space or community facilities have been identified, the process and timescales for establishing what mitigation will be provided must be fully understood to allow community organisations time to plan accordingly. It also needs to be established as a matter of importance which community facilities will and will not be provided replacement facilities by HS2 Ltd and which will be offered mitigation through other means. **Trafford Council request that HS2 Ltd establish the details of mitigation to be provided for all impacted public open space and community facilities identified and that the specific details are agreed in writing with the relevant local planning authority / authorities. Trafford Council would want to see a Community Task Force established with a remit to specifically consider and address community issues, including the agreement of appropriate mitigation, compensation or reprovision of community services and facilities.**
- 5.7.18 Where compulsory purchase is required, Trafford Council expects a definitive commitment to providing a longer notice period than the minimum three-month period specified in the Bill to notify businesses who are to be displaced under compulsory purchase arrangements. A minimum 12-month notice period should be committed to.
- 5.7.19 Trafford Council requests that HS2 Ltd provide landowners and impacted business owners with access to independent advice and signposting to services to assist their understanding of their rights to compensation and to recover costs associated to any such claims for compensation.

Ecology and Biodiversity

Biodiversity Net Gain

- 5.7.20 No clear figures are given on how long the long-term management of either compensation habitats or BNG habitats will actually be (noting that for BNG commitments of 30 years are required). For woodland outside of the final land ownership boundary of the Proposed Scheme, for example HS2 will only “*seek to make agreements with local landowners and/or other interested parties to ensure that the objective of the planting is maintained in perpetuity*” (Information Paper E20: Maintenance of landscaped areas 7.6) **Trafford Council requires HS2 to provide detail as to what would happen where agreements cannot be reached.**
- 5.7.21 Similarly for hedgerows it is stated (7.12) that “The nominated undertaker would seek to establish agreements to transfer other hedgerows along field boundaries to relevant landowners, or otherwise would look to make arrangements with other interested parties”. **Trafford Council requires HS2 to provide more detail as to how and when nominated undertakers would seek to establish agreements with landowners and request the local authority and GMEU are consulted on the content prior to the agreement being entered into.**
- 5.7.22 It is not clear as to where mitigation will be provided. There is no cross-reference back to what type and where mitigation will be provided or what it is intended to mitigate against. The ES is deficient as detail on mitigation is not provided. Trafford Council require **HS2 Ltd to demonstrate that sufficient, appropriate mitigation measures will be put in place for the Proposed Scheme in order to compensate for loss at a district level in line with GM Places for Everyone Policy JP-G 9 and Trafford’s Core Strategy Policies R2 and R3.** This needs to be communicated clearly. It also needs to be noted that changing landscape character is not a key principle of biodiversity net gain. **Compensatory habitats need to be appropriate to the location. Trafford Council require HS2 Ltd to provide more detailed information accurately demonstrating how and where mitigation and compensation will be provided.**

Habitats

- 5.7.23 Trafford Council’s key concerns across the Proposed Scheme include habitat loss, habitat fragmentation and habitat isolation, both through spatial losses but also through temporal impacts arising as a result of the construction period. The fragmentation of habitat, and in some cases periods of complete habitat isolation (Wood near Chapel Lane SBI, for example), are not adequately reflected on, catered for, or mitigated against. **In accordance with GM Places for Everyone Policy JP-G 9**



and Trafford Core Strategy Policies R2 and R3, Trafford Council requests that HS2 mitigate habitat loss fragmentation and isolation and contribute to the effectiveness of the wildlife corridor. HS2 should ensure trees and woodlands of value to amenity are protected and provide appropriate mitigation to reduce significant effects.

- 5.7.24 Trafford Council believes the potential impacts during both construction and operation as regards disturbance and movement of non-native invasive species and potential controls, biosecurity and safeguarding are not adequately considered in line with TfGM's IMS Environment and Sustainability Criteria – Biodiversity. **Therefore, Trafford Council requests that an Invasive Non-Native Species Management Plan is produced as well as management of INNS within HMP's. The potential impacts are scheme wide and relevant during both operational and construction phases.**
- 5.7.25 Trafford Council notes that the future baseline has only looked at development proposals and not long-term plans for habitat restoration, enhancement and creation such as the Nature Recovery Network/LNRs/SBIs with consideration of GM Places for Everyone Policy JP-G 9 and Trafford's Core Strategy Policies R2 and R3. **Trafford Council therefore requests that HS2 reconsider the future baseline scenario and identify suitable mitigation measures where appropriate.**
- 5.7.26 A full hedgerow assessment has not been included therefore in line with **Trafford's Core Strategy Policies R2 and R3**; and Wigan Replacement Unitary Development Plan, Remaining Policies, 2006 EV2C a full assessment is required is to ascertain 'Important' hedgerows under the Hedgerow Regulations, 1997. The loss of hedgerows indicated is considered to be of County not just of District Value. As such the scale and importance of Hedgerow loss to Greater Manchester is not adequately compensated. **Trafford Council requires that HS2 revise their hedgerow loss assessment and provide appropriate mitigation. Trafford Council would expect a much stronger Hedgerow replacement plan and programme.**
- 5.7.27 Trafford Council request a more nuanced approach is taken in respect of tree and woodland planting, to understand the need, feasibility and suitability, and that takes into account other habitat priorities e.g., grasslands in line with Trafford's Core Strategy 2012-26- Policies R2 and R3 and TfGM's IMS Environment and Sustainability Criteria - Biodiversity. Trafford Council would also expect that all areas of woodland creation would benefit from suitable planting of extensive woodland wildflower assemblages.
- 5.7.28 Trafford Council believes the Proposed Scheme does not take into account the importance of individual trees and street and highway trees of note that are not

- veteran trees but are important landscape features regardless. **Trafford Council requires that HS2 revise their tree loss assessment and provide appropriate mitigation.**
- 5.7.29 Trafford Council would also expect a full CAVAT assessment on trees of note/ to ensure a fuller Ecosystem Services understanding and appreciation of their value and function is considered in mitigation.
- 5.7.30 Trafford Council expect two for one compensation on all ponds to be lost in line with Manchester Core Strategy 2012-27- EN 15, **Trafford's Core Strategy Policy R2** and Wigan Replacement Unitary Development Plan, Remaining Policies, 2007 EV3F. **Trafford Council requests that HS2 confirm that this will be a commitment of the mitigation strategy, the details of which are to be agreed in writing with the Local Planning Authority.**
- 5.7.31 Trafford Council note that if the aim of the Green Corridor is to minimise and compensate the environment impacts of HS2. Clarification is required to explain why only the second aim has a woodland fund. Trafford Council consider that given there are also significant impacts on other habitats including hedgerows, ponds, and grassland together with impacts on local wildlife sites, a wider fund should be provided.
- 5.7.32 The Proposed Scheme should ensure that the protection and enhancement of key strategic green infrastructure assets is complemented by long-term measures to protect and enhance the existing network of green infrastructure, including protecting and enhancing sites of ecological value. There is brief reference to the Wetland Nature Improvement Area, but no real detail is supplied. Areas covered under GM Places for Everyone Policy JP-Strat 13 and Policy JP-g 9. **Clarification is required from HS2 as to how this will be addressed.**
- 5.7.33 Trafford Council believes there may be an opportunity to incorporate draft Greater Manchester Local Nature Recovery Strategy into the Proposed Scheme. **Furthermore, Trafford Council requires that the Proposed Scheme demonstrate clearly its ability to integrate and deliver local strategic environmental priorities such as Manchester Local Plan, Manchester's Great Outdoors: a Green and Blue Infrastructure Strategy, Our Rivers Our City, Manchester Parks Strategy.**
- 5.7.34 Trafford Council request commitment from HS2 to deploy a Landscape led approach to the scheme, following established design principles to deliver a route-wide "Green Corridor" and in place-making "demonstrate a commitment to the natural world in accordance with GM Places for Everyone Policy JP-g 9, Core Strategy 2012-27- EN15 and Trafford's Core Strategy Policy R2. It would be beneficial to see better



cross-cutting, thematic recognition and integration, where related themes can demonstrate multiple benefits e.g., the important roles that walking and cycling access to and through SBIs, and greenspaces has on community cohesion, placemaking, and health and wellbeing. Examples of multiple benefits can be found in Trafford's Core Strategy Policy R2 and GM Places for Everyone Policy JP-S 1. This could be delivered by completing a strong natural capital assessment for the scheme in Manchester.

Invasive Non-native Species

- 5.7.35 Trafford Council has concerns regarding the potential impacts during both construction and operation phases with reference to disturbance and movement of non-native invasive species and the potential controls, biosecurity and safeguarding are not adequately considered. **Trafford Council, therefore, require an Invasive Non-Native Species Management Plan to be produced by HS2 as well as management of INNS within HMP's as required by TfGM's IMS Environment and Sustainability Criteria – Biodiversity policy.** The potential impacts are scheme wide and relevant during both operational and construction phases.

Protected Species

- 5.7.36 Trafford Council have concerns relating specifically to bats which include the inclusion of appropriate provision for bats; and when artificial roosts are utilised it would be useful to understand the rationale surrounding the placement, type etc of the provision. **Trafford Council, therefore, require that HS2 undertake detailed bat surveys to ensure roosting, commuting and foraging ability can remain in accordance with Core Strategy Policy R2, with further provision of bat mitigation involving roost protection and installation of bat boxes.**
- 5.7.37 Furthermore, Trafford Council request that all buildings to be impacted are subject to a preliminary roost inspection to determine bat roost suitability, followed up by necessary further surveys as appropriate i.e. emergence/ return surveys. The survey data will inform appropriate mitigation such as replacement roosts- location, type and number. The Proposed Scheme should also prioritise bat commuting features (hedgerows etc.).
- 5.7.38 Trafford Council request to see species action plans developed for key species supporting the delivery of the new Manchester Biodiversity Strategy and Nature Recovery Network.

Health

- 5.7.39 Trafford Council and partner authorities have no comments on the summary of mitigation measures provided for health assessment.
- 5.7.40 Comments on the specific technical assessment and suggested mitigation measures are provided in detail in other sections of this report.

Historic Environment

- 5.7.41 Trafford Council and partner authorities have no comments on the summary of mitigation measures provided for the historic environment assessment.
- 5.7.42 Comments on the specific technical assessment and suggested mitigation measures are provided in detail in other sections of this report.

Land Quality

- 5.7.43 Trafford Council have recognised that a generic set of potential remediation mitigation measures have been presented for the Proposed Scheme (Vol 1, Section 9.10, Page 230). **Trafford Council expects that detailed remediation strategies/options appraisals (if required) will be produced by HS2 following site investigation works to determine the most appropriate remedial technique. Local Planning Authorities expect to be consulted during this process. Trafford Council expects HS2 to provide confirmation on the mechanisms/agreements which are currently in place to ensure consultation with the regulator takes place throughout each stage of investigation.**

Landscape and Visual

- 5.7.44 Section 9.11 (Vol 1, Page 232) outlines the landscape mitigation proposed at construction and operation. It does not however describe how, post completion, the landscape elements of the construction areas will be reinstated as part of the landscape strategy. **Trafford Council requests that this is included in the detailed landscape strategy which includes information on the timescales for the proposed advanced planting and the size of planting proposed in relation to affected areas to understand whether planting effects are immediate or will take time to become effective.**

Major Accidents and Disasters

- 5.7.45 For all identified risk events all mitigation is considered to be embedded, but given the lack of detail, context, timeframes and stakeholders, **Trafford Council would like**

to be provided with sufficient confidence that these measures will be implemented appropriately and that stakeholders will have sufficient overview of these proceedings. HS2 should provide significantly more detail and a robust framework to outline how these concerns will be addressed.

Socio-economics

- 5.7.46 It is acknowledged that a significant number of facilities, businesses and properties are identified as being required to be demolished at a route-wide level. **Trafford Council would expect the detailed design to limit the loss of property as far as possible. It also needs to be ensured that adequate and timely engagement and support is provided to the affected residents, businesses and other organisation. Where applicable, details of compensation, mitigation or alternative provision to be provided needs to be established in each case as a matter of urgency and where support from the LPA is required, this should be identified.**
- 5.7.47 Trafford Council would wish to seek financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route, both during construction and operation, within the borough that has been demonstrated to cause businesses to fail or had a significant impact on their income. It is not expected that the partner authorities should bear the financial consequences to the detriment of its residents and businesses.
- 5.7.48 It is acknowledged that a significant number of construction employment will be created at route-wide level and within individual community areas. **Trafford Council would request that HS2 Ltd identify the percentage of the potential employment opportunities to be required at a local level to identify the potential impacts on the current supply chain. If a significant proportion of vacancies are to be filled locally, Trafford Council would wish to work with HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages. This is to ensure that skill gaps and needs of the local population can be addressed appropriately for the residents of Trafford Council to take advantage of the varied employment opportunities both during and after the development of the Proposed Scheme.**

Sound, Noise and Vibration

- 5.7.49 It is currently unclear whether additional mitigation is proposed (outside of the embedded mitigation incorporated into the design). There is also no assessment on the residual impacts, and as such it is unclear how effective any proposed mitigation is - Major Adverse effects are predicted at several receptors during the operational phase, and it is not clear whether this is inclusive of mitigation.



- 5.7.50 While Trafford Council welcomes the methodology for the determination of mitigation measures outlined within paragraphs 9.14.3 and 9.14.4 (Vol 1, Page 237), more narrative would be beneficial to understand how the benefits per mitigation type are balanced across various disciplines are balanced (i.e., is acoustic performance the main determining factor when prescribing mitigation, or are concessions given when factoring in Landscape, Visual, Wastewater etc.?).
- 5.7.51 Trafford Council requests that HS2 provide a timetable for the selection and dissemination of information regarding specific mitigation measures (i.e., barrier materials, appearance etc.) to be agreed with relevant Local Authorities, and where possible provide information of mitigation implemented within previous phases of the project.
- 5.7.52 Trafford Council requests that HS2 provide justification for the screening out of potential noise impacts associated with operational road traffic. It appears that changes to the road layout are considered but not clear whether the assessment includes operational phase traffic associated with the Proposed Scheme (if required).
- 5.7.53 Paragraph 9.14.9 states that “Significant noise effects from the operational static sources such as line-side equipment, station ventilation equipment and public address systems will be avoided through their design and the specification of noise emission requirements”, however no methodology or assumptions for this assessment is presented at this time. **Trafford Council requests that HS2 should provide clarification of the methodology that shall be implemented when specifying noise emission requirements, and estimations the static sources to be included within the Proposed Scheme. Insight into any existing methodology currently under use within Phase 1 of the Proposed Scheme would be beneficial.**
- 5.7.54 Paragraph 9.14.19 (Vol 1, Page 238) states that during construction and operational phases, noise and/or vibration monitoring shall be attached to moving vehicles. Trafford Council consider this approach is not effective in determining potential environmental noise and vibration impacts given the significant uncertainty regarding environmental conditions and surrounding noise environment surrounding a moving source. **Trafford Council requires that HS2 reconsider the approach for noise and vibration monitoring of vehicles.**
- 5.7.55 Paragraph 9.14.10 (Vol 1, Page 238) states that “In practice, noise barriers may differ from [the general performance assumption] while maintaining the required acoustic performance.” Trafford Council questions the amount by which the final scheme will vary from the general assumption presented, and the metrics by which any variations will be judged to have maintained the required acoustic performance. For



instance, if noise barriers in some areas are more than 5m from the outer rail, this may have no effect on receptors at ground level but may have significant effects on receptors at height. **Trafford Council requests that HS2 should provide evidence to demonstrate that their assessments have considered the worst case. Without this, the ES reader has not been adequately consulted.**

- 5.7.56 Trafford Council require HS2 to provide justification for 85/80dB L_{pAFMax} trigger level for significant effects, as well as the 20 times per night metric (Vol1, Page 239, Footnote 181). Mention is made of 'The Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996' – however no reference to this level or frequency of events appears to be contained.
- 5.7.57 Similarly, Trafford Council requests confirmation on the justification for the established LOAEL and SOAEL daytime and night-time noise levels, as these do not appear to correspond to guidance outlined within of 'The Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996' (as stated within Information Note E10).
- 5.7.58 It is noted that the draft CoCP provides provisions for rehoming, noise insulation and/or compensation to minimise impacts from noise due to construction. Section 6.3.61 states that '*Buildings qualifying for noise insulation or residents qualifying for temporary rehousing will be identified early enough so that noise insulation can be installed, or temporary re-housing provided, before the start of the works predicted to exceed noise insulation or temporary rehousing criteria*' – **while this is welcomed by Trafford Council, HS2 should ensure that a scheme of works is drafted as a priority, to ensure that deadlines for the installation of Noise Insulation are met.**

Traffic and Transport

- 5.7.59 The strategic modelling is not sufficiently accurate to reflect the current situation in 2022. It does not sufficiently or accurately forecast terms of new infrastructure, planned growth (including new and emerging developments) and transport policy/strategy. **No validation report has been provided and Trafford Council requests sight of this to make comment.**
- 5.7.60 Modelling does not include committed highway infrastructure and it ignores Timperley Wedge and Places for Everyone allocations. No committed developments since September/October 2020 have been examined and these will need to be included for modelling to be representative.
- 5.7.61 Trafford Council requires that the highway modelling is updated to address these concerns so that it can provide a robust assessment of baseline and post HS2

conditions. Trafford Council cannot confirm the acceptability of any resultant highway mitigation proposed on the basis of the modelling as provided alongside the ES.

Waste and material resources

- 5.7.62 Mitigation for the impacts identified within the Volume 3: Route-Wide Effects document are for the sustainable use of excavation materials and reuse within the wider works. Whilst there are references to the circular economy and the waste hierarchy, there are no commitments to targets for diversion from landfill other than they will be explored through detailed design. **Trafford Council requests that HS2 Ltd apply circular economy approach to all phases of the development in accordance with The Waste (Circular Economy) Regulations 2020.**
- 5.7.63 Trafford Council requires a project plan for Waste Management. There are numerous local waste policies (including L6 Trafford Core Strategy, CP14 Wigan Core Strategy, EN 19 Manchester City Core Strategy) of the GM authorities that require Site Waste Management Plans. The project plans should be informed by the consolidation of baseline information (see chapter 4 Cross GM Issues) and through local (to the route) study, and for example, should reference any development features that may generate significant quantities of waste or that could present management challenges.

Flood Risk and Water Resources

- 5.7.64 Application of the Higher (H++) climate change allowance within hydraulic modelling for the stage is deemed appropriate. However, at the detailed stage, **Trafford Council requests that a wider suite of return periods is modelled using the Central allowance so exceedance events and less frequent flood events can be better understood for designs and appropriate mitigation identified and proposed where deemed required.**
- 5.7.65 Trafford Council requests that the process for determining appropriate options to manage watercourse diversions or the routing above or below the new line appears is consistent throughout. For example, it was noted within one community area that the use of syphons is not appropriate whereas within another, they are proposed on a number of occasions. Trafford Council requests that a clear understanding and rationale of how options have been selected and discounted is provided to demonstrate that a sequential and consistent approach has been taken is required.



- 5.7.66 Surface water flood risks have not been taken into account at this stage. A detailed understanding of surface water risks, flow routes and new risks created by the line will require a detailed assessment at the next stage.

5.8 Strategic, route-wide and route corridor alternatives

- 5.8.1 Volume 1, Section 10, sets out the alternatives considered during the development of the Proposed Scheme, and it lists the alternatives under four categories namely: strategic alternatives, route wide rail alternatives, route corridor alternatives and local alternatives.
- 5.8.2 Trafford Council believe that the Alternatives Report appears to have been submitted solely to satisfy the basic statutory requirement to submit a report describing alternatives. It does not provide sufficient detail to describe or allow consideration of the alternatives sifting and decision-making, nor does it seek any ES consultation response.
- 5.8.3 The decisions which dismissed strategic alternatives, route wide and route corridor alternatives were taken as long as nine years ago. The current ES Consultation exercise offers no opportunity to interrogate the reasons or data behind the decisions which have been taken over the past decade. It is evident that the latest proposals do not always represent the best option as derived from the sifting process.
- 5.8.4 The report does not invite comment from Consultees, and it is clear that the decisions have been taken on an inconsistent basis. The proposed route delivers the governments objectives irrespective of whether elements of the route are outperformed on cost or environmental terms by better alternatives.

5.9 Local and Regional Alternatives

- 5.9.1 The Alternatives Report simply summarises the historic sifting of Local and Regional alternatives without giving the necessary data to allow an independent evaluation of that process. It describes those which have been dismissed, on the way to arriving at the currently proposed route.
- 5.9.2 Where brief explanations on selecting alternatives are given, some raise serious questions over the validity of the assessments and decision making. For example, in relation to traffic around M56 Junction 6, HS2 acknowledge that the traffic volumes upon which they based their decision making on access to the Airport Station were only one third of the actual traffic forecast, yet the original decision has been retained. **Trafford Council requires that adequate modelling be shared to**

demonstrate the adequacy of the deposited Proposed Scheme and to confirm the validity of the decision making on alternatives.

5.9.3 As set out previously, the Alternatives Report appears to have been submitted solely to satisfy the basic statutory requirement to submit a report describing alternatives, but it does not provide sufficient detail to back up its decision-making nor does it seek any ES consultation response.

5.10 **Conclusion**

5.10.1 HS2 have not demonstrated that they have undertaken the ES appropriately. This chapter provides HS2 with detail on where those deficiencies lie and where additional information is required in order for Trafford Council to be adequately informed and consulted.

6 Trafford Council Points raised to the ES Consultation which are Common Across Community Area

Section 6 Table of Contents

Comments on Overall EIA Approach	72
Agriculture, Forestry and Soils	75
Air Quality	75
Climate Change	78
Community	79
Ecology and Biodiversity	81
Health	85
Historic Environment	86
Land Quality	87
Landscape and Visual	88
Socio-economics	90
Sound, Noise and Vibration.....	92
Traffic and Transport.....	95
Water Resource and Flood Risk.....	100

6.1 Comments on Overall EIA Approach

- 6.1.1 Section 7 of Volume 1 provides a staged overview of the EIA process and has been provided to fulfil the statutory requirements. The aim of the section is to provide an objective and systematic account of the likely significant environmental effects of the Proposed Development and identify how these are used throughout the EIA.
- 6.1.2 It is noted that no further refinements to the scope and methodology since the publication of the working draft have been made. However, changes to the Scope and Methodology Report (SMR) (Vol. 5 Appendix CT-001-00001) since the publication of this with the working draft are outlined in the SMR report. **HS2 should be required to check that the scope statement in paragraph 7.1.3 is correct if necessary and require confirmation.**
- 6.1.3 Volume 1, Section 7 does not make it clear which assessments, if any, were based on local policies and baseline information. HS2 should be required to clarify the extent to which stakeholders were engaged as part of the baseline gathering process and whether the baseline information was supported by GM partners' input.



- 6.1.4 Volume 1, Section 7.2 does not identify if or why the decommissioning phase is included within the temporal scope identified. **HS2 should be required to provide a breakdown of scheme lifecycle and consequent temporal scope included, in addition to justification on why any phases of the scheme development are omitted.**
- 6.1.5 GMCA welcomes the inclusion of committed developments between 2025 and 2038 and notes that where limited information on a committed development is available, an appropriate assessment has not been carried out. However, Volume 1, Section 7 does not include the selection criteria for committed developments and the potential zone of influence chosen for individual topic chapters which may be different throughout the ES. **HS2 should be required to explain the selection criteria for committed developments.**
- 6.1.6 It is also noted that no information on the geographical scope of the cumulative assessment is provided, specifically on whether a cumulative assessment has been undertaken at route-wide level, within individual community areas, or both. There is no detail on whether topic sections include or do not include a cumulative assessment. Similarly, further explanation is needed on topic specific cumulative assessment from an interaction between the effects of the Proposed Scheme with the effects of other projects. **HS2 should be required to explain where such an assessment is not undertaken in any topic section and provide a justification to comply with the requirements of the EIA Regulations 2017.**
- 6.1.7 Section 7.5, Volume 1 identifies that where surveys have not been carried out, assumptions were made. **HS2 should be required to provide additional information and supplementary assessment in the form of a revised ES that will be deposited to Parliament.** Furthermore, appropriate amendments in accordance with the comments provided should be made and are subject to full further consultation.
- 6.1.8 Within Part A Section 1.7 of the SMR, paragraphs 1.7.6 to 1.7.11 provide an overview of the expected set of environmental controls known as 'Environmental Minimum Requirements (EMR's)' for the scheme. It is stated that the EMR's will ensure that the impacts identified within the ES will not be exceeded. However, a significant proportion of the ES assessment work is heavily reliant on further survey and technical assessments to fully understand the impacts and effects and thus determine appropriate mitigation. On this basis, **HS2 should be required to confirm that the EMR's are robust enough to be relied upon to ensure impacts identified within the ES and subsequent assessment work will not be exceeded.**
- 6.1.9 Additionally, with the exception of the Code of Construction Practice (CoCP) document, the remaining EMR documents are very high level and lack any



meaningful detail. HS2 should be required to confirm when the EMR's will be updated to provide more detail to offer confidence to consultees that the mechanism for ensuring the impacts identified will not be exceeded and is robust and fit for purpose. Additionally, **HS2 should be required to provide further details on how the EMR will capture changes or adjustments to identified effects and impacts going forward as assessment work evolves.**

- 6.1.10 Part A Section 3 provides an overview of stakeholder engagement and consultation for both of the previous SMR stages and subsequent ES. However, GM stakeholders, including Trafford Council, have raised concerns that they have not previously been consulted, or that consultation to date has been limited only to responding to published documents rather than actually informing ongoing assessment and design. **HS2 should be required to detail the process and outline the steps followed to identify the initial comprehensive list of stakeholders and confirm how was this approved or verified.** In addition, **HS2 should demonstrate records or a consultation tracker to identify how/when stakeholders were approached or consulted directly.**
- 6.1.11 Part A Section 4 outlines the Environmental Impact Assessment Methodology and whilst the general approach and scope is agreeable it is not clear why certain topics, for example major accidents and disasters, have only been addressed as a 'Route wide' level instead of being addressed within individual community areas. **HS2 should be required to provide more justification and reasoning behind this on a topic-by-topic basis.**
- 6.1.12 Part A Section 4.3.2 indicates that it has been recognised by HS2 that at this stage, mitigation may not be included within scheme drawings and/or may need to be delivered through further measures. However, part 4.3.4 states that further engagement and consultation will allow stakeholders to raise issues and propose design and mitigation changes. **HS2 should be required to carry out full further engagement at all relevant stages.**
- 6.1.13 Part A Section 4.4 Cumulative Effects outlines the approach to cumulative assessment throughout the ES, however, it is noted that in some topic sections both within community areas and route wide effects that there are no cumulative assessment sections. **HS2 should be required to provide this additional information and explain why this has not been undertaken for some topics.**
- 6.1.14 The ES fails to address intra-project effects despite being identified as an example of a cumulative effect in paragraph 7.4.1 of Volume 1 of the ES. The significance of effects for each environmental topic (for example noise, air quality, landscape and visual) at individual or common groups of receptors should be set out and the overall



significance of these synergistic effects stated. This would enable Trafford Council to understand the significance of the totality of effects at receptors and the suitability of mitigation proposals. Trafford Council consider this approach to be deficient and that there is a lack of information on intra-project effect across the ES. **HS2 should be required to undertake an adequate approach to intra-project effects.**

6.2 Agriculture, Forestry and Soils

6.2.1 The agricultural land quality assessment is very detailed and includes a large dataset, which will be useful in establishing a baseline and generating specific management strategies for temporary construction areas to ensure effective restoration. It is noted that soils and agricultural land quality for some areas have been interpolated as land access was not available. This is unlikely to greatly affect the agricultural land quality assessment overall, but **HS2 should be required to provide detailed soil information for temporary construction works where land is to be restored to agriculture.** Furthermore, any restoration works needs to be appropriately secured and implemented via a soil resources plan or other agreed mechanism.

6.2.2 Detailed soils data has been collected concurrently with the land quality survey. However, it is noted that soil maps in the Environmental Topic Maps are based on high level published Soil Association mapping (from the 1:250,000 National Soil Map) rather than the actual data collected during the HS2 survey. This may give a false impression of the level of variability at the field scale, and it is crucial that specific construction management rely on the actual detailed field mapping to ensure soils are effectively separated, stored and replaced to pre-construction quality. **HS2 should be required to undertake detailed field mapping and implement all necessary appropriate mitigation.**

6.3 Air Quality

6.3.1 Throughout the documentation regarding air quality, although there is reference to the Clean Air Plan (CAP) and Clean Air Zone (CAZ) and there is no indication as to the impact HS2 will have on the compliance with the Nitrogen Dioxide (NO₂) legal limit. HS2 should be required to confirm how this will be addressed and ensure that any further assessment makes clear the potential impacts the proposed development will have on the CAP and CAZ.

6.3.2 DEFRA Guidance TG(16) states that where Particulate Matter verification is not possible, dispersion modelling may be required to use the NO_x/NO₂ adjustment factors. However, modelled concentrations of PM₁₀ and PM_{2.5} have not been adjusted, potentially resulting in under prediction of concentrations. **HS2 should be**



required to update the dispersion modelling to include Particulate Matter verification and adjustment where appropriate, or the NOX/NO2 verification process should be treated as representative of particulate matter, with the modelled particulate matter concentrations adjusted accordingly.

- 6.3.3 The air quality assessment has included future year background concentrations sourced from Defra's background mapping database. Background concentrations have been sourced for the construction year of 2025 and operational year of 2036 (2030 has been used within the operational phase assessment as background concentrations are not available beyond 2030). The use of these background concentrations does not represent worst-case predictions and may result in significant under predictions of future concentrations. **HS2 should be required to provide justification of the background concentrations used and why they are deemed representative.**
- 6.3.4 The use of 2025 as the worst-case year for construction phase impacts is concerning, as the MA06-08 Transport Assessment states that 100% of the overall peak in construction traffic across the whole construction period is between 2029 Q4 and 2030 Q2. **HS2 should be required to provide an explanation as to why AQ assessments have not been undertaken for alternative years.** This should include the cumulative impact of other committed developments for that scenario.
- 6.3.5 The air quality assessment has assessed PM2.5 against an Air Quality Objective (AQO) of 25 µg/m³, as outlined within the Air Quality Standards Regulations (2010 & 2016 Amendments). However, the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 amended the AQO for PM2.5, reducing it from 25 µg/m³ to 20 µg/m³. **HS2 should be required to assess potential effects as a result of the proposed development against the current AQO of 20 µg/m³ for PM2.5.**
- 6.3.6 It is not clear from the documentation provided which of the various construction scenarios will be confirmed and implemented. Additionally, it is not clear what criteria will be used to inform the choice of construction scenario. **HS2 should be required to provide further information regarding the selection of the construction scenario, and the key decisions determining which scenario is most likely to be selected.**
- 6.3.7 The air quality assessment verification process has adopted a minimum standard of 25% to apply to model verification and adjustment in accordance with minimum requirements of TG(16). TG(16) states that within the verification process, modelled concentrations should preferably be within 10% of the corresponding monitored values, which is considered national best practice. The justification of this is not explained within the assessment and may lead to an underestimation of potential



impacts associated with the proposed development. Additionally, there are significant underpredictions at a number of verification sites. Any updated assessment should adopt best practice throughout the verification process and verify the dispersion model to within 10% of the monitored concentrations. As a minimum, any monitoring site above or close to the Air Quality Objective, should be within 10%, and over predict the monitored value. ('Close to' the AQO is described as being above 36 µg/m³). **HS2 should be required to confirm that any updated assessment will adopt best practice throughout the verification process and verify the dispersion model to within 10% of the monitored concentrations.**

- 6.3.8 TG(16) TG(16) states that where PM verification is not possible, it may be required to use the NOX/NO₂ adjustment factors. However, modelled concentrations of PM₁₀ and PM_{2.5} have not been adjusted, potentially resulting in underprediction of concentrations. Any further assessment should either include Particulate Matter verification and adjustment where appropriate, or the NOX/NO₂ verification process should be treated as representative of particulate matter, with modelled particulate matter concentrations adjusted accordingly. **HS2 should be required to include Particulate Matter verification and adjustment where appropriate within the updated assessments.**
- 6.3.9 No commitment has been made to provide air quality assessments at key impact areas as construction routes and plans are finalised. HS2 should be required to provide further information to confirm that detailed air quality assessment is undertaken once construction routes are finalised, and mitigation provided where appropriate. Additionally, **HS2 should ensure that contractors are subject to audit during the construction phase to ensure that works are undertaken in accordance with the CoCP.**
- 6.3.10 Following Royal Assent, relevant local authorities will have a role in approving matters of detail relating to the design of the Proposed Scheme. GMCA therefore request that additional resources are provided to the relevant local authorities affected by the scheme in accordance with the Information Paper C12: Local Authority funding and new burdens. **HS2 should be required to provide funding in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2's selected contractors.**
- 6.3.11 Only permitted crushing, screening, concrete batching plant should be used within compounds. **HS2 should be required to ensure that local authorities are notified when permitted plant is brought onto site.**



- 6.3.12 **HS2 should be required to undertake audits of compound plant and equipment, and vehicle AADT to ensure that factors used within the air quality assessment are adhered to.**

6.4 Climate Change

- 6.4.1 In accordance with the 2017 EIA Regulations, potential cumulative assessment in relation to committed developments is to be undertaken for all technical topics forming the scope of the EIA. Trafford Council note that a cumulative assessment was not undertaken for the Green House Gases (GHG) section of the climate change assessment, and a justification has not been provided for the exclusion of this from the assessment. Trafford Council acknowledge that a cumulative GHG assessment with other committed developments listed in the ES may not be achievable for sites where limited information in relation to potential carbon output is available. However, given the significant number of projects to be developed within GM prior to and simultaneously to the Proposed Scheme, **HS2 should be required to include the committed developments and their carbon footprint to assume the worst-case scenario of the potential GHG emissions.** If such an assessment is not possible, HS2 should be required to identify the reasoning for not undertaking a cumulative assessment of GHG emissions and provide justification. This is particularly important as there has been no consideration of the impact on climate change at the local level or consideration of regional climate emergency carbon budgets. **HS2 should be required to provide additional clarification on these points.**
- 6.4.2 It is unclear how the produced GHG assessment will be used to assess the potential of further carbon reduction on a route-wide level. In Volume 3, paragraph 4.2.48, the mitigation approach to construction uses the industry standard PAS2080 and implies a detailed carbon management plan will be produced which is presumed to be undertaken at a later stage, with the plan being benchmarked against the worst-case scenario calculation. Paragraph 4.2.51 also identifies that the carbon management process will continue to be applied as the design of the development develops, however, it is unclear what management / monitoring plan will be used to ensure the ongoing assessment/monitoring. **HS2 should be required to provide additional clarification on these points.**
- 6.4.3 With very localised assets such as stations/depots within Trafford borough, Trafford Council requests that additional information is provided on management and reporting of construction GHG emissions, specifically, in relation to parties responsible for auditing the construction works, setting the targets for emissions reductions and reporting actual emissions on an annual basis. Similarly, should the set annual carbon emissions targets not be met, **HS2 should be required to clarify**

the parties responsible for ensuring that the net additional carbon emissions are offset appropriately.

- 6.4.4 Trafford Council note that the HS2 Net Zero Carbon Plan targets for 100% zero carbon electricity generation to power the HS2 assets, making journeys on HS2 zero carbon for emissions from day one. On this basis, **HS2 should be required to utilise 100% green energy during the operational phase of the scheme as embedded mitigation.**
- 6.4.5 **HS2 should be required to provide a planting and management strategy for the proposed carbon sequestration which provides details on the location, timescales, species type and management of the selected areas.** Without this information and understanding the species chosen for sequestration and the age of these it is difficult to understand how the reduction in emissions was calculated and the benefits of these for carbon sequestration, local communities and biodiversity.

6.5 Community

Community Severance

- 6.5.1 The route in a multitude of locations will sever connecting routes between communities as well as direct access routes to facilities and recreational routes for residents. Where access and isolation impacts are identified for specific local communities, mitigation is required to ensure appropriate access is retained for the community during the construction period and beyond, particularly for residents with mobility issues. Appropriate funding is required for such impacted communities to implement public access improvements where permanent impacts would occur. **HS2 should be required to ensure adequate mitigation will be put in place to mitigate community severance in agreement with Trafford Council prior to construction.**

Property Loss

- 6.5.2 **HS2 should be required to set out in more detail their approach to engagement and support which will be provided to affected businesses and organisations.** Principally, a detailed programme needs to be provided which will establish when directly impacted businesses, landowners and residents will be informed as to if they will qualify for compensation, and in what form.
- 6.5.3 **HS2 should be required to provide appropriate mitigation, compensation and support for residents, businesses and community groups whose properties or land are to be demolished or significantly impacted.** Where loss of property is



unavoidable, Trafford Council require a commitment from HS2 Ltd to providing a comprehensive, fair and timely financial compensation package alongside appropriate support services for each affected landowner and business. **HS2 should be required to detail their approach to engagement and support which will be provided to affected businesses and organisations.** Principally, a detailed programme needs to be provided which will establish when directly impacted businesses, landowners and residents will be informed as to if they will qualify for compensation. This is not currently provided in the 'C8: Compensation Code for compulsory purchase'.

Community Facilities

- 6.5.4 **HS2 should be required to provide financial compensation for the loss of any part of its open spaces, sports or physical activity sites caused by the development of the Proposed Scheme that is to the detriment of resident's health and wellbeing.** It is not expected that the Council should bear the financial consequences to the detriment of its residents. Where direct impacts would occur to sports facilities, replacement sports provision of no lesser quality and quantity should be provided by HS2 Ltd in accordance with Sport England's policy requirements. Replacement provision should be planned in co-ordination with the respective local authority to understand specific sports need. Where applicable, replacement sports facilities should be provided in full in advance of any works which would impact existing facilities.
- 6.5.5 It is critical that greater certainty is provided in respect to mitigating the impacts upon public open space and for community facilities. A basic policy methodology is provided within Information Paper E22; however, this is insufficient and provides uncertainty for many community facilities and services. **HS2 should be required to provide certainty on provision of open space and community facilities.**

Construction Impacts

- 6.5.6 A number of communities along the proposed route will experience significant impacts for a prolonged period associated with the construction phase and the location of construction compounds. In such locations, and where highlighted in the subsequent Community Area chapters in this report, **HS2 should be required to provide suitable safeguards which are greater than those identified in the CoCP to mitigate the amenity impacts placed upon these communities.** This should be inclusive of both residents and businesses located in close proximity to construction activity as well as the wider community who would experience associated impacts such as increased construction traffic movements and air pollution. **HS2 ltd should**



be required to provide mitigation including transport assessments to identify impacts upon the local highway network, with specific mitigation where required, acoustic screening offered to all directly neighbouring properties and engagement briefings with impacted education and community stakeholders. Impacted residents and businesses also need to be provided with clear construction timetables.

- 6.5.7 Temporary adverse effects on communities are predicted in MA04 and MA06 for construction noise after mitigation at numerous locations. Although Best Practice Means (BPM) will be employed, effects could last for up to several months/years. **HS2 Ltd should be required to justify how these have been classified as temporary given the duration of impacts.**

6.6 Ecology and Biodiversity

- 6.6.1 **HS2 should be required to deliver smarter and bolder mitigation in relation to GM Places for Everyone Policy JP-G9 and JP-S 1. HS2 should be required to provide further information on strategic mitigation and a timeframe for when this information will be available.**

Biodiversity Net Gain

- 6.6.2 The UK Government has now made a [policy commitment](#) to aim to deliver a net gain in biodiversity on this phase of HS2. Trafford Council do not consider that the habitat losses are adequately compensated for in the proposals and would expect a minimum of National Biodiversity Net Gain requirements, which at present it does not demonstrate. BNG should be clearly demonstrated by “a development that leaves biodiversity in a better state than before” (Baker, 2016) approach. The design and construction of HS2 will require completion of net gain condition assessment (Metric 3.0) and a Biodiversity Net Gain Strategy with consideration of the GMCA Biodiversity Net Gain Guidance for Greater Manchester (2021) which aims to deliver 10% biodiversity net gain for at least 30 years. This is in line with the National Planning Policy Framework (NPPF) (2021) and the following local planning policies: GM Places for Everyone Policy JP-G9. **HS2 should be required to undertake a Biodiversity Net Gain condition assessment (Metric 3.0) and produce a Biodiversity Net Gain Strategy demonstrating an overall net gain (with an aim for 10% net gain).**
- 6.6.3 In meeting this commitment, HS2’s approach will need to align to the priorities and approach set out in Greater Manchester’s Local Nature Recovery Strategy. A pilot has already been produced for Greater Manchester; as a requirement of the Environment Act 2021, a statutory Greater Manchester Local Nature Recovery



Strategy will be produced over the coming years, to which the construction of HS2 and its approach to biodiversity net gain (particularly for offsetting) will need to pay regard. In particular, the impact of the route on habitats and their fragmentation will need to be minimised, mitigated (e.g. through green bridges) or offset (locally and in line with priorities in the Local Nature Recovery Strategy), as per the mitigation hierarchy for biodiversity net gain. **HS2 should be required to provide additional information on how they intend to align the BNG requirements with Greater Manchester's Local Nature Recovery Strategy and how this will be agreed.**

- 6.6.4 Currently Trafford Council do not think it is clear as to where mitigation will be provided. There is no cross-reference back to what type and where mitigation will be provided or what it is intended to mitigate against. HS2 need to demonstrate that sufficient, appropriate mitigation measures will be put in place for the scheme in order to compensate for loss in the borough in line with GM Places for Everyone Policy JP-G9 and Trafford Core Strategy Policies R2 and R3. . This needs to be communicated clearly. It also needs to be noted that changing landscape character is not a key principle of biodiversity net gain. Compensatory habitats need to be appropriate to the location. **HS2 should be required to provide more detailed information accurately demonstrating how and where mitigation and compensation will be provided.**
- 6.6.5 Trafford Council request clearer references to the Environment Act Priorities, in terms of articulating how Biodiversity Net Gain is being delivered through HS2, and how the Greater Manchester Local Nature Recovery Network and opportunity mapping is being used to positively identify ecological receptors. **HS2 should be required to include this commitment in the mitigation strategy.**

Habitats

- 6.6.6 Trafford Council has key concerns across the scheme in relation to habitat loss, habitat fragmentation and habitat isolation, both through spatial losses but also through temporal impacts arising as a result of the construction period. The fragmentation of habitat, and in some cases periods of complete habitat isolation (Wood near Chapel Lane SBI, for example), are not adequately reflected on, catered for or mitigated against. In accordance with GM Places for Everyone Policy JP-G9 and Trafford Core Strategy Policies R2 and R3. HS2 should seek to mitigate habitat loss fragmentation and isolation as appropriate and contribute to the effectiveness of the wildlife corridor. **HS2 should be required to revise their assessment so that the full impacts to habitats can be understood and allow for appropriate mitigation to be identified, including the protection of trees and woodland of amenity value.**



- 6.6.7 Trafford Council note that the future baseline has only looked at development proposals and not long-term plans for habitat restoration, enhancement and creation such as the Nature Recovery Network/LNRs/SBIs with consideration of GM Places for Everyone Policy JP-G9 and Trafford Core Strategy Policies R2 and R3. **HS2 should be required to ensure the future baseline is robust and that the information and assessment are revised to include long term plans for habitat restoration, enhancement, and creation.**
- 6.6.8 Trafford Council do not consider that the scale of habitat loss and impact is adequately represented or reflected in the mitigation proposals submitted. For example, a full hedgerow assessment has not been included therefore in line with Trafford Council Core Strategy Policies R2 and R3 a full assessment is required to ascertain 'Important' hedgerows under the Hedgerow Regulations, 1997. The loss of hedgerows indicated is considered to be of County, not just of District, value. As such the scale and importance of Hedgerow loss to Greater Manchester is not adequately compensated. **HS2 should be required to correctly assess impacts on all hedgerows (for example in MA05 31.3km have not yet been surveyed) and provide adequate mitigation in agreement with the relevant local authority.** Trafford Council would expect a much stronger Hedgerow replacement plan and programme.
- 6.6.9 Trafford Council would like to see a more nuanced approach taken as regards tree and woodland planting, to understand the need, feasibility and suitability and to recognise other habitat priorities e.g. grasslands in line with Trafford Council Core Strategy Policies R2 and R3. Trafford Council expect that all areas of woodland creation would benefit from suitable planting of extensive woodland wildflower assemblages. **HS2 should be required to include this commitment in the mitigation strategy.**
- 6.6.10 Trafford Council for not consider that the Proposed Scheme takes into account the importance of individual trees and street and highway trees of note that are not veteran trees but are important landscape features regardless. **HS2 should be required to explain how these impacts will be addressed and how the effects will be mitigated.**
- 6.6.11 Trafford Council expect a full CAVAT assessment on trees of note/ to ensure a fuller Ecosystem Services understanding and appreciation of their value and function is considered in mitigation. **HS2 should be required to revise their assessment to reflect these concerns.**
- 6.6.12 Trafford Council expect two for one compensation on all ponds to be lost in line with. **HS2 should be required to include this commitment in the mitigation strategy.**



- 6.6.13 Woodland soil recovery and translocation principles should also extend to dead wood as dead wood could be relocated to similar habitat in same local area which would in turn increase biodiversity by providing refugia for a number of species. **HS2 should be required to include this commitment in the mitigation strategy.**

Green Infrastructure

- 6.6.14 The Proposed Scheme has a lack of strategic integration with Local Plans and policies such as GM Places for Everyone Policy JP-G9 and JP-S1 and Trafford Core Strategy Policies R2 and R3. **HS2 should be required to confirm how this will be addressed and ensure the protection and enhancement of key strategic green infrastructure assets.**
- 6.6.15 Trafford Council note that the aim of the Green Corridor is to minimise and compensate the environment impacts of the Proposed Scheme, but the second aim only has a woodland fund. **HS2 should be required to provide wider compensation to minimise impacts along the Green Corridor.** There are also significant impacts on other habitats including hedgerows, ponds, and grassland together with impacts on local wildlife sites, the fund should be wider and agreed with Trafford Council and GM Partners.
- 6.6.16 There is brief reference to the Great Manchester Wetland Nature Improvement Area, but no real detail supplied and regard should be had to GM Places for Everyone Policy JP-Strat 13 and Policy JP-G9. **HS2 should be required to ensure that the protection and enhancement of key strategic green infrastructure assets is complemented by a suite of policies to protect and enhance the existing network of green infrastructure, including protecting and enhancing sites of ecological value.**
- 6.6.17 **HS2 should be required to deploy a landscape-led approach to the scheme, following established design principles to deliver a route-wide “Green Corridor” and in place-making “demonstrate a commitment to the natural world”** in accordance with GM Places for Everyone Policy JP-G9 and Trafford Council Cores Strategy Policies R2 and R3. It would be beneficial to see better cross-cutting, thematic recognition and integration, where related themes can demonstrate multiple benefits e.g., the important roles that walking and cycling access to and through SBIs, and greenspaces has on community cohesion, place making, and health and wellbeing. Examples of multiple benefits can be found in GM Places for Everyone Policy JP-S 1.

Invasive Non-native Species

- 6.6.18 Trafford Council feel the potential impacts during both construction and operation as regards disturbance and movement of non-native Invasive species and potential controls, bio-security and safeguarding are not adequately considered. The potential impacts are scheme wide and relevant during both operational and construction phases. **HS2 should be required to revise the assessment to fully consider the impact of non-native invasive species.**

Protected Species

- 6.6.19 Trafford Council has concerns relating specifically to bats which include the inclusion of appropriate provision for bats; and when artificial roosts are utilised it would be useful to understand the rationale surrounding the placement, type etc of the provision. It is recommended that detailed bat surveys are carried out to ensure roosting, commuting and foraging ability can remain in accordance with Trafford Core Strategy Policies R2 and R3, with further provision of bat mitigation involving roost protection and installation of bat boxes. All buildings to be impacted should have a preliminary roost inspection to determine bat roost suitability, followed up by necessary further surveys as appropriate i.e. emergence/ return surveys. The survey data will inform appropriate mitigation such as replacement roosts- location, type and number. The scheme should also prioritise bat commuting features (hedgerows etc.). **HS2 should be required to undertake these surveys and agree appropriate mitigation strategies with the relevant local authority.**

6.7 Health

Construction Impacts

- 6.7.1 Trafford Council has concerns about the impact of construction on the local environment and property values from the presence of construction activities close to residential properties. Little detail is provided on mitigation measures. Trafford Council request further information on the construction management practices being proposed to ensure impacts upon the community are suitably managed and minimised as far as practicable, in coordination with the local highway authorities and local planning authority.
- 6.7.2 Trafford Council is concerned that some residents will be required to relocate involuntarily, leading to disruption and uncertainty. Changes in connectivity to social networks, schools, employment, services and facilities from demolition of residential properties. **HS2 should be required to provide more detail to explain how this is being effectively mitigated.**



- 6.7.3 The increase in traffic flows and proportion of HGVs on the local road network will lead to an increased risk of road traffic accidents and fear of accidents. The presence of construction sites, vehicles and plant will result in increased air emissions - increase in exposure of the population to dust, nitrogen oxides and particulates. Limited detail is provided on mitigation measures other than compliance with the CoCP, including Traffic Management Plans. **HS2 should be required to show how and when further details will be provided to ensure these risks are minimised.**

Operational Impacts

- 6.7.4 Trafford Council is concerned about increased exposure to noise from operational trains. HS2 should ensure that the design of the Proposed Scheme mitigates noise impacts as far as possible. **HS2 should be required to provide further detail on how noise mitigation will be incorporated within the design phases.**

6.8 Historic Environment

- 6.8.1 Despite a number of requests, HS2 Ltd did not previously agree the baseline of affected designated and non-designated heritage assets with heritage stakeholders, including Trafford Council. This has resulted in concern that a number of heritage assets have been missed from the assessment. **HS2 should be required to engage with heritage stakeholders to produce a definitive list of heritage assets and correctly establish a baseline for the assessment.**
- 6.8.2 There is significant concern that curtilage of listed structures and buildings have not been included in the assessment of designated heritage assets. **HS2 should be required to revise their assessment to account for the curtilage of listed buildings and structures.**
- 6.8.3 Trafford Council considers that the assessment neglects to appropriately assess the impact of the Proposed Scheme upon sites of archaeological interest. **HS2 should be required to undertake the relevant assessments on sites of archaeological interest and provide it to the relevant authorities for review.**
- 6.8.4 Trafford Council do not consider that the assessments undertaken comply with the steps sets out in Historic England GPA 3. **HS2 should ensure all assessments have been undertaken in compliance with England GPA 3 standards and address any deficiencies.**
- 6.8.5 Trafford Council is concerned that not all areas required for construction have been adequately assessed due to access, particularly in more rural areas. HS2 has stated that this has been an issue in some cases. **HS2 should be required to prepare a**



programme of further investigation for land required during construction along the proposed route, with relevant discussion and agreement with heritage stakeholders needed, including Trafford Council.

- 6.8.6 The baseline data provided in support of the assessment is considered to be insufficient. The process of assessment of heritage assets using map regression has not been included in the ES or appendices. As a result, it is unclear how significance and setting has been sufficiently assessed. **HS2 should be required to provide further information to support the baseline data and Trafford Council will review when it is available.**
- 6.8.7 Where loss of heritage assets cannot be demonstrably avoided, building records should be undertaken by a qualified conservation specialist in line with Historic England's Guidance on building recording (Level 3 minimum for non-designated heritage assets - Level 4 for Listed Buildings).
- 6.8.8 Volume 1: 8.9.10, states "Appropriate mitigation measures have been identified and taken into account", however Trafford Council does not consider the information provided within the community area reports regarding these measures to be sufficient. Volume 1: 8.9.10 also states that further mitigation will be considered as part of the detailed design process. Trafford Council considers mitigations should be identified as part of the overall impact assessment as required by Stage 4 of HEGPA, where there is a commitment to "Explore ways to maximise enhancement and avoid or minimise harm". In addition, limits of deviation are not adequately considered in respect of either direct effects on archaeological sites and monuments or indirect effects on the setting of designated assets.

6.9 Land Quality

- 6.9.1 Trafford Council note the construction phase impacts have been assessed based on a desktop exercise only and without any site investigation data. The risks could be subject to change once more information is known on the ground conditions. Only generic remediation options have been provided to date (due to the lack of site investigation data). Further investigation is key for Land Quality, **HS2 should be required to confirm when this additional assessment and revised information is likely to be provided.**
- 6.9.2 Dust and leachate control measures will be required for any stockpiles of contaminated spoil. HS2 should provide specific controls in the Remediation Strategies, Construction Environmental Management Plan and/or CoCP/LEMP.



- 6.9.3 Trafford Council is aware that potentially contaminated areas of land have been identified that could affect, or be affected by, the construction of the Proposed Scheme. Trafford Council expect that where sites which have been identified within the Conceptual Site Model (CSM) to potentially pose a contaminative risk in relation to the Proposed Scheme that detailed site investigation works will be carried out. **HS2 should be required to provide analysis of contaminated land data for HS2 within GM to Trafford Council as soon as it is available in order for it to be reviewed and assessed.** This will in turn determine the need for (if any) mitigation. Additionally, **HS2 should be required to provide confirmation on the current mechanisms/agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process.**
- 6.9.4 Site Investigations are required prior to construction to determine if any remediation is required, and the specific controls needed i.e., dust/odour during these works. **HS2 should be required to provide detailed remediation strategies once the Site Investigations have been completed for areas such as the construction compounds and southern tunnel portal.**
- 6.9.5 Trafford Council understand that proposed investigation and assessment of potentially contaminated sites across the Proposed Scheme will be undertaken in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) framework and BS10175 and BS8576, however, **HS2 should be required to produce a bespoke focussed strategy on how site investigations/land surveys will be undertaken.**

6.10 Landscape and Visual

Viewpoint Photographs and Photomontages

- 6.10.1 The photomontages and baseline photographs included in the Vol 5 Appendix do not comply with Landscape Institute Guidance (TGN 06/19 Visual Representation of development proposals, 2019). The images provided are too small to allow for a clear interpretation of the proposals. **HS2 should be required to provide a document with each image presented at the correct height and width as per LI guidance.** The methodology is acceptable, but not the presentation.
- 6.10.2 The viewpoint photographs included in the Vol 5 Appendix do not comply with Landscape Institute Guidance (TGN 06/19 Visual Representation of development proposals, 2019). **HS2 should be required to revise this to ensure photographs are presented in line with LI guidance.** Reference is made to out of date guidance (TGN 02/17 and TGN 01/11). The image height is too small on an A3 page, the field of view is not stated, the lens used is not a 50mm lens, the projection method is not stated



on the photo sheet, the AOD height of location is not stated, the direction of view in degrees is not stated, and the time of the photography is not stated.

- 6.10.3 The construction phase photomontages do not accurately reflect peak construction, i.e. 'worst-case scenario' in accordance with the Landscape Institute Guidelines. The photomontages do not include tall construction plant as set out in the methodology and do not include the construction of tall built elements within the view. **HS2 should be required to provide more detailed construction phase information in order to accurately reflect peak construction phase effects in photomontages.**
- 6.10.4 There are very limited photomontages provided to illustrate operational phase effects. **HS2 should be required to provide more photomontages in order to demonstrate effects and create a robust assessment, with reduced reliance on professional judgement alone to determine the magnitude and significance of effects.** Provision of verified photomontages should be provided to support the assessment of operational phase effects.
- 6.10.5 Paragraph 8.11.5 of Volume 1 states photomontage locations have been selected where they will aid assessment or where the level of significance of effect is borderline. Paragraph 8.11.1 of Volume 1 states that the landscape and visual assessment will include consideration of night-time effects during construction and operation. However, no night-time photomontages have been provided despite night-time construction working, lighting of construction compounds / worker accommodation, station and other railway lighting and the light impacts of the trains which will operate from 05:00 up to midnight from Monday to Saturday and from 08:00 up to midnight on a Sunday. The lack of night-time photomontages means that the assessment cannot be verified. Trafford Council considers the lack of night-time photomontages to be a deficiency in the consultation. **HS2 should be required to provide night-time photomontages to show that adequate assessment has been undertaken.**
- 6.10.6 The number and spread of the identified key viewpoints do not always reflect the potential extent of visual effects as illustrated by the ZTV. The selection and location of viewpoints are clustered around the site edges and do not reflect the full extent of the ZTVs. The baseline and visual assessment of views does not therefore form a robust assessment of the visual effects for either the construction or operational phases. Viewpoints should be selected to reflect the range of receptors and full extent of the potential visual effects and **HS2 should be required to revise their assessment to reflect this.**
- 6.10.7 No committed development or future baseline is modelled into the photomontage views. Operational phase photomontages are therefore not representative of the

likely operational stage views. **HS2 should be required to include consented development in operational phase photomontages to allow for a more robust assessment of effects.**

Assessment

- 6.10.8 The assessment of townscape is carried out at a high level, with the identification of townscape character areas which cover substantial areas of the sub-urban or urban environment. The townscape areas are not considered at a more local level relevant to the proposals, and therefore provide only a very broad and superficial baseline assessment. As a result, a minor level of effect is frequently justified with the rationale that the development forms only a very minor part of the overall character area. There is no consideration of the townscape impacts at a more local level and the justification for minor effects on this basis is not robust. **HS2 should be required to provide a local level townscape assessment appropriate to the development in order to provide a comprehensive assessment of the existing baseline in order to inform the assessment.**
- 6.10.9 The use of professional judgement to determine the magnitude and significance frequently results in the determination of effects which require further explanation. For example, where a receptor has been assessed as 'medium' sensitivity and the effect has been assessed as 'medium', an explanation is required in order to determine how that could result in a 'minor adverse' overall effect which is not significant. The absence of a clear rationale results in a lack of robustness in the assessment conclusions, particularly where the level of effect and significance appear lower than the assessed sensitivity and magnitude of effect. **HS2 should be required to refine their methodology to ensure a robust approach to baseline assessment and assessment of effects.**
- 6.10.10 Due to the lack of appropriate criteria within the methodology, there is a reliance on professional judgement to assess the baseline and effects. Whilst this is part of the assessment process and in accordance with the Guidelines for Landscape and Visual Impact Assessment, the overall assessment lacks robustness. **HS2 should be required to refine their methodology to ensure it is suitable for a suburban or urban environment.**
- 6.11 **Socio-economics**
- 6.11.1 Trafford Council is concerned about direct effects on businesses / business activities and employment leading to loss of employment and earnings for some business owners and employees. Other than compensation for businesses that are forced to



relocate little mitigations are offered for business disruption. **HS2 should be required to provide further detail as to how this is considered and mitigated.**

- 6.11.2 For all areas, but specifically around the stations (Airport & Piccadilly), the economic baseline level is LA level and not detailed enough to be meaningful. This may be justified in some cases, but where the impacts are very direct and the context very specific, such as around the stations, this is not appropriate. **HS2 should be required to provide a more disaggregated economic baseline for assessment of potential effects.**
- 6.11.3 It is acknowledged that a significant number of construction roles will be created at route-wide level and within individual community areas. **HS2 should be required to identify the percentage of the potential employment opportunities to be required at a local level to identify the potential impacts on the current supply chain.** If a significant proportion of vacancies are to be filled locally, Trafford Council would wish to work with HS2 to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages. This is to ensure that skill gaps and needs of the local population can be addressed appropriately for the residents of Trafford to take advantage of the varied employment opportunities both during and after the development of the Proposed Scheme.
- 6.11.4 Trafford Council note that through the Volume 2 Community Area Reports, a total of 3,540 FTEs will be required across GM during the construction phase. **HS2 should be required to confirm if they will work in collaboration with other bodies such as the GMCA and the Education and Skills Funding Agency; whether a Training and Employment Opportunities Management Plan will be developed; what opportunities will be considered to prioritise local employment; and the timeframe for the provision of new training and employment opportunities.**

Table 6.1: FTEs required across community areas during construction

MA04	MA05	MA06	MA07	MA08	Total
440	660	1,480	490	470	3,540

- 6.11.5 Trafford Council notes that 88% of the businesses affected by HS2 will be successfully relocated and therefore a total of 5,720 FTE will be re-gained following relocation. This would appear to be a best-case scenario. The assumption that a proportion of the 88% of the businesses (which are largely located within the rural areas or are user specific) impacted by the Proposed Scheme will be able to re-locate



is not considered representative of the worst-case scenario for loss of FTEs. **HS2 should therefore be required to use evidence which can be related to the scheme locality and use existing experience from the ongoing construction of the earlier phases of HS2 to identify the actual loss of FTEs as a result of business displacement.** This is specifically important due to many businesses within GMCA area being affected by the impacts of Covid-19 making them less resilient to any changes which may affect footfall and trading.

- 6.11.6 Volume 3 - Section 12.5 outlines the wider socio-economic benefits which identifies that the scheme will allow for increased demand for property development around the Proposed Scheme stations. Trafford Council welcomes the potential benefits, however, request that HS2 consider the significant development portfolio already committed, and / or in the pipeline around the station locations. Whilst the benefits are recognised, given the long-term programme of the scheme development, it is considered that by 2038, this demand will have largely been realised. As such, whilst HS2 is considered to be a benefit in terms of providing supporting infrastructure, it is not facilitating significant new development that would not otherwise have occurred and therefore limiting developments to only committed developments gives an unrealistic picture of prevailing development levels around HS2 stations. As this has material implications for economic impact and appropriate mitigation, **HS2 should be required to ensure that economic impact assessments for the scheme are rebalanced based on more realistic assessment of prevailing levels of development and the assumption that HS2 is enabling development in this area should be re-considered with greater weight placed upon potential development barriers and therefore the need for mitigation.**

6.12 Sound, Noise and Vibration

- 6.12.1 As part of the applications for Section 61 Prior Consent under the Control of Pollution Act (1974), **HS2 should be required to ensure that baseline sound levels are updated over the course of the development, and that Local Authorities are consulted prior to this submission.**

Construction

- 6.12.2 The Scope and Methodology Report states that the assessment has been undertaken in line with Table 3.17 of the Design Manual for Roads & Bridges. The impacts due to increase in Baseline Noise Level from construction traffic are defined as major when a change in noise level of >5dB is predicted. In the ES assessment, major impacts are defined as a change of >10dB. **HS2 should be required to provide**



justification for deviation from the methodology outlined within DMRB, if this is an error by HS2 then impacts should be re-categorised.

- 6.12.3 Trafford Council notes numerous incorrect receptor categorisations as per the BS5228 ABC method. Categorisation should be done by rounding to the nearest 5dB, whereas it appears values have been rounded up. **HS2 should be required to ensure that all assessments have been undertaken following the correct methodology and provide further guarantees that assessments are robust.**
- 6.12.4 Detail on plant assumptions for the construction assessment have not been provided. **HS2 should be required to provide clarification the methodology by which noise levels within the construction assessment have been derived, and where possible provide any available information on construction plant to be used in prior phases of the project.**
- 6.12.5 As part of the applications for Section 61 Prior Consent under the Control of Pollution Act (1974), **HS2 should be required to clearly detail the mitigation measures that will be applied to control Noise and Vibration during the construction phase.**
- 6.12.6 The assessment of noise and vibration from construction compounds is unclear. HS2 should be required to provide more clarity on the assessment of noise and vibration from the construction compounds and confirm if this has been done now and will continue going forward. **HS2 should also be required to confirm that all relevant noise and vibration sources have been included.**
- 6.12.7 Trafford Council note that there are no details given on the acoustic performance of the taller screening as set out on MA06/07/08 around certain construction sites. **HS2 should be required to provide further details to allow meaningful comment.** For example, the CoCP 5.6.3 states that where raised hoarding is required (maybe altered form) to enhance acoustic performance for specific locations.

Operational

- 6.12.8 It is currently unclear whether additional mitigation is proposed (outside of the embedded mitigation incorporated into the design). There is also no assessment on the residual impacts, and as such it is unclear how effective any proposed mitigation is - Major Adverse effects are predicted at several receptors during the operational phase, and it is not clear whether this is inclusive of mitigation. **HS2 should be required to provide clarification as to the magnitude of post-mitigation residual impacts, and details of any further measures to mitigate this as necessary.**



- 6.12.9 HS2 should be required to provide a timetable for the selection and dissemination of information regarding specific mitigation measures (i.e. barrier materials, appearance etc.) to be agreed with relevant Local Authorities, and where possible provide information of mitigation implemented within previous phases of the project.
- 6.12.10 Major Adverse effects are predicted at several receptors across Greater Manchester during the operational phase. It is not clear whether these effects are inclusive of mitigation, and there is no demonstration of the effectiveness of any proposed mitigation measures. HS2 should be required to provide clarification on whether major adverse effects are anticipated inclusive of mitigation, and where necessary provide evidence of the effectiveness of mitigation measures.
- 6.12.11 Assumptions for operational rail movements are provided only as peak hour and not what has been used for noise predictions. There is mention of a "full timetable" that has been used within the assessment (ES Vol.1, 8.14.25) but these values do not appear to be presented. **HS2 should be required to provide the full operational timetable for the project to allow Trafford Council to ensure all assessments are suitable.**
- 6.12.12 Trafford Council notes the omission of an operational phase fixed plant noise assessment. It is stated in Information Paper E11 (Paragraph 3.1) that operation of stationary systems will be designed to -5dB below background (LA90) and assessed in accordance with BS4142. **HS2 should be required to consider operational fixed plant impacts to assess the feasibility of achieved the proposed targets and to feed into the overall design from an earlier stage than currently proposed.**
- 6.12.13 It is not clear how operational impact criteria are being applied. Trafford Council notes that numerous receptors could experience major impacts but that the impacts are not deemed significant on a "community level" but with no justification as to why this results in no impact. It is not clear whether these receptors are eligible for additional mitigation even if impacts are not considered significant on a "community level". **HS2 should be required to provide further clarification on operational phase significance criteria, particularly concerning community impacts.**
- 6.12.14 Given the high number & density of residential dwellings predicted to be eligible for mitigation across Greater Manchester, **HS2 should be required to provide details regarding the validation works to be undertaken following the installation of Noise Insulation measures.**

6.13 Traffic and Transport

Strategic and Local Highway Network

- 6.13.1 On the principle of cost saving, two platforms for NPR services have been included in the design for the Manchester Airport high speed station as well as additional car parking spaces. The highway design however excludes NPR demand and access requirements, the expectation is that NPR will amend the highway layout in the future, post HS2's construction. This is not an efficient approach and will lead to additional adverse social, environmental and economic impacts, particularly for residents in the Hale Barns area. HS2 Ltd should be required to provide highway designs considering planned developments that are anticipated to be delivered before HS2 construction begins, including NPR's future demand and access requirements.
- 6.13.2 GMCA are concerned that the mitigation for construction traffic is not sufficient. The methodology used by HS2 is too simplistic and doesn't sufficiently recognise the scale of the impact and consequently does not identify suitable measures. **HS2 should be required to undertake detailed assessment of routes, vehicle numbers and identify necessary mitigations.** Trafford Council require road monitoring and condition surveys are provided to validate proposed mitigations and enable appropriate highway repairs etc to be identified.
- 6.13.3 Beyond provision of junction improvements to provide direct access to the stations, HS2 have not proposed any mitigation for locations on the road network where they have identified the Proposed Scheme will have impacts on traffic flows, congestion and bus delays. **HS2 should be required to provide funding and be part of a cross agency monitoring and control centre that would be capable of monitoring key parts of the affected network.** This centre would actively manage the network through construction and for a period following HS2 operation. The bill allows for some engagement through the Highways Sub-Group of the HS2 Planning Forum, but this does not go far enough or cover an initial period of Operation HS2 to work with GM partners and highway authorities to develop agreed physical highway mitigations that respond to regional policy. **HS2 should be required to design and deliver all junction improvements in line with guidance set out in the Greater Manchester – Streets for All, Greater Manchester Transport Strategy 2040, and Greater Manchester Transport Strategy 2040 – 'Right Mix' Technical Note documents.**
- 6.13.4 It is not clear to Trafford Council how local businesses will be serviced when roads are closed or restricted. For example, in schemes such as the Edinburgh tram, local



- businesses were given access to a managed delivery service provided by the promotor. **HS2 should be required to provide an appropriate detailed traffic management plan to protect residents and businesses.** This should be done in line with the Traffic Management Act 2004 with regard to Network Management Duty.
- 6.13.5 GMCA are concerned that HGV movements will have significant impact on road surface conditions. **HS2 should be required to provide a condition monitoring and remediation agreement prior to HS2 commencing, condition surveys also need to be provided.** Improvements need to be made to the satisfaction of the Local Highway Authorities and details on maintenance should be set out.
- 6.13.6 Paragraph 2.4.2 of the Framework Travel Plan (FTP) (Annex A of the TA) should commit to and identify appropriate park and ride sites for construction workers. **HS2 Ltd should be required to provide this as a key mechanism going forward to reduce construction worker trips and therefore need to provide firmer commitments in this area.** With regard to paragraph 2.5.3 of the FTP the impact of traffic can be further reduced by effective consolidation methods. **HS2 should be required to provide more detail regarding consolidation techniques to enable their evaluation for adequacy.**
- 6.13.7 The fourth bullet in paragraph 3.1.2 of the FTP relates to providing good accessibility to workers. This comes across that provision of parking is acceptable for construction workers given competition from other construction projects for HS2. This is not a valid reason to provide parking. **HS2 should be required to provide alternative arrangements for construction worker travel (e.g. park and ride, car sharing) to set a precedent for sustainability.** This clause needs removing and firmer commitments required from Contractors to cater for more sustainable transport solutions for workers.
- 6.13.8 The third bullet point in paragraph 3.1.3 of the FTP re. 'less target-driven' is questionable. Trafford Council and GM Partners require targets in place to monitor progress of the CWTP (Construction Worker Travel Plan) and ensure it is meeting the objectives - which are listed in para 3.2.2. (reducing impact of freight movements; reduce severance, disruption, diversion, damage during construction). Otherwise, the CWTPs hold little purpose. **HS2 should be required to provide suitable overarching targets and include these in CWTPs.** Some targets will need to be site specific and can be developed in due course
- 6.13.9 At paragraph 3.7.2 of the FTP, HS2 need to include a measure here about Park and Ride facility (for appropriate sites). This section speaks to the minibus services but P&R could be large facilitator for reducing trips. Also, at paragraph 4.8.4 later on in the report, this is a key initiative for the Travel Plan Coordinator to develop in



partnership with local authorities. **HS2 should be required to include a P&R facility for construction workers as mitigation.**

- 6.13.10 Paragraph 3.8.2 of the FTP states that monitoring should be every year. Trafford Council consider that this should be every six months to make sure targets and measures stay 'relevant' to this site, which will be indicated from the staff travel surveys. Measures can then be introduced quicker to achieve targets (e.g. introducing more cycle parking) rather than waiting for a year.
- 6.13.11 Trafford Council has concerns with respect to construction traffic routing and construction worker associated parking demands on local communities. **HS2 should be required to provide a fully detailed construction management plan with appropriate commitments to minimise any adverse impacts.** This should also set out details with respect to appropriate travel initiatives for construction workers including a mini-bus service, a car sharing scheme and cycle parking at each individual construction compound to ensure the workforce can travel by means other than car. In addition, it is imperative to Trafford Council that all construction workers travelling to site by car, park within the confines of the construction compounds to ensure the adopted highway is safeguarded from excessive on-street parking.
- 6.13.12 Trafford Council consider that mitigation for scheme traffic is not sufficient. The wider impact of the scheme at Manchester Airport has not been sufficiently analysed and addressed. As set out above the modelling used is flawed, therefore there is no appropriate assessment of conditions and no robust mitigation. **HS2 should be required to provide analysis of wider impacts and mitigations which Trafford Council request sight of to make comment.**

Parking and Loading

- 6.13.13 Parking and loading are superficially mentioned but Trafford Council is concerned that during construction and operation residential neighbourhoods will suffer with increased non-residential parking. There is precedent in the area for this type of parking associated with the airport and it is foreseeable that this will be exacerbated. Trafford Council have concerns that any Travel Plans put in place for construction workers will not force off road parking. HS2 should ensure that appropriate construction management plans are in place in line with local authority requirements. **HS2 should be required to make plans for all construction worker traffic to be suitably accommodated in off road facilities, station car parks should be sensitively priced in order to make them an attractive parking offer and mitigation in terms of parking restrictions should be provided for residential areas impacted.**



- 6.13.14 Moreover, **HS2 should be required to encourage and support construction workers to travel to and from construction sites and compounds using active travel. Secure cycle parking, locker storage and changing/showering facilities should be provided at the construction compounds and/or welfare sites along with safe routes to and from these.**
- 6.13.15 Regarding paragraph 4.10.1 of the FTP, operational informal parking will most certainly occur. The station management will need to come up with an appropriate strategy to curb those negative impacts occurring (e.g. kiss and ride zone will be heavily monitored, and PCNs issued for drop offs in illegal locations). **HS2 should be required to deliver this as part of station design and management.**
- 6.13.16 During the construction phase, Trafford Council consider that all necessary measures should be provided to protect residential amenity and businesses from on-street parking. **HS2 LTD should be required to produce an appropriate package of traffic regulation orders to prevent unacceptable parking and loading activity by construction workers and delivery/ spoil/ waste drivers.** This should be agreed and implemented prior to the commencement of construction.
- 6.13.17 Trafford Council require information on how the number of car parking spaces at Manchester Airport Station have been determined within the design and hybrid Bill, considering its role in travel demand management and impact on congestion, as well as its impact on Trafford Council's and GM's carbon neutral target and clear air objectives. HS2 should be required to confirm these parking considerations are amended to reduce the proposed number of parking spaces. **HS2 should liaise with Trafford Council and GM Partners for agreement in the context of any changes / reductions to the overall parking provision.**

Public Transport Network - Bus

- 6.13.18 Trafford Council are concerned that bus journey time impacts are significant. Both construction (Tables 18-223 to 18-226) and Operation (tables 18-242 to 18-245) phases show increases in journey times of over 40% on some corridors. This level of impact is not acceptable and there has been no mitigation proposed by HS2 in the ES. This should trigger the need for HS2 to provide compensation and bus priority measures to mitigate. **HS2 should be required to ensure that mitigation includes provision of compensation events or funding of mitigating bus priority measures.** Mitigation proposals should take into account guidance set out in the Bus Back Better, Greater Manchester – Streets for All, Greater Manchester Transport Strategy 2040 and Greater Manchester Transport Strategy 2040 – 'Right Mix' Technical Note documents.



- 6.13.19 Trafford Council require no unacceptable impacts on bus journey times which would present a barrier to bus usage. **HS2 should be required to engage with Trafford Council and GM Partners so that appropriate mitigations for public transport impacts can be agreed for delivery by HS2.**

Public Transport Network - Metrolink

- 6.13.1 The ES does not assess the impacts of closures to the Metrolink Network on the Ashton Line during construction. It does not assess the impacts of the additional traffic associated with this or identify appropriate highway/ travel improvements. **HS2 Ltd should be required to accurately undertake the relevant assessments so that the correct environmental effects and subsequent mitigation can be identified.**
- 6.13.2 The ES has not fully explored the impact of not having a Metrolink connection at the HS2 Manchester Airport station from Day 1 of the operational phase. **HS2 should be required to assess the scenario of no Metrolink connection, the resultant implications on traffic and provide appropriate mitigation.**

Non-motorised Users

- 6.13.3 The highway infrastructure does not include cycling facilities designed to current recommended provisions (e.g., LTN1/20 guidance etc). Where provision for cycling is described, there is no details provided with respect to width/segregation/junction geometry. On this basis Trafford Council cannot ascertain the details of the proposals and therefore the acceptability of the mitigation proposed. HS2 should ensure that cycle facilities fully adhere to the requirements of LTN1/20. **HS2 should be required to redesign junctions to include cycling facilities in accordance with current best practice (LTN1/20 and TfGM cycling standards).**
- 6.13.4 Any cycling infrastructure should be integrated and complementary to the TfGM 'Bee Network'. **HS2 should be required to ensure that cycle infrastructure is integrated and complementary to the Bee Network.** This is likely to require cycling infrastructure to be provided beyond the immediate vicinity of the HS2 infrastructure to link with wider cycling 'Beelines'.
- 6.13.5 No existing baseline cycle counts have been used in the assessment of highway-based cycle infrastructure or needs. Counts have been limited to PRoWs. The assessment of impacts and mitigation is therefore wholly absent and flawed for this important user class. **HS2 should be required to demonstrate cyclists have been adequately considered and suitable infrastructure delivered to mitigate HS2**

impacts upon this important user group. Trafford Council and GM Partners require this information so that the adequacy of the identified proposals can be assessed.

6.14 Water Resource and Flood Risk

- 6.14.1 Trafford Council have concerns across all community areas regarding some of the control structures and interventions made, such as the use of syphons and pumping stations. **HS2 should be required to provide more detail with respect to how these options were derived and if alternative solutions could be available.** Additionally, there is no detail on who will be the maintainer or adopt these in the future.
- 6.14.2 Whilst solutions for Main Rivers have largely been identified, there is little in the detail with respect to ordinary watercourses and drainage ditches which appear to have been omitted. Additional detail on how these would be managed is required.
- 6.14.3 No detail has been provided with respect to track or embankment drainage and how this will be managed and discharged into rivers or surface water systems. **HS2 Ltd should be required to provide full details of surface water drainage design to Trafford Council and demonstrate how impacts on rivers and surface water systems have been minimised.**
- 6.14.4 Following Royal Assent, relevant local authorities will have a role in approving matters of detail relating to the design of the Proposed Scheme. **HS2 Ltd should be required to provide additional resources to Trafford Council in accordance with the Information Paper C12: Local Authority funding and new burdens.** Funding should be made available in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2 Ltd.'s selected contractors.
- 6.14.5 The ES documentation indicates that the real-world evidence of flooding from March 2019 has not yet been assessed with respect to this location. Trafford Council understand that although that event was deemed to be in the region of a 1% annual estimated event, a similarly serious flooding event occurred in early 2022. **HS2 should be required to undertake detailed analysis of the evidence of previous flooding events and identify appropriate mitigations.**
- 6.14.6 Trafford Council note the H++ climate change scenario has been used to model future flood flows for example at the River Mersey. Whilst this is accepted as very conservative, **HS2 Ltd should be required to undertake a sensitivity analysis to ensure their proposed flood mitigation would be robust in the event of extraordinary flooding events experience in recent years.**



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

High Speed Rail – Phase 2b Western Leg Environmental Statement Consultation

Chapter 3

Section 7: Trafford Council Comments on Volume 2: MA04
Broomedge to Glazebrook Community Area
Report and Map Book



7 **Trafford Council Comments on Volume 2: MA04 (Broomedge to Glazebrook) community area report and map book**

Section 7 Table of Contents

Introduction	102
Scheme Overview	103
Key Requirements Applicable to all Sections in MA04	104
Agriculture, Forestry and Soils	106
Air Quality	113
Community	118
Ecology and Biodiversity	127
Health	151
Historic Environment	160
Land Quality	169
Landscape and Visual	174
Socio-economics	209
Sound, Noise and Vibration.....	220
Traffic and Transport.....	233
Waste.....	255
Water, Resources and Flood Risk	256
Conclusions	262

7.1 **Introduction**

7.1.1 This chapter specifically details the Trafford Council consultation response comments in respect of issues and requirements which have been identified within MA04 Broomedge to Glazebrook.

7.1.2 Other chapters within this Trafford Council consultation response detail issues and requirements identified in relation to the other sections of the ES. Where those issues apply to all or several of the Community Areas, they have been set out in the Chapter titled “Community Areas Common Issues”. Wherever possible, to avoid repetition, those issues and requirements have not been re-stated here but in reading this chapter it should be noted that those issues and requirements also apply to this Community Area.

7.1.3 Text within this chapter which has been presented in **bold**, highlights Trafford Council requirements.



7.2 Scheme Overview

7.2.1 The route of the Proposed Scheme in the Broomedge to Glazebrook area will be 7.3km (4.5 miles) in length extending north-west from the east of Broomedge to the west of Glazebrook and east of Risley. The area falls within local authority area of Trafford Metropolitan Borough Council.

7.2.2 The area is predominantly rural in character with agriculture being the main land use. The HS2 line will largely be routed through undeveloped / agricultural land and will incorporate elevated sections via embankments and raised viaducts.

7.2.3 HS2 will impact through this area during both the construction and operational phases with particular emphasis on the following key topics:

- Severance of the A6144 Paddock Lane link between the neighbouring communities of Warburton and Moss Brow (where it crosses the Proposed Scheme), resulting in greater isolation and remoteness from existing local community assets.
- Significant and permanent adverse visual, noise and vibration impacts of the Proposed Route's operation and associated landscaping on nearby local businesses and communities in Warburton and Moss Brow.
- Significant and permanent adverse visual and landscape impacts of the proposed viaduct over the Manchester Ship Canal.
- Wide ranging loss of habitat/landscape features (i.e., hedgerows, trees, ponds etc.) due to inadequate habitats and species surveys undertaken; and concerns over the Proposed Scheme's ability to deliver a minimum 10% biodiversity net gain.
- Adverse impacts on human health including noise and air quality associated with the significant construction works (including HGV movements and suitability of construction routes) of the Proposed Scheme and the subsequent operation of the railway line.
- Concerns over existing over-capacity issues on the highway network, most notably on the A6144 and M60 Junction 8.
- Proposed Places for Everyone allocation at New Carrington is not included within the transport modelling.



- Concerns around the assumptions used to undertake the airborne construction noise and ground-borne construction vibration assessments, and insufficient baseline noise modelling for the assessment of traffic noise.
- Lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows.

7.2.4 Notwithstanding the above, Trafford Council notes the findings from the Integrated Rail Plan (IRP) 2021 in relation to the Golborne Link and that the Government may be considering alternatives for this route and would welcome further information from and engagement with HS2 Ltd on this matter.

7.3 Key Requirements Applicable to all Sections in MA04

7.3.1 Following a review of the MA04 Community Area Report and Map Book, Trafford Council has identified that additional resources will be needed across the Council in order to support and facilitate the delivery of the HS2 Phase 2b Proposed Scheme.

7.3.2 The following requirements therefore apply to each of the Sections within this Chapter and similarly so, for Trafford Council as a whole.

- 1) **HS2 Ltd must be required to provide additional resources to Trafford Council in accordance with the Information Paper C12: Local Authority funding and new burdens. This is essential in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2's selected contractors and associated S17 and S61 applications.** Without additional resources Trafford Council will be unable to efficiently expedite its existing regulatory duties and those arising from the Proposed Scheme.
- 2) **HS2 must be required to make funding available under the New Burdens Policy (Information Paper C12) to support Trafford Council in delivering mitigations.** Without additional resources Trafford Council will be unable to efficiently expedite the expected and/or required mitigation measures arising from the Proposed Scheme.
- 3) **HS2 must be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health and wellbeing activity to be delivered of an equal or better standard than exists at the time of temporary or permanent loss.** Without additional resources Trafford Council will be unable to provide the type, quantity and quality of facilities needed by the borough's residents.



- 7.3.3 The following sections provide Trafford Council’s response to the individual sections included within MA04. The response highlights where more information is required to provide a suitable assessment or where Trafford Council consider that an assessment hasn’t been undertaken in line with the relevant policy or guidelines.
- 7.3.4 The response does not consider any sensitivity analysis as a result of the line of deviation. It should be noted that any changes to the proposed route presented within the ES is likely to have a significant impact upon the assessments undertaken.

7.4 **Agriculture, Forestry and Soils**

- 7.4.1 Trafford Council welcome the commitment from HS2 to consider the potential effects on agriculture, forestry and soils and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.4.2 This area of Trafford is predominantly rural and provides the richest soils in the borough which support arable farming, with much of the land classified as being off high quality (grade 2 on average).
- 7.4.3 Woodland is limited to small parcels, with some ancient woodland located within land required for the construction of the Proposed Scheme at Coroners Wood, near Partington. Trafford Council's detailed response to all woodland habitats is set out at Section 1.6 Ecology and biodiversity.
- 7.4.4 There are no areas of commercial forestry land within this area of Trafford and as such no assessment has been made of the effects on commercial forestry and Trafford Council accordingly make no comments in this regard.
- 7.4.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the agriculture, forestry and soils related aspects on this report. It is noted that there are still several issues that could be improved and resolved.
- 7.4.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.4-1.

Key Observations and Concerns

- Loss of, and impacts, on high quality agricultural land are likely to have been downplayed.

- Loss of irreplaceable peat and natural carbon capture opportunities and release of associated carbon by disturbance/ removal.
- It is unclear to what business impacts are covered in this chapter and to what extent they are covered in other topics.
- Impacts on businesses which include non-agricultural activities (either in whole or in part with farming) likely to be severe than assessed.
- Concern that the loss of equestrian/livery land and facilities.
- Assessment of soils is unclear.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including assessments
- More detailed assessments to establish impacts on businesses to inform associated mitigation and compensation measures

7.4.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 7.4-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community	General Comment	Point/ Comment	Issue/ Concern	Proposed Mitigation	HS2 should be required to make it clear in the ES

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>Most of the agricultural land within this area is of high quality (grade 2 on average). HS2 have concluded that the effect on land quality is moderately adverse (rather than major) because such land is abundant in the area. Trafford Council consider that while this is factually accurate, it is somewhat self-fulfilling: land adjoining a linear route is very likely to be of the same quality, and therefore there is a risk these impacts are downplayed.</p> <p>Likely Impact Areas of high-grade agricultural land will be permanently lost and/or altered by the Proposed Scheme.</p>	<p>N/A</p> <p>Residual Impact Major</p>	to what extent it is possible to avoid all best and most versatile agricultural land as far as practical within the Proposed Scheme.
Volume 2: Community Area report MA04	General Comment	Point/	<p>Issue/ Concern Potential large effects of carbon loss where peat is disturbed. Trafford Council are concerned the peat soil carbon loss mitigation is not appropriately assessed covered in the ES.</p> <p>Likely Impact Significant release of captured carbon and loss of important natural resource to combat and mitigate the effects of climate change locally.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	HS2 must provide the detailed work that has been undertaken to underpin the assessment.

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	General Comment	Point/	<p>Issue/ Concern There are likely to be many impacted businesses which include non-agricultural activities (either in whole or in part with farming).</p> <p>Likely Impact It is considered that the impacts on local non-agricultural businesses will be more severe than HS2 has identified.</p>	<p>Proposed Mitigation Financial compensation will be available under existing statutory arrangements to offset impacts of construction (temporary or permanent). No measures are included to mitigate the operational effects of the Proposed Scheme on agriculture, forestry and soils.</p>	<p>HS2 should be required to provide further assessment to establish the forecast impacts on non-agricultural businesses for both the construction and operational phases. This should be done on a case-by-case basis and not at a community level, to take account of the unique circumstances of each business/ holding.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
				Residual Impact Moderate	
Volume 2: Community Area report MA04	General Comment	Point/	<p>Issue/ Concern</p> <p>There is a slight concern that the loss of equestrian/livery land and facilities may be underplayed in terms of its impact which are considered in the ES to be less sensitive to other grazing agriculture such as dairy farms.</p> <p>Likely Impact</p> <p>The nature of temporary and permanent land loss for stables/equestrian businesses may have a socio-economic impact which should be considered in the socio-economic chapter of the ES.</p>	<p>Proposed Mitigation</p> <p>Financial compensation will be available under existing statutory arrangements to offset impacts of construction (temporary or permanent).</p> <p>No measures are included to mitigate the operational effects of the Proposed Scheme on</p>	<p>HS2 should be required to provide further assessment to establish the forecast impacts on non-agricultural businesses for both the construction and operational phases.</p> <p>This should be done on a case-by-case basis and not at a community level, to take account of the unique circumstances of each business/ holding.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>agriculture, forestry and soils.</p> <p>Residual Impact Moderate</p>	
Volume 2: Community Area report MA04	General Comment	Point/	<p>Issue/ Concern</p> <p>The ES states that the principles set out in Defra’s Code of Practice for the Sustainable Use of Soils will be followed throughout the construction period.</p> <p>The ES also states that implementation of the measures set out in the draft CoCP will ensure displaced soil from the proposed scheme will mostly fulfil its pre-existing functions on-site, which are the production of food, water stores for flood attenuation and providing ecological habitat onsite. Information paper E19 Soil handling for land restoration also outlines how displaced soils will be reused for restoration of land to agriculture and other uses.</p> <p>Likely Impact</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	<p>HS2 should be required to provide clarification on what has been considered in the assessment of soils, and how this has informed the draft CoCP.</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			There is limited evidence that other soil functions have been considered and/or assessed i.e., flood water attenuation, carbon storage or habitat support.		

Summary

7.4.8 Protection is required to ensure that impacts on the best and most versatile agricultural land and peatlands are in the first instance avoided, and second suitably mitigated. Without a thorough assessment of the adverse impacts of the Proposed Scheme on these soils and their functions, the potential for any losses is likely to be significantly downplayed. A number of agricultural and rural non-agricultural businesses will also be affected. These impacts need to be understood on a case-by-case basis for both the construction and operational phases of the Proposed Scheme.

7.5 Air Quality

- 7.5.1 Trafford Council welcome the commitment from HS2 to consider air quality and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.5.2 There is a particular concern about the impact of air pollution on the health of the population, especially to babies and children, (including unborn babies), older people and people with long term health conditions, especially respiratory disease. These negative impacts can manifest as short- or long-term conditions and will increase pressure on health services and can increase inequalities.
- 7.5.3 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the Air Quality related aspects on this report. It is noted that there are still several issues that could be improved and resolved.
- 7.5.4 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.5-1.

Key Observations and Concerns

- Modelled concentrations of particulate matter (PM) including PM10 and PM2.5 have not been subject to model verification and adjustment. Where modelled concentrations are not subject to model verification this potentially may lead to under predicting of concentrations at sensitive receptors.
- Significant concerns around the effects of poor air quality, arising from the construction of HS2, including the significant number of vehicle movements anticipated.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including assessment of height and elevation
- Modelled particulate concentration, PM10 and PM2.5, within MA04 must be subject to verification in accordance with guidance contained with DEFRA TG(16).
- Further mitigation measures and resources be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme

7.5.5 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses, and environment.

Table 7.5-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix AQ-001- OMA04	4.2	4.2.6	Issue/ Concern The verification process within the air quality assessment documentation for MA04 states that the M6 is elevated approximately 8m above the monitoring sites MA05.10, MA05.11, and MA05.13.	Proposed Mitigation N/A Residual Impact Moderate	HS2 must undertake and provide for review additional air quality modelling for MA04 which considers guidance contained within DEFRA



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>However, the documentation continues to state that the M6 was not modelled at height and was modelled with no relative elevation to the monitoring sites, resulting in discrepancies between the modelled and monitored concentrations, and an adjustment factor of 0.6 being applied at these monitoring locations. No further explanation or justification is provided as to why the M6 was not modelled at height, despite Defra's TG (16) stating that the relative heights of sources and receptor locations are an important factor in dispersion modelling and should be used to inform the modelling. Any further assessment should account for the relative heights of sources, receptors and verification points within the dispersion modelling.</p> <p>Likely Impact Setting the whole road network at an elevated base level may result in the model under predicting, whilst not accounting for elevated road sections appropriately may result in the model over predicting</p>		<p>document TG16 for the modelling of road layouts which vary with height.</p> <p>This must be done in consultation with verification by Trafford Council and other Las.</p>
Volume 5: Appendix	4.2	4.2.8	<p>Issue/ Concern Modelled concentrations of particulate matter (PM) including PM10 and PM2.5 have not been subject to</p>	Proposed Mitigation N/A	Modelled particulate concentration, PM10 and PM2.5, within



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
AQ-001-OMA04			<p>model verification and adjustment. Where modelled concentrations are not subject to model verification this potentially may lead to under predicting of concentrations at sensitive receptors.</p> <p>Likely Impact Underestimation of air quality impacts at sensitive receptors.</p>	<p>Residual Impact Moderate</p>	<p>MA04 must be subject to verification in accordance with guidance contained with DEFRA TG(16).</p> <p>This must be done in consultation with verification by Trafford Council and other LAs.</p>
Volume 5: Appendix AQ-001-OMA04	4.2	4.2.6	<p>Issue/ Concern Monitoring location MA05.10 presents the highest recorded concentration of NO2 within the monitoring locations selected for verification.</p> <p>However, this monitoring location is under predicting (following adjustment) by over 10% (4.6 µg/m3). This under prediction has the potential to significantly underestimate concentrations within the dispersion model, and to alter the number of 'significant' effects predicted.</p> <p>Likely Impact Underestimation of air quality impacts</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	<p>HS2 must provide justification to explain why the monitoring location recording the highest concentration of NO2 was not considered in detail during the verification process.</p> <p>Additional mitigation and/or compensation measures must be</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					agreed with Trafford Council.
Volume 5: Appendix AQ-001- OMA04	4.2	4.2.8	<p>Issue/ Concern Within table 10 (Comparison of monitored and modelled NO2 concentrations) following model adjustment site MA04.01 presents a difference of 16.1% between the modelled and monitored data.</p> <p>In order to provide confidence in the modelling process it is preferable that modelling concentrations are within 10% of monitored concentrations.</p> <p>Likely Impact Under estimation of air quality impacts.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	<p>The air quality modelling for MA04 must be reviewed and updated to include guidance contained within box 7.17 of Defra TG (16)</p> <p>This must be done in consultation with verification by Trafford Council and other Las.</p>

Summary

7.5.6 Justification is required as to why monitoring locations have not been accurately verified. There are concerns that some monitoring locations are being under predicted. Additional monitoring and verification is therefore required which meets the guidance contained within DEFRA TG(16), and is undertaken in consultation with Trafford Council.

7.6 Community

- 7.6.1 Trafford Council welcome the commitment from HS2 to consider community effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.6.2 The area includes land required both temporarily and permanently for the construction and operation of the Proposed Scheme. It also includes a wider area including proposed construction traffic routes within which communities could be affected by a combination of noise, vibration, poor air quality, heavy goods vehicles traffic, and visual intrusion.
- 7.6.3 The proposed route will dissect the neighbouring communities of Warburton and Moss Brow. The neighbouring settlements share a small number of community facilities to which access for residents would be significantly impacted by the realignment of the A6144 Paddock Lane, breaking the direct connection between these two communities.
- 7.6.4 Two existing local businesses, The Saracens Head Public House and farm shop at Moss Brow Farm are located on opposite sides of the existing A6144. Both facilities constitute valuable local community assets. Permanent closure of the A6144 where it crosses the Proposed Scheme is likely to have an adverse impact on both businesses' trade.
- 7.6.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the community related aspects on this report. It is noted that there are still several issues that could be improved and resolved.
- 7.6.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.6-1.

Key Observations and Concerns

- The Proposed Route will sever the A6144 Paddock Lane link between the two small rural settlements of Warburton village and Moss Brow hamlet and create a sense of isolation.
- The proximity of the line will create significant visual and noise related impacts for local residents.
- Local businesses (which also act as valuable local community assets) on the A6144 are likely to experience a decrease in trade.
- Visual and noise impacts resulting from the Manchester Ship Canal viaduct are not considered for residents of Partington.
- The impacts of the various satellite compounds are not considered.

Recommendations and Additional Mitigations Required

- The full extent of the impact of the Proposed Scheme within the Community Area to be recognised and considered.
- Full details of all proposed noise and visual mitigation to be agreed with Trafford Council.
- Additional improvements to Public Rights of Way to reduce proposed diversion lengths and reduce issues of severance.
- Appropriate financial compensation for local businesses / community facilities directly impacted by the permanent closure the A6144 Paddock Lane where it crosses the Proposed Scheme.

7.6.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses, and environment.

Table 7.6-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	6	6.4 & 6.5	<p>Issue / Concern</p> <p>Consideration of the construction and operational impacts of the Manchester Ship Canal viaduct (up to 29m in height) and associated landscape mitigation appear to only be detailed for communities to the west of the canal, in Hollins Green and Glazebrook.</p> <p>ES Volume 5: Appendix CT-003-00000 Cross-topic Alternatives report in paragraph 5.2.85 states that the embankments either side of the canal crossing would have moderate landscape, visual, townscape and noise impacts for the residents of Hollins Green, Glazebrook <u>and</u> Partington.</p> <p>Trafford Council consider that the residents of Partington, to the east of the canal, will experience adverse visual and noise impacts from the proposed viaduct. This needs to be acknowledged and considered within the MA04 Communities chapter.</p>	<p>Proposed Mitigation</p> <p>None proposed</p> <p>Residual Impact</p> <p>Major (for the local area)</p>	<p>Trafford Council expects the full extent of the impacts of the Proposed Scheme within this location to be fully recognised and considered.</p> <p><i>Also see requirements in the Sound, Noise & Vibration and Landscape Topic Areas.</i></p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Adverse impacts on communities within Partington are not appropriately considered, resulting in inadequate mitigation measures being put in place. <i>Also see comments on the Sound, Noise & Vibration and Landscape Topic Areas.</i></p>		
Volume 2: Community Area report MA04	6		<p>Issue / Concern The Community chapter does not acknowledge or consider the impact(s) of the A6144 Paddock Lane Satellite Compound, Warburton Embankment Satellite Compound or Manchester Ship Canal Viaduct South Satellite Compound as shown on Volume 2: Community Area Map Book MA04 drawing CT-05-324. It is therefore unclear what designated routes construction traffic will take to these compounds and for how long.</p> <p>Likely Impact Adverse impacts on local communities from satellite compounds are not fully understood / considered, resulting in inadequate mitigation measures being put in place.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major (for the local area)</p>	Trafford Council expects the full extent of the impacts of the Proposed Scheme within this location to be fully recognised and considered. <i>Also see requirements in the Landscape and Visual and Traffic and Transport Topic Areas.</i>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<i>Also see comments on the Landscape and Visual and Traffic and Transport Topic Areas.</i>		
Volume 2: Community Area report MA04	6.4	6.4.11	<p>Issue / Concern The construction of the Warburton cutting will require the permanent realignment of the A6144 Paddock Lane, which provides a link between the village of Warburton and hamlet of Moss Brow. The two settlements share community facilities.</p> <p>Likely Impact Permanent realignment of the A6144 Paddock Lane will result in an increase in journey length of 950m between the Saracens Head public house and the Moss Brow farm shop. Paragraph 6.4.11 states that the reduced access, along with the creation of a visual barrier, will create feelings of separation from fellow residents and community facilities will result in isolation permanently affecting some residents in Warburton and Moss Brow. <i>Also see comments on the Traffic and Transport Topic Area.</i></p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major (for the local area)</p>	Trafford Council requires additional proposes for improvements to public footpaths and publicly accessible routes to mitigate against the barrier which the route would create in the village of Warburton and the surrounding area. <i>Also see requirements in the Traffic and Transport Topic Area.</i>
Volume 2: Community	6.4	6.4.12 - 6.4.14	<p>Issue / Concern Paragraphs 6.4.12 and 6.4.14 state that no permanent construction effects on community facilities and</p>	<p>Proposed Mitigation None proposed</p>	Trafford Council expects the full extent of the impacts of the Proposed Scheme within



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>recreational routes are anticipated in this area. These conclusions are not consistent with the conclusions of paragraph 6.4.11 which identifies significant impacts resulting from the permanent realignment of the A6144 Paddock Lane which would further separate local residents from local community facilities (I.e., a public house and farm shop).</p> <p>Likely Impact The adverse impacts of the Proposed Scheme in this location are played down and appropriate mitigation is not delivered.</p>	Residual Impact Major (for the local area)	this location to be fully recognised and considered.
Volume 2: Community Area report MA04	8.3	8.3.2 - 8.3.7	<p>Issue / Concern A number of rural communities within Trafford will be directly impacted by the Proposed Scheme.</p> <p>The village of Warburton and hamlet of Moss Brow are identified as having a combined total of approximately 150 residential properties. The nearest residential properties are located approximately 65m west of the Proposed Scheme.</p>	<p>Proposed Mitigation Landscaped earthworks</p> <p>Residual Impact Major (for the local area)</p>	<p>Trafford Council expects visual and noise related impacts of the Proposed Scheme on residents to be minimised wherever possible; and expect full details of all proposed mitigation.</p> <p><i>Also see requirements in the Sound, Noise & Vibration and Landscape Topic Areas.</i></p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The route of the Proposed Scheme will also be to the south-west of Partington, which has approximately 3,400 residential properties; the nearest of which being 500m away.</p> <p>Likely Impact The close proximity of rural communities and the extent of the Proposed Scheme mean residents are likely to experience adverse visual and noise related impacts during both construction and operation of the Proposed Scheme. <i>Also see comments on the Sound, Noise & Vibration and Landscape Topic Areas.</i></p>		
Volume 2: Community Area report MA04	8.4	8.4.23	<p>Issue / Concern Paragraph 8.4.23 acknowledges that significant visual effects on residential properties are predicted to occur both temporarily and permanently as a result of construction of the Proposed Scheme within Warburton and Moss Brow</p> <p>Likely Impact The introduction of a visual barrier (along with reduced access and severance from local community facilities) between the communities of Warburton and</p>	<p>Proposed Mitigation Landscaped earthworks</p> <p>Residual Impact Major (for the local area)</p>	<p>Trafford Council expects visual and noise related impacts of the Proposed Scheme on residents to be minimised wherever possible; and expect full details of all proposed mitigation. <i>Also see requirements in the Landscape Topic Area.</i></p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Moss Brow will have a permanent adverse impact on the local landscape and visual amenity of local residents.</p> <p><i>Also see comments on the Landscape Topic Area.</i></p>		
Volume 2: Community Area report MA04	12	12.4.4 - 12.4.6 & 12.4.15 - 12.4.19	<p>Issue / Concern</p> <p>Paragraphs 12.4.4 and 12.4.5 respectively stated that The Saracens Head public house and the farm shop at Moss Brow Farm (both located on the A6144 Paddock Lane), will experience significant visual and noise effects from HGV construction traffic during construction of the Proposed Scheme.</p> <p>The construction works are also considered to potentially discourage customers from using the facilities as the sensitivity of the establishments are assessed as being high within the ES, as customers are sensitive to the impacts on the local environment.</p> <p>Paragraph 12.4.17 also states that the closure of the existing A6144 Paddock Lane, where it crosses the route of the Proposed Scheme, will mean that the two</p>	<p>Proposed Mitigation</p> <p>None proposed</p> <p>Residual Impact</p> <p>Major (for the local area)</p>	<p>Trafford Council expects local businesses adversely impacted by the Proposed Scheme to be adequately compensated and appropriate mitigation put in place to help ensure successful continuation of such businesses, which also form valuable community assets.</p> <p><i>Also see requirements in the Socio-economic Topic Area.</i></p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>businesses will no longer be on a major road and consequently, this could lead to a loss of trade.</p> <p>Likely Impact Combined the visual impacts, noise impacts and sense of isolation could lead to a loss of trade for the affected businesses and therefore jeopardised the viable future of valued local community assets in a rural area.</p> <p><i>Also see comments on the Socio-economic Topic Area.</i></p>		

Summary

- 7.6.8 Compensatory schemes should be provided for lost woodland in addition to, improvements to footpaths and signposting, mitigation for affected residents and businesses during construction and operation, including compensatory funding, and provision of alternative space for lost community venues as well as support for local bus services.

7.7 Ecology and Biodiversity

- 7.7.1 Trafford Council welcome the commitment from HS2 to consider ecology and biodiversity effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.7.2 Within the ES chapter on ecology and biodiversity Trafford Council is concerned by the lack of reference to the Environment Act and its requirements for Biodiversity Net Gain. Providing a lasting positive environmental legacy should be one of the fundamental principles of the Phase 2b extension to Manchester.
- 7.7.3 Trafford Council also have concerns over how a number of species and habitat surveys were undertaken. This is likely to result in the unjustified loss of valuable habitats as adverse impacts of the Proposed Scheme have not been adequately considered, nor appropriate mitigation been identified.
- 7.7.4 The Proposed Scheme is also likely to adversely impact on a number of designated sites within the community area. These include GM Wetlands Nature Improvement Area, Manchester Mosses Special Area of Conservation and Fox Covert & Meadow SBI. Impacts are also likely on Red Brook which is an identified habitat of principal importance and local BAP habitat.
- 7.7.5 Where habitat compensation has been proposed, it is unclear what conventional methodology this has followed. The proposed habitat creation to mitigate the loss of a section of Coroner's Ancient Woodland is not considered acceptable, as Trafford Council does not consider that irreplaceable ancient woodland loss can be compensated through creation of new woodlands.
- 7.7.6 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the ecology and biodiversity related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

7.7.7 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.7-1.

Key Observations and Concerns

- Lack of reference to the Environment Act and its requirements for Biodiversity Net Gain.
- Wide scale unjustified loss of valuable habitats (including trees and hedgerows) possible due to surveys undertaken failing to assess the full range of natural assets within the community area.
- Inadequate surveys undertaken which may impact protected species such as bats and badgers.
- Potential for adverse impacts on GM Wetlands Nature Improvement Area, Manchester Mosses Special Area of Conservation and Fox Covert & Meadow SBI
- Permanent loss of habitat at Coroner's Wood Ancient Woodland and unnamed woodland adjacent to Coroner's Wood. Plus, impacts on eight further unnamed woodlands (each less than 1.5ha).
- Proposed habitat compensation does not appear to follow any conventional methodology.
- Impacts on Red Brook (river) which is an identified habitat of principal importance and local BAP habitats.

Recommendations and Additional Mitigations Required

- The Proposed Scheme must provide a minimum 10% biodiversity net gain across the community area.

- Justification must be provided where there are requirements to remove any trees, hedgerows, or areas of habitat.
- HS2 should be required to ensure that sufficient habitat and species surveys have been undertaken / undertake additional surveys where gaps are identified.
- HS2 Ltd, its contractors and undertakers must ensure that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.
- Advance planting of selected mature and semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity.
- Habitat fragmentation should be avoided wherever possible.

7.7.8 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 7.7-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	General Comment	Point/	Issue/ Concern There is insufficient reference to the Environment Act, in particular Biodiversity Net Gain and how the GM Local Nature Recover Network and opportunity mapping is being used to positively identify ecological receptors.	Proposed Mitigation N/A Residual Impact N/A	Clearer references to the Environment Act Priorities, in terms of articulating how Biodiversity Net Gain

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>It is not currently clear how this statutory requirement is being delivered and maximised.</p> <p>Likely Impact Opportunities to deliver biodiversity net gain are missed.</p>		<p>will be delivered are required.</p> <p>HS2 should produce a thorough and comprehensive CEMP/ LEMP to manage retained habitats and a provide a minimum 10% biodiversity net gain.</p>
Volume 2: Community Area report MA04	General Point / Comment		<p>Issue/ Concern Loss of trees and lack of justification for their removal.</p> <p>Likely Impact Unjustified loss of valuable habitat.</p>	<p>Proposed Mitigation Replacement and compensatory planting.</p> <p>Residual Impact Moderate</p>	<p>HS2 Ltd must provide justification where there are requirements to remove any trees along the route as well as trees being adequately replaced in accordance with Trafford's Core Strategy Policy R2.</p>
Volume 2: Community	General Point/ Concern		Issue/ Concern	Proposed Mitigation N/A	HS2 should be required to ensure

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>Trafford Council note that approximately 72% (up to 82%) of trees with moderate to high bat roost potential have not been surveyed.</p> <p>Likely Impact Potential harm and disturbance to bats likely to be higher and more detrimental than assessed.</p>	Residual Impact Moderate	that sufficient surveys are undertaken to identify bat roosts within all moderate – high potential trees.
Volume 2: Community Area report MA04	General Point/ Comment		<p>Issue/ Concern Trafford Council note that 128 buildings were subject to initial inspection for bat potential, however the total number of buildings that required further survey is unclear.</p> <p>Likely Impact Potential harm and disturbance to bats likely to be higher and more detrimental than assessed.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	HS2 should be required to provide clear totals for the number of buildings subject to further bat surveys, including the type of assessments, timing of surveys and full results for buildings with confirmed bat roosts.
Volume 2: Community Area report MA04	General Point / Comment		<p>Issue / Concern HS2 will run through the Great Manchester Wetlands Nature Improvement Area and near to the Manchester Mosses Special Area of Conservation (SAC).</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact Moderate</p>	The Council will require a full understanding of the impact of HS2 on



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Trafford/Wigan/Manchester/GMCA will need assurance that any impact on these designations is fully assessed and appropriately mitigated.</p> <p>Likely Impact</p> <p>There is a concern that HS2 in its operational and construction phases may result in the loss of part of the tree belt that shields Holcroft Moss, within the Manchester Mosses SAC, from air quality impacts arising from traffic using the M62.</p>		<p>Holcroft Moss, including on the tree belt, with appropriate mitigation provided to offset any impacts.</p>
<p>Volume 2: Community Area report MA04</p>	7.3	7.3.7	<p>Issue/ Concern</p> <p>A section of the Coroner’s Wood Ancient Woodland Inventory (AWI) will be permanently lost outside the Coroners Wood Site of Biological Interest (SBI) to accommodate the proposed scheme.</p> <p>Trafford Council does not accept that irreplaceable ancient woodland loss will be compensated through creation of new woodlands. This is contrary to the provisions of Policy R2 of the Trafford Local Plan Core Strategy, and Policy 9 of GM Places for Everyone and Transport for Greater Manchester (TfGM's) IMS Environment and Sustainability Criteria - Biodiversity.</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>Mitigation is proposed to include habitat creation extending east under the Manchester Ship Canal and an area of woodland habitat creation on the western side of Manchester Ship Canal viaduct between the northern bank of Red Brook and the southern bank of the</p>	<p>HS2 Ltd and its contractors and undertakers must ensure that all appropriate mitigation and protection measures are implemented before construction beings and maintained through the construction phase.</p> <p>Advance planting of selected mature and</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Permanent loss of irreplaceable Ancient Woodland. Significant adverse.	<p>Manchester Ship Canal, to provide compensatory habitat for the loss of ancient woodland at Coroners Wood. The proposed viaduct is to also provide compensatory habitat for the loss of ancient woodland at Coroners Wood.</p> <p>Residual Impact Major</p>	<p>semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity to allow sufficient time for establishment.</p> <p>Every effort should be made to relocate any mature and semi-mature trees within the Ancient Woodland.</p> <p>Further financial resources will be required to enable Trafford Council in collaboration with partners/ stakeholders to manage and protect the retained areas of</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					woodland that are in poor condition, as well those areas that are being established.
Volume 2: Community Area report MA04	7.3	7.3.6	<p>Issue/ Concern Impact on the nature conservation value of designated nature conservation sites notably; Fox Covert and Meadow SBI.</p> <p>In line with Trafford Core Strategy Policy R2 the proposals should not negatively impact on such designations.</p> <p>Likely Impact Moderate.</p>	<p>Proposed Mitigation None proposed.</p> <p>Residual Impact Moderate</p>	HS2 must be required to provide for mitigation against any negative and/or adverse impacts from the proposed scheme on designated sites/assets.
Volume 2: Community Area report MA04	7.4	7.4.45	<p>Issue/ Concern Trafford Council note the HS2 assumption that all hedgerows will be lost, with only 9.6km being replaced.</p> <p>This represents a loss of nearly 70% which is not considered acceptable, especially as it has not been identified where the new hedgerows required will be planted.</p>	<p>Proposed Mitigation No mitigations proposed, beyond the replacement of 9.6km of hedgerows.</p> <p>Residual Impact Major</p>	Additional assessment is required to set how this will be mitigated and highlight where habitat fragmentation may occur to inform where appropriate mitigation can be implemented.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>In addition, 16.6km of hedgerow has not been surveyed. This suggests there is likely to be more than 400m of Important hedgerow within the un-surveyed hedgerows.</p> <p>Likely Impact Permanent loss of valuable local habitat. Significant adverse.</p>		<p>This should be done in line with the National Planning Policy Framework (NPPF) (2021), the GMCA Biodiversity Net Gain Guidance (2021) relevant policies of the Trafford Core Strategy and Places for Everyone Plan.</p> <p>A minimum of a 10% Biodiversity Net Gain will be required for the project to include hedgerow replanting. HS2 must also provide justification for the removal of any hedgerow along the route as well as details on how the biodiversity target will</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					be secured further to the removal of hedgerows.
Volume 2: Community Area report MA04	Vol 2: Map Book	CT-06-324	<p>Issue/ Concern The proposals include creating compensation ponds to the west and north of Moss Brow.</p> <p>Trafford Council note that the two separate areas are isolated from not only each other but from other ponds in the wider landscape.</p> <p>Likely Impact Lack of integration between proposed ponds, thus reducing their value as biodiversity asset.</p>	<p>Proposed Mitigation Two compensation ponds.</p> <p>Residual Impact Moderate</p>	HS2 must be required to provide details of how potential wildlife corridors will be provided to link the ponds in the area in accordance with Trafford's Core Strategy Policy R2.
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern It is noted that the impact on amphibians other than great crested newts have been assessed as being of "local/parish" value.</p> <p>There has been no survey undertaken of these species and as such HS2 have not demonstrated how this value can be justified.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	HS2 Ltd must undertake additional surveys or assessments of current data sets for amphibians other than Great Crested Newts along with the production of a report to assess this issue on

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Adverse impacts on amphibians other than great crested newts are not considered in the immediate area and therefore appropriate mitigation is not put in place.		a wide basis in line with Trafford's Core Strategy Policy R2.
Volume 2: Community Area report MA04	7.4	7.4.47	<p>Issue/ Concern</p> <p>It is noted that the numbers that have been provided regarding habitat compensation do not appear to follow any conventional methodology i.e., it is not like for like or even two for one.</p> <p>For example, it is noted that page 152 Volume 2 MA04 refers to one pond to replace one pond lost. If a precautionary principle is to be applied this should be two ponds for every one pond lost.</p> <p>All woodland habitat lost must be compensated in line with Revised Trafford Core Strategy Policy R2.</p> <p>Likely Impact</p> <p>Proposed levels of mitigation provide an insufficient amount of habitat.</p>	<p>Proposed Mitigation</p> <p>One for one habitat replacement.</p> <p>Residual Impact</p> <p>Moderate</p>	Further information is required with regards to the areas selected for woodland creation to ensure that they are suitable in terms of adjacent habitats and ecosystems.
Volume 2: Community Area report MA04	7.4	7.4.43	<p>Issue/ Concern</p> <p>It is noted that on page 151 Volume 2 MA04, it is suggested that grassland enhancement can be achieved through woodland planting.</p>	<p>Proposed Mitigation</p> <p>No appropriate mitigations proposed by HS2.</p>	Clarification is needed from HS2 to confirm that this is an error, and that habitat



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>This would be a change in habitat and therefore not grassland.</p> <p>Habitat enhancements should be just that, and not lead to a change in habitat.</p> <p>Likely Impact Moderate. Habitat change affecting various species.</p>	<p>Residual Impact Moderate</p>	<p>change is not being confused with enhancements.</p> <p>In accordance with Policy 9 (GM Places for Everyone) further detail is required from HS2 on the amount of grassland habitat loss and how grassland enhancement will be achieved.</p>
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern Trafford Council have a concern regarding the foraging height of bats along the Bridgewater Canal and Bollin. The assessment has not taken account of the height of the viaduct which may have an impact on the flight of some higher-flying bat species noted to be active in that area.</p> <p>Both sites have been identified as significant routes for commuting bats, but limited discussion or mitigation has been provided to address this.</p>	<p>Proposed Mitigation Limited.</p> <p>Residual Impact Moderate</p>	<p>HS2 must undertake surveys at a height(s) appropriate for the viaduct such as on a blimp or meteorological mast similar to a wind farm survey assessment. This would allow the potential impact to be identified and then</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The species identified in the area included Pipistrelle sp Myotis sp and Nyctalus sp, with Nyctalus sp usually active on higher flight paths.</p> <p>Page 157 of MA04 indicates that the impact is not known. Trafford Council considers that further survey and assessment in respect of bats is necessary to determine the impact in line with Trafford Core Strategy Policy R2.</p> <p>Likely Impact Unknown and requires further assessment.</p>		<p>appropriate mitigation applied.</p> <p>Planting of trees and hedgerows to direct Nyctalus away from the viaduct is not considered appropriate mitigation for this species as they rarely use these linear features to navigate.</p>
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern</p> <p>It is noted that detailed information is absent for some species, i.e., badger, yet Volume 2 MA04 states there will be no significant effect on badgers.</p> <p>This statement is unsubstantiated, and Trafford Council note that two main sets will be lost; with 4 clans within the area, that equates to half of the animals being displaced. Displaced badgers will be reliant on immature newly created habitat to forage. A loss in badger populations would lead to a loss of biodiversity in that area.</p> <p>Likely Impact</p>	<p>Proposed Mitigation Newly established habitats.</p> <p>Residual Impact Moderate</p>	<p>HS2 should be required to provide surveys for species which are to be affected by the construction works, and that displaced species are adequately provided for in mitigation measures to avoid loss of biodiversity in line with Revised Trafford</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Moderate. Potential loss of biodiversity through direct displacement and newly established habitats.		Trafford's Core Strategy Policy R2.
Volume 2: Community Area report MA04	7.3	7.3.12	<p>Issue/ Concern An unnamed woodland, on the south bank of the Manchester Ship Canal adjacent to Coroners Wood, covering an area of 2.8ha is partially within the land required for construction of the Proposed Scheme and is of district/borough value.</p> <p>Likely Impact Loss of valued trees and biodiversity and adverse effect on the character of the area.</p>	<p>Proposed Mitigation Replacement and compensatory planting.</p> <p>Residual Impact Moderate</p>	HS2 Ltd must provide justification where there are requirements to remove any trees along the route as well as trees being adequately replaced in accordance with Trafford's Core Strategy Policy R2.
Volume 2: Community Area report MA04	7.3	7.3.12	<p>Issue/ Concern Impacts on a further eight unnamed woodlands (each less than 1.5ha, and none within wildlife site designations) at the following locations: adjacent to the River Bollin; adjacent to the Saracens Head public house in Warburton; adjacent to the A6144 Paddock Lane at Moss Brow; Warburton Park; between the A57 Manchester Road and Manchester Road at Hollins Green; disused railway line south of Glazebrook Moss; at Glazebrook Moss; and immediately south of Holcroft Moss SSSI at Glazebrook. These woodland habitats are of up to local/parish value.</p>	<p>Proposed Mitigation Replacement and compensatory planting.</p> <p>Residual Impact Moderate</p>	HS2 Ltd must provide justification where there are requirements to remove any trees along the route as well as trees being adequately replaced in accordance with Trafford's Core Strategy Policy R2.

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Loss of valued trees and biodiversity and adverse effect on the character of the area.</p>		
Volume 2: Community Area report MA04	7.3	7.3.20	<p>Issue/ Concern Impacts on Red Brook an identified habitat of principal importance and local BAP habitats. These watercourses and adjacent habitats are intrinsically important and provide corridors for wildlife dispersal; as such they are of up to county/metropolitan value.</p> <p>Water voles are present in this watercourse within 347m of the Proposed Scheme. Otters are also assumed to use the water course.</p> <p>Likely Impact Disturbance to habitat and food sources.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	<p>HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and mitigation measures to protect the water course from pollution and excessive damage that could detrimentally affect its ability to support water voles and otters.</p> <p>HS2 must be required to engage with Natural England and accredited ecologists to ensure that no</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					<p>adverse impacts arise either during construction or operation of the Proposed Scheme.</p> <p>Trafford Council request that GMEU is consulted upon such matters.</p>
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern Impacts on the habitat at Lower Carr Green Farm and Hollingreave Farm and suitable habitat in the Broomedge to Glazebrook area to support barn owls.</p> <p>Likely Impact Disturbance to habitat and food sources.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	<p>HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and mitigation measures to protect the habitat from pollution and excessive damage that could detrimentally affect its ability to support barn owls.</p>



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					<p>HS2 must be required to engage with Natural England and accredited ecologists to ensure that no adverse impacts arise either during construction or operation of the Proposed Scheme.</p> <p>Trafford Council request that GMEU is consulted upon such matters.</p>
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern</p> <p>Impacts upon vascular plants - Wild service trees at Coroners Wood.</p> <p>Field surveys identified wild service trees in Coroners Wood ancient woodland habitat, adjacent to the Manchester Ship Canal at Partington, partially within the land required for construction of the Proposed Scheme. Wild service trees are rare in Cheshire.</p>	<p>Proposed Mitigation</p> <p>Unknown/ unclear.</p> <p>Residual Impact</p> <p>Moderate</p>	<p>HS2 Ltd must provide justification where there are requirements to remove any trees along the route as well as trees being adequately replaced in accordance with</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Loss of valued trees and biodiversity and adverse effect on the character of the area.</p>		Trafford's Core Strategy Policy R2.
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern Impacts upon vascular plants - Early marsh-orchid at Fox Covert.</p> <p>Field surveys identified early marsh-orchid at Fox Covert and Meadows, 25m north of land that has been identified for the purpose of habitat creation or enhancement as part of the Proposed Scheme on the opposite side of the River Bollin. Early marsh-orchid is rare in Cheshire.</p> <p>Likely Impact Loss of biodiversity and adverse effect on the character of the area.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	HS2 Ltd must provide clarity where there are requirements to remove any rare plants along the route and adequately replace them in suitable local habitats in the locality wherever possible.
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern Impacts on reptiles.</p> <p>There is potential for isolated populations in other semi-natural habitats. Grass snake, slow worm and common lizard are all species of principal importance.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Minor</p>	HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and mitigation measures



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Loss of biodiversity.</p>		<p>to protect the habitat from pollution and excessive damage that could detrimentally affect its ability to support reptiles.</p> <p>HS2 should engage with Natural England and accredited ecologists as necessary to ensure that no adverse impacts arise either during construction or operation of the Proposed Scheme.</p>
<p>Volume 2: Community Area report MA04</p>	7.3	7.3.28 Table 13	<p>Issue/ Concern Impacts on terrestrial invertebrates - Invertebrate assemblage at Coroners Wood.</p> <p>Over 100 terrestrial invertebrate species, including alder leaf beetle were recorded during field surveys at Coroners</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Minor</p>	<p>HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and mitigation measures</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Wood. The remaining species were common and widespread and typical of the habitat types present.</p> <p>Likely Impact Loss of biodiversity.</p>		<p>to protect the habitat from pollution and excessive damage that could detrimentally affect its ability to support alder leaf beetles.</p> <p>HS2 should engage with Natural England and accredited ecologists as necessary to ensure that no adverse impacts arise either during construction or operation of the Proposed Scheme.</p>
Volume 2: Community Area report MA04	7.3	7.3.28 Table 13	<p>Issue/ Concern Impacts on fish - Fish assemblages within the Manchester Ship Canal.</p> <p>European eel, gudgeon, perch, dace, common bream, three-spined stickleback, common roach and rudd were</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Minor</p>	<p>HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>identified in the desk study data as being present in the Manchester Ship Canal.</p> <p>Likely Impact Loss of biodiversity.</p>		<p>mitigation measures to protect the habitat from pollution and excessive damage that could detrimentally affect its ability to support alder leaf beetles.</p> <p>HS2 should engage with Natural England and accredited ecologists as necessary to ensure that no adverse impacts arise either during construction or operation of the Proposed Scheme.</p>
Volume 2: Community Area report MA04	7.4	7.4.2	<p>Issue/ Concern Assumption of implementation of measures set out set out within the draft Code of Construction Practice (CoCP), which includes sensitive construction practices and habitat management plans.</p>	<p>Proposed Mitigation Section 9 of the draft CoCP requires contractors to implement a range of</p>	<p>Penalties for not complying the CoCP need to be set out including but not limited to:</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Please see response on CoCP for more detailed response.</p> <p>Likely Impact Please see response on CoCP for more detailed response.</p>	<p>measures to protect ecological receptors.</p> <p>Residual Impact</p>	<ul style="list-style-type: none"> - Habitat restoration at cost to contractor/ HS2 in accordance with guidance from Natural England, Local Authority, recognised Wildlife Organisation and/or accredited ecologist; and - Penalty fines in line with existing SI for protected species and habitat loss/damage
Volume 2: Community	7.4	7.4.12	Issue/ Concern	Proposed Mitigation N/A	Details on how the watercourse

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>The Proposed Scheme will pass through the southern part of the Great Manchester Wetlands local NIA, the objectives of which include improving species dispersal and providing habitat connectivity.</p> <p>It is noted that HS2 conclude that the Proposed Scheme will not directly impact any target sites of the NIA within the Broomedge to Glazebrook area, and a combined length of 2.6km of viaducts with associated riparian habitats will maintain connectivity along watercourses.</p> <p>Likely Impact Habitat segregation and fragmentation.</p>	<p>Residual Impact Moderate</p>	<p>connectivity across riparian habitats will be managed and maintained during the operation phase is required.</p> <p>Annual monitoring reports to be submitted to the affected Local Authorities, Greater Manchester Ecology Unit, Natural England and the Environment Agency.</p>

Summary

7.7.9 Given the species & habitats assessments undertaken, and the lack of reference to the Environment Act, it is unclear whether the Proposed Scheme will deliver a minimum 10% biodiversity net gain within the community area. Without thorough assessments of the adverse impacts of the Proposed Scheme on species and habitats, the potential for any losses is likely to be understated. HS2 must therefore be required to engage with Natural England and accredited ecologists to ensure that no adverse impacts arise either during



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

construction or operation. This will require HS2 and its contractors and undertakers ensuring that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.

7.8 Health

- 7.8.1 Trafford Council welcome the commitment from HS2 to consider health and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.8.2 The Proposed Scheme will have significant visual, noise, and air quality impacts on local communities, particularly those in Warburton and Moss Brow, located near the route and in the wider area (i.e., Partington).
- 7.8.3 During the significant period of construction, works and associated construction traffic will create a marked increase in noise, emissions and dust affecting air quality and a visual presence within the community area. The works will also result in local connections be severed, most notably on the A6144 Paddock Lane where it crosses the Proposed Scheme. This will create a significant physical barrier between Warburton and Moss Brow. The severance of communities is likely to lead to poor mental health outcomes due to increase feelings of isolation and remoteness from existing key community facilities (i.e., public house and farm shop).
- 7.8.4 A number of satellite construction compounds are also proposed near to Warburton and Moss Brow. Construction traffic will place a significant strain on surrounding rural roads, and construction workers are likely to place additional burdens on local services and facilities.
- 7.8.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the health-related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.8.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7-8-1.

Key Observations and Concerns

- Impacts on air quality and associated effects on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, people with existing health conditions).
- Impacts on the community and associated effects on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of communities all contributing.
- Impacts on health arising from changes to traffic and transport in terms of air quality, noise, and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.
- Proposed temporary workers accommodation planned between Warburton and Partington and lack of information on the potential impact on local amenities and services.
- Impact of the HS2 route / Airport Station on residents' health and wellbeing, physical activity, sports participation and facilities.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including the determination of eligibility for noise insulation.
- Further mitigation measures and resources (including financial) to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme, particularly with regards to increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.

7.8.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses, and environment.

Table 7.8-1

Document	Section Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	General Point / Comment	<p>Climate change – there will be health impacts of climate change, and as such HS2 must ensure that the construction and operation does not contribute to climate change. These will affect the most vulnerable residents (older people, children, those with health conditions, people living in poor housing). At a time when Trafford Council are prioritising addressing the climate crisis and reducing health inequalities, it is unacceptable for HS2 to have positive net emissions.</p> <p>Health risks of climate change include increased respiratory and cardiovascular disease, injuries, and premature death as a result of extreme weather events (e.g., flooding), changes in prevalence of food- and water-borne illnesses and other infectious diseases, and threats to mental health and wellbeing.</p>	<i>See Climate Change topic response</i>	<p>Note the requirements in the climate change topic response.</p> <p>If emissions associated with the scheme are not net negative, then provide financial compensation to enable local work to be undertaken to support our most vulnerable residents whose health will be impacted by climate change.</p>



Document	Section Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	General Point / Comment	<p>Air quality – any reduction in air quality will have a detrimental effect on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, people with existing health conditions). This includes poor air quality in relation to construction activity, construction traffic, increased traffic due to road closures during construction, and increased traffic accessing the station at Manchester Airport.</p> <p>The assessment for air quality needs to be robust, and where negative impact is unable to be mitigated, then additional capacity needs to be made available within local services to provide this mitigation. For example, by providing a budget to improve active travel infrastructure, or additional services for people who experience poor respiratory health.</p>	<i>See Air Quality topic response</i>	Note the air quality topic response and provide financial mitigation to enable Trafford Council and partners across the system (including primary care) to identify key communities where air quality is reduced and provide and commission services that support people with poor respiratory health.
Volume 2: Community Area report MA04	General Point / Comment	<p>Community – impacts on community will also impact on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of communities all contributing. There is a link between access to green space and positive mental wellbeing, which will be disrupted during the construction phase, with uncertainty of impact during operation.</p>	<i>See Community topic response</i>	Provide financial mitigation to enable Trafford Council and partners to provide and commission services and activities that benefit (in particular)

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			There is acknowledgement of the impact on community but little mitigation in place, particularly in the village of Warburton, where non-motorised routes across the community will be significantly altered and lengthened, meaning that some residents may not be able to easily visit friends, family, or amenities. The impact on a small community is likely to have a substantial impact on mental health and wellbeing.		mental health and wellbeing.
Volume 2: Community Area report MA04	General Point / Comment		Health and Wellbeing - Trafford Council has invested heavily in providing access and opportunities for all its residents to take part in Sport and Physical activity, to improve their Health and Wellbeing and address health inequalities across the borough. This route would put this Investment and associate health, wellbeing, and physical activity outcomes at risk.	Proposed Mitigation - Unknown Residual Impact - Moderate	To enable tis the Council would wish to seek financial compensation for the loss of any part of its open spaces, sports or physical activity sites caused by the development of the HS2 that is to the detriment of residents health and wellbeing. It is not expected that the Council should bear the financial consequences



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					to the detriment of its residents.
Volume 2: Community Area report MA04	General Point / Comment		<p>Traffic and transport – changes to traffic and transport will have an impact on health in terms of air quality, noise, and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.</p> <p>Where there are new/diverted/reinstated roads, Active Travel infrastructure should be included to the relevant best practice standard at the time (currently LTN 1/20). Ensure any active transport infrastructure is approved by an independent body such as Active Travel England.</p> <p>There are specific requirements below in relation to facilitating active travel, but consideration needs to be made in terms of wider health impacts relating to air quality and noise as detailed above and in the relevant chapters.</p>	<i>See Traffic and Transport response</i>	<p>Provide transport infrastructure that enables and promotes active travel as the easy option during both construction and operation.</p> <p>Provide financial mitigation to enable Trafford Council and partners to deliver and commission activity that support and enables residents to travel actively, reducing impact on road networks and the associated benefits this will bring.</p>
Volume 2: Community	8.4	8.4.18	Issue/ Concern	Proposed Mitigation None proposed	Provide sufficient funding to Trafford



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>There is proposed temporary workers accommodation planned between Warburton and Partington. There is little clarity on the level of impact that this will have on local amenities and services, meaning it is difficult to assess the impact.</p> <p>Likely Impact There will be increased demand on local services such as GP practices, leisure facilities, schools, community venues etc.</p>	Residual Impact Moderate	<p>Council and partners to enable increased local capacity in statutory and non-statutory services and facilities.</p> <p>Provide data model of numbers of workers housed in temporary accommodation to enable accurate forecast of demand on local services, ensuring sufficient lead-in time (as determined locally) for local authority and partners (e.g., local health services) to commission/provide additional capacity.</p>
Volume 2: Community Area report MA04	2.2	2.2.14	<p>Issue/ Concern New road layouts (including roundabouts) are proposed.</p> <p>Likely Impact</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact</p>	<p><i>See Traffic and Transport comments on cycle routes and parking</i></p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>New road layouts can impact the ability and safety of cyclists and pedestrians. This will impact on health and wellbeing through reduced opportunities for physical activity.</p> <p>Reasonable Alternative Option(s) Ensure that all new roundabouts include safe active travel infrastructure such as CYCLOPS junctions and meet best practice standards at the time of construction (e.g., LTN 1/20). Ensure any active transport infrastructure is approved by independent body such as Active Travel England.</p>	Moderate	
Volume 2: Community Area report MA04	6.3	6.4.4	<p>Issue/ Concern Neighbourhood quality is permanently affected.</p> <p>Likely Impact Neighbourhood quality is permanently affected, with a likely impact on residents' mental health and wellbeing. Temporary impacts are still long term (e.g., three years plus) so residents' lives will be impacted for a significant period of time.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Provide funding for 5-10 years to enable Trafford Council and partners to increase community activities to restore wellbeing.
Volume 2: Community	6.3	6.3.8	Issue / Concern	Proposed Mitigation None proposed	To enable this the Council would wish to

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>Impact of the HS2 route / Airport Station on Bollin Primary School and its sports facilities</p> <p>Likely Impact Loss of sports facility, open space and playing fields in area of deprivation. Especially the loss of half sized sand dressed APG.</p> <p>Reasonable Alternative Options Financial compensation to provide additional and / or alternative space in close proximity to enable age specific sport, physical activity and health and wellbeing activity to be delivered.</p>	<p>Residual Impact Major</p>	<p>seek financial compensation for the loss of any part of its open spaces, sports or physical activity sites caused by the development of the HS2 that is to the detriment of resident and pupil health and wellbeing. It is not expected that the Council should bear the financial consequences to the detriment of its residents and pupils</p>

Summary

- 7.8.8 Trafford Council requires provision to include protected active travel infrastructure for new, diverted, reinstated routes. Proposed routes to be diverted should not be more commodious than original routes. Any future amendments to the Trans Pennine Trail or cycle networks should not be liable to flooding. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.

7.9 Historic Environment

- 7.9.1 Trafford Council welcome the commitment from HS2 to consider the historic environment and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.9.2 MA04 comprises of the villages of Dunham and Warburton which contain some of the most significant areas of historic environment in the borough. Four of the six Grade I listed buildings in the Borough are present in this location. The rural and agricultural character is notable for being both linked to yet also remaining distinctly unchanged by the industrialisation of Greater Manchester.
- 7.9.3 The character of the wider area is one of small medieval settlements, dispersed farmsteads, cottages and barns sited within a large area of arable and pasture land. In Warburton there is a particularly high number of early post-medieval cruck framed vernacular dwellings as well as the Church of St Werburgh, Grade I listed. The rural nature contributes strongly to our understanding of the agricultural past in this area. This provides an historic setting which contributes to the significance of a large number of designated and non-designated heritage assets. The predominately level topography of MA04 enables panoramic and long distance views of the heritage assets from within and surrounding both Warburton and Dunham. There is inter-visibility between some of the heritage assets, resulting in a visual connection which amplifies their significance. Dunham and Warburton are also the only two areas in the borough to exhibit manorial landscape with associated parkland. Dunham Massey in particular is the only surviving extant historic deer park. The manorial landscape at Warburton lies directly on the route of HS2.
- 7.9.4 The Dunham Massey Estate, including the park, the hall and a number of estate farms, is currently owned and maintained by the National Trust. Dunham Massey is one of the most visited paid tourist attractions in the North West. The Hall, Grade I listed, lies within a Grade II* listed Registered Park and Garden and provides the setting for a number of other highly significant heritage assets.

- 7.9.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the historic environment related aspects of this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.9.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.9-1.

Key Observations and Concerns

- The assessment of impact of the construction and operation phases on the historic environment is very limited for both Warburton and Dunham. A large number of heritage assets at Warburton have been inadequately assessed. It is also noted that there are limitations to the assessment of impact on Dunham as this lies outside the red edge boundary. Significant concern regarding the impact of the construction and operation phases on Warburton Village and its associated manorial site and deer park. In heritage terms this is an exceptionally sensitive area incorporating a Grade I listed Church, 20 Grade II listed buildings, Warburton Conservation Area and over 12 NDHAs.
- The construction and operation phases will also impact on the setting of regional tourist attraction comprising of large group of highly graded designated heritage assets at Dunham Massey and group of designated heritage assets at Dunham Woodhouses.
- The construction phase results in the unnecessary removal of archaeological features.
- The long-term impact of the construction works, particularly noise and vibration on heritage assets particularly of timber frame construction is not adequately assessed or considered.

HS2 Phase 2b Environmental Statement Consultation

- Recommendations and Additional Mitigations Required
- Greater analysis of harm to historic environment required including more LVIA views incorporating heritage assets, as well as a greater assessment of the cumulative impact of the development taking into account the intervisibility between assets.
- Design principles of all infrastructure in this highly sensitive area need to be agreed at ES stage.
- Principles of remediation and mitigation need to be agreed as part of the ES and Heritage Memorandum. A greater level of landscaping is required in this area.
- Design of construction area needs to be changed to retain affected NDHAs.
- Noise & vibration mitigation required at ES stage. Design of construction area needs to be changed.

7.9.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 7.9-1

Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
3.2	3.2.1	Issue/ Concern <u>CT-05/06-322b – Impact on Dunham Massey & Dunham Woodhouses also affects MA03 CT-05/06-322a & CT-05/06-321-L1 CT-05/06-321.</u>	Proposed Mitigation Not known as it is not clear what commitment there is	Greater analysis of harm to historic environment required including more LVIA views incorporating



Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
		<p>Concern re the impact of Bridgewater Canal Viaduct [200m in length and up to 11m in height with noise fence barrier, 190m in length and 2m in height] & River Bollin West Viaduct [400m in length up to 11m in height] on setting of regional tourist attraction comprising of large group of highly graded designated heritage assets at Dunham Massey and group of designated heritage assets at Dunham Woodhouses.</p> <p>Assessment of impact on the historic environment is very limited presumably because it is outside the red edge boundary, however there are long distance views which have not been identified between the route and these heritage assets, particularly from public footpaths around Dunham Woodhouses and Dunham Massey. Only one view from the edge of the Dunham Massey Estate is assessed under the LVIA at MA03 329-03-003. No views are assessed from Dunham Woodhouses Conservation Area in the LVIA MA04. As a general point, views included in the LVIA MA04 do not sufficiently take into account the affected heritage assets including a number of listed buildings & non designated heritage assets in and adjacent to Warburton Park and from Warburton Conservation Area. Without this assessment insufficient mitigation will be provided. It is also unclear what commitment there is from HS2 for mitigation</p>	<p>from HS2 for mitigation within 2km</p> <p>Residual Impact Moderate</p>	<p>heritage assets, as well as a greater assessment of the cumulative impact of the development taking into account the intervisibility between assets.</p> <p>Design principles of Bridgewater Canal Viaduct, noise fence barrier & River Bollin West Viaduct need to be agreed at ES stage.</p> <p>Principles of mitigation need to be agreed as part of the ES and Heritage Memorandum.</p>



Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
		<p>within 2km. Principles of mitigation need to be agreed as part of the ES and heritage memorandum.</p> <p>Impact will also occur from Lymm Road telecommunications site; Lymm Road Viaduct; Lymm North & South Embankment; Heatley North & South Embankment.</p> <p>Likely Impact Significant impact on setting of designated and non designated heritage assets including Dunham Massey.</p>		
		<p>Issue/ Concern <u>CT-05/06-323; CT-05/06-324; CT-05/06-324-R1 & CT-05/06-325 Warburton Village</u></p> <p>Significant concern regarding the impact of the construction and operation phases on Warburton Village and its associated manorial site and deer park. In heritage terms this is an exceptionally sensitive area incorporating a Grade I listed Church, 20 Grade II listed buildings, Warburton Conservation Area and over 12 NDHAs.</p> <p>The Golborne Link will segregate the village into east and west areas and have a major impact on the wide, open, agricultural landscape character which forms the setting to the</p>	<p>Proposed Mitigation To be undertaken at detailed design stage</p> <p>Residual Impact Major</p>	<p>Greater analysis of harm to historic environment required including more LVIA views incorporating heritage assets, as well as a greater assessment of the cumulative impact of the development taking into account the intervisibility between assets.</p>



Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
		<p>aforementioned heritage assets. In particular Warburton Park to the north of the village will be adversely affected by the Manchester Ship Canal Viaduct [1.9km in length; 29m in height]; the Warburton Embankment [63m in length and 11m in height]; Paddock Lane Telecommunications Site [49m by 24m with mast upto 25m]; a number of access roads running along the embankments; Warburton Cutting [62m in length; 9m in height]; Paddock Lane Auto Transformer Station [75m by 26m]; a number of overbridges; changes to historic layout of Warburton Lane and introduction of engineered highways and three arm roundabouts. All of which will result in a highly urbanised character in an existing rural setting.</p> <p>Design principles of the structures need to be agreed at ES stage.</p> <p>HS2 identify that the Proposed Scheme will “result in significant effects due to permanent changes to the setting of only two Grade II listed buildings: The School and Post Office House at Warburton village”. This is an inadequate assessment of the impact these significant works will have on the historic environment in this area and the existing agricultural setting to all affected heritage assets. It does not appear that Warburton Park has been adequately assessed including the associated Park</p>		<p>Further assessment of cross disciplines needed.</p> <p>Design principles of Manchester Ship Canal Viaduct; the Warburton Embankment Viaduct; Paddock Lane Telecommunications Site; Warburton Cutting; Paddock Lane Auto Transformer Station & overbridges need to be agreed at ES stage.</p> <p>Remediation and mitigation principles need to be agreed at ES stage. A greater level of landscaping is required in this area.</p>



Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
		<p>Farm Grade II listed barn and curtilage listed structures. The works will have a significant effect on Onion Farm Grade II; Heathlands Farm & Barn Grade II; St Werburgs Church & Church House, Grade II; NDHAS at Mossbrow including the Saracens Head Public House, Park Cottages, Brook House & Jack Heys Gate.</p> <p>Greater analysis of harm to affected heritage assets required including cumulative impact and intervisibility between assets. Remediation and mitigation principles need to be agreed at ES stage. A greater level of landscaping is required in this area.</p> <p>Likely Impact Considerable impact on setting of designated and non designated heritage assets.</p>		
		<p>Issue/ Concern The construction of the proposed scheme will result in the loss of the pillow mound east of Warburton Park Farm. This needs to be addressed. The construction phase should not result in the unnecessary removal of archaeological features. There is further concern regarding the impact on the park pale and medieval fishponds at Warburton Park Farm.</p>	<p>Proposed Mitigation To be undertaken at detailed design stage</p> <p>Residual Impact Major</p>	Design of construction area needs to be changed to retain affected NDHAS.



Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
		<p>Design of construction area needs to be changed to retain affected NDHAs</p> <p>Likely Impact Demolition of heritage assets.</p>		
		<p>Issue/ Concern There are many box timber framed and cruck framed buildings across the Warburton area. The long-term impact of the construction works, particularly noise and vibration, needs to be monitored across these buildings and the principles agreed at ES stage. Further assessment of cross disciplines needed. Sound, Noise & Vibration comments for Trafford identify that “Due to the proposed works in the MA04 community area (overpasses, viaducts, retaining walls etc) we would expect that piling may be required and may be a significant source of noise and vibration”.</p> <p>Noise & vibration mitigation required at ES stage</p> <p>Likely Impact Structural damage</p>	<p>Proposed Mitigation Not known</p> <p>Residual Impact Minor</p>	<p>Noise & vibration mitigation required at ES stage. Design of construction area needs to be changed</p> <p>Sound, Noise & Vibration comments for Trafford identify that “Construction ground-borne vibration receptors do not appear to be displayed on the MA04 map books therefore it is not clear if this issue has</p>

Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>been adequately considered in the ES”.</p> <p>Sound, Noise & Vibration comments for Trafford identify that “To fully understand what has been considered in the assessment, we expect assumptions on construction plant etc to be presented in the ES and supporting documentation”.</p>

Summary

7.9.8 In conclusion the ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation.

7.10 Land Quality

- 7.10.1 Trafford Council welcome the commitment from HS2 to consider land quality effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.10.2 Warburton Park Landfill site is likely to be impacted by the Proposed Scheme. The site contains industrial, commercial, construction and potentially asbestos containing material. Trafford Council is aware that potentially contaminated areas of land have been identified that could be affect. The Council expects that the analysis of contaminated land data for HS2 within Trafford to be provided as soon as it is available in order for it to be reviewed and assessed which will in turn determine the need for (if any) mitigation.
- 7.10.3 Six Mineral Safeguarding Areas (MSAs) for sand and gravel are also located within the community area. Three of which will be crossed by the Proposed Scheme. Paragraph 212 of the National Planning Policy Framework that Local Planning Authorities should not normally permit other development proposals in MSAs if it might constrain potential.
- 7.10.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the land quality related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.10.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.10-1.

Key Observations and Concerns

- Warburton Park Landfill site, Hollins Green historical landfill and Lanstar historic landfill will be impacted by the Proposed Scheme.

- Six Mineral Safeguarding Areas (MSAs) for sand and gravel are also located within the community area. Three of which will be crossed by the Proposed Scheme.

Recommendations and Additional Mitigations Required

- HS2 should provide confirmation on the current mechanisms / agreements in place to ensure appropriate consultation with the regulator takes place.
- HS2 should provide site investigation methodologies to Trafford Council for review prior to any works commencing on potentially contaminated land.
- HS2 should clarify how development of Mineral Safeguarding Areas complies with the requirements of the NPPF.

7.10.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses, and environment.

Table 7.10-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	10	10.3.16	Issue/ Concern Warburton Park Landfill Site (MA04-66), landfill, containing industrial, commercial, construction and potentially asbestos containing material	Proposed Mitigation ES assumes site investigation will be required prior to	Trafford require HS2 to provide confirmation on the current



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Trafford Council is aware that potentially contaminated areas of land have been identified that could affect, or be affected by, the construction of the proposed scheme. Where sites which have been identified within the Conceptual Site Model (CSM) to potentially pose a contaminative risk in relation to the proposed scheme, detailed site investigation works will be carried out (in particular, landfills within the area). The Council expects that the analysis of contaminated land data for HS2 within Trafford to be provided as soon as it is available in order for it to be reviewed and assessed which will in turn determine the need for (if any) mitigation. Trafford would like confirmation on the current mechanisms/agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process.</p> <p>Likely Impact Potentially significant impact to future site users and the wider environment where sites that are potentially contaminated are not investigated prior to occupation by HS2.</p>	<p>construction of the proposed Scheme.</p> <p>Data sharing protocol with Trafford Council to be enabled.</p> <p>Residual Impact</p> <p>Moderate</p>	<p>mechanisms/agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process.</p>
Volume 2: Community	10	10.3.16	Issue/ Concern	Proposed Mitigation	Site investigation methodology is to be



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>Trafford Council understands that Hollins Green historical landfill and also adjacent Lanstar historical landfill will impact the proposed scheme. Both of which are thought to contain potentially hazardous waste. The Council require full access to any site investigation data once completed to inform any remediation and subsequent validation requirements at the sites. Trafford Council are able to provide site investigation data upon request to inform the CSM for the Proposed Scheme for historical Lock Lane landfill (MA04-67/68).</p> <p>Likely Impact Adverse impact on the Proposed Scheme</p>	<p>ES assumes site investigation will be required prior to construction of the proposed Scheme</p> <p>Data sharing protocol with Trafford Council to be enabled.</p> <p>Residual Impact Moderate</p>	<p>provided to Trafford Council for review prior to any works commencing on potentially contaminated land sites.</p>
Volume 2: Community Area report MA04	10	10.3.26	<p>Issue/ Concern Trafford Council is aware that there are six Mineral Safeguarding Areas (MSAs) for sand and gravel in the study area, three of which are crossed by the Proposed Scheme. GMCA question the appropriateness of using a 'Medium Sensitivity' value for all MSAs when the need and demand of different minerals will not be the same. There is currently for instance, a regional shortage in sand and gravel supplies in the North-West of England.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	<p>Further clarification shall be provided to the Council on how the sensitivity values were calculated and the mitigation in place to protect this resource. Paragraph 212 of the National Planning Policy Framework, 2021</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Adverse impact on MSA's</p>		<p>states that 'Local Planning Authorities should not normally permit other development proposals in MSAs if it might constrain potential</p>

Summary

7.10.7 There are a number of landfill / historic landfill sites in the community area which are thought to contain potentially hazardous waste. Site investigation data for contaminated land should therefore be made available to Trafford Council for review prior to any works commencing on potentially contaminated land sites. Any resultant remediation requirements should be agreed with the regulator and Trafford Council. There are also six Mineral Safeguarding Areas for sand and gravel in the community area, three of which are crossed by the Proposed Scheme. Further clarification is required on how the sensitivity values were calculated, and the mitigation proposed to protect this resource.

7.12 Landscape and Visual

- 7.12.1 Trafford Council welcome the commitment from HS2 to consider landscape and visual effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.12.2 Effective consideration of the Landscape and Visual Impacts of both the construction and operational phase of HS2 will be key to ensuring any negative impacts of the scheme, where possible, can be mitigated. The HS2 route through Trafford within the MA04 area passes through Warburton Village and close to Partington. It is a predominantly rural area which is very open and has wide ranging views, the landscape and visual impact of the scheme will therefore be significant.
- 7.12.3 The route severs the Warburton community at Paddock Lane, it is also elevated for much of this section, over the River Bollin and in relation to the Manchester Ship Canal viaduct. The viaduct will be a significant structure and will therefore be very visible in the landscape.
- 7.12.4 There will also be significant impacts during the construction phase as a result of the works required in relation to the Paddock Lane realignment and the Manchester Ship Canal viaduct – landscape mitigations are therefore needed to mitigate both the impact of construction and operation.
- 7.12.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the landscape related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.12.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.12.1.

Key Observations and Concerns

- Limited engagement with TMBC during the preparation of the Landscape and Visual Impact Assessment
- Insufficient information about the vegetation lost during construction. The construction compounds cover a wide area and there is no indication of trees, some of which are ancient woodland, hedgerows and grassland which could be lost.
- The assessment identifies significant effects on the River Bollin Meadowland LCA and Warburton Settled Sandlands LCA. Trafford Council consider the Dunham Woodhouses Settled Sandlands LCA will also be significantly affected, and it should have been included in the assessment.
- Disagree with the assessment of the effects at construction and Yr1 for the River Bollin Meadowland LCA and Dunham Woodhouses Settled Sandlands LCA.
- Question whether the effects on landscape character could be mitigated to any extent by the proposed planting in the Warburton Settled Sandlands LCA.
- Concern about the viewpoint locations used across the area
- Inconsistent approach to photomontages, they should be provided for all phases – including construction
- Concern about impact of views from public rights of way and the Trans Pennine Trail and very limited mitigation proposed
- The HS2 route will result in landscape severance between Warburton Village and Moss Brow

Recommendations and Additional Mitigations Required

- Advanced planting should be considered well in advance of construction to mitigate significant adverse construction and Yr1 effects.
- Require additional mitigation planting at various locations in Trafford within the MA04 area – see ‘Additional Landscape Mitigation Plans’.
- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme.
- Any design proposals for the viaduct should be non-generic and be designed to add visual interest to allow better integration into the otherwise open landscape.

7.12.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses, and environment.

Table 7.12-1

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community	2	2.2.15	Issue / Concern The proposed Manchester Ship Canal viaduct at 1.9km long and up to 29m in height crossing the	Proposed Mitigation None	Trafford Council requires any design proposals for the Manchester Ship

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area report MA04			<p>canal will have significant adverse visual and landscape impacts.</p> <p>Likely Impact</p> <p>The viaduct will form a dominant and incongruous feature in an otherwise open and rural landscape.</p>	<p>ES Impact Major</p> <p>Residual</p>	<p>Canal viaduct to be non-generic and designed to add visual interest to allow better integration with the wider open landscape.</p>
Volume 2: Community Area report MA04	3	3.3.16	<p>Issue/ Concern</p> <p><i>Table 4 ‘Engagement with expert, technical and specialist groups’ -TMBC - Meetings with technical leads to collate data and discuss landscape and visual impacts, viewpoint locations and site walkovers. Informed the identification of viewpoint locations to be assessed and reported within the ES, as well as the extent of the landscape and visual study area. Obtained information to improve understanding of baseline conditions.</i></p> <p>Trafford Council consider that additional engagement is required to determine and agree upon the identification of viewpoint locations.</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>N/A</p> <p>ES Impact Major</p> <p>Residual</p>	<p>Further engagement required with TMBC, to identify what further assessment is required – see specific TMBC comments on the HS2 Phase 2B Hybrid Bill Environmental Statement consultation for MA04 and MA06. Limited engagement with Trafford Council in preparing the Environmental Statement.</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Lack of adequate consultation could result in additional adverse visual / landscape impacts due to the lack of consideration of local knowledge of the area.		
Volume 2: Community Area report MA04	General point		Issue / Concern Landscape Policy and Design Requirements The Trafford Council comments on Landscape and Visual Impact are supported by the following policies: Greater Manchester, Places for Everyone - Policy JP-G1: Valuing Important Landscapes should be reflected in the proposals including having regard to 'topography, geology and drainage', 'semi-natural habitats and woodland cover' and 'views and perceptual qualities'. 'Opportunities to improve the intactness and condition of the landscape should be taken' – this statement should be addressed when preparing the landscape proposals and HS2 should seek to protect key features of landscape importance.		Trafford Council require HS2 to provide appropriate landscape enhancement to improve the character and quality of the route within the proposed design.



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The Trafford Local Plan: Core Strategy policies should be considered when preparing the landscape design including Policy L7: Design, which relates to design quality and functionality among other criteria. This includes that developments must be appropriate to their context and make best use of opportunities to improve the character and quality of an area.</p> <p>Policy R2: Natural Environment relates to the protection and enhancement of the environment and states that developers are required to provide an appropriate assessment of the Borough's assets in relation to a development – which includes the 'woodland, hedgerows and hedgerow trees including street trees and ancient trees'. MCC requires that a Tree Survey is carried out in accordance with BS 5837 (2012) Trees in relation to design, demolition and construction – recommendations' to identify the value of the existing vegetation along the route. Policy R3: Green Infrastructure follows on from R3 and also relates to protecting the Borough's assets and</p>		



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			includes' corridors and linear features including hedgerows, ditches, disused railways and verges'. These should be included in the tree survey.		
Volume 2: Community Area report MA04	11	11.2.9	<p>Issue/ Concern</p> <p><i>'It has been assumed that all vegetation within the land required for construction of the Proposed Scheme will be removed during construction...Removed vegetation will be reinstated...as is reasonably practicable...'</i> There is insufficient information about vegetation lost due to construction. The land potentially required for construction covers a broad area and there is no indication of trees, some of which are ancient woodland, hedgerows and grassland lost. This should be assessed as part of the effects on landscape. It is often assessed as an individual receptor within LVIAs. The proposed scheme drawings CT – 06 series do not show any reinstatement proposals. Without reinstatement proposals it is difficult to assess whether these would provide screening at Yr 15.</p>	<p>Proposed Mitigation</p> <p>Reinstate of vegetation where reasonably practicable.</p> <p>ES Residual Impact</p> <p>Moderate / Major</p>	<p>With regards to construction areas, compounds and material stockpile areas TMBC require more information regarding the proposed reinstatement, as there are no proposals to assess.</p> <p>This should be assessed as part of the effects on landscape. It is often assessed as an individual receptor within LVIAs.</p>

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Unjustified losses of vegetation and habitats.</p>		
<p>Volume 2: Community Area report MA04</p>	<p>11 – Landscape and Visual</p>	<p>11.3</p>	<p>Issue/ Concern Within TMBC area the route passes through three Landscape Character Areas. Volume 2 includes the effects on River Bollin Meadowland LCA and Warburton Settled Sandlands LCA which would be significantly affected. Dunham Woodhouses Settled Sandlands LCA is not considered to be significantly affected and is not included. Given the medium-high sensitivity of the Dunham Woodhouses Settled Sandlands LCA and the direct effects on the LCA, it is considered that the effects would be significant, at least during construction and at Yr1.</p> <p>Likely Impact Construction and Yr1 Landscape effect upon Dunham Woodhouses Settled Sandlands LCA is</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Negligible</p>	<p>TMBC require a reassessment of the landscape effects upon the Dunham Woodhouses Settled Sandlands LCA as it is considered that significant effects will prevail during construction and at Yr1.</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			considered to be at least Moderate adverse (significant).		
Volume 2: Community Area report MA04	11 – Landscape and Visual	11.4.1	<p>Issue/ Concern</p> <p>Temporary effects arising during construction - '<i>As is commonplace with major infrastructure works, the scale of the construction activities means that works will be visible from many locations and will have the potential to give rise to significant temporary effects that cannot practicably be mitigated.</i>' Advanced planting is recommended in the HS2 Landscape Design Approach (LDA) document and would likely be possible in many instances. Given the timescales involved, advanced planting could, in many instances, mitigate significant adverse construction and Yr1 effects.</p> <p>Likely Impact</p> <p>Visual impacts are significantly increased.</p>	<p>Proposed Mitigation</p> <p>Does not generally incorporate advanced planting</p> <p>ES Residual Impact</p> <p>Major (temporary)</p>	<p>TMBC require the incorporation of additional compensatory/ mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 5: App LV-001-OMA04, Part 2 Landscape Character Assessment	Part 2 Landscape Character Assessment	Pages 12-14	<p>Issue/ Concern River Bollin Meadowlands LCA - The sensitivity of this LCA has been elevated since the WDES (from Medium to Medium-High), which is considered appropriate given its low-lying and intimate scale with pockets of tranquillity and sense of remoteness associated with long distance footpaths.</p> <p>Likely Impact Visual impacts are increased.</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact Major</p>	TMBC require mitigation for this LCA to be improved to reflect the elevated level of sensitivity.
Vol 5: App LV-001-OMA04, Part 2 Landscape Character Assessment	Part 2 Landscape Character Assessment	Pages 12-14	<p>Issue/ Concern River Bollin Meadowlands LCA - Disagreement with the assessment of the effects at construction and Yr1. The effects associated with the River Bollin West Viaduct and Heatley North Embankment are considered to be high magnitude resulting in Major adverse effects (rather than the assessed Moderate adverse). Believe there is scope to provide some advanced planting and further mitigation to help assimilate some of the structures into the rural landscape. Further</p>	<p>Proposed Mitigation Planting</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	TMBC require the incorporation of advanced planting and additional compensatory/ mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>compensation planting required and possible improvement to hedgerows within the surrounding landscape.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate/Major Adverse Yr30: Moderate/Major Adverse</p>		
Vol 5: App LV-001-OMA04, Part 2 Landscape Character Assessment	Part 2 Landscape Character Assessment	Pages 16-18	<p>Issue/ Concern</p> <p>Dunham Woodhouses Settled Sandlands LCA - Disagreement with the assessment of the effects at construction and Yr1. There are direct effects across a stretch of around 500m. It is a medium-high sensitivity landscape so combining a low magnitude of change would still result in a Moderate adverse (significant) effect. It is considered that the magnitude would be higher than suggested and that the effects upon the LCA would be at least moderate adverse for the construction and Yr1 timeframes (rather than the</p>	<p>Proposed Mitigation</p> <p>Planting</p> <p>ES Residual Impact</p> <p>Yr15: Minor Adverse Yr30: Negligible</p>	<p>TMBC require the incorporation of advanced planting and additional compensatory/ mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>assessed Minor adverse). Scope for further mitigation and some potential advanced planting.</p> <p>Likely Impact Construction: At least Moderate Adverse Yr1: At least Moderate Adverse Yr15: Moderate/Minor Adverse Yr30: Minor Adverse</p>		
Vol 5: App LV-001-OMA04, Part 2 Landscape Character Assessment	Part 2 Landscape Character Assessment	Pages 24-26	<p>Issue/ Concern Warburton Settled Sandlands LCA - The sensitivity of this LCA has been elevated since the WDES (from Medium to Medium-High - this point was raised by TMBC in the WDES response), which is considered appropriate given its low-lying and intimate scale with pockets of tranquillity and sense of remoteness associated with long distance footpaths.</p> <p>Likely Impact Visual impacts are increased.</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact Major</p>	<p>TMBC require mitigation for this LCA to be improved to reflect the elevated level of sensitivity.</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 5: App LV-001-OMA04, Part 2 Landscape Character Assessment	Part 2 Landscape Character Assessment	Pages 24-26	<p>Issue/ Concern</p> <p>Warburton Settled Sandlands LCA - Agree that effects at construction and Yr1 would be Major adverse. Question whether the effects on landscape character could be mitigated to any extent by the proposed planting i.e., from Major adverse to Moderate adverse. There would be the permanent loss of ancient woodland which could not be mitigated even in 30 yrs. The severance to the landscape between the Warburton Village and Moss Brow, the effect upon the setting of Warburton Village CA, the medieval deer park (some of the features of which would be lost) and the setting to Warburton Park Farm, would be significant and adverse and changes would be permanent. As a result, the longer term (Yr15 and Yr30) landscape effect could remain at Major adverse. Significant further compensatory planting should be undertaken.</p> <p>Likely Impact Construction: Major Adverse</p>	<p>Proposed Mitigation Planting</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>TMBC require the incorporation of additional compensatory/ mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Yr1: Major Adverse Yr15: Moderate/Major Adverse Yr30: Moderate/Major Adverse		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 44-140	Issue/ Concern Warburton Settled Sandlands LCA - General comment - the viewpoint locations selected are not always the best representation of a typical view and not enough sequential views have been included. For instance, consideration of the views from Public Footpaths FP4 and FP8 are not properly addressed. There are currently open views across fields from these routes looking west. The views would be looking directly at the River Bollin West Viaduct at distances of 500m and below as routes pass underneath HS2. Footpath users would experience near-distance, clear views of the underside of the viaduct and its piers. The ES amalgamates the assessment of the views from FP4 into VP 319-03-015 but this receptor should have been considered separately as it is considered the effects would be Major adverse. VP 319-02-007 is the representative view from FP8	Proposed Mitigation N/A ES Residual Impact Yr15: Minor Adverse Yr30: Between Negligible and Minor Adverse	TMBC require the assessment of sequential viewpoints in order to understand actual visual effects



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>but is located 1.3km away from the route alignment. At this distance the effects would be minor but as the route of the FP nears the River Bollin West Viaduct and passes beneath it the visual effects would be Major adverse. Sequential views from these FPs would have identified the varying effects, without them, the assessment understates the visual impact of the River Bollin West Viaduct.</p> <p>Likely Impact Construction: Between Minor and Major Adverse Yr1: Between Minor and Major Adverse Yr15: Between Minor and Major Adverse Yr30: Between Minor and Major Adverse</p>		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 44-140	<p>Issue/ Concern Warburton Settled Sandlands LCA - General comment - Night-time views are only assessed for residents. During winter the compounds are likely to be lit in the early morning and early evening. Consider whether the views from footpaths should also include a night-time assessment of effects.</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact</p>	Consider whether the views from footpaths should also include a night-time assessment of effects.

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Likely Impact		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 56-57	<p>Issue/ Concern</p> <p>VP 319-02-007 - View West from Footpath Dunham 8 - View not representative of views from FP8. The location selected for the viewpoint at 1.3km away from the proposed route is odd as FP8 will pass underneath the proposed River Bollin West Viaduct. Existing rural view would be completely changed by the construction of the River Bollin West Viaduct. There would be the loss of vegetation associated with the siting of the construction compound and direct views of this compound which would be lit. Upon completion there would be a substantial change to the near and middle-distance views from the route which have not been identified. There is potential for further tree planting along the HS2 corridor which would soften views of the viaduct. There may be</p>	<p>Proposed Mitigation</p> <p>Planting</p> <p>ES Residual Impact</p> <p>Yr15: Minor Adverse</p> <p>Yr30: Negligible</p>	<p>TMBC require the assessment of sequential viewpoints in order to understand actual visual effects – Sequential Views including those located closer to HS2 will likely identify higher levels of adverse effect – TMBC require the incorporation of advanced planting and additional compensatory/ mitigation planting at locations and to the extents described by associated ‘Additional</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>potential for some advanced planting in the form of woodland blocks.</p> <p>Likely Impact Construction: Between Minor and Major Adverse Yr1: Between Minor and Major Adverse Yr15: Between Minor and Major Adverse Yr30: Between Minor and Major Adverse</p>		Landscape Mitigation Plans'
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 64-65	<p>Issue/ Concern VP 319-03-11 - View from Trans Pennine Trail (National Cycle Route 62) - WDES assessed the visual effect upon VPs on the Trans Pennine trail (VPs 319-03-011, 319-03-013 and 320-03-001) as 'Major adverse'. This VP is 800m away from centre line of the route. The trans Pennine Trail passes underneath the River Bollin West Viaduct and the location of the VP is not a true reflection on the effects likely from this route. Views from VP 319-03-013 (which is located to the west of the route – not within TMBC area) are assessed as Major adverse. The viewpoint selection masks the true effects on the views of those using the Trans</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>TMBC require assessment of sequential viewpoints in order to understand actual visual effects – Sequential Views including those located closer to HS2 will likely identify higher levels of adverse effect – TMBC require the incorporation of advanced planting and additional compensatory/</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Pennine Trail which are considered to be Major adverse during construction and Yr1. The lowering of the route would have major adverse effects on views during construction and may cause drainage issues on the Trans Pennine Trail. There is little in the way of planting proposed which would mitigate any visual effects, particularly where the TPT passes underneath the Viaduct. As such the assessments findings of Minor adverse at Yr15 and Yr30 are considered to understate the level of adverse effect, indeed the visual effects would be at least Moderate adverse (significant) at Yr15 and Yr30. There is potential for improvements to the route such as hedgerows with trees which may help to filter views. Potential for planting trees alongside the River Bollin West Viaduct to soften views.</p> <p>Likely Impact Construction: Between Minor and Major Adverse Yr1: Between Minor and Major Adverse Yr15: Between Minor and Moderate Adverse</p>		mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Yr30: Between Minor and Moderate Adverse		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 76-77	<p>Issue/ Concern VP 319-02-14 - View South from Carr Green Lane - ES assessment findings are Minor adverse at all stages. Viewpoint is not representative of views from Warburton FP5 and is looking south rather than west, towards to proposals. From FP5 there would be some open views across fields looking west towards the River Bollin West Viaduct. Proposals would be seen at around 800m away. Due to the highly sensitive nature of the view would consider that a high sensitivity x low magnitude = Moderate adverse effect, which would be significant. Further tree planting around the River Bollin West Viaduct may assist in assimilating the proposals into the landscape.</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>Proposed Mitigation Planting</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>TMBC require the incorporation of additional compensatory/ mitigation planting around the River Bollin West Viaduct at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 78-79	<p>Issue/ Concern</p> <p>VP 319-02-15 - View west from Lower Carr Green Farm - The location selected for the viewpoint is odd as it is not near the farm or on Public Footpath FP4. Existing rural view would be completely changed by the construction of the River Bollin West Viaduct and Heatley North Embankment. There would be the loss of vegetation associated with the siting of the construction compound and direct views of this compound which would be lit – the visual effect at Construction and Yr1 is therefore considered to be Major adverse. Loss of open rural views and introduction of large-scale elements would still generate a medium magnitude at Yr15. Combination of a high sensitivity/medium magnitude would still result in a Moderate adverse effect at Yr15. Potential for some advanced planting to mitigate these effects and suggest more planting should be included to replace that lost in the location of the site compound.</p>	<p>Proposed Mitigation</p> <p>Planting</p> <p>ES Impact</p> <p>Yr15: Adverse</p> <p>Yr30: Adverse</p> <p>Residual</p> <p>Minor</p> <p>Minor</p>	<p>TMBC require the incorporation of advanced planting and additional compensatory/mitigation planting around the River Bollin West Viaduct and site compound area at locations and to the extents described by associated ‘Additional Landscape Mitigation Plans’</p>

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 82-83	<p>Issue/ Concern VP 320-03-001 - View west from Footpath Warburton 3 - Substantial change to a rural view. River Bollin West Viaduct Satellite Compound; construction plant; earthworks; temporary material stockpiles; underground utilities and diversion of an overhead power line visible across the majority of the view. Removal of hedgerows and woodland at Fox Covert. Footpath Warburton 3 will be realigned. Yr1 - Heatley North embankment, River Bollin West Viaduct, FP3 overbridge all prominent structures. The views will be fundamentally changed due to the diversion over the HS2 corridor on the overbridge. Not sure that effects would ever be mitigated. Consider including as a photomontage for greater understanding of effects at Yr15/30.Potential to</p>	<p>Proposed Mitigation</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>TMBC require the incorporation of advanced planting (new hedgerow along the route of the footpath) and additional tree planting to the south of the route. All additional compensatory/mitigation/advanced planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'. TMBC require an additional photomontage for a</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>widen the belt of trees located to the south of the route. Possibly some hedgerow planting along the route of the path in advance of the works.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate/Major Adverse Yr30: Moderate Adverse</p>		greater understanding of longer-term visual effects.
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 86-87	<p>Issue/ Concern VP 320-02-003 - View north and east from St Werburgh's New Church. VP location not representative of views from Warburton FP3 which crosses the HS2 on an overbridge. Substantial change to the rural character of near and middle-distance views during construction. Works visible from 200m away including Warburton cutting, FP3 Overbridge, road closures, Warburton embankment satellite compound. Proposed Scheme will be visible across a large proportion of the view. It is considered that the ES findings understate the effect, in that a high</p>	<p>Proposed Mitigation</p> <p>ES Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p> <p>Residual Minor</p>	TMBC require additional compensatory/mitigation planting within the closed off sections of Paddock Lane, advanced woodland planting to the west of the HS2 corridor and hedgerow planting alongside proposed access tracks to the north and south of the overbridge – All additional



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>sensitivity and a low magnitude of change should in most cases result in a Moderate adverse (significant) effect (ES finding: Minor adverse - non-significant). Potential for advanced planting in the form of a linear band of woodland to the west of the HS2 route which would also help to mitigate views of the access road and overbridge at Yr1. Further planting around the closed off sections of Paddock Lane is required to compensate for that lost. The proposed hedgerows shown around the new Paddock Lane roundabout are inadequate.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		compensatory/mitigation/advanced planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 88-89	<p>Issue/ Concern VP 320-02-004 - View north-west from the A6144 Warburton Lane at Moss Brow - Permanent change to the character of the views. Close proximity views from approx. 10 residential</p>	Proposed Mitigation Landscaped earthworks	TMBC require additional compensatory/mitigation planting around the Paddock Lane Auto-transformer station and



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>properties and the Saracens Head. In addition to the construction of the Warburton cutting and road works there will be a large-scale Railway Systems Compound and temporary stockpile area. Work area extends right up to the boundary with the properties (west of Onion Farm). Visual effects would be substantial. Loss of existing mature roadside trees and trees around the Saracens Head. Agree with assessed visual effects. Potential to provide a strip of advanced woodland planting between the housing and the compounds to ameliorate construction and Yr1 visual effects. Plant the remaining strip of land to the east of the Saracens Head with trees. More planting required around the Paddock Lane Auto-transformer station and access road.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>access road and around balancing ponds and associated access adjacent to new roundabouts on Warburton Lane and Paddock Lane. TMBC also require advanced woodland planting on the boundary between the houses (Onion Farm) and the adjacent compound area. All additional compensatory/mitigation/advanced planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 90-93	Issue/ Concern VP 320-02-005 - View east from the A6144 Paddock Lane - Photomontage included for Yr1 and Yr15 but not for construction - why do photomontages not consistently describe all phases? Some photomontages describe construction effects as well as Yr1 and Yr15, other just describe construction...what is the basis for the inconsistent approach?	Proposed Mitigation N/A ES Residual Impact Unknown	TMBC require all phases to be considered within Photomontage as significant effects are generated from construction through to Yr30.
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 90-93	Issue/ Concern VP 320-02-005 - View east from the A6144 Paddock Lane - Effects on views from properties in Warburton village. A6144 Paddock Lane satellite compound will be a prominent feature – around 200m away from the closest properties. Difficult to mitigate construction and longer-term residual effects - construction and operational scheme would be highly visible from local roads and properties. Large-scale earthworks and machinery and loss of vegetation. Agree with assessed visual effects. Potential for regrading some parts of the Warburton Embankment so it appears more	Proposed Mitigation ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse	TMBC require a redesign of the slopes of the Warburton Embankment to create a more naturalistic landform. The proposed woodland along the embankments should be deeper/wider and a new hedgerow is needed around the large balancing pond to link with those proposed and a new hedgerow is



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>natural. The woodland belt along the embankments should be wider and offsite tree planting within hedgerow field boundaries should be considered.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		<p>required to contain the grassland area around balancing pond. TMBC also require off-site tree and hedgerow planting within intervening field boundaries. All additional compensatory/mitigation/advanced planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 90-93	<p>Issue/ Concern VP 320-02-006 - View north-west from Footpath Warburton 11 at Jack Hey Gate Farm - Distance 500m – 0m. FP11 will be diverted. Views of construction of Warburton Embankment, Manchester Ship Canal Viaduct, Manchester Ship Canal Viaduct South Satellite Compound and</p>	<p>Proposed Mitigation</p> <p>ES Residual Impact</p>	<p>TMBC require a consistent approach to describing/illustrating landscape reinstatement works to construction/compound areas – describing all</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>material storage. Agree with assessed visual effects. Intervening field boundaries shown as 'Land required during construction' - Loss of vegetation and woodland blocks. MSC Compound area includes several existing ponds. These are shown on the proposed drawings, but no reinstatement planting shown. Proposed scheme shows hedgerows along field boundaries – these are described as new hedgerows in construction areas when they are effectively reinstated hedgerows. Reinstated trees and hedgerows in construction areas are not generally described as the ES states that all construction/compound areas will be reinstated and generally these works are not illustrated within the Proposed Scheme plans in Volume 2 – why the inconsistent approach? Potential for further woodland planting along alignment of MSC Viaduct to help assimilate the structure into the landscape.</p> <p>Likely Impact Construction: Major Adverse</p>	<p>Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>reinstatement works. Reinstatement works to construction/ compound areas should include new ponds to replace those lost. TMBC require further proposed woodland along the alignment of the viaduct to assimilate the structure into the landscape. All additional compensatory/ mitigation/advanced planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse		
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 96-97	<p>Issue/ Concern</p> <p>VP 320-02-007 - View east from Footpath Warburton 11 - A section of Footpath Warburton 11 will be permanently realigned. Substantial changes to near and middle-distance views, large proportion of view affected at construction, Yr1 and beyond, uncharacteristic elements in a flat, open, rural landscape, extensive construction areas, compounds and stockpiles. Lit MSC viaduct south satellite compound and lighting required for construction of MSC viaduct. The loss of vegetation will noticeably change the composition of views compared to the baseline. Look at potential to incorporate further tree planting and trees within hedgerows. Advanced planting could be beneficial in ameliorating high levels of adverse visual effect, particularly during construction and at Yr1.</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>TMBC require increased levels of proposed planting in general, along the alignment of the viaduct and the diverted section of Warburton Park Brook. TMBC also require additional tree planting within existing hedgerows and advanced planting to ameliorate significant adverse visual effects, particularly at construction and Yr1. All additional compensatory/ mitigation/advanced planting to be at locations and to the extents</p>

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse		described by associated 'Additional Landscape Mitigation Plans'
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 98-101	Issue/ Concern VP 320-02-008 - View north-west from the A6144 Warburton Lane at the junction with Moss Lane - Photomontage included for Yr1 and Yr15 but not for construction. Agree with assessment findings. Substantial change to middle-distance views during construction of A6144 Paddock Lane realignment and overbridge, Warburton embankment and MSC viaduct – visual effects significant at construction so why no photomontage? MSC viaduct south satellite compound, earthworks and temporary material stockpiles. Lighting associated with MSC viaduct compound. New, large-scale structures, introduced into views of arable farmland in the middle distance that will feature prominently on the skyline across the majority of the view. Further tree planting alongside the route required to	Proposed Mitigation ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse	TMBC require increased levels of proposed planting, along the alignment of the viaduct, along the route in general and hedgerow improvements and tree planting offsite along Warburton Lane. TMBC also require advanced planting to ameliorate significant adverse visual effects, particularly at construction and Yr1. All additional compensatory/ mitigation/advanced planting to be at locations



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>mitigate views and vegetation loss with potential for advanced planting. Potential for hedgerow improvements and tree planting offsite along Warburton Lane.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		and to the extents described by associated 'Additional Landscape Mitigation Plans'
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 102-103	<p>Issue/ Concern VP 321-03-001 - View east from Bridleway Partington 6 part of the Bollin Valley Way along Manchester Ship Canal. Key view - Photomontage from this PRoW would have been helpful. Agree with assessed visual effects. Near and middle-distance views of construction of MSC viaduct and MSC compound. Proposals show new hedgerow planting offsite – some of this could potentially be undertaken in advance of the works. Construction needs to ensure that affected sections of Coroner's Wood (ancient woodland) are kept to an absolute</p>	<p>Proposed Mitigation New hedgerow planting</p> <p>ES Residual Impact Yr15: Major Adverse Yr30: Major Adverse</p>	<p>TMBC require increased levels of proposed planting along the alignment of the viaduct and the route in general. TMBC require increased areas of new woodland adjacent to Coroner's Wood and advanced planting to ameliorate significant adverse visual effects, particularly at</p>



Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>minimum. New tree planting proposed alongside Coroners Wood should be extended to help compensate for that lost – Consider potential for improvements along the Bollin Valley Way – further tree planting.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Major Adverse Yr30: Major Adverse</p>		<p>construction and Yr1. All additional compensatory/mitigation/advanced planting to be at locations and to the extents described by associated ‘Additional Landscape Mitigation Plans’</p>
Vol 5: App LV-001-OMA04 Part 3 Visual Assessment	Part 3 Visual Assessment	Pages 124-125	<p>Issue/ Concern VP 321-02-012 - View north-west from Lock Lane, Partington - Agree that Construction activity and proposals will be largely filtered through intervening vegetation along the banks of MSC to the north and west. No suggested additional works.</p> <p>Likely Impact Construction: Minor Adverse Yr1: Negligible</p>	<p>Proposed Mitigation N/A</p> <p>ES Residual Impact Yr15: Negligible Yr30: Negligible</p>	

Document	Section	Para/Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Yr15: Negligible Yr30: Negligible		

Summary

- 7.12.8 Limited engagement has been undertaken with Trafford Council in the preparation of the Landscape and Visual Impact Assessment for the community area. The assessment identifies significant effects on the River Bollin Meadowland and Warburton Settled Sandlands Landscape Character Areas (LCAs). Trafford Council also considers the Dunham Woodhouses Settled Sandlands LCA will be significantly affected, however this is not included in the assessment.
- 7.12.9 There are also concerns about the viewpoint locations used across the community area and the inconsistent approach to photomontages. Some of the assessment of the effects at construction and Year 1 for the River Bollin Meadowland and Warburton Settled Sandlands LCAs are disagreed with, and there are questions as to whether the effects on landscape character could be mitigated to any extent by the proposed planting in the Warburton Settled Sandlands LCA.
- 7.12.10 The HS2 route will also result in landscape severance between Warburton Village and Moss Brow, and there are concerns about the impact of views from public rights of way and the Trans Pennine Trail with very limited mitigation proposed.



TRAFFORD COUNCIL

HS2 Phase 2b Environmental Statement Consultation



Unit 6 Longley Lane
Northenden, Manchester
M22 4WT
T: 0161 946 0808
E: design@barneswalker.co.uk
W: www.barneswalker.co.uk

DWG NO.
M3186-PA-01-V1
CLIENT
Trafford Borough Council
WORK STAGE
Planning
SCALE
NTS@A3

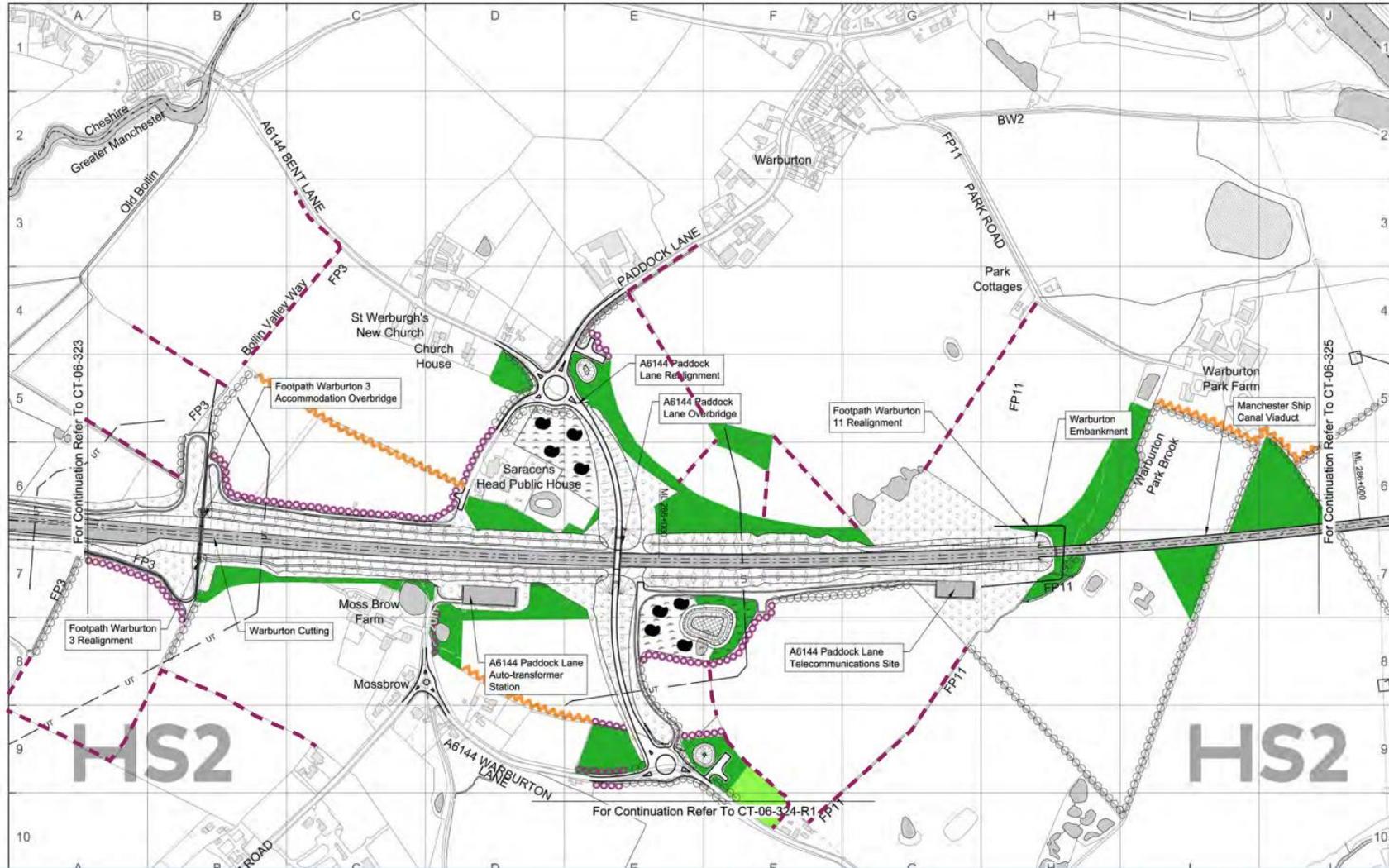
DWG TITLE
Proposed Scheme - Additional Landscape Works
PROJECT TITLE
HS2 - MA04 Broomeedge to Glazebrook
DATE
03.2020
DRAWN BY
JH
CHECKED BY
NF

KEY

- Woodland Creation
- Grassland Habitat Creation
- Hedgerow
- Hedgerow Reinstatement / Improvement
- Advanced Planting New Hedgerows / Existing Hedgerows Improvements
- Advanced Planting Woodland Habitat Creation
- Proposed Ponds



HS2 Phase 2b Environmental Statement Consultation



bw Unit 6 Longley Lane
Northenden, Manchester
M22 4WT
T: 0161 946 0808
E: design@barneswalker.co.uk
W: www.barneswalker.co.uk

DWG NO. M3186-PA-02-V1
CLIENT: Trafford Borough Council
WORK STAGE: Planning
SCALE: NTS@A3

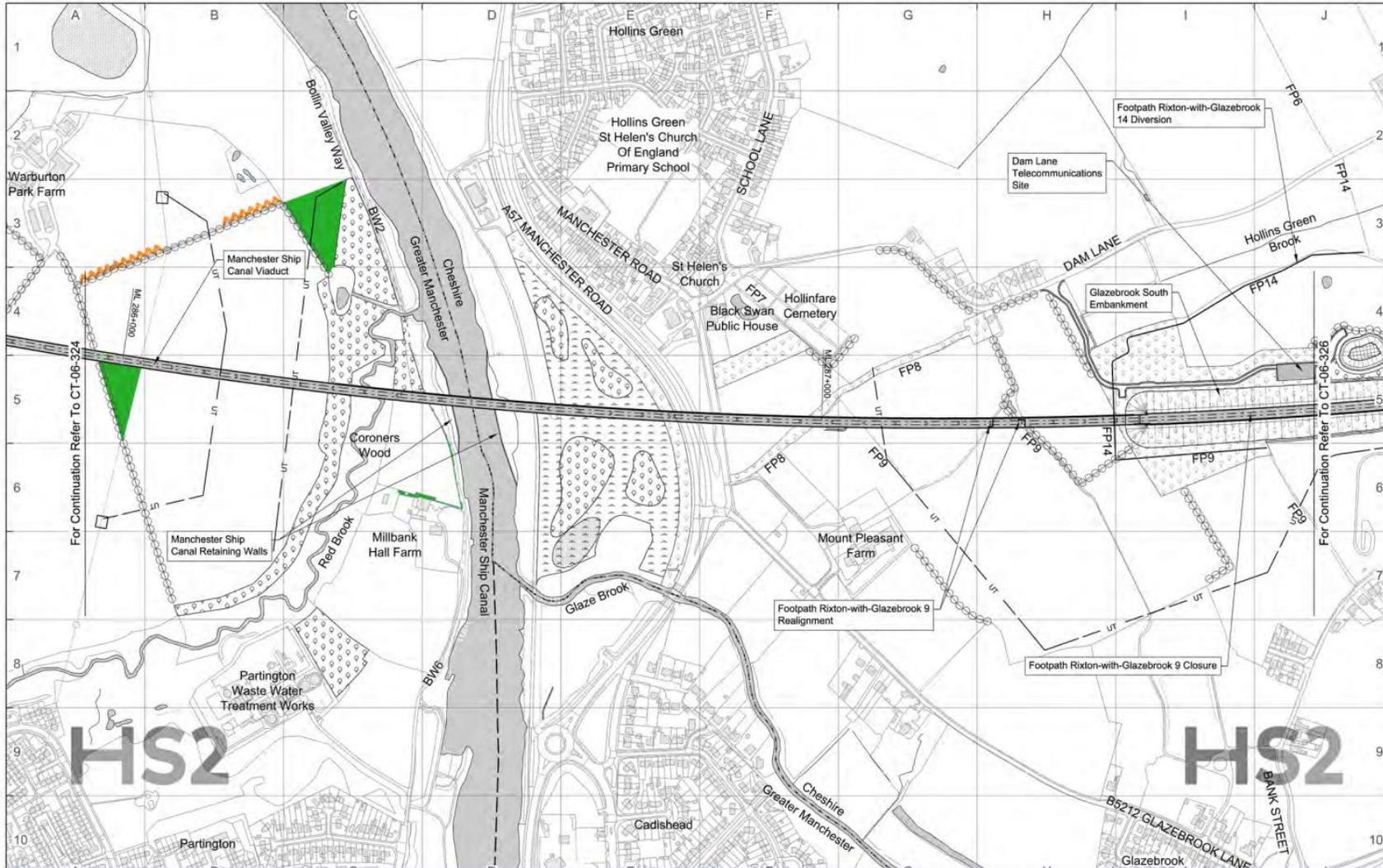
DWG TITLE: Proposed Scheme - Additional Landscape Works
PROJECT TITLE: HS2 - MA04 Broomedge to Glazebrook
DATE: 03.2020
DRAWN BY: JH
CHECKED BY: NF

KEY	
	Woodland Creation
	Grassland Habitat Creation
	Hedgerow
	Hedgerow Reinstatement / Improvement
	Advanced Planting New Hedgerows / Existing Hedgerows Improvements
	Advanced Planting Woodland Habitat Creation
	Proposed Ponds



TRAFFORD COUNCIL

HS2 Phase 2b Environmental Statement Consultation



bw
BARNES WALKER

Unit 6 Longley Lane
Northenden, Manchester
M22 4WT
T: 0161 946 0808
E: design@barneswalker.co.uk
W: www.barneswalker.co.uk
DWG NO.
M3186-PA-03-V1
CLIENT
Trafford Borough Council
WORK STAGE
Planning
SCALE
NTS@A3
DWG TITLE
Proposed Scheme - Additional Landscape Works
PROJECT TITLE
HS2 - MA04 Broomedge to Glazebrook
DATE
03.2020
DRAWN BY
JH
CHECKED BY
NF

KEY	
	Woodland Creation
	Grassland Habitat Creation
	Hedgerow
	Advanced Planting New Hedgerows / Existing Hedgerows Improvements
	Proposed Ponds
	Hedgerow Reinstatement / Improvement
	Advanced Planting Woodland Habitat Creation

7.13 Socio-Economics

- 7.13.1 Trafford Council welcome the commitment from HS2 to consider socio-economic effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.13.2 Effective consideration of the socio-economic implications of both the construction phase and operational phase of HS2 will be key to ensuring any negative effects can be mitigated where possible and that benefits can be adequately realised. It is evident that significant efforts and finances will be required to ensure that the skills need during the construction and operational phases can be met at the most local level possible. Trafford Borough Council will endeavour to assist this process by providing a brokerage service to match training providers with HS2 requirements to ensure an adequately skilled workforce is available at the appropriate time. In addition, those businesses which are displaced on either a temporary basis or a permanent basis will need significant help and assistance to relocate their premises and workforce. Although the compensation scheme will go some way to addressing this aspect, there will be a significant draw on the Council's time and expertise to ensure businesses are supported during this process. In supporting businesses both during and after the construction phase, the Council must be fairly compensated for the loss or reduction in its business rates.
- 7.13.3 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the socio-economic related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.13.4 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.13-1.

Key Observations and Concerns

- Assessment of effects on the identified receptors is significantly inconsistent throughout Volume 2: Community Area assessments.

- Assumptions on the ability for businesses to continue to operate ‘as normal’ particularly during the construction phase must be clarified.
- Some of the data used in assessments is old and out of date. Census 2021 datasets for any strategies prepared after April 2022 should be used.

Recommendations and Additional Mitigations Required

- Clarification and agreement are needed to ensure that local employment and business opportunities are available during both the construction and operational phases.
- Local businesses likely to be affected by the construction and/or operation of the Proposed Scheme must receive additional financial assistance to enable them to continue to operate ‘as normal’ whilst remaining profitable and viable.
- Trafford Council and other Local Authorities must be compensated for lost business rates as a consequence of the HS2 route causing businesses to cease trading.

7.13.5 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses, and environment.

Table 7.13-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	3.2		<p>Issue/ Concern It is noted that a standardised methodology for assessing significance of effects was used which is based on professional judgement and drawn on guidance such as the Treasury Green Book, DfT Transport Appraisal Guidance Homes and Communities Agency (HCA) Employment Density Guide and the HCA Additionality Guide. This approach is considered appropriate and in accordance with the EIA Regulations.</p> <p>However, the assessment of effects on the identified receptors is significantly inconsistent throughout Volume 2: Community Area assessments with the sensitivity of receptors selected without clear justification and often underestimated.</p> <p>Likely Impact Underestimated impacts and effects are not appropriately mitigated, likely to result in harm to receptors.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd must re-assess the potential effects on the receptors likely to be affected and provide appropriate mitigation to reduce these effects.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	12.2	12.2.2	<p>Issue/ Concern Assumes that the existing businesses resources can be retained within areas of land required for utility works. Therefore, these were scoped out and not assessed further.</p> <p>The scale of the potential effects on these businesses has not been clarified.</p> <p>Likely Impact Businesses not able to operate during the relevant periods, leading to job losses, business closures and/relocation to other areas of Trafford and/or GM.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Moderate</p>	HS2 must provide clear justification for scoping out the listed receptors provided in the scope / assumptions section.
Volume 2: Community Area report MA04	12.3	12.3.2	<p>Issue/ Concern Trafford Council have no comments on the baseline information provided, however, HS2 Ltd must use the Census 2021 datasets for any strategies prepared after April 2022 to ensure the latest information is used.</p> <p>Likely Impact Failure to utilise the most up to date data may lead to incorrect assumptions on the number of people or</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	HS2 Ltd must use the Census 2021 datasets for any strategies prepared after April 2022 to ensure the latest information is used.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			businesses affected by the route and as such the proposed mitigation approaches by HS2 may be limited in their success.		
Volume 2: Community Area report MA04	12.4	12.4.10	<p>Issue/ Concern Approximately 440 FTE will be required within MA04. Trafford Council require that HS2 Ltd identify the percentage of the potential employment opportunities to be required at a local level to identify the potential impacts on the current supply chain.</p> <p>If a significant proportion of vacancies are to be filled locally HS2 Ltd must work with Trafford Council and GM Partners to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed in order for the residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.</p> <p>Likely Impact</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	<p>HS2 Ltd to confirm that it will work in collaboration with Trafford Council and GM Partners to ensure the local workforce is able to benefit from the scheme and that the local supply chain is prepared as far as practical. This should be secured via local labour and supply chain agreements.</p> <p>Financial assistance will be required to develop skills co-</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Not adequately equipping the local workforce and supply to support the construction and operation of the Proposed Scheme will lead to unnecessary carbon emissions and a greater impact upon the necessary local services required to support the anticipated number of construction workers that may be brought to the area.</p> <p>Not supporting local employment and economic opportunities would therefore be contrary to the Governments Levelling Up Agenda and HS2 Ltd's aim to be carbon neutral.</p>		ordinators to identify skill gaps to work with training providers to ensure a well-trained workforce is able to meet the needs of HS2 through the construction and operational stages.
Volume 2: Community Area report MA04	12.4	12.4.11	<p>Issue/ Concern Direct construction employment could lead to Indirect opportunities for local businesses surrounding the construction works. This assumption is considered appropriate however, it is not made clear how the supply chain employment will be generated or how businesses may gain early guidance as to how to bid in to/benefit from supply chain activity.</p> <p>Likely Impact Not adequately equipping the local workforce and supply to support the construction and operation of the Proposed Scheme will lead to unnecessary carbon</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd to confirm that it will work in collaboration with Trafford Council and GM Partners to ensure the local workforce is able to benefit from the scheme and that the local supply chain is prepared as far as practical. This should be secured via local

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>emissions and a greater impact upon the necessary local services required to support the anticipated number of construction workers that may be brought to the area.</p> <p>Not supporting local employment and economic opportunities would therefore be contrary to the Governments Levelling Up Agenda and HS2 Ltd's aim to be carbon neutral.</p>		<p>labour and supply chain agreements.</p> <p>Financial assistance will be required to develop skills co-ordinators to identify skill gaps to work with training providers to ensure a well-trained workforce is able to meet the needs of HS2 through the construction and operational stages.</p>
Volume 2: Community Area report MA04	12.4	12.4.17	<p>Issue/ Concern</p> <p>It is not clearly justified why the selected level of sensitivity for potential effects on the receptors identified is considered appropriate.</p> <p>In this regard, Trafford Council question why the sensitivity of the farm shop at Moss Brow Farm was chosen as medium when the explanation for choosing this</p>	<p>Proposed Mitigation</p> <p>N/A.</p> <p>Residual Impact</p> <p>Moderate</p>	<p>HS2 Ltd must re-assess the potential effects on the receptors identified following an approach which is consistent and in accordance with the</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>sensitivity level is the same as for the high sensitivity receptors.</p> <p>It would seem likely that the farm shop would potentially be of the same sensitivity level as the Black Swan and Saracens Head Public Houses during the construction phase due to a loss of trade and isolation of businesses.</p> <p>Likely Impact As a result of the selected sensitivity of receptors, Section 12.4 is inconsistent with identifying the level of residual effects throughout with some effects identified as significant adverse and others as moderate adverse significant whilst the impact on the receptor remains the same (i.e., loss of trade / isolation). Similarly for some receptors it is clearly identified that the effect is of a temporal scope, however the timescales are not provided for most. In accordance with the EIA Regulations 2017,</p> <p><i>'The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect... short-term, medium-term and long-term, permanent</i></p>		requirements of the EIA Regulations.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<i>and temporary, positive and negative effects of the development’.</i>		
Volume 2: Community Area report MA04	12.4	12.4.22	<p>Issue/ Concern Physical signage measures to inform members of the public that the Moss Brow Farm and Saracens Head will still be open during the construction works of the scheme will be put in place however this only covers physical signage.</p> <p>Trafford Council consider this to be a significant issue as much of the marketing for such businesses will be through electronic means such as websites and online publications which may incur additional expenditure to be amended and advise their potential customer base.</p> <p>Likely Impact Moderate – businesses receive less trade due to customers not being adequately informed of any changes.</p>	<p>Proposed Mitigation Physical Signage to be in place.</p> <p>Residual Impact Moderate</p>	Physical signage is suggested but needs to go further for changing and enhancing online marketing opportunities. HS2 Ltd must provide additional compensation for assisting businesses to amend their online marketing presence and advise their potential customer base.
Volume 2: Community Area report MA04	General Point		<p>Issue/ Concern Trafford Council must receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route within the borough that has caused businesses to fail or had a</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact</p>	HS2 Ltd must provide financial compensation to Local Authorities on lost business rates as



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.</p> <p>Likely Impact Moderate</p>	Moderate	a consequence of the HS2 route (during both construction and operation) causing businesses to cease trading.
Volume 2: Community Area report MA04	12.4	12.4.17	<p>Issue/ Concern Inconsistency with effects terminology throughout with some effects identified as significant adverse and others as moderate adverse significant with the inclusion of temporal scope, i.e., short-term effects whilst the timescales are not provided.</p> <p>Likely Impact Clarity and consistency on the use of terminology is required throughout the document.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	To ensure consistency with the use of EIA terminology. It is not clear how temporary some of the effects are as it is not stated in the assessment. Similarly, it is not always clear whether the effect is moderate or major and significant.

Summary

- 7.13.6 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.
- 7.13.7 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.
- 7.13.8 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

7.14 Sound, Noise and Vibration

- 7.14.1 Trafford Council welcome the commitment from HS2 to consider sound, noise and vibration and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.14.2 The proposed works in MA04 raise the greatest concerns acoustically, since the impact of noise and vibration from both construction and operation will be greater due to the low existing ambient and background noise levels. This is due to the rural nature of the area, and although it is not as densely populated as other areas affected by the proposed scheme, there are still a significant number of noise sensitive premises in the area which have the potential to be subject to significant noise and vibration impacts. Concerns have been highlighted about the future baseline noise modelling in this area in particular, as the predicted future baseline noise levels appear to be significantly higher than the current measured baseline levels, which ultimately has the potential to significantly change the impacts. This is more noticeable in this particular zone because of the low measured ambient noise levels.
- 7.14.3 Essentially, our overarching concerns in this area are that the introduction of noise and vibration generating activities (both from construction and operation) into such a quiet area has the potential to create a significant adverse impact, and there is not sufficient clarity in the Sound, Noise and Vibration chapters of the ES to demonstrate that this has been adequately assessed or mitigated.
- 7.14.4 Sound, Noise and Vibration also has the potential to have a detrimental impact on Community and Health topic areas. Excessive levels of sound, noise and / or vibration should be monitored and managed in a way to minimise impacts on local communities. Given the long-term nature of both the construction period and operation period of HS2, noise and vibration generating activities need to utilise best practice and consideration construction practices in combination with appropriate mitigation and compensation measures where required.

- 7.14.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the sound, noise and vibration related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.14.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 1-14-1.

Key Observations and Concerns

- Concerns regarding the baseline noise level modelling, particularly in terms of the assessment of traffic noise.
- Concerns around the assumptions used to undertake the airborne construction noise or ground-borne construction vibration assessments.
- Lack of understanding in the HS2 assessment of the existing noise and vibration context in MA04, specifically in and around Warburton.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including the determination of eligibility for noise insulation.
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme, particularly with regards to increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.

- Additional mitigation and/or compensation measures to be provided to affected residents and businesses from both the construction of the route and the associated construction traffic, the latter of which will affect a large geographical linear area between Warburton, Partington and Carrington

7.14.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses, and environment.

Table 7.14-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA04	General	Point/ Comment	<p>Issue/ Concern It is not currently clear how construction impact criteria are being applied.</p> <p>Trafford Council notes that certain receptors could experience major impacts but as impacts are not deemed significant on a "community level" then no impact is predicted. Ultimately, these receptors will experience major impacts and are likely to raise noise/vibration complaints if additional mitigation is not provided to them (e.g., 618208).</p> <p>It is not clear whether these receptors would therefore be eligible for noise insulation. Some of the works near</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>HS2 must provide justification as to the conclusions reached in determining eligibility for noise insulation.</p> <p>Additional mitigation and/or compensation measures required for residents and businesses. To be agreed with Trafford Council.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>to these receptors will be ongoing for 37 months with predicted levels of 66-71dB (e.g., 618208).</p> <p>Likely Impact Detrimental impacts on physical and mental health and wellbeing of affected residents and businesses.</p>		Financial contribution to Trafford Council to manage the likely increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.
<p>Volume 5: Appendix SV-002-OMA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report</p>	SV-002-OMA04	Table 1	<p>Issue/ Concern It appears that predicted baseline noise levels from road traffic modelling are inconsistent with the actual measured baseline noise levels. At some receptor locations, the predicted baseline level from road traffic predictions is 15dB higher than nearby measured baseline levels within a similar area or even along the same road.</p> <p>Measured baseline noise levels within Warburton are approximately 50dB during daytime and 40dB during night-time (from measurement locations ML712720 and ML712728).</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>Predicted baseline noise data must be supported by measured noise data at representative locations.</p> <p>The predicted levels must then be verified against the measured levels to ensure that the predictions are suitable and representative of the</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The predicted noise levels within Warburton from road traffic modelling are approximately 60-65dB during the daytime and 50-55dB during the night-time (from receptors 617543, 617544, 618202, 618203, 618204, 618220, 617547, 617551, 618205, 618206, 618208, 617539, 618207)</p> <p>Likely Impact</p> <p>The existing baseline noise level forms the basis for the noise assessment criteria. Therefore, overpredicting the baseline noise level at receptors could allow more relaxed noise thresholds/criteria in the impact assessment. This in turn could have major adverse impacts at receptors and may significantly under-predict the resulting noise impacts associated with the scheme.</p> <p>It is also noted that the operational noise assessment within Warburton presents large beneficial impacts. This beneficial impact appears to be the result of the proposed road diversion and overpass along Paddock/Warburton Lane, moving the road network further away from certain existing receptors. However, we believe that existing noise levels within Warburton</p>		<p>existing/future noise environment.</p> <p>Where predicted baseline noise levels deviate from the measured noise results, explanation and justification must be presented to ensure there is transparency between the measured existing baseline levels and the predicted future levels used in the assessments.</p> <p>Additional mitigation and/or compensation measures required. To be agreed with Trafford Council.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			are likely much lower than the predicted baseline levels presented in the ES and that the road traffic model is overpredicting the noise associated with the nearby road network within Warburton. Therefore, we believe the beneficial impacts associated with the proposed road diversion and overpass at Paddock/Warburton Lane are not representative and could actually result in an adverse impact.		Financial contribution to Trafford Council to manage the likely increase in noise and disturbance complaints arising from the Proposed Scheme.
Volume 5: Appendix SV-002-0MA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report	SV-002-0MA04	Table 1	<p>Issue/ Concern There is no baseline data presented for measurement locations ML712754 and ML712804 (which are presented on the map books)</p> <p>Likely Impact N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	Data must be presented for these locations, and it must be presented in the ES and supporting documentation to ensure that the predicted noise levels are consistent and representative and of the measured noise level at the receptors.
	SV-002-0MA04	Map books	<p>Issue/ Concern Construction ground-borne vibration receptors do not appear to be displayed on the MA04 map books</p>	Proposed Mitigation N/A	Construction ground-borne vibration receptors must be

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact N/A</p>	<p>Residual Impact N/A</p>	<p>presented in the map books, as per the legend, and must be considered in the impact assessment.</p>
<p>Volume 5: Appendix SV-002-0MA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report</p>	<p>SV-002-0MA04</p>	<p>Table 5</p>	<p>Issue/ Concern It appears that several airborne construction noise receptors have been incorrectly categorised as per the BS5228 ABC method.</p> <p>Categorisation should be undertaken by rounding to the nearest 5dB, as per the guidance, instead it appears values have been rounded up to the nearest 5dB.</p> <p>Likely Impact The assessment presents higher noise threshold criteria at certain receptor locations due to the way that receptors have been categorised. Therefore, the assessment at these locations is not in line with current guidance and may not present a representative assessment of the likely impacts.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>Categorisation of residential receptors must be undertaken by rounding to the nearest 5dB, as per the guidance BS5228.</p> <p>The construction noise assessment must then be updated to reflect the correct noise categories and magnitude of impact from the proposed works.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			This may also impact future construction noise assessments if the receptor thresholds are not presented correctly in the ES.		
Volume 5: Appendix SV-002-OMA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report	SV-002-OMA04	General	<p>Issue/ Concern It is not clear what assumptions were made for the airborne construction noise or ground-borne construction vibration assessments.</p> <p>Due to the proposed works in the MA04 community area (overpasses, viaducts, retaining walls etc) we would expect that piling may be required and may be a significant source of noise and vibration.</p> <p>Likely Impact Due to a lack of clarity and detail presented in the ES, we are not satisfied that the findings fully show that limited adverse impact is predicted during the construction phase</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>To fully understand what has been considered in the assessment, assumptions on construction plant etc must be presented in the ES and supporting documentation.</p> <p>During the detailed design stage, it is anticipated that updated assessments will be provided detailing any changes in construction methodology and full details on the assessment assumptions</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					(inclusive of working hours, operational plant and associated noise level, plant on-time and the duration of works).
Volume 5: Appendix SV-002-OMA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report	SV-002-OMA04 & SV-003-OMA04	General	<p>Issue/ Concern</p> <p>It is not clear how the construction or operational impact criteria are being applied within the assessment.</p> <p>It appears that certain receptors are predicted to experience major impacts, but as these impacts are not deemed significant on a "community level" and the assessment considers that no impact is present.</p> <p>Ultimately, if these receptors are to experience major impacts (above the SOAEL), they are likely to raise noise complaints. It is also not clear if additional mitigation will be provided to these receptors as per Information Paper E9 (para 3.3).</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>N/A</p> <p>Residual Impact</p> <p>Major</p>	<p>More narrative must be provided on how the impact criteria are being applied in the operational phase assessment along with further reasoning and explanation to why impacts are considered not significant on a "community level" at certain receptors.</p> <p>The assessment currently seems to contradict the</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			We consider it likely that if these receptors are to experience major impacts, they are likely to raise noise complaints.		<p>assessment criteria and it must also be clearly presented in the ES whether these receptors will be provided with additional mitigation measures.</p> <p>HS2 must allow for mitigation to be provided at all receptors within Trafford where significant adverse impacts (above the SOAEL) are predicted.</p> <p>All mitigation measures must follow the hierarchy presented in the ES (Volume 1, para 9.14.3) and the</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					residual impact must be presented to ensure that the proposed mitigation is suitable.
Volume 5: Appendix SV-002-OMA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report	SV-002-OMA04	Table 8	<p>Issue/ Concern Categorisation of construction traffic impacts.</p> <p>In the assessment, major impact from construction road traffic is defined as a change of >10dB. This effect levels correspond to long-term noise change as per the methodology provided in the SMR (Part 1, Table 59).</p> <p>We consider these criteria suitable for assessing operational road traffic noise, but construction traffic should be assessed in accordance with Table 3.17 of the DMRB (increase in BNL from construction traffic). This is consistent with the short-term noise change as per the methodology provided in the SMR (Part 1, Table 59), with the major impact is defined for a change in noise level (BNL) of >5dB.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>The impact magnitude criteria for construction must be changed to reflect that in the latest DMRB guidance (LA111, Table 3.17).</p> <p>These criteria must be applied to all existing road links within Trafford that are to be used during the construction phase of the development.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Associated impacts from construction road traffic could be greater than that reported, although currently no existing road links within Trafford are considered in the assessment.		
Volume 5: Appendix SV-002-0MA04 Sound, noise and vibration MA04: Baseline and construction sound, noise and vibration report	SV-002-0MA04	Table 8	<p>Issue/ Concern Only one existing road link is currently considered in the construction traffic assessment (Wet Gate Lane). Due to the works required in the MA04 community area, it is likely that other roads, many of which are rural, will be used during the construction phase.</p> <p>Likely Impact N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	The impact assessment must include details of the traffic flow and composition to further understand the likely noise impacts associated with construction road traffic. It must also present a screening assessment to demonstrate why other roads that are likely going to be used aren't considered in the assessment. If this can't be demonstrated, the assessment must

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					include all road links within Trafford to be used during the construction phase.

Summary

7.14.8 Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works. Clarity is also required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.

7.15 Traffic and Transport

- 7.15.1 Trafford Council welcome the commitment from HS2 to consider traffic and transport effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.15.2 Effective consideration of the Traffic and Transport impacts of both the construction and operational phase of HS2 will be key to ensuring any negative impacts of the scheme, where appropriate, can be mitigated. The HS2 route through Trafford within the MA04 area passes through Warburton Village and close to Partington. This is a predominantly rural area served primarily by the A6144 from M60 J8 and a variety of country lanes.
- 7.15.3 The majority of the country lanes are unsuitable for construction traffic and Trafford Council are concerned about the volume of construction traffic proposed to use the already congested A6144 to access the construction compounds.
- 7.15.4 The HS2 alignment severs the Warburton community at Paddock Lane, it is also elevated for much of this section, over the River Bollin and in relation to the Manchester Ship Canal viaduct.
- 7.15.5 There will be significant impacts during the construction phase particularly from construction traffic associated with the works required in relation to the Paddock Lane realignment and the Manchester Ship Canal viaduct.
- 7.15.6 All of the construction traffic to the main and satellite compounds in MA04 is proposed to use A6144 to/from M60 J8, in the region of **1189 Cars/LGV per day** and **631 HGVs per day** in the “**busy period**” and in the region of **1558 Cars/LGV per day** and **772 HGVs per day** in the “**peak period**” although the “**peak periods**” may not all be concurrent.
- 7.15.7 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the traffic and transport related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

7.15.8 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.15-1.

Key Observations and Concerns

- Construction worker parking not contained within identified main/satellite compounds
- Capacity of existing strategic and local highway networks, particularly the A6144 which is already over-capacity
- Volume and length of construction traffic and associated effects on residents, health, and well-being
- Capacity of M60 Junction 8
- Air quality and residential amenity implications
- Footpaths and severance of community from facilities. Severance of PRoW
- Use of inappropriate/ unsuitable routes
- Proposed Places for Everyone allocation at New Carrington not included within modelling
- Limited traffic modelling for junctions

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)

HS2 Phase 2b Environmental Statement Consultation

- Road condition survey prior to commencement and at regular intervals during construction
- Provision of EV charging points within main and satellite construction compounds
- Contribution to the Carrington Relief Road (CRR) and use of the route approved during construction
- Financial contributions to facilitate improvements to the adopted highways for both vehicles, cyclists and pedestrians
- Advanced planting and public realm improvements adjacent to the proposed construction routes in Partington and Warburton
- Contributions towards local public transport improvements/ provision during the construction
- Contributions and improvements at M60 J8
- Alternative footpaths and crossings where PRowS are being closed/ diverted
- Keep junctions and roundabout sizes to minimum that is required for visibility, and reduce after construction period
- Amend construction routes to avoid use of inappropriate/ unsuitable routes

7.15.9 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses, and environment.

Table 7.15-1 – General Comments affecting all of MA04

General Comments Affecting All of MA04

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Comment			<p>Issue/ Concern Trafford Council is concerned about the impact of HS2 construction on the wider local road network. The ES has focused on the identified construction routes, but the impact will be significantly wider than this in terms of workforce related traffic and other traffic which is diverted / avoiding the construction areas.</p> <p>In the MA04 area, this is a particular concern in relation to the New Carrington development site where a number of junction have been identified as needing improvements. In addition, the cumulative impact of the additional traffic must be considered – for example along the A56 in Altrincham / Sale and the rural lanes around Warburton.</p> <p>Likely Impact Without mitigation, there will be significant congestion on the wider LRN impacting residents and businesses.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	HS2 should be required to fully assess the impact on the wider LRN and identify / deliver suitable mitigations in consultation with Trafford Council and other local stakeholders.
Volume 2: Community	14	General Point	Issue / Concern	Proposed mitigation n/a	HS2 should clarify what they mean by



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Area Report MA04			<p>The LHA are extremely concerned that the Highways Modelling for HS2 both during construction and operation does not account for the Places for Everyone allocations. This is particularly concerning given the advanced stage of the Plan. In Trafford this relates to the proposed New Carrington allocation in the MA04 area.</p> <p>Likely Impact The transport mitigations and improvements outlined in the hybrid Bill will not have sufficient capacity to support the Manchester Airport High Speed station and planned growth in the wider area.</p>	Residual Impact Potentially Major	'monitoring' of development sites in advance of Royal Assent and how any changes in 'committed development' sites will be accounted for in the modelling and how the proposed mitigations will be reviewed.
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern It is unclear from the Environmental Statement if parking for construction workers is provided within the main and satellite compounds. The LHA are concerned that if off street parking is not provided for construction workers at all construction sites then this will have a significantly adverse impact on the performance and safety of the local highway network in the vicinity of all construction compounds.</p> <p>Likely Impact</p>	<p>Proposed Mitigation Not clear at this point</p> <p>Residual Impact Potentially Major</p>	HS2 Ltd to confirm. If not, provision must be made to accommodate parking off the LRN, adjacent to the site compounds, including provision for HGV waiting areas, for HGVs waiting to access



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Potential significant congestion and blocking of the Local Road Network.		site for deliveries or collections of materials and plant.
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern Trafford Council is concerned about the impact the significant volumes of construction vehicles indicated in the Environmental Statement, and in particular construction related HGVs, will have on the condition of the local road network.</p> <p>Likely Impact Deterioration of road surface and construction, requiring additional maintenance.</p>	<p>Proposed Mitigation None specified</p> <p>Residual Impact Moderate</p>	Condition survey prior to commencement and at regular intervals during construction and contribution to maintenance above what would normally be expected to be undertaken on the construction routes.
			<p>Issue/ Concern To assist with the environmental impact of construction works Trafford Council require EV charging points to be provided at all construction compounds.</p> <p>Likely Impact</p>	<p>Proposed Mitigation None specified</p> <p>Residual Impact Moderate</p>	HS2 must provide EV charging points at construction compounds (Numbers to be agreed with LHA)



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Reduced carbon emissions, better local air quality		

A6144/ Carrington Relief Road

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern</p> <p>The LHA is extremely concerned about the ability of the A6144 to accommodate the predicted construction traffic. Construction routes from the Bridgewater Canal Satellite Compound, Wet Gate Lane Satellite Compound, River Bollin West Satellite Compound, A6144 Paddock Lane Satellite Compound, Warburton Embankment Satellite Compound and the Manchester Ship Canal Viaduct South Satellite Compound all use the A6144 through Partington to Junction 8 of the M60. The ES shows the additional volume of traffic on this route to be in the region of 1189 Cars/LGV per day and 631 HGVs per day in the “busy period” and in the region of 1558 Cars/LGV per day and 772 HGVs per day in the “peak period” although the “peak periods” may not all be concurrent.</p>	<p>Proposed Mitigation</p> <p>None specified</p> <p>Residual Impact</p> <p>Major</p>	<p>A financial contribution towards the implementation of the Carrington Relief Road is required from HS2 (amount to be agreed) and use of the route approved when available during the HS2 construction period.</p> <p>A further financial contribution to LRN improvements is</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact This route is already at, or very near, capacity as indicated by the junction modelling. The LHA are extremely concerned by the volume of additional traffic proposing to use this route, the effect on the existing junctions, and the impact on the village of Partington.</p> <p>Congestion, there is a significant volume of construction traffic and a long period of time over which this will be experienced.</p> <p>Associated pollution, vibration and noise. This will be a particular problem though Partington.</p>		<p>required to enable the construction traffic to be accommodated on the LRN.</p> <p>The LHA will require a restriction to the hours of operation of construction traffic on this route – i.e. not during school peak times and not overnight.</p>
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern Damage to public realm areas, particularly in Partington, is a real concern. Improvements and screening would lessen the impact to some extent.</p> <p>Likely Impact Danger and deterioration of user experience for pedestrians and cyclists.</p>	<p>Proposed Mitigation None specified</p> <p>Residual Impact Moderate</p>	<p>Advance tree planting with mix of semi-mature and mature trees along the highway will provide environmental benefits.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern The LHA are concerned that the already limited public transport services to and from Partington and Carrington would be adversely impacted by the additional construction traffic through Partington and elsewhere along the A6144.</p> <p>Likely Impact The long journey times to travel outside of the local area would be significantly further increased and reliability affected.</p> <p>By improving bus services, the impact of additional vehicular traffic will be lessened by reducing the overall traffic volumes. It will take some vehicles off the highway network, improve air quality and encourage a mode shift away from car.</p>	<p>Proposed Mitigation None specified</p> <p>Residual Impact Moderate</p>	Financial contribution towards local public transport improvements/ provision during construction.



M60 Junction 8

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern</p> <p>The LHA is extremely concerned about the ability of the A6144 to accommodate the predicted construction traffic. Construction routes from the Bridgewater Canal Satellite Compound, Wet Gate Lane Satellite Compound, River Bollin West Satellite Compound, A6144 Paddock Lane Satellite Compound, Warburton Embankment Satellite Compound and the Manchester Ship Canal Viaduct South Satellite Compound all use the A6144 through Partington to Junction 8 of the M60. The ES shows the additional volume of traffic on this route to be in the region of 1189 Cars/LGV per day and 631 HGVs per day in the “busy period” and in the region of 1558 Cars/LGV per day and 772 HGVs per day in the “peak period” although the “peak periods” may not all be concurrent. All of this additional traffic is predicted to use M60 Junction 8. The LHA are concerned about the capacity of the junction and the SRN in the vicinity of Junction 8.</p> <p>Likely Impact</p> <p>Significant additional delays and safety issues.</p>	<p>Proposed Mitigation</p> <p>None specified</p> <p>Residual Impact</p> <p>Major</p>	<p>Financial contribution to improvements in line with advice and requirements of National Highways.</p> <p>J8 on M60 is a key concern, requires improvement to accommodate the additional traffic volumes, particularly that related to construction traffic.</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	TR-08-309-R1		<p>Issue/ Concern Improvements to M60 Junction 8 are proposed to accommodate the predicted traffic growth associated with development of the Carrington Area.</p> <p>The LHA are concerned that no improvements are proposed to accommodate HS2 construction traffic and that this will also restrict development in the Carrington area.</p> <p>Likely Impact Further congestion and adverse environmental impacts and restriction to development of the Carrington area.</p>	<p>Proposed Mitigation None specified</p> <p>Residual Impact Major</p>	Financial contributions to improvements at M60 J8, Carrington Relief Road and to A6144.

Effects on Warburton Village

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA04	Drawing CT-05-324 and CT-06-324		<p>Issue/ Concern The proposed alignment of HS2 proposes a diversion to Paddock Lane near the village of Warburton with the current road being severed by the HS2 alignment.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact</p>	Provide additional footbridge and alternative footpath



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Footpaths and severance of community from facilities. This severs the existing routes for pedestrians, cyclists and equestrians.</p> <p>Likely Impact Severance of village community and potential safety implications.</p>	Moderate	
Volume 2: Community Area Book MA04	Drawing CT-05-324 and CT-06-324		<p>Issue/ Concern The proposed diversion to Paddock Lane near the village of Warburton severs the existing routes for pedestrians, cyclists and equestrians but provides for these along the new alignment. The new route is proposed to join the existing carriageway at roundabout junctions at either end of the new route. Whilst these junctions will operate effectively from a highway perspective there is some concern about the size of the roundabouts in keeping with the nature of the route.</p> <p>Likely Impact No direct transport impacts but significant alteration of rural village character.</p>	<p>Proposed Mitigation Divert Route</p> <p>Residual Impact Moderate</p>	Keep roundabout size to minimum that is required for visibility, reduce after construction period



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA04	Drawing CT-05-324 and CT-06-324		<p>Issue/ Concern The realignment of Paddock Lane means that bus stop outside the Saracens Head Public House serving the bus route CAT5a will need to be relocated. It is also recommended that additional stops are provided on Warburton Lane adjacent to the north roundabout.</p> <p>Likely Impact Alteration of alignment affects bus services which will have to follow the new section of road.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	<p>Contribution towards Public Transport improvements to lessen impact and encourage mode shift away from private car use.</p> <p>Improvement to service frequency and new bus stops with real time information on services</p>
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern The LHA is extremely concerned about the ability of the A6144 to accommodate the predicted construction traffic. Construction routes from the Bridgewater Canal Satellite Compound, Wet Gate Lane Satellite Compound, River Bollin West Satellite Compound, A6144 Paddock Lane Satellite Compound,</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate/</p>	<p>Construction routes to be made suitable for use by significant volumes of HGVs. In some cases, this will mean widening (or</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Warburton Embankment Satellite Compound and the Manchester Ship Canal Viaduct South Satellite Compound all use the A6144 Warburton Lane and travel through Partington to Junction 8 of the M60. The ES shows the additional volume of traffic on this route to be in the region of 1189 Cars/LGV per day and 631 HGVs per day in the “busy period” and in the region of 1558 Cars/LGV per day and 772 HGVs per day in the “peak period” although the “peak periods” may not all be concurrent.</p> <p>The LHA considers Bradshaw Lane to be particularly unsuitable for construction traffic and whilst this only carries traffic to and from the Bridgewater Canal Satellite compound, improvements to the road are necessary to accommodate construction traffic.</p> <p>Likely Impact Damage to roads, nuisance, delays and collisions</p>	Major	providing passing places) and strengthening of carriageway construction



Effects on Partington

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern Volume of construction traffic through Partington will have a particularly adverse impact on pedestrians and cyclists in the area. There are potential safety issues in crossing the road and cycling in the town considering the increase in HGVs as a result of HS2 construction.</p> <p>Likely Impact Increased number of HGVs could deter people from travelling by active travel modes, resulting in increased car journeys and a negative impact on air quality.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	<p>HS2 to provide improved public realm and walking / cycling infrastructure on the A6144, particularly in Partington.</p>
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern The LHA is extremely concerned about the ability of the A6144 to accommodate the predicted construction traffic. Construction routes from the Bridgewater Canal Satellite Compound, Wet Gate Lane Satellite Compound, River Bollin West Satellite Compound, A6144 Paddock Lane Satellite Compound, Warburton Embankment Satellite Compound and the Manchester Ship Canal Viaduct South Satellite Compound all use the A6144 Warburton Lane and</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major</p>	<p>The LHA will require a restriction to the hours of operation of construction traffic on this route – i.e. not during school peak times and not overnight.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>travel through Partington to Junction 8 of the M60. The ES shows the additional volume of traffic on this route to be in the region of 1189 Cars/LGV per day and 631 HGVs per day in the “busy period” and in the region of 1558 Cars/LGV per day and 772 HGVs per day in the “peak period” although the “peak periods” may not all be concurrent. Adopted highway capacity and impacts on schools and residents etc.</p> <p>The proposed additional traffic volumes due to construction related traffic including significant numbers of HGVs will impact substantially in the following areas: Pedestrian safety, congestion, volume of construction traffic (& period of time over which this will be experienced), further pollution, vibration and noise.</p> <p>Likely Impact Delays to traffic for residents and businesses on A6144 and particularly those in Partington.</p> <p>Safety concerns particularly near schools.</p>		Financial contribution to improvements to the highway during and after construction to include planting of trees (mature and semi- mature) and public realm improvements.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern Damage to public realm areas, particularly in Partington, are a real concern.</p> <p>Likely Impact Improvements and screening would lessen the impact.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Minor</p>	Advance tree planting with mix of semi-mature and mature trees along the highway.
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern The LHA are concerned that the already limited public transport services to and from Partington would be adversely impacted by the additional construction traffic through Partington and elsewhere along the A6144.</p> <p>Likely Impact The long journey times to travel outside of the local area would be significantly further increased and reliability affected.</p> <p>Reduced number of additional vehicles on the road if Public Transport enhanced significantly.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Contribution towards local public transport improvements/ provision during the construction.



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and transport	MA04: TR-03, TR-04 & TR-08		<p>Issue/ Concern Volume of construction traffic through Partington will have a particularly adverse impact on pedestrians and cyclists in the area. There are potential safety issues in crossing the road and cycling in the town considering the increase in HGVs as a result of HS2 construction.</p> <p>Likely Impact Increased number of HGVs could deter people from travelling by active travel modes, resulting in increased car journeys and a negative impact on air quality.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	HS2 to provide improved public realm and walking / cycling infrastructure on the A6144, particularly in Partington.

Effects on Public Rights of Way (PRoW)

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA04	Drawings CT-05-323 and CT-06-323		<p>Issue / Concern The proposed route will cut across the Trans Pennie Trail via the River Bollin West viaduct.</p> <p>Likely Impact Construction of the viaduct may result in partial closure of the Trail which is a significant recreational route.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Trafford Council requires detailed design of the River Bollin West viaduct to maintain access along the Trans Pennie Trail throughout the



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					construction period and beyond.
Volume 2: Community Area Book MA04	Drawing CT-05-323	Construction	<p>Issue / Concern Footpaths FP4 and FP8, formerly in Warburton are known as FP37 and FP38. The footpaths connect to paths in Trafford named FP4 and FP8. No documentation has been provided regarding the renaming of these footpaths.</p> <p>The drawing does not show which section of FP8 will be temporarily closed. The drawing also shows a diversion that appears to be connected to a utility line.</p> <p>Likely Impact Inappropriate mitigation caused by inaccurately mapping.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council requires further explanation regarding the temporary footpath diversion 'Footpath Warburton 8' realignment.
Volume 2: Community Area Book MA04	Drawings CT-05-323 and CT-06-323	Construction and Proposed	<p>Issue / Concern FP4 in the vicinity of Lower Carr Farm is incorrectly shown on the maps. Trafford Council have previously provided the HS2 team with a copy of a confirmed public path order.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council requires the maps to be amended to reflect the information provided.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Inappropriate mitigation caused by inaccurately mapping.		
Volume 2: Community Area Book MA04	Drawing CT-05-324 (B5)	Construction	<p>Issue / Concern Trafford Council have previously advised HS2 that there is a badger set in the location of FP3. Public access also appears to be shared (other than the accommodation bridge) with HS2 access.</p> <p>Likely Impact Inappropriate mitigation caused by inaccurately mapping.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council require further details on shared access arrangements and want confirmation that the badger set location has been fully taken into account.
Volume 2: Community Area Book MA04	Drawing CT-05-323 and CT-05-324 (B5)	Proposed	<p>Issue / Concern Much of the realigned length of footpath Warburton 3 appears to be shared with access tracks for farm vehicles and the LHA seek confirmation that on completion the maintenance of such tracks will remain the responsibility of the landowner and not the LHA.</p> <p>Likely Impact Subsequent issues regarding maintenance.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council seek confirmation that on completion Footpath Warburton 3 accommodation bridge and its approaches will remain the maintenance



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					responsibility of Network Rail
Volume 2: Community Area Book MA04	Drawing CT-05-324	Construction	<p>Issue / Concern Users of footpath 11 during the construction phase face a lengthy temporary diversion route and it is asked whether a shorter temporary diversion route can be made available to users.</p> <p>Likely Impact The length of the diversion will discourage active travel and create a perceived and actual sense of severance.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	Trafford Council would seek shorter alternatives to the proposed Footpath 11 diversion considered.
Volume 2: Community Area Book MA04	Drawing CT-06-324 (H7)	Proposed	<p>Issue / Concern The proposed permanent diversion to Footpath 11 appears to pass over the end of a ditch/ watercourse.</p> <p>Likely Impact Inappropriate mitigation caused by inaccurately mapping.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council consider that a small amendment to the alignment should be considered.
Volume 2: Community Area Book MA04	Drawing CT-05-325 (C5)	Construction	<p>Issue / Concern It is noted that a temporary diversion of BW6 in Partington is proposed and that it will be necessary for the promotor to provide a temporary bridge over Red Brook. N.B. Red Brook is main river.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	Trafford Council would require a temporary bridge to be provided over Red Brook to facilitate the

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Inappropriate mitigation caused by inaccurately mapping.		temporary diversion of BW6.

Summary

- 7.15.10 The primary impact on traffic and transportation of HS2 in the MA04 community area will be experienced during the construction period. Trafford Council require more evidence to be provided to show how the anticipated volumes of construction traffic will be accommodated on the highway network, particularly at M60 J8, on the A6144 through the already congested junctions and trough Partington.
- 7.15.11 Trafford Council also require detailed clarification and justification on the transport modelling data used, and the conclusions reached within the transport assessment. Contributions will also be sought towards both local public transport improvements and key highways likely to be significantly affect by the Proposed Scheme (including M60 J8).
- 7.15.12 Severance to the Village of Warburton, caused by the HS2 alignment will also need to be addressed for non-motorised users, and bus stops, and service information will need to be provided for bus users.
- 7.15.13 Road condition surveys prior to commencement and at regular intervals during construction will also be required, along with alternative footpaths and crossings where PRoWs are being closed / diverted. A number of construction routes should also be amended to avoid inappropriate / unsuitable uses.



7.16 **Waste**

- 7.16.1 The submitted Waste and Resources chapter does not include an assessment of individual community areas. There has been no consideration of the proposals against policies included in authority area local plans or of local waste infrastructure capacity.
- 7.16.2 Trafford Council therefore require HS2 Ltd to provide a project plan for waste management. Specifically, for this area, it is considered that more detail on the management of waste arising from the construction of the Manchester Ship Canal viaduct should be provided as well as any associated issues relating to waste management.

7.17 Water Resources and Flood Risk

- 7.17.1 Trafford Council welcome the commitment from HS2 to consider water resources and flood risk and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 7.17.2 Within Community Area MA04, the proposed route crosses the Manchester Ship Canal (MSC) has the potential to create significant hydrological / flood risk issues. The MSC viaduct would incorporate retaining walls to be built within the Canal. This will create a narrowing of the MSC and increase flows within it, as identified within the hydraulic modelling.
- 7.17.3 There are also numerous rivers and surface water outfalls draining into the MSC. Based on the current proposals, it has not been made clear if any of these would be impacted by the designs to constrict flow for the crossing. Trafford Council therefore expect to see details of how the Proposed Scheme's impact on the MSC could affect surface water outfalls to ensure that there is no increase in flood risk within the immediate or wider area.
- 7.17.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the water resources and flood risk related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 7.17.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 7.17-1.

Key Observations and Concerns

- Details are needed for the retaining walls to be built within the MSC, as part of the MSC viaduct.
- The impact of the MSC crossing on the rivers and surface water outfalls draining into the MSC needs to be made clear.

- The flood risk impacts of the construction works near the un-named culverted watercourse near Paddock Lane need to be assessed.
- There has been no indication how surface water within this community area will be managed.
- The hydraulic modelling report provided only covers the MSC and no other watercourses.
- General concerns about drainage in its broadest sense, including the sewerage system, which is all part of an interconnected system.
- Inadequate consideration of the impact on the groundwater environment

Recommendations and Additional Mitigations Required

- Detailed engagement with Peel, the Lead Flood Authority and Environment Agency to agree an acceptable solution for the MSC, which does not pass on flood risk elsewhere.
- Further detail provided to consider volumes of runoff and drainage, as well as the methods of how this will drain.
- Hydraulic modelling to be completed for all watercourses and surface water flow paths where they interact with the route.

7.17.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses, and environment.

Table 7.17-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Concern			<p>Issue/ Concern Inadequate consideration of the impact on the groundwater environment with respect to United Utilities (UU) groundwater public water supply resources (noting that the route of HS2 passes through a series of groundwater source protection zones)/</p> <p>The Environment Act 2021 places a clear obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health.</p> <p>Consistent with this obligation, Trafford Council and United Utilities are concerned that there is an absence of detail relating to drainage for HS2 and any associated development both during operation and during construction.</p> <p>Likely Impact Unable, to fully conclude the impact on sewerage infrastructure, in terms of flood risk from public sewers</p>	<p>Proposed Mitigation None at present</p> <p>Residual Impact Major</p>	<p>HS2 Ltd should be required to provide full details of surface water drainage design to the relevant local authorities and demonstrate how impacts on rivers and surface water systems have been minimised.</p>



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>and the consequential impact on the environment of any drainage proposals.</p> <p>This is a fundamental failing of the assessment of the environmental impact of HS2.</p>		
Volume 5: Appendix WR-005-OMA04 Flood Risk Assessment	6	6.1.1	<p>Issue/ Concern The proposed route crossing of the Manchester Ship Canal (MSC) will require retaining walls to be built within the canal. This will create a narrowing of the MSC and increase flows within it as identified within hydraulic modelling. No detail is provided to the detail of this design and the size of the constriction.</p> <p>Likely Impact Have the levels of the surface water outfalls in this area been accounted for to ensure they continue to work and not back up?</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Minor</p>	The Council must see details of rises in the MSC which could affect surface water outfalls. There would be a clear preference for any crossing structure to be clear span without any new structures within the canal.
Volume 5: Appendix WR-005-OMA04	4	4.1.27	<p>Issue/ Concern There is an un-named culverted watercourse on the edge of the construction boundary by Paddock Lane which hasn't been identified.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Minor</p>	The Council requires clarification on the works on this area and any effects this may have on the



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Flood Risk Assessment			Likely Impact Due to previous flooding issues in the area, there could be a flood risk with any works.		management of flood risks locally.
Volume 5: Appendix WR-005-OMA04 Flood Risk Assessment	4	4.5.3	Issue/ Concern Balancing ponds linked to new highway Likely Impact N/A	Proposed Mitigation None Residual Impact Minor	The Council must be provided with details on who will be responsible for the balancing ponds.
Volume 5: Appendix WR-005-OMA04 Flood Risk Assessment		General point	Issue/ Concern There has been no indication within the chapter to how surface water within this community area will be managed. Likely Impact Potential for increased surface water run-off to cause localised flood issues.	Proposed Mitigation None Residual Impact Unknown	The Council must be provided with details with respect to the volumes to run-off and drainage as well as the methods on how this will drain.
Volume 5: Appendix WR-005-OMA04		General point	Issue/ Concern A hydraulic modelling report has been provided for the MSC but no other watercourses where the route crosses.	Proposed Mitigation None Residual Impact	The Council must be provided with an additional hydraulic modelling for all

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Flood Risk Assessment			Likely Impact Potential for increased surface water run-off to cause localised flood issues.	Unknown	watercourses and surface water flow paths where they interact with the new line.

Summary

7.17.7 Further stakeholder engagement is needed. There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows.



7.18 Conclusions

- 7.18.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA04 have not given fully considered Trafford MBC's local planning policy and as such the Environmental Statement is considered to lack the required detail for Trafford Council to provide support for the scheme.
- 7.18.2 Furthermore, each of the assessments outlined above has given no consideration of the proposed limit of deviation which would materially affect a number of the assessments namely, Landscape and Visual, Historic Environment, Ecology, Noise and Human Health. Trafford Council consider that the true impact of the scheme can only be assessed where a definitive line has been proposed.
- 7.18.3 A summary of the key points raised in each of the above sections is provided below:

Agriculture, Forestry and Soils

- 7.18.4 Protection is required to ensure that impacts on the best and most versatile agricultural land and peatlands are in the first instance avoided, and second suitably mitigated. Without a thorough assessment of the adverse impacts of the Proposed Scheme on these soils and their functions, the potential for any losses is likely to be significantly downplayed. A number of agricultural and rural non-agricultural businesses will also be affected. These impacts need to be understood on a case-by-case basis for both the construction and operational phases of the Proposed Scheme.

Air Quality

- 7.18.5 Justification is required as to why monitoring locations have not been accurately verified. There are concerns that some monitoring locations are being under predicted. Additional monitoring and verification is therefore required which meets the guidance contained within DEFRA TG(16), and is undertaken in consultation with Trafford Council.

Community

- 7.18.6 Compensatory schemes should be provided for lost woodland in addition to, improvements to footpaths and signposting, mitigation for affected residents and businesses during construction and operation, including compensatory funding, and



provision of alternative space for lost community venues as well as support for local bus services.

Ecology & Biodiversity

- 7.18.7 Given the species & habitats assessments undertaken, and the lack of reference to the Environment Act, it is unclear whether the Proposed Scheme will deliver a minimum 10% biodiversity net gain within the community area. Without thorough assessments of the adverse impacts of the Proposed Scheme on species and habitats, the potential for any losses is likely to be understated. HS2 must therefore be required to engage with Natural England and accredited ecologists to ensure that no adverse impacts arise either during construction or operation. This will require HS2 and its contractors and undertakers ensuring that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.

Health

- 7.18.8 Trafford Council requires provision to include protected active travel infrastructure for new, diverted, reinstated routes. Proposed routes to be diverted should not be more commodious than original routes. Any future amendments to the Trans Pennine Trail or cycle networks should not be liable to flooding. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.

Historic Environment

- 7.18.9 The ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation.



Land Quality

- 7.18.10 There are a number of landfill / historic landfill sites in the community area which are thought to contain potentially hazardous waste. Site investigation data for contaminated land should therefore be made available to Trafford Council for review prior to any works commencing on potentially contaminated land sites. Any resultant remediation requirements should be agreed with the regulator and Trafford Council. There are also six Mineral Safeguarding Areas for sand and gravel in the community area, three of which are crossed by the Proposed Scheme. Further clarification is required on how the sensitivity values were calculated, and the mitigation proposed to protect this resource.

Landscape & Visual

- 7.18.11 Limited engagement has been undertaken with Trafford Council in the preparation of the Landscape and Visual Impact Assessment for the community area. The assessment identifies significant effects on the River Bollin Meadowland and Warburton Settled Sandlands Landscape Character Areas (LCAs). Trafford Council also considers the Dunham Woodhouses Settled Sandlands LCA will be significantly affected, however this is not included in the assessment.
- 7.18.12 There are also concerns about the viewpoint locations used across the community area and the inconsistent approach to photomontages. Some of the assessment of the effects at construction and Year 1 for the River Bollin Meadowland and Warburton Settled Sandlands LCAs are disagreed with, and there are questions as to whether the effects on landscape character could be mitigated to any extent by the proposed planting in the Warburton Settled Sandlands LCA.
- 7.18.13 The HS2 route will also result in landscape severance between Warburton Village and Moss Brow, and there are concerns about the impact of views from public rights of way and the Trans Pennine Trail with very limited mitigation proposed.

Socioeconomics

- 7.18.14 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.



- 7.18.15 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.
- 7.18.16 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

Sound Noise and Vibration

- 7.18.17 Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works.
- 7.18.18 Clarity is required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.

Traffic & Transport

- 7.18.19 The primary impact on traffic and transportation of HS2 in the MA04 community area will be experienced during the construction period. Trafford Council require more evidence to be provided to show how the anticipated volumes of construction traffic will be accommodated on the highway network, particularly at M60 J8, on the A6144 through the already congested junctions and through Partington.
- 7.18.20 Trafford Council also require detailed clarification and justification on the transport modelling data used, and the conclusions reached within the transport assessment. Contributions will also be sought towards both local public transport improvements and key highways likely to be significantly affected by the Proposed Scheme (including M60 J8).
- 7.18.21 Severance to the Village of Warburton, caused by the HS2 alignment will also need to be addressed for non-motorised users, and bus stops, and service information will need to be provided for bus users.



Waste

7.18.22 The proposals for the management of waste arising do not reference local policies within the Trafford Core Strategy. Further details of how waste is to be managed is required by way of a waste management plan.

Water

7.18.23 Further stakeholder engagement is needed. There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows

7.18.24 The preceding sections in this chapter detail the Trafford Council Consultation response on issues and requirements which are unique to Community Area MA04. To avoid repetition, the Trafford Council Consultation response also presents a Chapter titled "[Trafford Council Points raised to ES Consultation which are Common across Community Areas](#)" and those points should be taken as also applying in this Chapter.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

High Speed Rail – Phase 2b Western Leg Environmental Statement Consultation

Chapter 4

Section 8: Trafford Council Comments on Volume 2: MA05
Risley to Bamfurlong Community Area Report and
Map Book



8 Trafford Council Comments on Volume 2: MA05 (Risley to Bamfurlong) Community Area report and Map Book

Section 8 Table of Contents

Introduction	268
Scheme Overview	268
Key Requirements Applicable to all Sections in MA05	269
Ecology and Biodiversity	272
Traffic and Transport.....	274
Conclusion	281

8.1 Introduction

- 8.1.1 The HS2 route within the MA05 area is not within Trafford borough, however Trafford is impacted by some of the construction routes in the Community Area.

8.2 Scheme Overview

- 8.2.1 Many of the construction routes follow the A57 through Salford, with some routes accessing the M60 via Junction 11 in Salford and others accessing the M60 via Junction 10 in Trafford. This is of significant concern to Trafford Council. The M60 in this area is already under significant pressure and it is not clear how HS2 have modelled the impacts on the Strategic Road Network. The cumulative impact of the construction routes at M60 Junction 10 and 11 must be considered with the construction routes / traffic within the MA04 area which primarily relates to M60 Junction 8.
- 8.2.2 This section of the SRN is being assessed as part of the National Highways led Manchester North West Quadrant (MNWQ) Study. The MNWQ Study is looking at ways to ease congestion and make journey times more reliable between Junction 8 to 18 of the M60. The HS2 construction routes must therefore have regard to this study.
- 8.2.3 In addition, the Western Gateway Infrastructure Scheme (WGIS) is a committed highways scheme to facilitate the development at Port Salford and Trafford Waters. The first phase of the scheme has been delivered which included improvements to the A57 and a new lift bridge over the Manchester Ship Canal.



8.2.4 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.

8.3 Key Requirements Applicable to all Sections in MA05

8.3.1 Following a review of the MA05 Community Area Report and Map Book, Trafford Council has identified that additional resources will be needed across the Council in order to support and facilitate the delivery of the HS2 Phase 2b Proposed Scheme.

8.3.2 The following requirements therefore apply to each of the Sections within this Chapter and similarly so, for Trafford Council as a whole.

- 1) **HS2 Ltd must be required to provide additional resources to Trafford Council in accordance with the Information Paper C12: Local Authority funding and new burdens. This is essential in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2's selected contractors and associated S17 and S61 applications.** Without additional resources Trafford Council will be unable to efficiently expedite its existing regulatory duties and those arising from the Proposed Scheme.
- 2) **HS2 must be required to make funding available under the New Burdens Policy (Information Paper C12) to support Trafford Council in delivering mitigations.** Without additional resources Trafford Council will be unable to efficiently expedite the expected and/or required mitigation measures arising from the Proposed Scheme.
- 3) **HS2 must be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health and wellbeing activity to be delivered of an equal or better standard than exists at the time of temporary or permanent loss.** Without additional resources Trafford Council will be unable to provide the type, quantity and quality of facilities needed by the borough's residents.

8.3.3 In the interests of ease and legibility, the following points provide a summary of Trafford Council's key comments, concerns and observations. More detail and other comments are set out in the tables below. As the construction routes relate to Construction Compounds located in the MA04 Community Area, the Council has also included the comments below in the response to the MA04 Traffic and Transport Topic area.



Key Observations and Concerns

- Concern about the impact of the HS2 route on the Great Manchester Wetlands Nature Improvement Area and the Manchester Mosses Special Area of Conservation (SAC).
- HS2 construction routes which access the M60 at Junction 8, 10 and 11 will be adding additional vehicles to an already very congested network. Any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 currently operates at capacity during peak times and the M60 already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.
- The HS2 Traffic and Transport Assessment assumes that the entirety of the Western Gateway Infrastructure Scheme (WGIS) has been completed. The J10 link at the Trafford Centre is identified as a possible construction route and this link is yet to be constructed.
- Impact of construction traffic, particularly HGVs on the Trafford Centre area and the severance this will cause to NMUs in the area

Recommendation and Additional Mitigations Required

- Assurance required from HS2 that any impact on the Great Manchester Wetlands Nature Improvement Area and Manchester Mosses Special Area of Conservation (SAC) is fully assessed and appropriately mitigated.
- Review of construction routes to and from M60 giving particular emphasis on removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle. Construction traffic routes to be primarily on A57 to and from the west to M6 Junction 21.
- As a minimum, Trafford Council will require a restriction to the hours of operation of construction traffic on this route.
- HS2 to model a 'without full-WGIS' scenario and assess the impact on the existing network / identify suitable mitigations.

8.3.4 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

8.4 Ecology: Comments in relation to Places for Everyone

- 8.4.1 Trafford Council welcome the commitment from HS2 to consider ecology and biodiversity effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 8.4.2 The Proposed Scheme is likely to adversely impact on the GM Wetlands Nature Improvement Area and Manchester Mosses Special Area. Trafford Council will therefore require assurance that any impact on these designations is fully assessed and appropriately mitigated.
- 8.4.3 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 8.4-1.

Table 8.4-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area MA05 report			Issue/ Concern HS2 will run through the Great Manchester Wetlands Nature Improvement Area and in close proximity to the Manchester Mosses Special Area of Conservation (SAC). Trafford/Wigan/Manchester/GMCA will need assurance that any impact on these designations is fully assessed and appropriately mitigated. In particular, there is a concern that HS2 in its operational and construction phases may result in the loss of part of the tree belt that shields	Proposed Mitigation None proposed Residual Impact Major	Trafford Council will require a full understanding of the impact of HS2 on Holcroft Moss, including on the tree belt, with appropriate mitigation provided to offset any impacts.
General Point/ Comment					

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Holcroft Moss, within the Manchester Mosses SAC, from air quality impacts arising from traffic using the M62.		

Summary

- 8.4.4 Trafford Council and its Partners will require assurance that the HS2 route will fully assess impacts on the Great Manchester Wetlands Nature Improvement Area or Manchester Mosses Special Area of Conservation (SAC). Where impacts are unavoidable, these should be mitigated for appropriately.
- 8.4.5 In particular, there is a concern that HS2 in its operational and construction phases may result in the loss of part of the tree belt that shields Holcroft Moss, within the Manchester Mosses SAC. Any loss is likely to have adverse impacts on air quality as emissions from traffic using the M62 will become more apparent.

8.6 Traffic and Transport:

- 8.6.1 Trafford Council welcome the commitment from HS2 to consider traffic and transport effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 8.6.2 Effective consideration of the Traffic and Transport impacts of both the construction and operational phase of HS2 will be key to ensuring any negative impacts of the scheme, where appropriate, can be mitigated. HGV movements along construction routes and to and from construction compounds within MA05 have the potential to adversely impact a number of key locations within Trafford that already experience high levels of congestion.
- 8.6.3 Trafford Council is also extremely concerned that the Highways Modelling for HS2 both during construction and operation does not account for the following foreseeable development and as such that the traffic demand associated with these developments is not modelled and that the proposed junction layouts will not be adequate to accommodate the envisaged demand. This includes the proposed Places for Everyone allocations and specifically the New Carrington allocation in Trafford.
- 8.6.4 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 8.6-1.

Table 8.6-1

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Map Book Traffic and Transport	Map: TR-08- 308	Page 148	Issue/ Concern Construction Routes impacting on the Trafford Centre and Trafford Park, creating additional congestion in the area.	Proposed Mitigation None proposed Residual Impact	Review of construction route to and from M60 giving particular emphasis



Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
	Map: TR-08- 309-R1	Page 179	<p>HS2 related traffic to the following site compounds: Manchester Ship Canal Viaduct Central Satellite Compound, Glazebrook Railway South Satellite Compound, Glazebrook Railway North Satellite Compound and the Manchester Ship Canal Viaduct North Main Compound is estimated in the region of 693 Cars/LGV per day and 253 HGVs per day in the “busy period” and in the region of 840 Cars/LGV per day and 318 HGVs per day in the “peak period”. This traffic is distributed to and from the east and west on the A57, so it is unclear how much will travel to and from the east and the M60 junctions 10 and 11.</p> <p>Whilst the HS2 related traffic volumes are relatively low the LRN around the Trafford Centre is already congested and any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 also currently operates at capacity during peak times and the M60 already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.</p> <p>Likely Impact Significant congestion created by the construction traffic which will be experienced over a long period of time.</p>	Major	<p>on removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle.</p> <p>Construction traffic route to be primarily on A57 to and from the west to M6 Junction 21.</p> <p>As a minimum, Trafford Council will require a restriction to the hours of operation of construction traffic on this route.</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Associated pollution, vibration and noise.		
Volume 2: Community Area report MA04 Broomedge to Glazebrook	14	14.3.22	<p>Issue/ Concern The HS2 Traffic and Transport Assessment assumes that the entirety of the Western Gateway Infrastructure Scheme (WGIS) has been completed. The J10 link at the Trafford Centre is identified as a possible construction route and this link is yet to be constructed.</p> <p>Likely Impact In the event that full-WGIS is not completed at the time of HS2 construction then it will result in additional congestion on the network.</p>	<p>Proposed Mitigation Standard measures identified in CoCP, but no further mitigations identified.</p> <p>Residual Impact Major</p>	<p>Trafford Council require HS2 to model a ‘without full-WGIS’ scenario and assess the impact on the existing network / identify suitable mitigations.</p> <p>Should this modelling show the impacts without full-WGIS to be significant, a financial contribution towards the implementation of full-WGIS will be required from HS2 (amount to be agreed) to enable the</p>

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					scheme when available during the HS2 construction period.
Volume 2: Community Area report MA04 Broomedge to Glazebrook	14	14.4.22 - 23	<p>Issue/ Concern</p> <p>Trafford Council is very concerned about the impact of construction traffic, particularly HGVs on the Trafford Centre area which is already congested, particularly at peak times.</p> <p>The ES identifies that during the construction of HS2 there will be a substantial change in traffic flows in some locations and that there will be a ‘major adverse effect’ at A57 Liverpool Road / Salford Western Gateway.</p> <p>The following locations are also identified in relation to traffic related severance for NMUs:</p> <ul style="list-style-type: none"> • Salford Western Gateway (between Trafford Way and B5214 Trafford Boulevard) - moderate adverse effect due to an increase in HGVs • Salford Western Gateway (between Trafford Way and A57 Liverpool Road) - major adverse effect due to an increase in HGVs <p>Likely Impact</p> <p>Congestion in the Trafford Centre area.</p>	<p>Proposed Mitigation</p> <p>Standard measures identified in CoCP, but no further mitigations identified.</p> <p>Residual Impact</p> <p>Major</p>	<p>Review of construction route to and from M60 giving particular emphasis to removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle.</p> <p>Construction traffic route to be primarily on A57 to and from the west to M6 Junction 21.</p> <p>As a minimum, Trafford Council will require a restriction to the hours of operation of</p>



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Severance caused by construction traffic / HGVs will deter uptake of active travel modes in the Trafford Centre area, contrary to the 2040 Transport Strategy.		construction traffic on this route. Trafford Council require active travel infrastructure mitigations, such as additional crossings to be provided in the Trafford Centre Rectangle area.
Volume 2: Community Area Report MA05	14		Issue/ Concern Trafford Council is extremely concerned that the Highways Modelling for HS2 both during construction and operation does not account for the following foreseeable development and as such that the traffic demand associated with these developments is not modelled and that the proposed junction layouts will not be adequate to accommodate the envisaged demand. This includes the proposed Places for Everyone allocations and specifically the New Carrington allocation in Trafford.	Proposed Mitigation n/a Residual Impact Major	HS2 should be required to review and update modelling to include foreseeable demand from development and amend junction designs accordingly.

Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Modelling underestimates the likely traffic demand and junctions not able to accommodate the volume of traffic anticipated.</p>		
GENERAL COMMENT			<p>Issue/ Concern Trafford Council is concerned that the Places for Everyone allocations have not been included in the transport modelling – this is particularly concerning given the advanced stage of the Plan. In Trafford this relates to the proposed Timperley Wedge allocation in the MA06 area.</p> <p>Likely Impact The transport mitigations and improvements outlined in the hybrid Bill will not have sufficient capacity to support the Airport Station and planned growth in the surrounding area.</p>	<p>Proposed mitigation n/a</p> <p>Residual Impact Potentially Major</p>	<p>HS2 should clarify what they mean by ‘monitoring’ of development sites in advance of Royal Assent and how any changes in ‘committed development’ sites will be accounted for in the modelling and how the proposed mitigations will be reviewed</p>

Summary

8.6.5 The Trafford Centre is already congested and any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 also currently operates at capacity during peak times and the M60 already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.



HS2 Phase 2b Environmental Statement Consultation

- 8.6.6 Construction traffic HGVs operating along construction routes / to and from construction compounds are likely to substantially change in traffic flows in some locations. The ES confirms that there will be a 'major adverse effect' on traffic in some areas as a direct result of construction traffic.
- 8.6.7 Trafford Council would therefore request a review of the construction route to and from M60 giving particular emphasis to removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle.
- 8.6.8 Trafford Council is also disappointed that the HS2 transport modelling used does not take into account future demands on the network from significant development proposals at Timperley Wedge (in MA06) within Places for Everyone. The proposed transport mitigations set out within the ES are therefore not considered sufficient to accommodate the demands resulting from the Airport station and planned growth within the surrounding area.



8.7 Conclusion

8.7.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA05 have not given full consideration of the impacts on designated biodiversity sites nearby the proposed route or adequately modelled transport impacts of Places for Everyone strategic allocations, including the nearby Timperley Wedge proposal.

8.7.2 A summary of the key points raised in each of the above sections is provided below:

Ecology

8.7.3 Trafford Council and its Partners will require assurance that the HS2 route will fully assess impacts on the Great Manchester Wetlands Nature Improvement Area or Manchester Mosses Special Area of Conservation (SAC). Where impacts are unavoidable, these should be mitigated for appropriately.

8.7.4 In particular, there is a concern that HS2 in its operational and construction phases may result in the loss of part of the tree belt that shields Holcroft Moss, within the Manchester Mosses SAC. Any loss is likely to have adverse impacts on air quality as emissions from traffic using the M62 will become more apparent.

Traffic and Transport

8.7.5 The Trafford Centre is already congested and any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 also currently operates at capacity during peak times and the M60 already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.

8.7.6 Construction traffic HGVs operating along construction routes / to and from construction compounds are likely to substantially change in traffic flows in some locations. The ES confirms that there will be a 'major adverse effect' on traffic in some areas as a direct result of construction traffic.

8.7.7 Trafford Council would therefore request a review of the construction route to and from M60 giving particular emphasis to removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle.

8.7.8 Trafford Council is also disappointed that the HS2 transport modelling used does not take into account future demands on the network from significant development proposals at New Carrington within Places for Everyone.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

- 8.7.9 The preceding sections in this chapter detail the Trafford Council Consultation response on issues and requirements which are unique to Community Area MA04. To avoid repetition, the Trafford Council Consultation response also presents a Chapter titled "[Trafford Council Points raised to ES Consultation which are Common across Community Areas](#)" and those points should be taken as also applying in this Chapter.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

High Speed Rail – Phase 2b Western Leg Environmental Statement Consultation

Chapter 5

Section 9: Trafford Council Comments on Volume 2: MA06
Hulseheath to Manchester Airport Community
Area Report and Map Book



9 **Trafford Council comments on Volume 2 – MA06 (Hulseheath to Manchester Airport) community area report and map book**

Section 9 Table of Contents

Introduction	284
Scheme Overview	285
Key Requirements Applicable to all Sections in MA06	286
Agriculture, Forestry and Soils	288
Air Quality	292
Community	297
Ecology and Biodiversity	305
Health	322
Historic Environment	333
Land Quality	341
Landscape and Visual	349
Socio-economics	379
Sound, Noise and Vibration.....	393
Traffic and Transport.....	408
Waste.....	446
Water Resources and Flood Risk	447
Airport Station	454
Conclusion	471

9.1 Introduction

9.1.1 This chapter specifically details the Trafford Council consultation response comments in respect of issues and requirements which have been identified within MA06 Hulseheath to Manchester Airport.

9.1.2 Other chapters within this Trafford Council consultation response detail issues and requirements identified in relation to the other sections of the ES. Where those issues apply to all or several of the Community Areas, they have been set out in the Chapter titled "[Trafford Council Points raised to ES Consultation which are Common across Community Areas](#)". Wherever possible, to avoid repetition, those issues and requirements have not been re-stated here but in reading this section it should be noted that those issues and requirements also apply to this Community Area.



9.1.3 Text within this chapter which has been presented in **bold**, highlights Trafford Council requirements.

9.2 Scheme Overview

9.2.1 The route of the Proposed Scheme in the Hulseheath to Manchester Airport area will be 10.7km (6.8 miles) in length extending north-east from the north of Hulseheath to the north-east of Davenport Green. In this area, the Proposed Scheme will also provide a connection between HS2 and a future NPR route between Manchester and Liverpool, a railway infrastructure maintenance facility, and the Manchester Airport High Speed station.

9.2.2 The area falls within the local authority areas of Cheshire East Council and the Greater Manchester local authorities of Trafford Metropolitan Borough Council and Manchester City Council.

9.2.3 The HS2 line will route through Cheshire, then under the M56 and in a shallow cutting under Hale Road, past Junction 6 of the M56 Motorway and to the HS2 Manchester Airport station, located to the west of the M56. It will then route towards Manchester City Centre via a tunnel. The southern tunnel portal entrance is located in the Davenport Green area.

9.2.4 HS2 will have impacts in this area during both the construction and operational phases with particular emphasis on:

- Landscape and visual impacts of the scheme and appropriate landscape mitigation works. The Airport Station will be a significant structure in the landscape
- Loss of landscape features/habitat i.e., hedgerows, trees, ponds etc including the partial loss of Davenport Green ancient woodland.
- Impacts upon local community areas, both during construction and operation in terms of noise disturbance and visual impacts
- Adverse impacts on human health including noise and air quality associated with the construction and operation of the railway line
- Impacts on heritage assets which have not been mitigated against including the loss of a Grade II listed building.



- Impact on Air Quality. Trafford Council require HS2 to rectify the air quality issues highlighted and revisit the verification process, and adjustment of particulate matter in particular.

9.3 Key Requirements Applicable to all Sections in MA06

9.3.1 Following a review of the MA06 Community Area Report and Map Book, Trafford Council has identified that additional resources will be needed across the Council in order to support and facilitate the delivery of the HS2 Phase 2b Proposed Scheme.

9.3.2 The following requirements therefore apply to each of the Sections within this Chapter and similarly so, for Trafford Council as a whole.

- 1) **HS2 Ltd must be required to provide additional resources to Trafford Council in accordance with the Information Paper C12: Local Authority funding and new burdens. This is essential in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2's selected contractors and associated S17 and S61 applications.** Without additional resources Trafford Council will be unable to efficiently expedite its existing regulatory duties and those arising from the Proposed Scheme.
- 2) **HS2 must be required to make funding available under the New Burdens Policy (Information Paper C12) to support Trafford Council in delivering mitigations.** Without additional resources Trafford Council will be unable to efficiently expedite the expected and/or required mitigation measures arising from the Proposed Scheme.
- 3) **HS2 must be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health and wellbeing activity to be delivered of an equal or better standard than exists at the time of temporary or permanent loss.** Without additional resources Trafford Council will be unable to provide the type, quantity and quality of facilities needed by the borough's residents.

9.3.3 The following sections provide Trafford Council's response to the individual sections included within MA06. The response highlights where more information is required in order to provide a suitable assessment or where Trafford Council consider that an assessment hasn't been undertaken in line with the relevant policy or guidelines.

9.3.4 The response does not give consideration to any sensitivity analysis as a result of the line of deviation. It should be noted that any changes to the proposed route



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

presented within the ES is likely to have a significant impact upon the assessments undertaken.

9.4 **Agriculture, Forestry and Soils**

- 9.4.1 Trafford Council welcome the commitment from HS2 to consider the potential effects on agriculture, forestry and soils and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.4.2 The land within this area of Trafford is generally lower quality (3b or 4) with better quality land in patches. The eastern section of the area is urban/suburban in nature and agriculture and forestry are not assessed.
- 9.4.3 Woodland is limited to small parcels, with some ancient woodland located within land required for the construction of the Proposed Scheme at Davenport Wood, near the proposed Airport Station. Trafford Council's detailed response to all woodland habitats is set out at Section 9.7 Ecology and biodiversity.
- 9.4.4 There are no areas of commercial forestry land within this area of Trafford and as such no assessment has been made of the effects on commercial forestry and Trafford Council accordingly make no comments in this regard.
- 9.4.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.4-1.

Key Observations and Concerns

- Impacts on MA06/24 Chapel House Farm more significant than assessed
- Assessment of soils is unclear

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- More detailed assessments to establish impacts on businesses to inform associated mitigation and compensation measures

9.4.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.4-1

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area report MA06	General Point/ Comment		<p>Issue/ Concern There is a slight concern that the loss of equestrian/livery land and facilities may be underplayed in terms of its impact which are considered in the ES to be less sensitive to other grazing agriculture such as dairy farms.</p> <p>Likely Impact The nature of temporary and permanent land loss for stables/equestrian businesses may have a socio-economic impact which should be considered in the socio-economic chapter of the ES.</p>	<p>Proposed Mitigation Financial compensation will be available under existing statutory arrangements to offset impacts of construction (temporary or permanent).</p>	<p>HS2 should be required to provide further assessment to establish the forecast impacts on non-agricultural businesses for both the construction and operational phases.</p> <p>This should be done on a case by case</p>



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>No measures are included to mitigate the operational effects of the Proposed Scheme on agriculture, forestry and soils.</p> <p>Residual Impact Moderate</p>	<p>basis and not at a community level, to take account of the unique circumstances of each business/holding.</p>
Volume 2: Community Area report MA06	General Point/ Comment		<p>Issue/ Concern The ES states that the principles set out in Defra’s Code of Practice for the Sustainable Use of Soils will be followed throughout the construction period.</p> <p>The ES also states that implementation of the measures set out in the draft CoCP will ensure displaced soil from the proposed scheme will mostly fulfil its pre-existing functions on-site, which are the production of food, water stores for flood attenuation and providing ecological habitat onsite. Information paper E19 Soil handling for land restoration also outlines how displaced soils will be reused for restoration of land to agriculture and other uses.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	<p>HS2 should be required to provide clarification on what has been considered in the assessment of soils, and how this has informed the draft CoCP.</p>



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Likely Impact There is limited evidence that other soil functions have been considered and/or assessed i.e., flood water attenuation, carbon storage or habitat support.		

Summary

- 9.4.7 In conclusion, Trafford Council is concerned that the loss of equestrian / livery land and facilities has not been fully recognised / considered in the ES. There is also a need for further clarity in relation to the soil assessment.

9.5 Air Quality

- 9.5.1 Trafford Council welcome the commitment from HS2 to consider air quality and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.5.2 The Proposed Scheme has the potential to significantly impact air quality within the community area. Both the Manchester Airport High Speed station and associated highways improvements, and major works to the M56 are likely to generate significant increases in both construction traffic and also vehicular traffic of users of the above.
- 9.5.3 Consequently, there is a particular concern about the impact of air pollution on the health of the population, especially to babies and children, (including unborn babies), older people and people with long term health conditions, especially respiratory disease. These adverse impacts can manifest in both the short and long term, increasing pressure on health services, and can increase inequalities.
- 9.5.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the Air Quality related aspects on this report. It is noted that there are still several issues that could be improved and resolved.
- 9.5.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.5-1.

Key Observations and Concerns

- Modelled concentrations of particulate matter (PM) including PM10 and PM2.5 have not been subject to model verification and adjustment. Where modelled concentrations are not subject to model verification this potentially may lead to under predicting of concentrations at sensitive receptors.

- Consequently, there are significant concerns around the effects of poor air quality, arising from the construction of HS2, including the significant number of vehicle movements anticipated over an extended period.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including assessment of height and elevation
- Modelled particulate concentration, PM10 and PM2.5, within MA06 must be subject to verification in accordance with guidance contained with DEFRA TG(16).
- Further mitigation measures and resources be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme

9.5.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.5-1

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area	4.2	4.2.5	Issue/ Concern Within the verification process for Community Area MA06, monitoring locations MA07.1, MA08.4 and TM56	Proposed Mitigation N/A	Trafford Council require HS2 to provide justification to explain why the monitoring



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Report MA06			<p>all monitor NO2 concentrations above the National Air quality objective (AQO) of 40 µg/m3.</p> <p>However, in the model verification (Table 10) the modelled concentrations at these locations are under predicting and providing modelled concentrations below the AQO. This indicates that the modelled concentrations within the vicinity of these verification points are under predicted.</p> <p>Likely Impact Under estimation of air quality impacts at sensitive receptors.</p>	<p>Residual Impact Moderate</p>	<p>location recording the highest concentrations of NO2 were not considered in detail during the verification process.</p> <p>Trafford Council require HS2 to re-verify the air quality dispersion model.</p> <p>Additional mitigation and/or compensation measures must be agreed with Trafford Council.</p>
Volume 2: Community Area Report MA06	4.2	4.2.5	<p>Issue/ Concern Modelled concentrations of particulate matter (PM) including PM10 and PM2.5 have not been subject to model verification and adjustment. Where modelled concentration are not subject to model verification this</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	<p>Trafford Council requires confirmation from HS2 that modelled particulate concentrations of</p>



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>potentially may lead to under predicting of concentrations at sensitive receptors.</p> <p>Likely Impact Underestimation of air quality impacts at sensitive receptors.</p>		<p>PM10 and PM2.5, within MA06 shall be subject to verification in accordance with guidance contained with DEFRA TG(16).</p> <p>Additional mitigation and/or compensation measures must be agreed with Trafford Council.</p>
Volume 2: Community Area Report MA06	4.2	4.2.5	<p>Issue/ Concern Within table 10 (Comparison of monitored and modelled NO2 concentrations) following adjustment, site MA06.02 presents a difference of -18.5% between the modelled and monitored data.</p> <p>To provide confidence in the modelling process modelling concentrations must be within 10% of monitored concentrations.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	<p>Trafford Council require HS2 to review the air quality modelling for MA06 and update to include guidance contained within box 7.17 of Defra TG(16)</p>

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Under estimation of air quality impacts at sensitive receptors.</p>		Additional mitigation and/or compensation measures must be agreed with Trafford Council.

Summary

- 9.5.7 In conclusion, Trafford Council is concerned about the effects of poor air quality arising from the construction of HS2, including the significant number of vehicle movements associated with the various construction compounds in the Airport Station area. In addition, the modelled concentrations of particulate matter have not been subject to model verification and adjustment, which may result in under predicting of concentrations and sensitive receptors.
- 9.5.8 HS2 should provide further resources to Trafford Council to help mitigate the significant impact on communities in Trafford.

9.6 Community

- 9.6.1 Trafford Council welcome the commitment from HS2 to consider community effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.6.2 A number of local communities within the MA06 Community Area, specifically the Hale Barns, Warburton Green, Ringway and Davenport Green areas, will experience significant and prolonged amenity, environmental and traffic disruption impacts, (including significant increases in local traffic from construction vehicles), associated to their proximity to the proposed route as well as multiple construction compounds in the area and road closures.
- 9.6.3 There will also be a number of community facilities which will be directly and indirectly impacted during the construction phase, which will also experience lesser impacts during the operational phase (such as Ringway Golf Club, Hale Barns Cricket Club, Hale Synagogue, 1st Hale Barns Scout Group and more).
- 9.6.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the community related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 9.6.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.6-1.

Key Observations and Concerns

- Local communities will experience significant and prolonged amenity, environmental and traffic disruption.
- A number of community facilities will be impacted both during construction and operation.

- A number of residential properties will need to be demolished.
- Closure of roads and major works on the M56 will create major highways impacts.
- Satellite construction compounds will create additional adverse impacts for local residents.

Recommendations and Additional Mitigations Required

- Demonstration of how the loss of property has been kept to a minimum.
- Provision of adequate support and engagement with affected residents and businesses.
- Clarification over the timing of proposed physical mitigation measures.
- Agreement with Trafford Council and its Partners over the proposed design and implementation of highways works.
- Provision of more information regarding the role(s) and operation of satellite construction compounds.

9.6.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

Table 9.6-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Reports MA06	6	6.3.14 -18	<p>Issue / Concern A number of local communities within the MA06 Community Area, specifically the Hale Barns, Warburton Green, Ringway and Davenport Green areas, will experience significant and prolonged amenity, environmental and traffic disruption impacts, (including significant increases in local traffic from construction vehicles), associate to their proximity to the proposed route as well as multiple construction compounds in the area and road closures. There will also be a number of community facilities which will be directly and indirectly during the construction phase, which will also experience lesser impacts during the operational phase.</p> <p>Likely Impact Significant community impact – see above.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>HS2 should be required to demonstrate how loss of property has been reduced, as far as possible, through the detailed design stage of the programme. Trafford Council also require HS2 Ltd to provide adequate and timely engagement and support to the effected residents, businesses and other organisations. Where applicable, details of any mitigation or alternative provision to be provided need to be established in each case as a matter of urgency.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					HS2 should work collaboratively with Trafford Council in demonstrating, and agreeing, the full details of HS2's approach and procedures for dealing with the loss of property and affected residents and business in Trafford throughout the implementation of the Proposed Scheme.
Volume 2: Community Area Reports MA06	6	6.4.23 - 6.4.25	<p>Issue / Concern Construction of the scheme will be in close proximity to approx. 40 residential properties in the eastern side of Warburton Green and 30 residential properties in Hale Barns.</p> <p>Likely Impact These communities will be subject to significant noise and visual effects, resulting in a major adverse effect.</p>	<p>Proposed Mitigation Some landscape and earthworks mitigations</p> <p>Residual Impact Major</p>	Trafford Council require HS2 Ltd to provide adequate and timely engagement and support to the effected residents, businesses and other organisations. Where applicable, details of any mitigation or alternative provision to be provided



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					need to be established in each case as a matter of urgency.
Volume 2: Community Area Reports MA06	6.4	6.4.29	<p>Issue / Concern Construction of Manchester Airport High Speed station cutting retaining wall north will require the demolition of nine residential properties four on Hasty Lane and five on the A538 Hale Road in Hale Barns.</p> <p>Likely Impact This will significantly impact upon this community.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	HS2 should continue to engage with residents/businesses directly impacted by the HS2 construction works.
Volume 2: Community Area Reports MA06	6.5	6.5.1	<p>Issue / Concern Landscaping earth works are proposed to the west of the route for HS2 in the Hale Barns area as mitigation during the operational phase, but it is not clear if these mitigation works will be in place during the construction process.</p> <p>Likely Impact</p>	<p>Proposed Mitigation Some landscape and earthworks mitigations</p> <p>Residual Impact Major</p>	Trafford Council require HS2 to provide clarification of these works and where appropriate, acoustic barriers to enclose the Manchester Airport High Speed Station North Satellite Compound and adjacent material stockpile

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Significant impact on the local community if these mitigations are not in place during the construction process.		need to be in place during the construction process.
Volume 2: Community Area Reports MA06	6		<p>Issue / Concern Major highway works at M56 Junction 6</p> <p>Likely Impact Concern about the significant and prolonged community impact and severe traffic impacts.</p> <p><i>See also comments on Traffic and Transport Topic Area.</i></p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	HS2 should coordinate, and agree with Trafford Council and other relevant stakeholders, the final design and implementation programme of these works and the highways mitigation strategy with the local highway authority, with planned warning signage and information to road users and residents.
Volume 2: Community Area Reports MA06	6		<p>Issue / Concern The indicative M56 East Satellite Compound, Manchester Airport High Speed Station North and South Satellite compounds and the Manchester Airport High Speed Station Main Compound will each be accessed via the A538 creating substantial traffic disruption for local residents.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	HS2 should provide more information on the proposed operating times, technical consideration of the implications of increased construction traffic on the highway

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Substantial traffic disruption for local residents.</p> <p><i>See also comments on Traffic and Transport Topic Area.</i></p>		network and mitigation measures to control the environmental impacts associated to construction at these locations and a programme for monitoring impacts and addressing issues over the construction period of the Proposed Scheme.
Volume 2: Community Area Reports MA06	6		<p>Issue / Concern The closure of roads in order to facilitate the construction and operation of the Proposed Development access to the Manchester Airport High Speed Station will impact the local community significantly in terms of pedestrian accessibility within the surrounding area.</p> <p>Likely Impact Decreased active travel accessibility in the area.</p> <p><i>See also comments on Traffic and Transport Topic Area.</i></p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	HS2 should demonstrate, and agree with Trafford Council, how enhanced access for people with reduced mobility will be re-provided in this area and implemented.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Reports MA06	6		<p>Issue / Concern A number of public footpath closures and diversions would be required in all community areas.</p> <p>Likely impact HS2 construction could cause community severance and deter residents from making journeys by active travel modes</p> <p><i>See also comments on Traffic and Transport Topic Area.</i></p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	<p>HS2 should provide, and agree with Trafford Council and other relevant stakeholders, replacement footpath routes where existing routes would be impacted, ensuring that recreational access is not detrimentally impacted overall. If either temporary or permanent closure is required on any routes, details of the proposed route realignment are needed with local stakeholders.</p>

Summary

9.6.7 In conclusion, Trafford Council is concerned about the significant and prolonged impact on communities in terms of local amenity and the environment. This will be particularly acute during the construction phase, but there will also be operational impacts for communities in the Hale area. HS2 must provide compensatory schemes to mitigate the impact, including provision of alternative space for lost community venues as well as support for local bus services.

9.7 Ecology and Biodiversity

- 9.7.1 Trafford Council welcome the commitment from HS2 to consider ecology and biodiversity effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.7.2 Within the ES chapter on ecology and biodiversity Trafford Council is concerned by the lack of reference to the Environment Act and its requirements for Biodiversity Net Gain. Providing a lasting positive environmental legacy should be one of the fundamental principles of the Phase 2b extension to Manchester.
- 9.7.3 Trafford Council also have concerns over how a number of species and habitat surveys were undertaken. This is likely to result in the unjustified loss of valuable habitats as adverse impacts of the Proposed Scheme have not been adequately considered, nor appropriate mitigation been identified.
- 9.7.4 The Proposed Scheme is also likely to adversely impact on a number of designated sites within the community area. These include Woodland near Chapel Lane SBI/Hennersley Bank AWI, Sunbank Wood SBI and Small Wood.
- 9.7.5 Where habitat compensation has been proposed, it is unclear what conventional methodology this has followed. The proposed habitat creation to mitigate the loss of a section of Davenport Green Ancient Woodland is not considered acceptable, as Trafford Council does not consider that irreplaceable ancient woodland loss can be compensated through creation of new woodlands.
- 9.7.6 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the ecology and biodiversity related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 9.7.7 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.7-1.

Key Observations and Concerns

- Lack of reference to the Environment Act and its requirements for Biodiversity Net Gain.
- Wide scale unjustified loss of valuable habitats (including trees and hedgerows) possible due to surveys undertaken failing to assess the full range of natural assets within the community area.
- Inadequate surveys undertaken which may impact protected species such as bats and badgers.
- Adverse impacts on Woodland near Chapel Lane SBI/Hennersley Bank AWI, Sunbank Wood SBI and Small Wood.
- Permanent loss of habitat at Davenport Green Ancient Woodland.
- Proposed habitat compensation does not appear to follow any conventional methodology.

Recommendations and Additional Mitigations Required

- The Proposed Scheme must provide a minimum 10% biodiversity net gain across the community area.
- Justification must be provided where there are requirements to remove any trees, hedgerows, or areas of habitat.
- HS2 should be required to ensure that sufficient habitat and species surveys have been undertaken / undertake additional surveys where gaps are identified.
- HS2 Ltd, its contractors and undertakers must ensure that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.

HS2 Phase 2b Environmental Statement Consultation

- Advance planting of selected mature and semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity.
- Habitat fragmentation should be avoided wherever possible.

9.7.8 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.7-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	General Point / Commen t		<p>Issue/ Concern There is insufficient reference to the Environment Act, in particular Biodiversity Net Gain and how the GM Local Nature Recover Network and opportunity mapping is being used to positively identify ecological receptors.</p> <p>It is not currently clear how this statutory requirement is being delivered and maximised.</p> <p>Likely Impact N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	The assessment must be consistent throughout the ES and in accordance with the relevant statutory regulations and legislation. Clearer references to the Environment Act Priorities, in terms of articulating how Biodiversity Net Gain will be delivered are required.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					HS2 should produce a thorough and comprehensive CEMP/LEMP to manage retained habitats and a provide a minimum 10% biodiversity net gain.
Volume 2: Community Area Report MA06	General Point / Comment		<p>Issue/ Concern Loss of trees and lack of justification for their removal.</p> <p>Likely Impact Moderate.</p>	<p>Proposed Mitigation Replacement and compensatory planting.</p> <p>Residual Impact Moderate</p>	HS2 Ltd must provide justification where there are requirements to remove any trees along the route as well as trees being adequately replaced in accordance with Trafford's Core Strategy Policy R2.
Volume 2: Community Area Report MA06	General Point / Comment		<p>Issues/ Concern Trafford Council note that the Woodland near Chapel Lane SBI/Hennersley Bank AWI assessment of the impacts only identifies the direct loss of habitat as an impact. No consideration has been given to the</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact</p>	HS2 Ltd should be required to review and revisit impacts on the Woodland near Chapel Lane SBI/Hennersley Bank AWI

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>temporal impacts of the proposals and its isolation from other areas of woodland (Sunbank Wood SBI and Small Wood) and habitats during the considerable construction duration in line with best practice guidance.</p> <p>Likely Impact Moderate. ES assessment likely underestimates impact.</p>	Moderate	and ensure all impacts are appropriately mitigated (e.g. Phased development to limit isolation / habitat compensation within surrounding area) and develop a habitat management plan. HS2 should also revise the methodology to consider temporal impacts.
Volume 2: Community Area Report MA06	7.4	7.4.26	<p>Issue/ Concern Trafford Council note that approximately 50% of the Davenport Green Wood SBI will be lost, including approximately 54% of the area of ancient woodland within the SBI. This is significant loss of this ecological receptor. No consideration has been given to the isolation or the remnants of the SBI and the species it supports during the considerable construction period.</p> <p>Trafford Council does not accept that irreplaceable ancient woodland loss will be compensated through</p>	<p>Proposed Mitigation Para 7.4.76 Planting of native broadleaved woodland as follows: 5.1ha at Warburton Green and at Davenport Green Wood which will be</p>	<p>HS2 Ltd and its contractors and undertakers must ensure that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.</p> <p>Advance planting of selected mature and semi-mature native trees in</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>creation of new woodlands. This is contrary to Policy R2 of the Trafford Core Strategy, Policy 9 of GM Places for Everyone and Transport for Greater Manchester (TfGM's) IMS Environment and Sustainability Criteria - Biodiversity.</p> <p>Likely Impact Permanent. Significant adverse.</p>	<p>created in three locations. This will partly compensate for the loss of 0.7ha from Davenport Green Wood AWI. The planting will increase the connectivity of Davenport Green Wood and Flaxhigh Covert; and</p> <p>1.9ha of wood will be planted near Fairywell Brook and 0.3ha west of the River Bollin. This will partly compensate for the loss of 0.4ha from Birkin Bridge Lodge Wood ancient</p>	<p>combination with saplings must be agreed and provided at the earliest opportunity to allow sufficient time for establishment.</p> <p>Every effort should be made to relocate any mature and semi-mature trees within the Ancient Woodland.</p> <p>Further financial resources will be required to enable Trafford Council in collaboration with partners/ stakeholders to manage and protect the retained areas of woodland that are in poor condition, as well those areas that are being established.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>woodland. The planting will enhance connectivity of habitat between Fairywell Brook and Davenport Green Wood. It will also mitigate the effects of habitat loss on bats. This site was identified as ancient woodland towards the end of the assessment process and further opportunities for compensation will be explored</p> <p>Residual Impact Major</p>	<p>As part of the Local Environmental Management Plan development, HS2 Ltd should be required to provide a detailed impact assessment of the impacts on Davenport Green Wood SBI during the construction phase along with appropriate mitigation to retain habitat corridors and connectivity.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	7.3	7.3.6	<p>Issue/ Concern Impact on the nature conservation value (including bats) of designated nature conservation sites notably; Sunbank Wood, Well Double Woods, Cotteril Clough SBIs.</p> <p>In line with Trafford’s Core Strategy Policy R2, the Proposed Scheme should not negatively impact on such designations.</p> <p>Likely Impact Moderate. Potential harm and disturbance to bats likely to be higher and more detrimental that assessed.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Moderate</p>	<p>HS2 must be required to provide for mitigation against any negative and/or adverse impacts from the proposed scheme on designated sites/ assets.</p> <p>As part of the Local Environmental Management Plan development, HS2 should be required to provide bat assessments and appropriate mitigation at Sunbank Wood, Well Double Woods and Cotteril Clough.</p>
Volume 2: Community Area Report MA06	7.4	7.4.23	<p>Issue/ Concern Trafford Council note the potential for disruption and fragmentation of Sunbank Wood and ponds, Hennesley Bank AWI site and others during extended construction.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Major</p>	<p>HS2 Ltd should be required to improve site specific management at fragmented areas including Sunbank Wood and Ponds</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Permanent. Significant adverse.</p>		and Hennersley Bank AWI site during construction.
Volume 2: Community Area Report MA06	7.2	7.2.3	<p>Issue/ Concern Trafford Council note that no surveys have been undertaken at the following sites that have the potential to support key ecological features: Castle Mill LWS, Brickhill Wood LWS and Ancient Woodland Inventory (AWI) site, Wood near Chapel Lane Site of Biological Interest (SBI), Hennersley Bank AWI site, and Davenport Green Wood SBI and AWI site.</p> <p>Likely Impact Moderate. Potential loss of biodiversity.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Moderate</p>	HS2 Ltd should be required to assess sites where no surveys have been undertaken to provide robust baseline information in line with Policies EN15 and JP-Strat 13 of the PFE strategy to inform decision making and design and development of appropriate mitigation.
Volume 2: Community Area Report MA06	General Point/ Concern		<p>Issue/ Concern Trafford Council note the fragmentation of habitat, and in some cases periods of complete habitat isolation (Wood near Chapel Lane SBI), are not adequately reflected on, catered for or mitigated against.</p> <p>Likely Impact Moderate. Potential loss of biodiversity.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Moderate</p>	HS2 Ltd should be required to provide mitigation to include habitat corridors and/or phased works at the “Wood near the Chapel Lane SBI” to limit the impact of fragmentation.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	General Point/ Concern		<p>Issue/ Concern Trafford Council note that in MA06, on a precautionary basis it is assumed that all 52 ponds located within the land required for the construction of the Proposed Scheme in the MA06 area will be permanently lost. However, mitigation plans do not appear to show the creation of 104 ponds as would be expected where the adoption of 2 for 1 pond replacement policy is in place as expected of HS2. As part of the LEMP development.</p> <p>Likely Impact Moderate. Potential loss of biodiversity.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd should be required to provide the appropriate mitigation in the MA06 area in the form of 104 ponds as per Manchester Local Development Framework, Core Strategy, Development Plan Document, 2075 - EN15 and GM Places for Everyone Policy JP-g 9
Volume 2: Community Area Report MA06	General Point/ Concern		<p>Issue/ Concern Trafford Council note that native woodland planting should include ground flora not just saplings. The calculations which have been made with regards quantum of replacement habitat are not readily available, so it is not possible to review the rationale behind the proposals i.e., are habitats being created in targeted areas where location is appropriate or are habitats just being created where there is land available. In addition, there is an assumed loss of</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd should be required to provide the rationale and whether combined ecosystem services have been considered.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>veteran trees which will result in a permanent adverse residual effect.</p> <p>Likely Impact Moderate. Potential loss of biodiversity and adverse impact on character of the area.</p>		
Volume 2: Community Area Report MA06	General Point/ Concern		<p>Issue/ Concern Loss of Ancient Woodland Ancient woodland is irreplaceable and the combined loss of 3.3ha in this map area will result in a permanent adverse residual effect at the national level.</p> <p>Likely Impact Moderate. Potential loss of biodiversity and adverse impact on character of the area.</p>	<p>Proposed Mitigation Range of measures, including planting of 26.5ha of native broadleaved woodland, the translocation of ancient woodland soil with its associated seed bank where appropriate and planting native trees and shrubs.</p>	<p>HS2 Ltd should be required to ensure that sufficient, appropriate compensatory woodland habitat is incorporated into the scheme proposal.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>It is not clear whether these will be applied directly to existing ancient woodland edge habitats or within other areas within the woodland to improve overall condition</p> <p>Residual Impact Permanent, major, adverse.</p>	
Volume 2: Community Area Report MA06	General Point/ Concern		<p>Issue/ Concern Trafford Council note that within MA06 it is proposed to create 5.2ha of species rich and marshy grassland in response to the loss of grassland. The locations of the loss are not clear therefore the appropriateness of the proposed compensation cannot be verified. Additionally, some of the areas identified for compensation could be enlarged and would be of greater benefit.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	As part of the LEMP development, HS2 Ltd should be required to provide detailed clarification of the plans for habitat location in MA06 so the level of provision can be considered and evaluated.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact N/A</p>		
Volume 2: Community Area Report MA06	7.3	7.3.32 , 7.3.33 & 7.4.54	<p>Issue/ Concern Trafford Council note there will be a net loss of 46.1km (28.6 miles) of hedgerow (over 79%) resulting in a permanent adverse residual effect. GMCA do not consider this level to be acceptable, especially as the locations for 12km of new hedgerow to offset impacts and contribute towards maintaining connectivity have not been identified. Of the 58.1km of hedgerow, 40.7km have not been surveyed. It is not considered that this offers a robust baseline.</p> <p>Likely Impact Permanent Adverse.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Permanent adverse effect that is significant at county/metropolit an level.</p>	HS2 Ltd should be required to provide full details of the hedgerow mitigation scheme within the MA06 area with a District specific appraisal of loss against compensation measures.
Volume 2: Community Area Report MA06	7.3	7.3.3	<p>Issue/ Concern It has been assumed that only 3.8% of the hedgerows is classified as “Important” under the Hedgerow Regulations, 1997. Given GMCA knowledge of hedgerows in this area, particularly the ones in Greater Manchester, this seems to be a large underestimation.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Permanent adverse effect that is</p>	HS2 Ltd should be required to provide further details on hedgerow loss in the MA06 area to allow appropriate consideration of the robustness of the classification.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Permanent Adverse.</p>	significant at county/metropolitan level.	
Volume 2: Community Area Report MA06	7.4	7.4.76	<p>Issue/ Concern Trafford Council note that 1.9ha of wood will be planted near Fairywell Brook and 0.3ha west of the River Bollin to compensate for the loss of 0.4ha from Birkin Bridge Lodge Wood ancient woodland and enhance connectivity of habitat between Fairywell Brook and Davenport Green Wood. This is not an appropriate location for any amelioration as Birkin Bridge Lodge Wood is over 4km from Davenport Green Wood. In addition, the planting shown does not actually connect Davenport Green Wood and Fairywell Brook.</p> <p>Likely Impact Moderate.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	HS2 Ltd should be required to provide appropriate mitigation for the loss of Ancient Woodland at Birkin Bridge Lodge Wood.
Volume 2: Community Area Report MA06	7.4	7.4.55	<p>Issue/ Concern Trafford Council note the impact of the Proposed Scheme on the Rivers Bollin and Medlock in Manchester, along with associated tributaries including the Fairywell Brook.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact</p>	HS2 Ltd should be required to ensure that the protection and enhancement of key strategic green



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>More detailed improvements are required to address impacts on watercourse, grassland and woodland around Fairywell Brook in accordance with Trafford's Core Strategy Policy R2.</p> <p>Likely Impact Moderate.</p>	Moderate	infrastructure assets is complemented by a suite of policies to protect and enhance our network of green infrastructure, including protecting and enhancing sites of ecological value.
Volume 2: Community Area Report MA06	7.3	7.3.46 Table 16:	<p>Issue/ Concern Trafford Council note that water vole records were identified through the desk study, however no records were collected during the survey. It is not clear which scenario has been taken forward to inform mitigation. Based on the methodology section it would be assumed worst reasonable case i.e., water voles are present but that is not clearly set out.</p> <p>Likely Impact Disturbance to habitat and food sources.</p>	<p>Proposed Mitigation Unknown/ unclear.</p> <p>Residual Impact Moderate</p>	<p>HS2 and its contractors must be required to undertake all appropriate and necessary precautionary and mitigation measures to protect the water course from pollution and excessive damage that could detrimentally effect its ability to support water voles and otters.</p> <p>HS2 must be required to engage with Natural</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					<p>England and accredited ecologists to ensure that no adverse impacts arise either during construction or operation of the Proposed Scheme.</p> <p>Trafford Council request that GMEU is consulted upon such matters.</p>
Volume 2: Community Area Report MA06	7.4	7.4.2 and 7.4.3	<p>Issue/ Concern Assumption of implementation of measures set out set out within the draft Code of Construction Practice (CoCP), which includes sensitive construction practices and habitat management plans.</p> <p>Please see response on CoCP for more detailed response.</p> <p>Likely Impact Please see response on CoCP for more detailed response.</p>	<p>Proposed Mitigation Section 9 of the draft CoCP requires contractors to implement a range of measures to protect ecological receptors.</p> <p>Residual Impact Moderate</p>	<p>Penalties for not complying the CoCP need to be set out including but not limited to:</p> <ul style="list-style-type: none"> Habitat restoration at cost to contactor/ HS2 in accordance with guidance from Natural England, Local Authority, recognised Wildlife Organisation and/or accredited ecologist

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					<ul style="list-style-type: none"> Penalty fines in line with existing SI for protected species and habitat loss/damage

Summary

- 9.7.9 In conclusion, Trafford Council is concerned about the unjustified loss of valuable habitats which have not been fully assessed in the ES. There are a number of SBIs in the area, as well as Davenport Green ancient woodland, which will be impacted by the scheme.
- 9.7.10 Regard should be had to Environment Act and its requirements for 10% Biodiversity Net Gain in the MA06 community area. HS2 must ensure that all appropriate mitigation and protection measures are implemented before construction begins and habitat fragmentation should be avoided, where possible. In addition, advanced planting of selected mature and semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity.

9.8 Health

- 9.8.1 Trafford Council welcome the commitment from HS2 to consider health and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.8.2 There are likely to be adverse impacts on the mental and physical health of the residents of the area during the construction phase. Any severance of communities is likely to lead to poor mental health outcomes. Any reduction in access to high quality green space is likely to reduce physical activity levels, to the detriment of residents' physical and mental health.
- 9.8.3 Reductions in air quality resulting from both construction traffic and additional vehicle movements in the community area accessing the Manchester Airport High Speed station could have a significant impact on the health of local communities. Additional traffic is also likely to increase noise and disruption due to the greater number of vehicles using the local highway network.
- 9.8.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the health-related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 9.8.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.8-1.

Key Observations and Concerns

- Impacts on air quality and associated effects on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, people with existing health conditions).

- Impacts on the community and associated effects on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of communities all contributing.
- Impacts on health arising from changes to traffic and transport in terms of air quality, noise and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.
- Proposed temporary workers accommodation planned in the Manchester Airport Station area and lack of information on the potential impact on local amenities and services.
- Lack of active travel measures around the Airport Station
- Lack/loss of pedestrian routes to and in the vicinity of the Airport Station
- Impact of the HS2 route / Airport Station on residents' health and wellbeing, physical activity, sports participation and facilities
- Impact on residents' health and wellbeing, physical activity, sports participation arising from the reduction of sporting opportunities and facilities

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including the determination of eligibility for noise insulation.
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme, particularly with regards to increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.

- Provision of active travel measures and designs within the Airport Station including cycle parking, showers and lockers etc.
- Alternative provision/ re-alignment of diverted/ closed foots

9.8.6 There are potential health impacts to be considered across all topics of the ES, relating to traffic and transport, air quality, community, sound noise and vibration, and climate change. Specifics are addressed in these topic responses, but there are considerations to be made in relation to the impact on health in each area.

Table 9.8-1

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06			<p>Climate change – there will be health impacts of climate change, and as such HS2 must ensure that the construction and operation does not contribute to climate change. These will affect the most vulnerable residents (older people, children, those with health conditions, people living in poor housing). At a time when Trafford Council are prioritising addressing the climate crisis and reducing health inequalities, it is unacceptable for HS2 to have positive net emissions.</p> <p>Health risks of climate change include increased respiratory and cardiovascular disease, injuries and premature death as a result of extreme weather events (e.g. flooding), changes in prevalence of food- and water-</p>	<i>See Climate Change topic response</i>	Note the requirements in the climate change topic response. If emissions associated with the scheme are not net negative then provide financial compensation to enable local work to be undertaken to support our most vulnerable residents



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			borne illnesses and other infectious diseases, and threats to mental health and wellbeing.		whose health will be impacted by climate change.
Volume 2: Community Area Report MA06			<p>Air quality – any reduction in air quality will have a detrimental effect on health, specifically contributing to poor respiratory health, and impacting on already vulnerable populations (older people, children, and people with existing health conditions). This includes poor air quality in relation to construction activity, construction traffic, increased traffic due to road closures during construction, and increased traffic accessing the station at Manchester Airport.</p> <p>The assessment for air quality needs to be robust, and where negative impact is unable to be mitigated, then additional capacity needs to be made available within local services to provide this mitigation. For example, by providing a budget to improve active travel infrastructure, or additional services for people who experience poor respiratory health.</p>	<i>See Air Quality topic response</i>	Note the air quality topic response and provide financial mitigation to enable Trafford Council and partners across the system (including primary care) to identify key communities where air quality is reduced and provide and commission services that support people with poor respiratory health.
Volume 2: Community Area			Community – impacts on community will also impact on health and wellbeing, with disruption, loss of peaceful and pleasant green and blue space and severance of	<i>See Community topic response</i>	Provide financial mitigation to enable Trafford Council and

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Report MA06			<p>communities all contributing. There is a link between access to green space and positive mental wellbeing, which will be disrupted during the construction phase, with uncertainty of impact during operation.</p> <p>There is acknowledgement of the impact on community but little mitigation in place, particularly in the village of Warburton, where non-motorised routes across the community will be significantly altered and lengthened, meaning that some residents may not be able to easily visit friends, family or amenities. The impact on a small community is likely to have a substantial impact on mental health and wellbeing.</p>		partners to provide and commission services and activities that benefit (in particular) mental health and wellbeing.
Volume 2: Community Area Report MA06			<p>Traffic and transport – changes to traffic and transport will have an impact on health in terms of air quality, noise and ability to utilise active travel, as well as causing increased stress to residents, all of which will impact on health and wellbeing.</p> <p>Where there are new/diverted/reinstated roads, Active Travel infrastructure should be included to the relevant best practice standard at the time (currently LTN 1/20).</p>	<i>See Traffic and Transport topic response</i>	<p>Provide transport infrastructure that enables and promotes active travel as the easy option during both construction and operation.</p> <p>Provide financial mitigation to enable</p>

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			There are specific requirements below in relation to facilitating active travel, but consideration needs to be made in terms of wider health impacts relating to air quality and noise as detailed above and in the relevant chapters.		Trafford Council and partners to deliver and commission activity that support and enables residents to travel actively, reducing impact on road networks and the associated benefits this will bring.
Volume 2: Community Area Report MA06			Health and Wellbeing - Trafford Council has invested heavily in providing access and opportunities for all its residents to take part in Sport and Physical activity, to improve their Health and Wellbeing and address health inequalities across the borough. This route would put this Investment and associate health, wellbeing and physical activity outcomes at risk.	Proposed Mitigation None proposed Residual Impact Moderate	To enable this the Council would wish to seek financial compensation for the loss of any part of its open spaces, sports or physical activity sites caused by the development of the HS2 that is to the detriment of residents health and wellbeing. It is not expected that

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					the Council should bear the financial consequences to the detriment of its residents.
Volume 2: Community Area Report MA06	2.2	2.2.35	<p>Issue/ Concern It is not clear if safe cycle routes are in place to take cyclists from the road to the cycle parking at the airport station.</p> <p>Likely Impact It will discourage people from cycling to the airport station, resulting in lost opportunities to be physically active.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	<i>See Traffic and Transport comments on cycle routes and parking.</i>
Volume 2: Community Area Report MA06	2.4	2.4.5	<p>Issue/ Concern It is not clear what provision there is for people to take cycles on the train in order to continue their journey actively at the destination.</p> <p>Likely Impact If people are unable to take their cycle onto the train to continue their journey, they are less likely to cycle to the station resulting in reduced physical activity and increased motorised traffic.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	HS2 should ensure that there is significant cycle storage provision on board all HS2 trains, which is accessible and suitable for non-standard cycles. Consider 5% cycle

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					spaces as proportion of passenger capacity.
Volume 2: Community Area Report MA06	8.4	8.4.30	<p>Issue/ Concern The ES identifies that there will be increased stress to residents caused by both construction and operation of HS2.</p> <p>Likely Impact Increased stress will increase pressure on health and wellbeing services.</p>	<p>Proposed Mitigation Engaging and consulting with communities</p> <p>Residual Impact Minor</p>	HS2 should provide financial mitigation to enable Trafford Council to expand and enhance community wellbeing services for communities directly impacted by the construction and operation of HS2.
Volume 2: Community Area Report MA06	14.4	14.4.42	<p>Issue/ Concern Several permanent footpath diversions of 500-1000m are suggested in this map-book area.</p> <p>Likely Impact Increasing distances by this amount will increase journey times by an unacceptable amount, especially for people who are older or in poor health. This decreases the likelihood of people using the path for both transport and recreation and increases health risk from increased sedentary behaviour.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	<i>See Traffic and Transport comments on footpath diversions.</i>

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	14.5	14.5.25	<p>Issue/ Concern It is not clear if airport station cycle parking will be under cover, close to station and platforms, easy to find and with a direct, sheltered route to the station concourse.</p> <p>Likely Impact If cycle parking is not undercover then it will discourage people from cycling to the airport station. If cycle parking is hard to find or located away from the station concourse then it will discourage people from using it and therefore reduce people cycling to the station with resultant impact on health and wellbeing through reduced physical activity and increased air pollution from motorised vehicles.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Ensure that the cycle parking is close to the concourse, under cover, easy to find and with a direct sheltered route to the concourse.
Volume 2: Community Area Report MA06	14.5	14.5.25	<p>Issue/ Concern It is not clear if there are storage and facilities for cyclists (both passengers and staff) at the airport station e.g. showers, lockers etc.</p> <p>Likely Impact Lack of facilities and storage will discourage people from cycling to the airport station. This will impact on health and wellbeing through reduced opportunities for physical activity.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Minor</p>	HS2 should ensure provision of suitable facilities to enable staff to cycle to work. Consider enabling these to be available to passengers as well.

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	6.3	6.3.17	<p>Issue / Concern Impact of the HS2 route / Airport Station on Boden Vale Cricket Club</p> <p>Likely Impact Impact on access to sports facility. Specially one natural turf cricket square and changing facilities</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Ensure alternative provision and recompense is made available for the loss of any part of Trafford's open spaces, sports or physical activity sites caused by the development of the HS2 that is to the detriment of resident health and wellbeing.
Volume 2: Community Area Report MA06	6.3	6.3.17	<p>Issue / Concern Impact of the HS2 route / Airport Station on Hale Barns Cricket Club and Hale Barns Tennis Club</p> <p>Likely Impact Direct impact on sports facilities. Hale Barns Cricket Club - Including natural turf cricket pitches, natural turf cricket wickets and changing rooms. Hale Barns Tennis Club – artificial tennis courts and facilities.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major</p>	HS2 should be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					and wellbeing activity to be delivered.
Volume 2: Community Area Report MA06	6.3	6.3.17	<p>Issue / Concern Impact of the HS2 route / Airport Station on Hale Golf Course and Ringway Golf Course</p> <p>Likely Impact Direct impact on golf course and green space.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major</p>	<p>HS2 should be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health and wellbeing activity to be delivered.</p>

Summary

- 9.8.7 In conclusion, Trafford Council is concerned about impacts on the health and wellbeing of communities in relation to air quality, noise and loss of open, peaceful space.
- 9.8.8 HS2 must have regard to active travel measures during both construction and operation of the scheme, the design of the station must prioritise active travel modes. HS2 must also provide clarification on the date used to determine who is eligible for noise insulation. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.

9.9 Historic Environment

9.9.1 Trafford Council welcome the commitment from HS2 to consider the historic environment and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.

9.9.2 The historic environment comprises of the late 19th century/early 20th century suburban area of South Hale, the village of Hale Barns and the rural hamlet of Davenport Green. The latter is characterised by historic routeways, small farmsteads and open, agricultural fields. There are a number of designated and non-designated heritage assets in the vicinity, including several timber framed buildings. A significant group of 17th/18th century Grade II listed buildings are located at Davenport Green Farm on the west side of Roaring Gate Lane. Davenport Green Hall is a 17th century example of a timber framed, yeoman farmhouse on the south side of Shay Lane close to the junction with Brooks Drive. In the south of the Borough, the topography slopes towards the River Bollin and allows views beyond to the Cheshire plains. The proposed scheme therefore has the potential to impact on setting of the South Hale Conservation Area and Watch Hill, SAM.

9.9.3 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.9-1.

Key Observations and Concerns

- The Manchester Airport High Speed Station will result in the complete demolition of the Marriott Four Seasons Hotel, Grade II listed. The assessment undertaken is inadequate and no recording of the asset is proposed in the ES.
- Significant concerns regarding the impact of construction compounds, material stockpile and access road on a number of designated and non-designated heritage assets.

- Significant concern that the permanent effects of the proposed scheme have not been adequately assessed on designated and non-designated heritage assets particularly at Davenport Green.
- The ES does not detail the noise and vibration mitigation, and therefore, an assessment on the impact on historic landscape has not been carried out.
- The assessment does not fully assess the potential impact(s) on the setting of the South Hale Conservation Area and Watch Hill, SAM.

Recommendations and Additional Mitigations Required

- Trafford Council require HS2 to undertake an appropriate assessment of the Marriot Four Seasons Hotel, Grade II listed and propose recording and mitigation for the loss of the listed building.
- HS2 must be required to set out the proposed remediation and mitigation principles to protect and/or enhance these structures prior to any construction activities taking place.
- Trafford Council require HS2 to undertake further assessment of the permanent effects of the proposed scheme on all affected designated and non-designated heritage assets. The design principles of all proposed infrastructure need to be agreed with HS2 at ES stage in order to agree improved mitigation. In addition, remediation and mitigation principles need to be agreed between Trafford, Historic England and HS2 at ES stage.
- A greater level of landscaping is required in the Davenport Green area.
- Trafford require HS2 to undertake further analysis of the River Bollin East Viaduct. This would provide assessment of the potential impact on the setting of the South Hale Conservation Area and Watch Hill, SAM. Consequently,

9.9.4 Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.9-1

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report/ Map Book MA06	3.2	3.2.1	<p>Issue/ Concern <u>CT-05/06-352; CT-05/06-353-L1; CT-05-353; CT-05-354 CT-05-355; CT-05-356; CT-05-357a-R1; CT-05-357a Hale Barns</u> The Manchester Airport High Speed Station will result in the total loss of the Marriott Four Seasons Hotel, Grade II listed.</p> <p>The assessment undertaken is inadequate and no recording of the asset is proposed in the ES.</p> <p>Likely Impact Total loss of Grade II listed building. No recording proposed.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Major</p>	<p>Trafford Council require HS2 to undertake appropriate recording and mitigation for the loss of this asset. The Council is concerned that this is currently omitted from the ES.</p> <p>Recording and mitigation through research should be agreed in ES. Where loss of heritage assets cannot be</p>

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					demonstrably avoided, building records should be undertaken by a qualified conservation specialist in line with Historic England's Guidance on building recording (Level 3 minimum for non-designated heritage assets - Level 4 for Listed Buildings).
			<p>Issue/ Concern Significant concerns regarding the impact of construction compounds, material stockpile and access road along Brooks Drive & Roaring Gate Lane on Davenport Green Hall, Grade II and Davenport Green Farmhouse, barn & Paddys Hut all Grade II.</p> <p>Likely Impact</p>	<p>Proposed Mitigation Proposed at detailed design stage.</p> <p>Residual Impact Major</p>	HS2 must be required to set out the proposed remediation and mitigation principles to protect and/or enhance these structures prior to any construction activities taking place. These must be produced in

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Significant impact on setting of affected listed buildings and NDHAs		<p>collaboration with and agreed by Trafford Council and Historic England.</p> <p>Design principles of construction compounds; material stockpile; access roads; reinforced soil retaining wall; cutting retaining wall north; realignment of historic lanes; Manchester Tunnel South Portal & building need to be agreed at ES stage to improve mitigation.</p> <p>HS2 should be required to provide a greater</p>

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					level of landscaping is required in this area.
			<p>Issue/ Concern Permanent effects of the proposed scheme including the Manchester Airport High Speed Station & Metrolink provision; reinforced soil retaining wall and cutting retaining wall north; access roads; realignment of historic lanes; Manchester Tunnel South Portal & building will also have a major impact on the rural setting to listed buildings and NDHAs at Davenport Green. The impact on these heritage assets has not been adequately assessed.</p> <p>Likely Impact Significant impact on setting of affected listed buildings and NDHAs</p>	<p>Proposed Mitigation Proposed at detailed design stage.</p> <p>Residual Impact Major</p>	<p>Trafford Council require HS2 to undertake further assessment and the design principles of these structures need to be agreed with HS2 at ES stage in order to agree improved mitigation. In addition, remediation and mitigation principles need to be agreed between Trafford, Historic England and HS2 at ES stage.</p> <p>HS2 should be required to provide a greater</p>

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
					level of landscaping is required in this area.
			<p>Issue/ Concern Currently, the ES does not detail the noise and vibration mitigation, and therefore, an assessment on the impact on historic landscape has not been carried out. The Sound, Noise & Vibration response for Trafford Council states that “Due to the proposed works in the MA06 community area (overpasses, embankments, tunnelling etc) we would expect that piling and tunnelling works may be significant source of noise and vibration”. There is concern that these works will impact on timber frame buildings in the vicinity such as Davenport Green Hall, Grade II and Davenport Green Farmhouse, Barn & Paddys Hut all Grade II.</p> <p>Likely Impact Potential impact on affected listed buildings and NDHAs</p>	<p>Proposed Mitigation Not known</p> <p>Residual Impact Moderate</p>	Trafford require HS2 to provide full details of such noise and vibration mitigation at ES stage, and this should support further assessment of the potential effects of the operation phase on designated assets in the historic landscape around the route.

Document	Section/ Map Number	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Issue/ Concern The assessment does not fully assess the potential impact(s) on the setting of the South Hale Conservation Area and Watch Hill, SAM.</p> <p>Likely Impact Potential impact on affected listed buildings and NDHAs</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	<p>Trafford require HS2 to undertake further analysis of the River Bollin East Viaduct. This would provide assessment of the potential impact on the setting of the South Hale Conservation Area and Watch Hill, SAM.</p>

Summary

9.9.5 In conclusion the ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation.

9.10 Land Quality

- 9.10.1 Trafford Council welcome the commitment from HS2 to consider land quality effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.10.2 A significant amount of potentially contaminated spoil will be extracted from the South Manchester Tunnel and likely stored and processed at the South Manchester Portal Tunnelling Compound. The storage, processing and treatment of contaminated material can create adverse impacts on the local environment and any nearby sensitive receptors.
- 9.10.3 Trafford Council is aware that there are three Mineral Safeguarding Areas (MSAs) for sand and gravel which partially fall within the land required for the proposed scheme. Paragraph 212 of the National Planning Policy Framework states that Local Planning Authorities should not normally permit other development proposals in MSAs if it might constrain potential.
- 9.10.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the land quality aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 9.10.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.10-1.

Key Observations and Concerns

- Large amounts of potentially contaminated spoil will likely be stored and processed at the South Manchester Portal Tunnelling Compound, which could adversely impact local communities.
- Mineral Safeguarding Areas (MSAs) for sand and gravel are also located within the community area.

Recommendations and Additional Mitigations Required

- A bespoke focussed strategy on how site investigations/land surveys will be undertaken within potentially contaminated areas within the tunnelled section of the proposed scheme specifically.
- The analysis of contaminated land data for HS2 within the tunnelled route to be available as soon possible in order for it to be reviewed and assessed which will in turn determine the need for (if any) mitigation.
- Confirmation on the current mechanisms/ agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process.
- A detailed strategy for the processing, investigation and any treatment of spoil generated during the tunnelling shall be provided to the local authority prior to tunnelling work commencing.

9.10.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

Table 9.10-1

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Land Quality Report:LQ-001-0MA07 Code of Construction Practice	3.5	3.51	<p>Issue/ Concern Potentially contaminated spoil from the tunnelling process is likely to be stored and processed at the South Manchester Portal Tunnelling Compound.</p> <p>The Council is aware that potentially contaminated areas of land have been identified that could affect, or be affected by, the construction of the proposed scheme. It is expected that where sites which have been identified within the Conceptual Site Model (CSM) to potentially pose a contaminative risk in relation to the proposed scheme that detailed site investigation works will be carried out across the tunnelled route.</p> <p>Likely Impact The storage, processing and treatment of significantly contaminated material can create adverse impacts on the local environment and any nearby sensitive receptors.</p> <p>Reasonable Alternative Option(s) N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	Trafford Council understands that proposed investigation and assessment of potentially contaminated sites across the proposed scheme will be undertaken in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) framework and BS10175 and BS8576. However, Trafford expect a bespoke focussed strategy on how site investigations/land surveys will be undertaken within potentially contaminated areas within the tunnelled section of the



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					<p>proposed scheme specifically.</p> <p>Trafford Council expects that the analysis of contaminated land data for HS2 within the tunnelled route to be available as soon possible in order for it to be reviewed and assessed which will in turn determine the need for (if any) mitigation.</p> <p>Trafford Council require confirmation on the current mechanisms/ agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process</p>



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Land Quality Report:LQ-001-0MA07 Code of Construction Practice	16	16.1.2 5.2.6	Issue/ Concern Storage of contaminated spoil at the South Manchester Portal Tunnel Compound. Likely Impact The storage, processing and treatment of significantly contaminated material can create adverse impacts on the local environment and any nearby sensitive receptors.	Proposed Mitigation N/A Residual Impact Moderate	Trafford Council require HS2 to provide a detailed strategy for the processing, investigation and any treatment of spoil generated during the tunnelling shall be provided to the local authority prior to tunnelling work commencing. Trafford Council require confirmation on the current mechanisms/agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process



Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
LQ-001- OMA06	3		<p>Issue/ Concern</p> <p>Trafford Council is aware that potentially contaminated areas of land have been identified that could affect, or be affected by, the construction of the Proposed Scheme. The Council expect that where sites which have been identified within the Conceptual Site Model (CSM) to potentially pose a contaminative risk in relation to the Proposed Scheme that detailed site investigation works will be carried out (in particular, landfills within the area). The Council expects that the analysis of contaminated land data for HS2 within Trafford to be provided as soon as it is available in order for it to be reviewed and assessed which will in turn determine the need for (if any) mitigation.</p> <p>Likely Impact</p> <p>If locations of potentially contaminated are not investigated during the development of the proposed scheme this may result in adverse impact to workers, future site users and the wider environment.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	Trafford require HS2 to provide confirmation on the current mechanisms/agreements in place to ensure appropriate consultation with the regulator takes place throughout each stage of this process.
LQ-001- OMA06	n/a	n/a	<p>Issue/ Concern</p>	<p>Proposed Mitigation N/A</p>	Trafford Council require further information to



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Trafford Council is aware that there are Mineral Safeguarding Areas (MSAs) for sand and gravel which partially fall within the land required for the proposed scheme. Trafford Council question the appropriateness of using a 'Medium Sensitivity' value for all MSAs when the need and demand of different minerals will not be the same. There is currently for instance, a regional shortage in sand and gravel supplies in the North-West of England.</p> <p>Likely Impact Impact on mineral safeguarding areas.</p>	<p>Residual Impact Minor Moderate</p>	<p>ensure any HS2 excavations makes best use of available minerals and ensure they do not waste the resource.</p>
LQ-001-OMA06	3	27 / table 28	<p>Issue/ Concern Trafford Council are aware that potential areas of Made Ground are present in the area surrounding the Marriott Hotel in Hale Barns.</p> <p>Likely Impact If locations of potentially contaminated are not investigated during the development of the proposed scheme this may result in adverse impact to workers, future site users and the wider environment.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Minor</p>	<p>HS2 should be required to contact Trafford Council for further information which can be then be included within the site investigation and assessment methodology.</p>



Summary

- 9.10.7 In conclusion, Trafford Council is concerned about the large amounts of potentially contaminated spoil which be stored and process at the South Manchester Tunnelling Compound. The ES should also have regard to the Mineral Safeguarding Areas.
- 9.10.8 Further site investigations are required for contaminated land, with particular regards to former historic landfills. This should be set out in a bespoke Strategy. Any resultant remediation requirements should be agreed with the regulator and Trafford Council, confirmation of the mechanisms in place to ensure appropriate consultation with regulator is required.



9.11 Landscape and Visual

- 9.11.1 Trafford Council welcome the commitment from HS2 to consider landscape and visual effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.11.2 Effective consideration of the Landscape and Visual Impacts of both the construction and operational phase of HS2 will be key to ensuring any negative impacts of the scheme, where possible, can be mitigated. The HS2 route through Trafford within the MA06 area passes underneath the M56, under Hale Road, to the new Manchester Airport High Speed Station and then to the tunnel portal on the Manchester / Trafford boundary.
- 9.11.3 The new Manchester Airport High Speed Station will be a significant structure in the landscape which will be very visible across a wide area. The station is located close to existing residential properties on Brooks Drive, Davenport Green, Shay Lane and the wider Hale Barns area. Landscape planting will therefore be critical to providing adequate screening from the Station and associated HS2 infrastructure. More fundamental is the design of the station and its structures the landscape character and context of the site should underpin its design to allow it to integrate well into the landscape character of the area limiting its visual impact.
- 9.11.4 There will also be significant impacts during the construction phase as a result of the works required in relation to the M56 realignment and junction upgrades, the Airport Station and the tunnel portal – landscape mitigations are therefore needed to mitigate both the impact of construction and operation.
- 9.11.5 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the landscape and visual related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

9.11.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.11-1.

Key Observations and Concerns

- Limited engagement with TMBC during the preparation of the Landscape and Visual Impact Assessment
- Insufficient information about the vegetation lost during construction. The construction compounds cover a wide area and there is no indication of trees, some of which are ancient woodland, hedgerows and grassland which could be lost.
- Disagree with the HS2 assessment of the River Bollin Broad Urban Fringe LCA - this area will be affected significantly.
- Inconsistent approach to photomontages, they should be provided for all phases – including construction
- Concern about impact of views from public rights of way and the very limited mitigation which is proposed.
- Disagree with the construction and Yr1 effects for the River Bollin Broad Urban Fringe Valley LCA and Altrincham and Hale Suburban LCA

Recommendations and Additional Mitigations Required

- Advanced planting should be considered well in advance of construction to mitigate significant adverse construction and Yr1 effects.
- Require additional mitigation planting at various locations in Trafford within the MA06 area – see ‘Additional Landscape Mitigation Plans’.

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme
- The design of the Manchester Airport Station must have regard to and integrate with the surrounding landscape

9.11.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.11-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	Section 3 Stakeholder Engagement and Consultation	3.3.16	Issue/ Concern <i>Table 8 Engagement with expert, technical and specialist groups -TMBC - Meetings with technical leads to collate data and discuss landscape and visual impacts, viewpoint locations and site walkovers. Informed the identification of viewpoint locations to be assessed and reported within the ES, as well as the extent of the landscape and visual study area. Obtained information to improve understanding of</i>	Proposed Mitigation n/a ES Residual Impact Moderate	Trafford Council require further engagement with HS2, to identify what further assessment is required – see specific Trafford Council comments on the HS2 Phase 2B Hybrid Bill Environmental



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p><i>baseline conditions</i>. To what extent were viewpoints agreed with TMBC?</p> <p>Likely Impact Important viewpoints may have been missed from the assessment.</p>		<p>Statement consultation for MA04 and MA06. Limited engagement with Trafford Council in preparing the Environmental Statement.</p>
<p>Volume 2: Community Area Report MA06</p> <p>General Point/ Concern</p>			<p>Issue / Concern Landscape Policy and Design Requirements The Trafford Council comments on Landscape and Visual Impact are supported by the following policies: Greater Manchester, Places for Everyone - Policy JP-G1: Valuing Important Landscapes should be reflected in the proposals including having regard to ‘topography, geology and drainage’, ‘semi-natural habitats and woodland cover’ and ‘views and perceptual qualities’. ‘Opportunities to improve the intactness and condition of the landscape should be taken’ – this statement should be addressed when preparing the landscape proposals and HS2 should seek to protect key features of landscape importance.</p>		<p>HS2 should be required to provide appropriate landscape enhancement to improve the character and quality of the route within the proposed design.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The Trafford Local Plan: Core Strategy policies should be considered when preparing the landscape design including Policy L7: Design, which relates to design quality and functionality among other criteria. This includes that developments must be appropriate to their context and make best use of opportunities to improve the character and quality of an area.</p> <p>Policy R2: Natural Environment relates to the protection and enhancement of the environment and states that developers are required to provide an appropriate assessment of the Borough's assets in relation to a development – which includes the 'woodland, hedgerows and hedgerow trees including street trees and ancient trees'. MCC requires that a Tree Survey is carried out in accordance with BS 5837 (2012) Trees in relation to design, demolition and construction – recommendations' to identify the value of the existing vegetation along the route. Policy R3: Green Infrastructure follows on from R3 and also relates to protecting the Borough's assets and includes' corridors and linear features including</p>		

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			hedgerows, ditches, disused railways and verges'. These should be included in the tree survey.		
Volume 2: Community Area Report MA06	Section 11 – Landscape and Visual	11.2.11	Issue/ Concern <i>'It has been assumed that all vegetation within the land required for construction of the Proposed Scheme will be removed during construction...Removed vegetation will be reinstated...as is reasonably practicable...'</i> There is insufficient information about vegetation lost due to construction. The land potentially required for construction covers a broad area and there is no indication of trees, some of which are ancient woodland, hedgerows and grassland lost. This should be assessed as part of the effects on landscape. It is often assessed as an individual receptor within LVIAs. The proposed scheme drawings CT – 06 series do not show any reinstatement proposals. Without reinstatement proposals it is difficult to assess whether these would provide screening at Yr 15.	Proposed Mitigation n/a ES Residual Impact n/a	With regards to construction areas, compounds and material stockpile areas Trafford Council require HS2 to provide more information regarding the proposed reinstatement, as there are no proposals to assess.
Volume 2: Community Area Report	Section 11 – Landscape and Visual	276	Issue/ Concern	Proposed Mitigation	HS2 should provide a reassessment of the landscape effects



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
MA06			<p><i>11.3.10 For the purposes of this assessment, the study area for the Hulseheath to Manchester Airport area has been subdivided into six LCA.</i></p> <p><i>11.3.11 Four of the six LCA will not be significantly affected by the Proposed Scheme on account of their distance from the Proposed Scheme and/or screening by existing retained vegetation and topography, which will contain effects to a relatively narrow corridor along the route of the Proposed Scheme.</i></p> <p>Disagree that only two of the six LCAs will be significantly affected – It is considered that the River Bollin Broad Urban Fringe LCA will be affected significantly during construction and at Yr1 (Moderate adverse).</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>ES Residual Impact</p> <p>Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>upon the River Bollin Broad Urban Fringe LCA as it is considered that significant effects will prevail during construction and at Yr1.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	Section 11 – Landscape and Visual		Issue/ Concern Landscape Character Areas - The WDES placed all the MA06 land in Trafford within 1no Landscape Character Area (LCA) being 'Hale and Davenport Green Urban Fringe LCA' – The latest ES divides this LCA in two, with areas associated with the Bollin Valley to the south of the edge of Hale Barns being in the 'River Bollin Broad Urban Fringe Valley LCA' and land to the north being in 'Altrincham and Hale Urban Fringe Farmland' LCA. This is change is considered to be more representative of the landscape character of the urban fringe landscapes within this part of Trafford Borough. It is therefore an improvement over and above the LCAs considered within the WDES.		
Volume 2: Community Area Report MA06	Section 11 – Landscape and Visual	11.4.1	Issue/ Concern <i>Temporary Effects Arising During Construction - 'As is commonplace with major infrastructure works, the scale of the construction activities means that works will be visible from many locations and will have the potential to give rise to significant temporary effects that cannot practicably be mitigated.'</i>	Proposed Mitigation n/a ES Residual Impact	Trafford Council require HS2 to incorporate additional compensatory/ mitigation planting at locations and to the extents described by



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Advanced planting is recommended in the HS2 Landscape Design Approach (LDA) document and would likely be possible in many instances. Given the timescales involved, advanced planting could, in many instances, mitigate construction and Yr1 effects.</p> <p>Likely Impact A greater landscape impact, without the additional mitigation planting proposed by Trafford Council.</p>	Moderate	associated 'Additional Landscape Mitigation Plans'
Volume 2: Community Area Report MA06	Section 11 – Landscape and Visual	11.4.4	<p>Issue/ Concern <i>Temporary Effects Arising During Construction - 'Effects during the construction period may be reduced by establishing planting early in the construction programme. Advance planting is proposed on farmland east of Brooks Drive at Davenport Green. The planting will provide additional screening for visual receptors during construction (as well as into operation) and will also help better integrate the Proposed Scheme into the landscape.'</i> Advanced planting in this instance, is planting at the start of the construction period. When referring to</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Moderate</p>	Trafford Council require HS2 to incorporate additional compensatory/ mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>advanced planting, it is normal for it to be implemented well in advance of the commencement of the construction phase, rather than at the start of the construction phase as it will be far more effective from the start of the works.</p> <p>Likely Impact Greater landscape impact from the construction works at the start of the construction period.</p>		
Vol 5: App LV-001-OMA04	Part 2 Landscape Character Assessment	16-18	<p>Issue/Concern River Bollin Broad Urban Fringe Valley LCA – General disagreement with the findings associated with the construction and Yr1 effects upon the landscape of this LCA. During construction the M56 will be diverted over a distance of circa 1.4km whilst the HS2 underbridge/M56 East Tunnel is constructed (part of the diversion will be in this LCA). Also, HS2 will cross the Bollin Valley via the proposed River Bollin East Viaduct and carve a large cutting through the LCA. The 2022 ES findings in regard of landscape effects upon the character of the LCA are understated ie</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Minor Adverse</p>	Trafford Council require HS2 to incorporate advanced planting and additional compensatory/mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Construction effects and Yr1 effects are likely to be Significant (at least Moderate Adverse) – As a result, the River Bollin Broad Urban Fringe Valley LCA should have been considered in Volume 2. There is scope to provide some advanced planting and further mitigation to help assimilate some of the structures into the rural landscape.</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Minor Adverse</p>		
Vol 5: App LV-001-OMA04	Part 2 Landscape Character Assessment	24-26	<p>Issue/Concern Altrincham and Hale Suburban LCA – Disagreement with the assessment of the effects at construction and Yr1. The effects associated with the demolition of properties, extensive works to the Hale Road corridor and the nearby/adjacent construction of numerous large elements and adjacent associated compounds and storage areas is considered to be Moderate</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Minor Adverse</p>	Trafford Council require HS2 to incorporate advanced planting and additional compensatory/mitigation planting at locations and to the extents described by



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Adverse at Construction (significant). There is scope to provide some advanced planting and further mitigation to help assimilate the changes into the townscape.</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>Yr30: Minor Adverse</p>	<p>associated 'Additional Landscape Mitigation Plans'</p>
<p>Vol 5: App LV-001-OMA04</p>	<p>Part 2 Landscape Character Assessment</p>	<p>28-30</p>	<p>Issue/Concern Altrincham and Hale Urban Fringe Farmland LCA – with the exception of the anticipated Yr1 landscape effect, we generally agree with the findings associated with this LCA – Given the scale of the changes associated with the edge of Hale Barns, affected ancient woodland, the proposed terminus, cutting, tunnel portal and associated buildings, it is considered that a Major Adverse landscape effect will prevail at Yr1. These comments are notwithstanding the requirement for additional landscape</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>Trafford Council require HS2 to incorporate advanced planting and additional compensatory/mitigation planting at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>mitigation/compensatory works. There is scope to provide some advanced planting and further mitigation/ compensatory works to help assimilate some of the structures, roads etc into the landscape. GMSF proposals for extensive residential development in Timperley Wedge will also significantly affect this LCA - should this be considered when assessing cumulative effects? ES Cumulative assessment states that there are no developments which will result in cumulative construction or cumulative operational effects.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		<p>TMBC require cumulative landscape effects associated with GMSF proposals for Timperley Wedge to be assessed.</p>
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 106-110	<p>Issue/Concern VP 332-03-001 - View West from Footpath Ringway 13, near Pigleystair Bridge Dunham 8 - Page 106 - Photomontage included for construction, Yr1 and Yr15 - Generally agree with findings apart from Yr30</p>	<p>Proposed Mitigation n/a</p>	<p>Trafford Council require HS2 to incorporate additional compensatory/ mitigation planting</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>as there is unlikely to be any change in the visual effect between Yr15 and Yr30. – Yr30 visual effect is therefore likely to be Moderate Adverse. VP is located on FP dropping down into the Bollin Valley – assessment and mitigation appears appropriate. VP is meant to be representative of FP12, 13 and 14 although no mitigation proposed between diverted FP12 and HS2. Footpath FP12 Ringway is located to the west side of HS2 and will be diverted along new access road - the proposals include a construction compound and the operational access road and there is no landscape mitigation proposed apart from Grassland/new ponds – additional mitigation required by FP12 Ringway – woodland screening and or hedgerows, particularly to the HS2 side of the access road.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>	<p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>adjacent to access road /diverted Footpath FP12 at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 5: App LV-001- OMA04	Part 3 Visual Assessment	Pages 112- 113	<p>Issue/Concern VP 332-04-002 - View north-east from Sunbank Lane Bridge over the M56 - Page 112 - VP is located on bridge over M56 and HS2 passes under the motorway to the north within the view – Agree with findings of visual assessment and mitigation appears appropriate.</p> <p>Likely Impact Construction: Minor Adverse Yr1: Minor Adverse Yr15: Negligible Yr30: Negligible</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Negligible Yr30: Negligible</p>	
Vol 5: App LV-001- OMA04	Part 3 Visual Assessment	Pages 114- 115	<p>Issue/Concern VP 332-02-003 - View west by Yew Tree House on Sunbank Lane - VP is located on Sunbank Lane. HS2 will be in cutting and there will be earth banking to the top of the cut slope with landscape planting thereon. Large temporary material stockpile proposed to the immediate north of the property/road, with construction compound to the north – these areas to be reinstated (pastoral fields and hedgerows). Also two ponds lost to HS2 close to</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	Trafford Council require HS2 to incorporate additional compensatory/mitigation planting adjacent to access road off Sunbank Lane, and new balancing pond and adjacent access, close to FP13.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Hale Bank Farm. Generally agree with ES findings re visual effects. Large compound areas to north (adjacent to Yew Tree House) to be reinstated – hedgerows, trees and pastoral fields. Additional mitigation planting required – new access road off Sunbank Lane requires hedgerows/hedgerow trees. Additional Landscape Mitigation - New ponds (2no) within new grassland areas adjacent to Yewtree House to mitigate pond losses. Also landscape works required in the vicinity of new turning access adjacent to proposed balancing pond off Sunbank Lane to the west of Yewtree House, close to FP13.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Minor Adverse</p>		Also two new ponds required to mitigate loss of existing ponds. All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 116-117	<p>Issue/Concern VP 332-02-004 - View west from Sunbank Lane by Keepers Cottage - VP is located on Sunbank Lane. HS2 will be in cutting and there will be earth banking to the top of the cut slope with landscape planting</p>	Proposed Mitigation n/a	Trafford Council require HS2 to incorporate additional compensatory/mitigation planting ie



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>thereon. Large temporary material stockpile proposed to the immediate north of the property/road, with construction compound to the north – these areas to be reinstated (pastoral fields and hedgerows) FP 11 Ringway diverted, in part along new access road off Sunbank Lane. Woodland planting proposed between Keepers Cottage and M56/HS2. Generally, agree with assessment findings re visual effects. Large compound areas to north (adjacent to Yew Tree House) to be reinstated – hedgerows, trees, and pastoral fields. Additional mitigation planting required – new access road off Sunbank Lane requires hedgerows/hedgerow trees.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>hedgerows and trees adjacent to new access road off Sunbank Lane. All additional planting to be at locations and to the extents described by associated ‘Additional Landscape Mitigation Plans’.</p>
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 118-120	<p>Issue/Concern VP 332-02-005 - View east from Burnside, Warburton Green - Photomontage included for Yr1 only - why not construction and Yr15? VP is located on Footpath</p>	Proposed Mitigation n/a	Trafford Council require HS2 to provide photomontage for construction and Yr15



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Ringway FP13. HS2 will be in cutting and there will be earth banking to the top of the cut slope with landscape planting thereon with an access road in front. Large temporary material stockpile proposed within the entire area between the HS2 cutting and the houses/footpath. These areas to be reinstated (pastoral fields and hedgerows). Generally, agree with assessment findings re visual effects. FP 13 Ringway and FP Hale 9 diverted to run along back of houses on Burnside – additional mitigation planting required – Planting works (min hedgerow adjacent to access track alongside HS2. Additional Landscape Mitigation – New hedgerows proposed along alignment of existing hedgerows lost to temporary material stockpile -in all other areas construction zones affected are just left blank with an intention to reinstate – why are these proposed as new hedgerows when they clearly replace existing hedgerows lost to construction phase material stockpiles and compounds? Advance planting alongside diverted footpaths FP13 and FP9/rear of houses would be beneficial in terms of ameliorating construction and Yr1 visual effects.</p>	<p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>and the incorporation of additional compensatory/mitigation planting ie hedgerow alongside new access track on west side of HS2 and new woodland and or hedgerow adjacent to diverted Footpaths FP9 & FP13 (could be advanced planting). All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Minor Adverse</p>		
Vol 5: App LV-001- OMA04	Part 3 Visual Assessment	Pages 122- 123	<p>Issue/Concern VP 332-02-006 - View east from the A538 Hale Road - VP is located on Hale Road. Substantial alteration to view. Houses on Hasty Lane/Hale Road demolished, trees and garden frontages/vegetation removed along with sylvan character. Hale Road will be wider and there will be adjacent service roads. Proposals include new planting areas between main road and service roads and new hedgerows defining realigned front garden boundaries of adjacent retained properties. Land beyond gyratory road and either side of HS2 to be developed. Generally, agree with assessment findings re visual effects. Additional mitigation planting required – Planting works (min hedgerow between Station Access Gyratory Road and development land). Additional Landscape Mitigation – New planting required between retained houses</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Major Adverse Yr30: Major Adverse</p>	<p>Trafford Council require HS2 to incorporate additional compensatory/mitigation planting ie between retained houses located off the corner of Hale Road/Hasty Lane and the Station Access Gyratory Road and between Station Access Gyratory Road and development land and advanced planting in front of affected houses on Hale Road.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>located off the corner of Hale Road/Hasty Lane and the Station Access Gyratory Road – currently just engineered embankment. Advanced planting in front gardens of affected properties on Hale Road.</p> <p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Major Adverse Yr30: Major Adverse</p>		All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 124-125	<p>Issue/Concern VP 332-05-007 - View West from Runger Lane - VP is located on Runger Lane nr Hotels. Alteration to views from upper storeys of hotel, lower and ground level views screened by trees alongside the M56 – Construction drawings suggest intervening trees could be removed, which would open views up from Runger Lane and from the hotels – if this is the case then disagree with assessment findings re construction and Yr1 as views would open up and would include the motorway and all construction activity in the vicinity, which would be significant. If the screening trees are lost to construction activity as</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Negligible</p>	If construction activity requires trees to be removed, proposals need to incorporate replacement tree planting between the M56 and the hotels to ensure significant construction and Yr1 visual effects do not prevail in the longer term. All additional planting to be at



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>indicated, the visual effects would be significant (moderate adverse) during construction and Yr1 and ameliorated by Year 15 by established replacement screening trees alongside the M56.</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Negligible</p>		locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 126-129	<p>Issue/Concern VP 332-02-008 - View south-east from Brooks Drive - VP is located on Footpath Hale 16 and adjacent to backs of Houses on Brooks Drive. Generally, agree with findings apart from the anticipated reduction in visual effect between Yr15 and Yr30 -visual effect likely to prevail at Moderate Adverse. Substantial alteration to view as the viewpoint is located close to the Manchester Airport High Speed Station North Satellite Compound. Footpath Hale 16 will be closed. The new Terminus will be located directly in the view. An area of woodland planting will be planted in the foreground of the view, up to the rear</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	Trafford Council require HS2 to incorporate additional compensatory/ mitigation planting ie planting sections of the proposed woodland planting (areas closest to the houses) in advance to ameliorate significant levels of adverse visual effect during



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>boundaries of the houses on Brooks Drive – This planting will be implemented early in the construction period and will become gradually more effective at screening as the construction activity progresses. The proposed terminus and associated multi-storey elements will be highly visible beyond the planted area, until it becomes established.</p> <p>Advance planting? – The proposed woodland planting (or a proportion of it) between the backs of houses on Brooks Drive and the proposed Manchester Airport High Speed Station North Satellite Compound could be planted well in advance of the construction phase, thus moderating significant visual impacts at construction, Yr1 and Yr15.</p> <p>Davenport Green Wood (ancient woodland) – Construction needs to ensure that affected sections of the ancient woodland are kept to an absolute minimum.</p> <p>New tree planting proposed alongside? Davenport Green Wood should be extended to help compensate for that lost there does not appear to be any provision for any higher levels of mitigation other than to plant new woodland</p> <p>...woodland/ground flora translocation works?</p>		<p>construction and at Yr1 and extending the retained sections of Davenport Green Wood with areas of new woodland planting. All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Construction: Major Adverse Yr1: Major Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		
Vol 5: App LV-001- OMA04	Part 3 Visual Assessment	Pages 130- 131	<p>Issue/Concern VP 333-02-001 - View east from Davenport Green Hall on Brooks Drive - VP is located at northern end of Brooks Drive. Generally agree with construction and Yr1 findings. A lack/absence of screening planting between Brook Lane and HS2 will make the terminus/tram line/adjacent proposed development visible in the longer term so Moderate adverse visual effects could prevail beyond Year 1. Substantial alteration to view as the viewpoint is located close to a large temporary material stockpile that will require the loss of the mature trees and hedgerows within the fields and the construction activity associated with the terminus will be visible beyond the stockpile. Field will be reinstated and views of the terminus will prevail...not much screening planting proposed between the terminus and Brooks Drive in this</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Moderate Adverse Yr30: Minor Adverse</p>	<p>Trafford Council require HS2 to incorporate additional compensatory/mitigation planting ie Woodland/screening planting to areas between Brooks Drive and the terminus/tram line/adjacent proposed development and advanced hedgerow and tree planting along Brooks Drive. All additional planting to be at locations and to</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>location. Additional screening planting required between Brooks Drive and the Terminus/proposed development – more planting located closer to the terminus. Advance planting? – Hedgerow/tree planting along Brooks Drive could be planted well in advance of the construction phase, thus moderating significant visual impacts at construction and Yr1.</p> <p>Likely Impact Construction: Major Adverse Yr1: Moderate Adverse Yr15: Moderate Adverse Yr30: Moderate Adverse</p>		the extents described by associated 'Additional Landscape Mitigation Plans'.
Vol 5: App LV-001-OMA04	Part 3 Visual Assessment	Pages 132-134	<p>Issue/Concern VP 333-02-003 - View south-east from Footpath Hale 26 - VP is located on Public Footpath FP26, off Roaring Gate Lane. Photomontage prepared, but only showing construction. Very subtle change – why was this viewpoint selected for photomontage considering it is not affected significantly? and why does it only describe construction phase? Generally, agree with findings.</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Negligible</p>	Trafford Council require HS2 to incorporate additional compensatory/mitigation planting ie In areas adjacent to the tunnel portal and associated pumping station and storage tank.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The Manchester Tunnel South Portal Main Compound will be located to the east of this viewpoint but will be set behind retained existing trees located within the intervening land. Compound will result in the loss of extensive areas of scrub, trees, hedgerows, rough grassland, and an extensive, informal network of footpaths – all to be reinstated? The proposed depth/quantity of planting adjacent to the tunnel portal and associated pumping station and storage tank should be increased. Thorley Lane is diverted over a new bridge – the old road should be removed.</p> <p>Likely Impact Construction: Minor Adverse Yr1: Minor Adverse Yr15: Minor Adverse Yr30: Negligible</p>		The old disused section of Thorley Lane should be removed. All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.
Vol 5: App LV-001-OMA07,	Part 3 Visual Assessment	Pages 58-59	<p>Issue/Concern VP 333-03-006 - View south-east from the Embankment south of Newall Green - VP is located within recreational local green space on the edge of Wythenshawe. Vegetation will be removed – construction of the Manchester Southern Tunnel Portal will be visible ie taller plant will be visible above</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact</p>	



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>hoardings and intervening vegetation. Generally agree with assessment findings – large area of woodland planting proposed between viewpoint and tunnel portal area so short term adverse visual effects (significant) likely to be mitigated by Yr15.</p> <p>Likely Impact Construction: Moderate Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>Yr15: Minor Adverse Yr30: Minor Adverse</p>	
Vol 5: App LV-001-OMA07	Part 3 Visual Assessment	Pages 60-61	<p>Issue/Concern VP 333-03-009 - View south from Davenport Green - VP is located within recreational local green space on the edge of Wythenshawe and is located on the edge of a proposed large Railway Systems Compound – all to be reinstated? Clear views of the tunnel portal area, Thorley Lane Overbridge and possibly the terminus building beyond will prevail at Yr1 due to the juvenile nature of reinstated trees and hedgerows and the scale of the compound areas/areas to be reinstated. Yr1 visual effect likely to be Major Adverse. The proposed depth/quantity of planting</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact Yr15: Minor Adverse Yr30: Minor Adverse</p>	<p>Trafford Council require HS2 to incorporate additional compensatory/mitigation planting ie In areas adjacent to the tunnel portal and associated pumping station and storage tank and advanced planting to the edges of the compound area.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>adjacent to tunnel portal and associated pumping station and storage tank should be increased. Advanced planting to edges of compound area could help ameliorate expected significant levels of visual effect at construction and Yr1.</p> <p>Likely Impact Construction: Major Adverse Yr1: Moderate Adverse Yr15: Minor Adverse Yr30: Minor Adverse</p>		All additional planting to be at locations and to the extents described by associated 'Additional Landscape Mitigation Plans'.
Volume 2: Community Area Report MA06			<p>Issue/Concern</p> <p>The Zone of Theoretical Visibility (ZTV) highlights areas along the boundary between MA06 and MA07 along the boundary between Manchester and Trafford, where there are potential views of the development. The number and spread of views is very limited, and do not reflect the full extent of the ZTV. The urban fringe farmland to the north of Davenport Green is particularly sensitive.</p>	<p>Proposed Mitigation n/a</p> <p>ES Residual Impact N/A</p>	Trafford Council require HS2 to provide more viewpoints on key routes, footpaths and recreational green spaces particularly in more sensitive urban fringe farmland areas are required in order to fully understand the potential visual effects

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					during construction and operation.

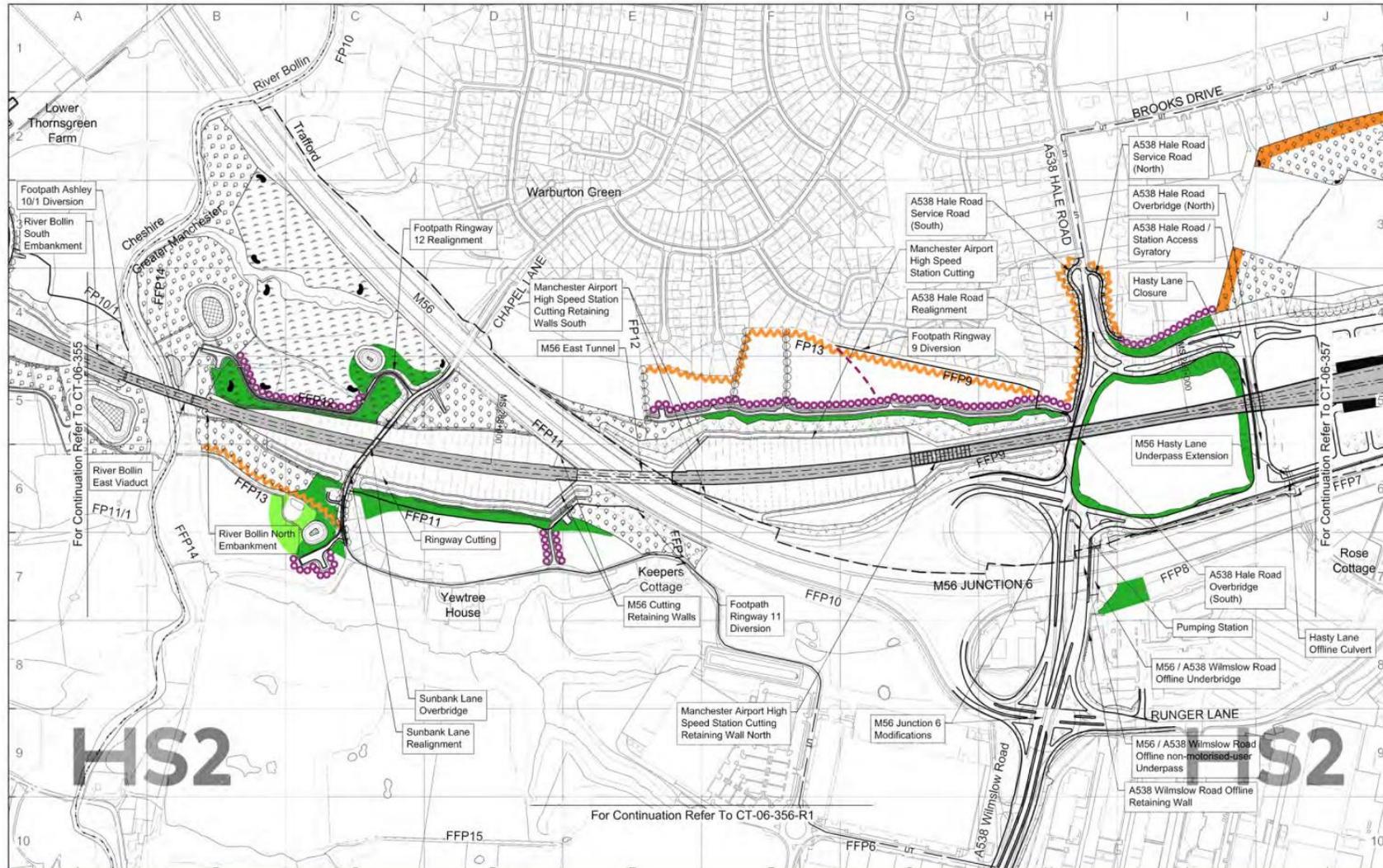
Summary

- 9.11.8 In conclusion, Trafford Council consider that insufficient detail has been provided on the reinstatement of planting and landscape proposals. Based on what is contained within the ES, the harm would be significant. Assessments / viewpoints need revisiting at several locations and advanced planting is required. Significant additional compensation planting is needed at several locations, photomontages are needed for all phases and tree surveys are required.
- 9.11.9 Trafford Council consider there is a significant opportunity to provide advanced planting, well in advance of construction to give time for this to become established and to help mitigate some of the impacts. The design of the Manchester Airport Station must also have regard to the surrounding landscape.



TRAFFORD COUNCIL

HS2 Phase 2b Environmental Statement Consultation



bw
 BARNES WALKER
 Unit 6 Longley Lane
 Northenden, Manchester
 M22 4WT
 T: 0161 946 0808
 E: design@barneswalker.co.uk
 W: www.barneswalker.co.uk

DWG NO.
 M3186-PA-04-V2
 CLIENT:
 Trafford Borough Council
 WORK STAGE: Planning
 SCALE: NTS@A3

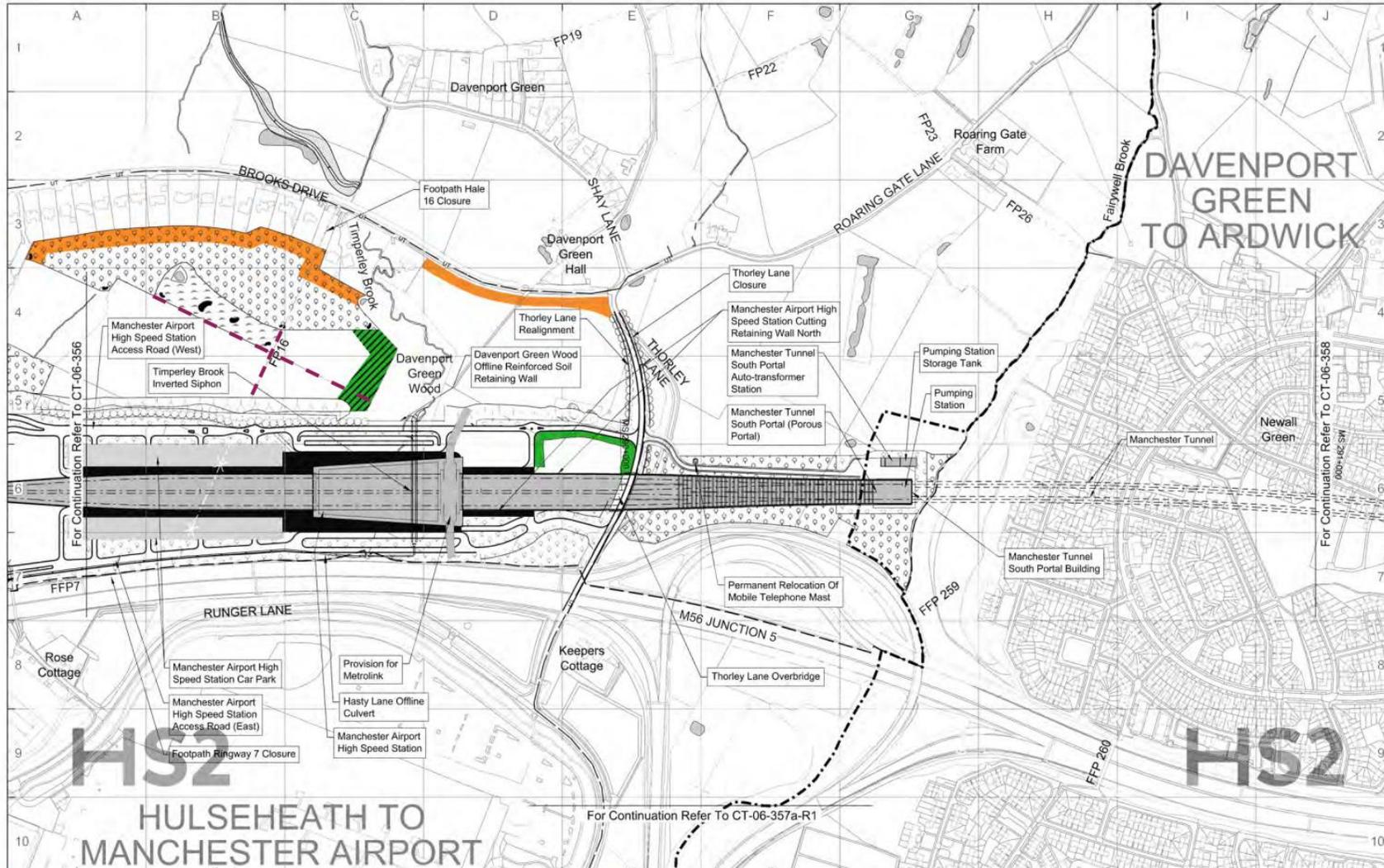
DWG TITLE:
 Proposed Scheme - Additional Landscape Works
 PROJECT TITLE:
 HS2 - MA06 Hulsheath to Manchester Airport
 DATE: 03.2020
 DRAWN BY: JH
 CHECKED BY: NF

KEY	
	Woodland Creation
	Grassland Habitat Creation
	Advanced Planting New Hedgerows / Existing Hedgerows Improvements
	Hedgerow
	Hedgerow Reinstatement / Improvement
	Advanced Planting Woodland Habitat Creation



TRAFFORD COUNCIL

HS2 Phase 2b Environmental Statement Consultation



Unit 6 Longley Lane
 Northenden, Manchester
 M22 4WT
 T: 0161 946 0808
 E: design@barneswalker.co.uk
 W: www.barneswalker.co.uk

DWG NO.
 M3186-PA-05-V2
 CLIENT
 Trafford Borough Council
 WORK STAGE
 Planning

DWG TITLE
 Proposed Scheme - Additional Landscape Works
 PROJECT TITLE
 MA06 Hulseheath to Manchester Airport
 DATE
 03.2020
 DRAWN BY
 JH
 CHECKED BY
 NF

KEY	
	Woodland Creation
	Grassland Habitat Creation
	Advanced Planting New Hedgerows / Existing Hedgerows Improvements
	Woodland Creation / Contribution (Subject to P/E Safeguarded Land position)
	Hedgerow
	Hedgerow Reinstatement / Improvement
	Advanced Planting Woodland Habitat Creation

9.12 Socio-Economics

- 9.12.1 Trafford Council welcome the commitment from HS2 to consider socio-economic effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.12.2 Effective consideration of the socio-economic implications of both the construction phase and operational phase of HS2 will be key to ensuring any negative effects can be mitigated where possible and that benefits can be adequately realised. It is evident that significant efforts and finances will be required to ensure that the skills needs during the construction and operational phases can be met at the most local level possible. Trafford Borough Council will endeavour to assist this process by providing a brokerage service to match training providers with HS2 requirements to ensure an adequately skilled workforce is available at the appropriate time. In addition, those businesses which are displaced on either a temporary basis or a permanent basis will need significant help and assistance to relocate their premises and workforce. Although the compensation scheme will go some way to addressing this aspect, there will be a significant draw on the Council's time and expertise to ensure businesses are supported during this process. In supporting businesses both during and after the construction phase, the Council must be fairly compensated for the loss or reduction in its business rates.
- 9.12.3 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.13-1.

Key Observations and Concerns

- Assessment of effects on the identified receptors is significantly inconsistent throughout Volume 2: Community Area assessments.
- Assumptions on the ability for businesses to continue to operate 'as normal' particularly during the construction phase must be clarified, as there is a risk that the scale of the potential effects on these businesses will lead to some businesses not being able to operate during the relevant periods, leading to job losses, business closures and/relocation to other areas of Trafford and/or GM.

- Some of the data used in assessments is old and out of date. Census 2021 datasets for any strategies prepared after April 2022 should be used.
- Clarification and agreement is needed to ensure that local employment and business opportunities are available during both the construction and operational phases.
- All elements of the assessment must be consistent throughout the ES and in accordance with the relevant statutory regulations, particularly the EIA Regulations 2017.
- Local businesses likely to be affected by the construction and/or operation of the Proposed Scheme must receive additional financial assistance to enable them to continue to operate 'as normal' whilst remaining profitable and viable.
- Trafford Council and other Local Authorities must be compensated for lost business rates as a consequence of the HS2 route causing businesses to cease trading.

Recommendations and Additional Mitigations Required

- Trafford Council will therefore be seeking additional finance to cover any loss of Business Rates from the development and would recommend as a key mitigation that HS2 works with the Council to establish a brokerage system between skills providers and HS2 to ensure that local residents benefit from the skilled employment opportunities and to enable HS2 to recruit locally for their required workforce both during and when the scheme is operational.
- More current Census data must be used wherever possible to be able to provide a more up to date understanding of the likely impacts of the scheme both during the construction phase and when complete.

9.12.4 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.12-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Comment			<p>Issue/ Concern The Council would wish to seek financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route within the borough that has been demonstrated to cause businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.</p> <p>Likely Impact Moderate</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	Trafford Council request that financial compensation is provided to Local Authorities on lost business rates as a consequence of the HS2 route causing businesses to cease trading.
General Point/ Comment			<p>Issue/ Concern Trafford Council must receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route within the</p>	<p>Proposed Mitigation N/A</p>	Trafford Council require HS2 Ltd to provide financial compensation to



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>borough that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.</p> <p>Likely Impact Moderate</p>	Residual Impact Moderate	Local Authorities on lost business rates as a consequence of the HS2 route causing businesses to cease trading.
Volume 2: Community Area Report MA06			<p>Issue/ Concern It is noted that a standardised methodology for assessing significance of effects was used which is based on professional judgement and drawn on guidance such as the Treasury Green Book, DfT Transport Appraisal Guidance Homes and Communities Agency (HCA) Employment Density Guide and the HCA Additionality Guide. This approach is considered appropriate and in accordance with the EIA Regulations.</p> <p>However, the assessment of effects on the identified receptors is significantly inconsistent throughout Volume 2: Community Area assessments with the sensitivity of receptors selected without clear justification and often underestimated.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd must be required to re-assess the potential effects on the receptors likely to be affected and provide appropriate mitigation to reduce these effects.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Underestimated impacts and effects are not appropriately mitigated, likely to result in harm to receptors.</p>		
<p>Volume 2: Community Area Report MA06</p>	12.2	12.2.2	<p>Issue/ Concern It is not clear why the listed businesses resources were not assessed given that the effects on these as a result of the proposed utility works have not been identified. If no effects are anticipated and these are therefore scoped out, this needs to be clearly stated in the scope / assumptions section.</p> <p>Likely Impact N/A if clarified.</p> <p>Businesses not able to operate during the relevant periods, leading to job losses, business closures and/relocation to other areas of Trafford and/or GM.</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Moderate</p>	<p>HS2 must be required to provide clear justification for scoping out the listed receptors provided in the scope / assumptions section.</p>
<p>Volume 2: Community Area Report MA06</p>	12.3	12.3.2	<p>Issue/ Concern Trafford Council have no comments on the baseline information provided, however, HS2 Ltd must use the Census 2021 datasets for any strategies prepared after April 2022 to ensure the latest information is used.</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	<p>HS2 Ltd should be required to use the Census 2021 datasets for any strategies prepared after April 2022 to</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Failure to utilise the most up to date data may lead to incorrect assumptions on the number of people or businesses affected by the route and as such the proposed mitigation approaches by HS2 may be limited in their success.		ensure the latest information is used.
Volume 2: Community Area Report MA06	12.4		<p>Issue/ Concern Approximately 1,480 FTE will be required within MA06 during the construction phase. Trafford Council require that HS2 Ltd identify the percentage of the potential employment opportunities to be required at a local level to identify the potential impacts on the current supply chain.</p> <p>If a significant proportion of vacancies are to be filled locally HS2 Ltd must work with Trafford Council and GM Partners to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed in order for the residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.</p> <p>Likely Impact</p>	<p>Proposed Mitigation None.</p> <p>Residual Impact Major</p>	HS2 Ltd to confirm that it will work in collaboration with Trafford Council and GM Partners to ensure the local workforce is able to benefit from the scheme and that the local supply chain is prepared as far as practical. This should be secured via local labour and supply chain agreements.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Not adequately equipping the local workforce and supply to support the construction and operation of the Proposed Scheme will lead to unnecessary carbon emissions and a greater impact upon the necessary local services required to support the anticipated number of construction workers that may be brought to the area.</p> <p>Not supporting local employment and economic opportunities would therefore be contrary to the Governments Levelling Up Agenda and HS2 Ltd's aim to be carbon neutral.</p>		Financial assistance will be required to develop skills co-ordinators to identify skill gaps to work with training providers to ensure a well trained workforce is able to meet the needs of HS2 through the construction and operational stages.
Volume 2: Community Area Report MA06	12.4	12.4.23	<p>Issue/ Concern</p> <p>The ES states that 320 jobs are expected to be displaced or lost as a direct result of the HS2 development and its impact on businesses discussed above which is calculated through a combination of sources. The impact from the relocation or loss of jobs is considered by HS2 to be minor in the context of the total number of people employed in the CEC, TMBC and MCC areas. However, given the dependency of these business on the current location and the likelihood of successful relocation considered to be very low, the loss of</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	Trafford Council require HS2 Ltd to provide financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route within the relevant

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>the business and its employees is considered to be significant adverse in EIA terms.</p> <p>It is not expected that the partner authorities should bear the financial consequences to the detriment of its residents and businesses.</p> <p>Likely Impact Significant adverse effect.</p>		<p>partner authorities that has been demonstrated to cause businesses to fail or had a significant impact on their income.</p>
Volume 2: Community Area Report MA06	12.4	12.4.28	<p>Issue/ Concern Signage measures to inform members of the public that businesses will still be open during the construction works of the scheme will be put in place however this only presumed to cover physical signage.</p> <p>Trafford Council consider this to be a significant issue as much of the marketing for such businesses will be through electronic means such as websites and online publications which may incur additional expenditure to be amended and advise their potential customer base.</p> <p>Likely Impact Moderate adverse impact</p>	<p>Proposed Mitigation Physical Signage to be in place.</p> <p>Residual Impact Moderate</p>	<p>Signage is suggested but needs to go further for changing and enhancing online marketing opportunities. HS2 Ltd should be required to provide additional compensation for assisting businesses to amend their online marketing</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					presence and advise their potential customer base.
Volume 2: Community Area Report MA06	12.4	12.4.3	<p>Issue/ Concern</p> <p>It is not clearly justified why the selected level of sensitivity for potential effects on the receptors identified is considered appropriate.</p> <p>In this regard, Trafford Council question why the sensitivity of the Cherry Tree Farm was chosen as medium when the explanation for choosing this sensitivity level is the same as for the high sensitivity receptors.</p> <p>It is noted that the magnitude of impact is based on the number of potential jobs that are likely to be lost, this is agreed. However, Trafford Council require that HS2 Ltd use the sensitivity matrix to understand the actual sensitivity and resilience of the business to the permanent magnitude of impact.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A.</p> <p>Residual Impact Moderate</p>	HS2 Ltd must be required to re-assess the potential effects on the receptors identified following an approach which is consistent and in accordance with the requirements of the EIA Regulations.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>As a result of the selected sensitivity of receptors, Section 12.4 is inconsistent with identifying the level of residual effects throughout with some effects identified as significant adverse and others as moderate adverse significant whilst the impact on the receptor remains the same (i.e., loss of trade / isolation). Similarly for some receptors it is clearly identified that the effect is of a temporal scope, however the timescales are not provided for most. In accordance with the EIA Regulations 2017,</p> <p><i>'The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect,... short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development'.</i></p>		
Volume 2: Community Area Report MA06	12.4	12.4.15 to 12.4.19	<p>Issue/ Concern</p> <p>It is not clear how the significance level was identified for the three resources identified in Table 33.</p> <p>It is not clear which resources are re-located or impacted indirectly for the significance to be determined.</p> <p>Similarly, para 12.4.20 states the Higher Thorns Green Farm will be demolished for the purposes of the assessment and</p>	<p>Proposed Mitigation</p> <p>Financial compensation</p> <p>Residual Impact</p> <p>Major</p>	<p>The businesses identified may well find it difficult to replicate their operation elsewhere and as such alongside financial</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>whilst the farm has adapted its operation for its users and this can be difficult to be replicated elsewhere, the sensitivity is assessed as medium.</p> <p>It is noted that the magnitude of impact is based on the number of potential jobs that are likely to be lost, this is agreed. However, Trafford Council require that HS2 Ltd use the sensitivity matrix to understand the actual sensitivity and resilience of the business to the permanent magnitude of impact.</p> <p>Likely Impact As a result of the selected sensitivity of receptors, Section 12.4 is inconsistent with identifying the level of residual effects throughout with some effects identified as significant adverse and others as moderate adverse significant whilst the impact on the receptor remains the same (i.e., loss of trade / isolation). Similarly for some receptors it is clearly identified that the effect is of a temporal scope, however the timescales are not provided for most. In accordance with the EIA Regulations 2017,</p>		<p>compensation, resources must be provided to the Local Authority to assist businesses with their relocation needs.</p> <p>HS2 Ltd must be required to re-assess the potential effects on the receptors identified following an approach which is consistent and in accordance with the requirements of the EIA Regulations.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<i>'The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect,... short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development'.</i>		
Volume 2: Community Area Report MA06	12.4	12.4.30 to 32	<p>Issue/ Concern Inconsistency with effects terminology - it is not clear what the level of residual effect is for the demolition of the socio-economic resources.</p> <p>Inconsistency with effects terminology throughout with some effects identified as significant adverse and others as moderate adverse significant with the inclusion of temporal scope, i.e., short-term effects whilst the timescales are not provided.</p> <p>Likely Impact N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	HS2 should provide clarity of information - to ensure consistency with the use of EIA terminology. It is not clear how temporary some of the effects are as it is not stated in the assessment. Similarly, it is not always clear whether the effect is moderate or major and significant.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	12.5	12.5.6	<p>Issue/ Concern</p> <p>The use of LA level data for this section is problematic, since it hides the clear and obvious importance of Manchester Airport and associated businesses located in its environs.</p> <p>This area is one of the key development areas for Greater Manchester, as set out in the Places for Everyone, with a number of business and residential developments planned that will be impacted by HS2.</p> <p>Whilst not all of these developments are committed and not directly included in the assessment, the characterisation of the assessment in paragraph 12.5.6 that the “<i>station is likely to encourage further investment in the surrounding area seeking to capture the benefits of increased activity around the station</i>” is incorrect. The majority of development are expected to have happened by the time the station is operational.</p> <p>Likely Impact</p> <p>Without the latest local level data at such a key juncture of the route, it is highlight likely that the construction of the Proposed Route and Airport Station will adversely affect the</p>	<p>Proposed Mitigation</p> <p>N/A</p> <p>Residual Impact</p> <p>Major</p>	Trafford Council require the impact of the construction of the station in constraining development to be addressed and assessed by HS2 Ltd.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>delivery and ability of both planned and committed development, resulting in abortive work and requiring scheme refinements, delays and additional costs to all parties.</p> <p>Not taking this into full account would therefore be contrary to the Governments Levelling Up Agenda</p>		

Summary

- 9.12.1 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.
- 9.12.2 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.
- 9.12.3 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

9.13 **Sound, Noise and Vibration**

- 9.13.1 Trafford Council welcome the commitment from HS2 to consider sound, noise and vibration and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.13.2 The MA06 community area consists of an already busy area in terms of noise and vibration, with the proximity to major road links such as the M56 and also Manchester Airport. However, this area is also densely populated with large areas of residential development in close proximity to the proposed works. As such, although existing ambient and background noise levels are high, there is still a significant risk of noise and vibration from both construction and operation of the proposed works affecting a large number of residents (and other noise sensitive premises) in the area. Concerns have been highlighted about the future baseline noise modelling for MA04, and although here in MA06 the impact of similar issues may be less pronounced due to the existing high noise levels, concerns remain that similar problems with the future baseline noise models could also occur in MA06 resulting in inaccurate assessments of the potential noise and vibration impacts.
- 9.13.3 Essentially, our overarching concerns in this area are that the introduction of noise and vibration generating activities (both from construction and operation) into such a densely populated area has the potential to create a significant adverse impact, and there is not sufficient clarity in the Sound, Noise and Vibration chapters of the ES to demonstrate that this has been adequately assessed or mitigated. In particular, the omission of an operational phase assessment of stationary mechanical plant for the MA06 community area, especially in the presence of such significant proposed infrastructure such as the Manchester Airport Station, is of major concern.
- 9.13.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the sound, noise and vibration related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

9.13.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.14.-1.

Key Observations and Concerns

- Concerns regarding the baseline noise level modelling, particularly in terms of the assessment of traffic noise.
- Concerns around the assumptions used to undertake the airborne construction noise or ground-borne construction vibration assessments.
- Concerns that pilling has been scoped out of the assessment, which would give rise to a significant amount of noise and vibration
- Manchester Airport High Speed Station has been omitted from the ES operational phase assessment. It is stated that all plant will be designed to minimise adverse impacts

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s) including the determination of eligibility for noise insulation.
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme, particularly with regards to increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.

- Additional mitigation and/or compensation measures to be provided to affected residents and businesses from both the construction of the route and the associated construction traffic, the latter of which will affect a large geographical in the south of Trafford
- The Manchester Airport Station must in included within the ES operational phase assessment

9.13.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.13-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix SV-002- OMA06			<p>Issue/ Concern It is not currently clear how construction impact criteria are being applied.</p> <p>Trafford Council notes that certain receptors could experience major impacts but as impacts are not deemed significant on a "community level" then no impact is predicted. Ultimately, these receptors will experience major impacts and are likely to raise noise/vibration complaints if additional mitigation is not provided to them (e.g. 618208).</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>Trafford Council require HS2 to provide justification as to the conclusions reached in determining eligibility for noise insulation.</p> <p>Additional mitigation and/or compensation measures required.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>It is not clear whether these receptors would therefore be eligible for noise insulation. Some of the works near to these receptors will be ongoing for 40-50 months with predicted levels of over 69-75dB (e.g. 612811, 612880, 612883, 613090).</p> <p>Likely Impact Detrimental impacts on physical and mental health and wellbeing of affected residents and businesses.</p>		<p>To be agreed with Trafford Council.</p> <p>Financial contribution to Trafford Council to manage the likely increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.</p>
<p>Volume 5: Appendix SV-002- OMA06</p> <p>General Point/ Comment</p>			<p>Issue/ Concern It is not currently clear how construction traffic impact criteria are being applied.</p> <p>Trafford Council notes that certain receptors could experience major impacts but as impacts are not deemed significant on a "community level" then no impact is predicted. Ultimately, these receptors which due to the construction routes are spread out over a significant geographical area, will experience major impacts and are likely to raise noise/ vibration</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>Trafford Council require HS2 to provide justification as to the conclusions reached in determining eligibility for noise insulation.</p> <p>Additional mitigation and/or compensation measures required.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>complaints if additional mitigation is not provided to them (e.g., 618208).</p> <p>It is not clear whether these receptors would therefore be eligible for noise insulation. Some of the works near to these receptors will be ongoing for 40-50 months with predicted levels of over several dB.</p> <p>Likely Impact Detrimental impacts on physical and mental health and wellbeing of affected residents and businesses.</p>		<p>To be agreed with Trafford Council.</p> <p>Financial contribution to Trafford Council to manage the likely increased demand for health and mental wellbeing services and noise complaints arising from the Proposed Scheme.</p>
<p>Volume 5: Appendix SV-002- OMA06</p> <p>General Point/ Concern</p>			<p>Issue/ Concern It is not clear what the assumptions were made for the airborne construction noise or ground-borne construction vibration assessments.</p> <p>Due to the proposed works in the MA06 community area (overpasses, embankments, tunnelling etc) we would expect that piling and tunnelling works may be significant source of noise and vibration.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>To fully understand what has been considered in the assessment, HS2 should present the assumptions on construction plants etc in the ES and supporting documentation.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Due to a lack of clarity and detail presented in the ES, we are not satisfied that the findings fully show that limited adverse impact is predicted during the construction phase.		During the detailed design stage, it is anticipated that updated assessments will be provided detailing any changes in construction methodology and full details on the assessment assumptions (inclusive of working hours, operational plant and associated noise level, plant on-time and the duration of works).
Volume 5: Appendix SV-002- OMA06			<p>Issue/ Concern Omission of an operational phase assessment on plant associated with Manchester Airport High Speed Station.</p> <p>It is stated that all plant will be designed to minimise adverse impacts but due to the size of this element, it is</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	Due to the size and significance of Manchester Airport High Speed Station, Trafford Council consider that an



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Concern			<p>considered that an assessment should be included in the ES.</p> <p>Likely Impact Depending on the design, this has the potential for major adverse effects.</p>		<p>assessment on operational phase plant must be included in the ES. This will also require an understanding of the existing background noise level (LA90) to feed into the design.</p>
Volume 5: Appendix SV-002- OMA06	3.6	Page 10 Table 1	<p>Issue/ Concern There are no baseline data presented for any measurement locations within Trafford or nearby areas. The following noise monitoring locations are presented in the MA06 area map book, but no data is presented (ML712709, ML712710, ML712711, ML712713, ML712714 & ML712715).</p> <p>Likely Impact The predicted baseline noise levels from road traffic modelling appear to be within the expected noise range given the distance to the M56 motorway and other major road links however, this must be supported with</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>If data has been measured at these locations, as indicated within the map books, then it must be presented in the ES and supporting documentation.</p> <p>Predicted baseline noise data must be supported by and measured noise data.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			measured noise data to fully verify that the modelling predictions are correct.		The predicted levels must then be verified against the measured levels to ensure that the predictions are suitable and representative of the existing/future noise environment.
Volume 5: Appendix SV-002- OMA06	4.2	Page 28 Table 5	<p>Issue/ Concern It appears that several airborne construction noise receptors have been incorrectly categorised as per the BS5228 ABC method.</p> <p>Categorisation must be undertaken by rounding to the nearest 5dB, as per the guidance, instead it appears values have been rounded up to the nearest 5dB.</p> <p>Likely Impact The assessment presents higher noise threshold criteria at certain receptor locations due to the way that receptors have been categorised. Therefore, the assessment at these locations is not in line with current</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>HS2 should undertake categorisation by rounding to the nearest 5dB, as per the guidance BS5228.</p> <p>The construction noise assessment must then be updated to reflect the correct noise categories and magnitude of impact from the proposed works.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>guidance and may not present a representative assessment of the likely impacts.</p> <p>This may also impact future construction noise assessments if the receptor thresholds are not presented correctly in the ES.</p>		
Volume 5: Appendix SV-002- OMA06)	4.2	Page 28 Table 5	<p>Issue/ Concern It is not clear how construction impact criteria are being applied within the assessment.</p> <p>It appears that certain receptors are predicted to experience major impacts, but it is not clear whether these receptors are eligible for noise insulation or additional mitigation measures.</p> <p>In addition, some of the proposed construction works near to these receptors will be ongoing for 40-50 months with predicted levels of over 70dB (e.g. 612811, 612832, 612880, 612883 & 613090).</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>HS2 should provide more narrative on how the impact criteria are being applied in the assessment.</p> <p>The impact assessment must consider the duration of works when defining the magnitude of impacts.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>We consider that receptors will experience major impacts where the predicted noise level is close to the BS5228 threshold for such a long duration, and we believe these receptors are likely to raise noise complaints.</p> <p>BS5228 considers a “significant extent of time” to be greater than 6 months, the duration of the proposed construction works must be considered when determining the level of impact within the assessment.</p>		<p>It must also be clearly presented in the ES which receptors will be provided with additional mitigation measures and the residual impacts due to construction noise and vibration.</p> <p>HS2 must allow for mitigation to be provided at all receptors within Trafford where significant adverse impacts (above the SOAEL) are predicted.</p> <p>All mitigation measures must follow the hierarchy presented in the ES</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					(Volume 1, para 9.14.3) and the residual impact must be presented to ensure that the proposed mitigation is suitable.
Volume 5: Appendix SV-002- OMA06)	4.2	Page 54 Table 8	<p>Issue/ Concern Categorisation of construction traffic impacts.</p> <p>In the assessment, major impact from construction road traffic is defined as a change of >10dB. This effect levels correspond to long-term noise change as per the methodology provided in the SMR (Part 1, Table 59).</p> <p>We consider these criteria suitable for assessing operational road traffic noise but construction road traffic must be assessed in accordance with Table 3.17 of the DMRB (increase in BNL from construction traffic). This is consistent with the short-term noise change as per the methodology provided in the SMR (Part 1, Table 59), with the major impact is defined for a change in noise level (BNL) of >5dB.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	<p>HS2 should be required to change the construction phase road traffic to reflect that in the latest DMRB guidance (LA111, Table 3.17).</p> <p>These criteria must be applied to all existing road links within Trafford that are to be used during the construction phase of the development.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Associated impacts from construction road traffic could be greater than that reported, although currently no existing road links within Trafford are considered in the assessment.</p>		
<p>Volume 5: Appendix SV-003- OMA06</p> <p>General Point/ Concern</p>			<p>Issue/ Concern Without presenting the “full timetable” or at least what has been assumed in the operational assessment, it is not clear how often the predicted maximum noise levels (L_{Amax}) are likely to occur during the night-time (between 23:00 and 07:00).</p> <p>It is understood that the evidence to support the chose L_{Amax} criteria are based on research findings (as stated in Information Paper E9). However, the research findings that were used to support the definition of the SOAEL criteria (85dB from <20 passbys or 80dB from >20 train passbys during the night) are neither presented in the ES nor referenced.</p>		<p>HS2 should be required to present and reference the findings from the research in the ES. The ES must provide sufficient evidence as to why this level is applied as the SOAEL and compare with other existing guidance (such as that from the World Health Organisation).</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact The SOAEL for maximum noise events appears far higher than generally accepted criteria. As the maximum noise levels have the potential to cause sleep disturbance, it is crucial that the findings from the research are presented/referenced and provide sufficient evidence as to why this level is applied as the SOAEL.</p>		<p>The assessment must also clearly present the assumptions on the operational timetable and include discussion on the effects from LMax passbys and their likely occurrence during the night-time.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix SV-003- OMA06	3.2	Page 11 Table 6	Issue/ Concern At certain receptor locations, incorrect baseline values (without proposed scheme) are used in the operational phase assessment (eg 612763, 612765 and 612880). Likely Impact This is unlikely to change the outcomes of this assessment but may have impacts on potential updated assessments further down the line.	Proposed Mitigation N/A Residual Impact N/A	HS2 must be required to update the assessment to reference the correct baseline levels without the scheme.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix SV-003- OMA06)	3.2	Page 11 Table 6	<p>Issue/ Concern It is not clear whether the predicted operational airborne values for the proposed scheme only include contributions from road traffic in addition to rail noise.</p> <p>It appears that the operational phase noise graphs only present levels associated with rail noise but the values presented in the assessment include road traffic noise.</p> <p>Likely Impact N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact N/A</p>	Trafford Council require HS2 to ensure the operational noise assessment and associated graphs are consistent and present the same data.

Summary

- 9.13.7 In conclusion, Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works.
- 9.13.8 Clarity is required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.

9.14 Traffic and Transport

- 9.14.1 Trafford Council welcome the commitment from HS2 to consider traffic and transport effects and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.14.2 Effective consideration of the Traffic and Transport impacts of both the construction and operational phases of HS2 will be key to ensuring any negative impacts of the scheme, where appropriate, can be mitigated.
- 9.14.3 The HS2 route through MA06 goes under the busy M56 motorway, to the Manchester Airport Station. The area around Manchester Airport / M56 J5 and 6 is already under significant pressure and there are several large development sites proposed in the area, including around the Airport site and at Timperley Wedge, in Trafford.
- 9.14.4 There will be significant impacts both during the construction and operational phases. During construction, the impact will be primarily from traffic associated with the construction of the following large infrastructure elements: M56 J6, proposed new gyratory and airport station access, the airport station, Manchester Tunnel, and the M56 crossing. Access for these works is all essentially from the M56 junction 6 and the surrounding local road network which is already congested at peak times.
- 9.14.5 During operation the impact will be from traffic travelling to and from the airport station mixing with the current traffic and increased traffic relating to local developments.
- 9.14.6 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.15-1.

Key Observations and Concerns

Highways modelling

- Fundamental issues with the baseline information used to inform the Highways modelling. It does not include Places for Everyone allocations – including Timperley Wedge, Manchester Airport growth or Northern Powerhouse Rail.
- All highway improvements and mitigations must be supported by robust highway modelling, and this is currently not the case. Trafford Council and GM Partners are unable to fully comment on, or support, the suitability of the proposed highway schemes as it is not possible to ascertain if they are fit-for-purpose and effectively mitigate impacts of HS2.

M56 – Junction 6

- The scale of the junction and highway infrastructure for Manchester Airport is not appropriate. HS2 should ensure that the highway infrastructure around Manchester Airport is fit for purpose.
- The changes to M56 Junction 6 do not provide an acceptable solution to accommodate existing trips, a situation which is further exacerbated when additional growth is added to the network.
- Phase 1 of the South Manchester Highways Study demonstrated that the proposed ‘HS2 network’ does not have capacity to support growth in the area, or NPR.
- Limited engagement with National Highways and the Department for Transport (DfT) on M56 Junction 6 issues.

Local Road Network

- HS2 will be adding significant additional trips to an already saturated highways network.
- The Hale Road gyratory will create a convoluted route and extend journey times
- New service roads on Hale Road will have a significant impact on residential properties
- Concern about drop off / access to the station from the realigned Thorley Lane to the north of the station
- Limited active travel / public transport infrastructure through the Hale Road gyratory and on the realigned Thorley Lane
- Realignment of M56 during construction will lead to the closure of Sunbank Lane / Chapel Lane for an extended period and an alternative temporary route should therefore be provided.

Timperley Wedge Spine Road / integration

- Opportunity for the realigned Thorley Lane / Tunnel service road junction to include provision for the Timperley Wedge Spine Road.

Construction

- Significant concern about the number of HGVs accessing the construction compounds in the MA06 area – includes sites at the Airport Station, tunnel portal and south of Hale Road.

- For MA06, not including the Castle Mill and Mobberley Rd North satellite compounds, the vast majority of the construction traffic is assumed to use M56 J6, in the region of **1757 Cars/LGV per day** and **1692 HGVs per day** in the “**busy period**” and in the region of **2124 Cars/LGV per day** and **2062 HGVs per day** in the “**peak period**”
- Runger Lane (MCC) is identified as a main construction route to Junction 6 which requires significant upgrades to accommodate the construction traffic. Likely to have an impact on access to the Airport from Thorley Lane / Trafford.
- Concern that some roads identified as construction routes are not suitable for large construction vehicles, such as Shay Lane.
- Unclear if workforce parking spaces will be included within the construction compounds.

Recommendations and Additional Mitigations Required

- M56 Junction 6 and Hale Gyratory to be redesigned to be fit for purpose for both HS2, the SRN and LRN taking into account planned and committed developments and growth of Manchester Airport
- Need to re-establish South Manchester Highways Group with HS2, DfT, National Highways, GM Partners, Manchester Airport and Cheshire East. The issues on the M56 corridor need to be considered in the wider context.
- HS2 to construct the section of spine road through the HS2 tunnel construction compound, linking to Roaring Gate Lane.
- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- Road condition survey prior to commencement and at regular intervals during construction
- Provision of EV charging points within main and satellite construction compounds

- Financial contributions to facilitate improvements to the adopted highways for both vehicles, cyclists and pedestrians
- Advanced planting and public realm improvements adjacent to the proposed construction routes and CCB
- Contributions towards local public transport improvements/ provision during the construction
- Alternative footpaths and crossings where PRoWs are being closed/ diverted
- Amend construction routes to avoid use of inappropriate/ unsuitable routes

9.14.7 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.14-1

General Comments affecting all of MA06

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Comment			Issue/ Concern Trafford Council is concerned about the impact of HS2 construction on the wider local road network. The ES has focused on the identified construction routes, but the impact will be significantly wider than this in terms	Proposed Mitigation N/A Residual Impact Moderate	HS2 should be required to fully assess the impact on the wider LRN and identify / deliver suitable mitigations in

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>of workforce related traffic and other traffic which is diverted / avoiding the construction areas.</p> <p>In the MA06 area, this is a particular concern in relation to the Timperley Wedge development site where a number of junction have been identified as needing improvements. In addition, the cumulative impact of the additional traffic must be considered – for example along Hale Road and the A56 in Altrincham / Sale.</p> <p>Likely Impact Without mitigation, there will be significant congestion on the wider LRN impacting residents and businesses.</p>		consultation with Trafford Council and other local stakeholders.
General Point/ Comment			<p>Issue/ Concern Trafford Council is concerned that a significant amount of new/ upgraded transport infrastructure (signalling, crossings, street lighting etc) will be needed to facilitate the Proposed Scheme and these will be powered by ‘standard’ forms of energy – namely fossil fuel based.</p> <p>Likely Impact</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	HS2 should be required to use renewable powered transport infrastructure where possible, including the use of Solar PV powered lighting, signalling and signage necessary to facilitate

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Using fossil fuels to power associated infrastructure is counterintuitive and will only increase the carbon emissions of the Proposed Scheme.</p> <p>National and local net zero targets will be harder to achieve and may be missed.</p>		the Proposed Scheme and its effects.
Volume 2: Community Area Report MA06	14	14.3.2 0 – 25	<p>Issue/ Concern</p> <p>Trafford Council is extremely concerned that the Highways Modelling for HS2 both during construction and operation does not account for the following foreseeable development and as such that the traffic demand associated with these developments is not modelled and that the proposed junction layouts will not be adequate to accommodate the envisaged demand.</p> <p>Key development sites missing:</p> <ul style="list-style-type: none"> o Timperley Wedge o Airport Growth o Global Logistics o Wythenshawe Hospital <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>Proposed gyratory and new traffic signalled junctions at M56 J6 and Hale Road</p> <p>Residual Impact</p> <p>Major</p>	HS2 should be required to review and update modelling to include foreseeable demand from development and amend junction designs accordingly.

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Modelling underestimates the likely traffic demand and junctions not able to accommodate the volume of traffic anticipated.		
Volume 2: Community Area Report MA06 General Point/ Concern			<p>Issue/ Concern Trafford Council is concerned that the Places for Everyone allocations have not been included in the transport modelling – this is particularly concerning given the advanced stage of the Plan. In Trafford this relates to the proposed Timperley Wedge allocation in the MA06 area.</p> <p>Likely Impact The transport mitigations and improvements outlined in the hybrid Bill will not have sufficient capacity to support the Airport Station and planned growth in the surrounding area.</p>	<p>Proposed mitigation n/a</p> <p>Residual Impact Potentially Major</p>	HS2 should clarify what they mean by ‘monitoring’ of development sites in advance of Royal Assent and how any changes in ‘committed development’ sites will be accounted for in the modelling and how the proposed mitigations will be reviewed.
Volume 2: Community Area Report MA06			National Highways commissioned the South Manchester Highways & Transport Study – Phase 1. Guided by the South Manchester Project Steering Group (which included GM partners and HS2), this study identified that:	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	Trafford Council, alongside the GM Partners, require that HS2 reconvene the multi-agency South Manchester Project and Working Group to

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Concern			<ul style="list-style-type: none"> • Localised delay east/west of Junction 6 and on the Airport spur is apparent during HS2 construction (2026); • More radical interventions are required over and above that planned by 2033 / HS2 and NPR Opening Year; • Any future highway interventions in the area must include consideration of a holistic M56 junction strategy focused between Junctions 7/8 and 3a. This is required due to the form of the junctions and their constraints; and • It is considered unlikely that alterations to Junction 6 only in its current location will be sufficient to realise proposed growth in the area. <p>This evidences that the HS2 proposals to deliver only an upgrade to M56 J6 is not adequate and will require subsequent further works that will be highly disruptive to operation of the HS2 station and surrounding Strategic Road Network.</p> <p>Likely Impact</p>		deliver a long-term solution to the cumulative highway impacts in the area that the HS2 proposals affect.



Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Modelling underestimates the likely traffic demand and junctions not able to accommodate the volume of traffic anticipated.		
Volume 2: Community Area Report MA06 General Point/ Concern			<p>Issue / Concern On the principle of cost saving, two platforms for NPR services have been included in the design for the Manchester Airport high speed station as well as additional car parking spaces. The highway design however excludes NPR demand and access requirements, the expectation is that NPR will amend the highway layout in the future, post HS2's construction. This is not an efficient approach.</p> <p>Likely impact Such an approach will likely lead to additional adverse social, environmental and economic impacts, particularly for residents in the Hale Barns area.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	HS2 Ltd should be required to provide highway designs considering planned developments that are anticipated to be delivered before HS2 construction begins, including NPR's future demand and access requirements
Volume 2: Community Area Report MA06	14	14.3.6	<p>Issue/ Concern The highway network around Manchester Airport is already under significant stress. The existing traffic level on the local road network shows that there are significant congestion issues. On a workday an estimated 57% of the classified road network</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	HS2 should be require to mitigate any additional traffic on the road network as a result of HS2

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>(Motorways, A and B roads) within 7km of the Airport are operating close to or at capacity at some point in the day.</p> <p>Likely Impact There is limited spare capacity on the road network in the Airport area and therefore an additional traffic as a result of HS2 construction and operation, which is not suitably mitigated, could have a significant impact on the network.</p>		construction or operation.
Volume 5: Map Book Traffic and transport (TR-01, TR-03, TR-04, TR-08)	TR-08-311		<p>Issue/ Concern Trafford Council is concerned about the impact the significant volumes of construction vehicles indicated in the Environmental Statement, and in particular construction related HGVs, will have on the local road network.</p> <p>Likely Impact Deterioration of the road surface and construction, requiring additional maintenance.</p>	<p>Proposed Mitigation Non specified</p> <p>Residual Impact Moderate</p>	HS2 should provide a condition survey needs to be completed prior to commencement of the major HS2 works and at regular intervals during construction. HS2 must provide a contribution to maintenance above what would normally be expected to be

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					undertaken on the construction routes.
			<p>Issue/ Concern The use of a conveyor/railhead system should be thoroughly investigated for use in the movement of spoil, offsite disposal of spoil from the Manchester tunnel and transportation of materials such as construction aggregates and tunnel segments to site.</p> <p>Likely Impact The railhead help reduce construction traffic movements on the local highway network and avoid potential significant adverse construction environmental effects associated with this. There is an opportunity for the railhead to be designed such that it can be incorporated into the tram-train extension south-western link, thereby maximising the legacy value from HS2.</p>	<p>Proposed Mitigation New highway layout, gyratory, Hale Rd changes</p> <p>Residual Impact Major</p>	HS2 Ltd should be required to provide further details demonstrated how risks associated with movement of spoil in MA06 are minimised, including further investigation for a conveyor / railhead system to transport spoil from the Manchester Airport area to the mid-Cheshire Line and import material to site.
Volume 2: Community Area Report MA06	14	14.4.2 6	<p>Issue/ Concern Trafford Council is concerned about the temporary closure of Sunbank Lane / Chapel Lane bridge over the M56. This will sever the route for six years and three months for all traffic including pedestrians and cyclists.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Moderate</p>	HS2 should provide an alternative, perhaps temporary, M56 crossing for NMUs –as an alternative walking

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The proposed diversion will increase journey length by up to 3.3km.</p> <p>Likely Impact Concerned about the impact of the closure on local residents and NMUs who use the route to access the airport and to avoid busy highway junctions in the area, such as Hale Road. This could result in a reduction in active travel journeys and community severance.</p> <p>Will affect airport and other workers who currently walk / cycle using this route. Detrimental to road safety</p>		and cycling route to Manchester Airport.
			<p>Issue/ Concern Facilitation of access and integration of bus facilities at the HS2 Manchester Airport station is insufficient. Onward bus connectivity is vital for onward connections from the stations if national and regional policy objectives on sustainability are to be met</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	In accordance with the GM 2040 vision, Right Mix, Bus-back-better, Trafford Council require that appropriate provision of bus requirements is included within the HS2 Manchester

Document	Section / Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Insufficient bus provision and access to the station will result in increased car journeys, causing additional congestion and air quality issues.		Airport station proposals. Bus passengers to be provided with real time information on bus services.
Volume 2: Community Area Map Book MA06	CT-06-357a		<p>Issue/ Concern The ES has not fully explored the impact of not having a Metrolink connection at the HS2 Manchester Airport station from Day 1 of the operational phase.</p> <p>Likely Impact The omission of Metrolink, results in the station being almost wholly dependent on the car as a mode of access. Resulting in increased road traffic to the airport station, further increasing congestion and delays.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Major</p>	HS2 should be required to assess a scenario of not having Metrolink at the Airport Station from Day 1, the resultant implications on traffic and provide appropriate mitigation.

M56 Junction 6

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Report MA06	3.2	3.2.1	<p>Issue/ Concern HS2 has undertaken junction assessments on the local highway network, however no analysis of mainline motorway capacity (including weaving etc) has been undertaken. This is contrary to guidance set out by National Highways in “Managing Delay on the Strategic Road Network (2021) and Connecting the Country Planning for the Long Term (2017) documents.</p> <p>Likely Impact Potentially inappropriate highway and junction improvements proposed by HS2, which do not take account of a suitable assessment of the SRN.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	Trafford Council require that HS2 ensure all highway improvements/mitigations are fit for purpose. The proposals at M56 J6 are currently inadequate, do not provide sufficient vehicular capacity and do not align with relevant policies.
Volume 2: Community Area Map Book MA06	CT-06- 356		<p>Issue/ Concern The proximity of the HS2 alignment to M56 J6, and the proposed design for the 'operational' junction layout, highly constrain the ability to increase capacity should it be required. For example, multi-lane junction stop-lines and stacking length for traffic</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	Trafford Council require that as a minimum some sensitivity analysis should be carried out by HS2 to ensure such a crucial component of the local

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>are at their limit, and there is very little residual capacity or resilience in the designs.</p> <p>Likely Impact There is a realistic likelihood of traffic queuing back onto the motorway based on the capacity assessments provided, given the uncertainty in traffic models, lack of headroom in the capacity assessments and the highly sensitive nature of the local road network to conditions on the M56. Regular queuing onto a motorway causes serious and fatal collisions and would need remediation by National Highways.</p>		and strategic highway network remains resilient to unplanned incidents or higher traffic demands than forecast. Trafford Council require HS2 to provide appropriate designs that take into account network resilience by design or as a minimum make passive provision for future improvement.
Volume 2: Community Area Book MA06	CT-06- 356		<p>Issue/ Concern The proposed M56 tunnel to the south-west of the airport station does not appear to be of sufficient cross-section to facilitate future motorway widening as planned by National Highways.</p> <p>Likely Impact Planned future motorway widening could not be completed causing additional capacity issues on the network.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	Trafford Council require that HS2 ensure the structure is sufficiently sized.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-O5- 356		<p>Issue/ Concern The M56 tunnel to the south-east of the airport station requires the existing M56 to be diverted onto a temporary alignment and then switched back to its original alignment at end of construction. This will cause an extended period (4+ years) of disruption to a critical part of the strategic motorway network.</p> <p>Likely Impact Extended disruption to a critical part of the strategic motorway network.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	Trafford Council require that HS2 justify this approach against the alternative of building a new alignment for the M56 'offline' such that disruption is kept to a minimum.

Proposed Hale Road Gyratory and Hale Road

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-O5-356		<p>Issue/ Concern Maps show the HS2 line being elevated above Hale Road. This is incorrect.</p> <p>Likely Impact n/a</p>	<p>Proposed Mitigation</p> <p>Residual Impact Major</p>	HS2 must be required to amend the Plans.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-O6-356		<p>Issue/ Concern LRN highway issues, including increased traffic and congestion on Hale Road and inadequate provision for through traffic via the proposed gyratory.</p> <p>The design of the gyratory and surrounding local road network is inappropriate for the volumes of traffic anticipated and will significantly increase delays and journey times – including for buses.</p> <p>Likely Impact Severance, disruption, delay and confusion for traffic on A538 Hale Road and Wilmslow Road, and for traffic wishing to access / egress the proposed HS2 station parking areas. Result in increased journey times, including for public transport.</p>	<p>Proposed Mitigation New highway layout, gyratory, Hale Rd changes</p> <p>Residual Impact Major</p>	<p>HS2 should be required to redesign highway layout in the vicinity of the airport station and M56 J6 to accommodate all users and appropriate demand. Trafford Council require that the highway proposals do not unacceptably increase journey times for all road users.</p> <p>Trafford Council requires a financial contribution to wider improvements on Hale Road, including public transport (bus priority and real time information) and road layout, junctions,</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					particularly the traffic signalised junctions.
Volume 2: Community Area Book MA06	CT-O6-356		<p>Issue/ Concern LRN highway issues, including increased traffic and congestion on Hale Road and inadequate provision for active travel modes via the proposed gyratory.</p> <p>The design of the gyratory and surrounding local road network does not sufficiently provide for pedestrians and cyclists.</p> <p>Likely Impact Deter cyclists and pedestrians, increase in road traffic collisions involving vulnerable road users, further increase in motorised traffic.</p>	<p>Proposed Mitigation</p> <p>Residual Impact</p> <p>Moderate</p>	<p>HS2 should be required to redesign the highway layout in the vicinity of the airport station and M56 J6 to accommodate all users and appropriate demand.</p> <p>Better provision must be provided for Pedestrians and cyclists</p> <p>Financial contribution to improvements on Hale Road, including public transport (bus priority and real time information) and road</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					layout, junctions, particularly the traffic signalised junctions.
Volume 2: Community Area Book MA06	CT-O6- 357a		<p>Issue/ Concern Insufficient improvements to public transport (bus) at the Airport Station and on surrounding LRN.</p> <p>Likely Impact Deter use of public transport</p>	<p>Proposed Mitigation</p> <p>Residual Impact</p> <p>Major</p>	<p>PT improvements at the Station and on surrounding LRN – bus stop real time information.</p> <p>Encourage take up of sustainable modes during construction and operation, ease pressure on network etc.</p> <p>Trafford Council requires a financial contribution to improvement, including public transport (bus priority and real time information) and road</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					layout, junctions, particularly the traffic signalised junctions.
Volume 2: Community Area Book MA06	CT-O6-356 and CT-06- 357a		<p>Issue/ Concern Inadequate provision for active travel particularly east-west and west east though proposed gyratory, across HS2 and under the M56.</p> <p>Likely Impact Deter cyclists and pedestrians, increase in road traffic collisions involving vulnerable road users, further increase in motorised traffic.</p>	<p>Proposed Mitigation Proposed amended road layout.</p> <p>Residual Impact Moderate</p>	HS2 must review and amend the proposed road layout and access to airport station.
Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08	Transport Assessment Part 3 - Report 3 of 4	Figure 18- 93: Junction layout diagram (A538 Hale Road/A538 Hale Road realignment)	<p>Issue/ Concern The proposed Hale Road service roads/ property access roads have a significant impact on residential properties both in terms of land required and access to the properties both during construction and operational phases.</p> <p>Likely Impact Properties on the south side of Hale Road will experience inconvenience and difficulties in exiting to travel east on A538 Wilmslow Rd or to</p>	<p>Proposed Mitigation Proposed amended road layout.</p> <p>Residual Impact Moderate</p>	<p>HS2 should review the road layout and access to airport station.</p> <p>Linked to issues with Hale Road gyratory and Junction 6</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			access the M56 at J6 due to the additional traffic volumes and proximity of the complex gyratory junction arrangement. Considerable land take from several properties on Hale Road is proposed.		
Volume 2: Community Area Book MA06	CT-O5- 357a		Issue/ Concern Construction area at Brooks Drive / High Elm Road junction – Utility works. Likely Impact Unknown at this stage Reasonable Alternative Option(s) Reconsider if works are essential to HS2	Proposed Mitigation Residual Impact Potentially Moderate	Trafford Council requires clarification from HS2 of what works are to be conducted here and the need for this. Review and reconsider access arrangements

Realignment of Thorley Lane

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-O5- 357a		Issue/ Concern There are concerns over congestion and road safety with potential HS2 (and NPR) rail users accessing the station from Thorley Lane, being dropped off and	Proposed Mitigation Residual Impact	HS2 should provide measures to prevent/deter the use of Thorley Lane for

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>collected by car here, rather than use the main station access.</p> <p>Likely Impact Further congestion on Thorley Lane and Runger Lane.</p>	<p>Potentially Major, if this causes congestion at the Thorley Lane/Runger Lane junction</p>	<p>passenger drop off/ pick up to/from HS2 station. If the gyratory is congested people with knowledge of the local road network are likely to use Thorley Lane even if vehicular access to the station is denied here, adding to potential issues on Thorley Lane</p>

Construction

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
<p>Volume 2: Community Area Book MA06</p>	<p>CT-O5- 357a</p>		<p>Issue/ Concern Trafford Council is concerned over the use of Thorley Lane (from Runger Lane) for construction traffic as it is currently signed as not suitable. Trafford Council require that HS2 should check this, providing provide appropriate mitigations and proposing alternatives where necessary.</p>	<p>Proposed Mitigation</p> <p>Residual Impact</p> <p>Moderate</p>	<p>HS2 should be required to Dualling of Runger Lane and signalling of Thorley Lane junction to be implemented prior to commencements of main construction works.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Likely Impact Congestion on Thorley Lane and Runger Lane.</p>		Consider improvements and realignment of Thorley Lane at an early stage
<p>Volume 5: Map Book Traffic and transport (TR-01, TR- 03, TR-04, TR-08)</p>	<p>TR-08- 311</p>		<p>Issue/ Concern For MA06, not including the Castle Mill and Mobberley Rd North satellite compounds, the vast majority of the construction traffic is assumed to use M56 J6, in the region of 1757 Cars/LGV per day and 1692 HGVs per day in the “busy period” and in the region of 2124 Cars/LGV per day and 2062 HGVs per day in the “peak period”. This includes traffic to the following site compounds: Manchester Tunnel South Portal main compound, Manchester Airport HS Stn North Satellite Compound, Manchester Airport HS Stn Main Compound, Manchester Airport HS Stn South Satellite Compound, M56 East Satellite Compound, Sunbank Lane Satellite Compound, River Bollin East Viaduct Satellite Compound.</p> <p>Likely Impact</p>	<p>Proposed Mitigation New highway layout, gyratory, Hale Rd changes</p> <p>Residual Impact Major</p>	<p>Funding for LRN improvements in addition to the layouts proposed by HS2.</p> <p>Dualling of Runger Lane and signalling of Thorley Lane junction to be implemented prior to commencements of main construction works.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Significant congestion, there is a large volume of construction traffic and a long period of time over which this will be experienced. The new junction arrangements will be constructed whilst major construction work is ongoing.</p> <p>Associated pollution, vibration and noise.</p>		
Volume 2: Community Area Book MA06	CT-O5- 357a		<p>Issue/ Concern The proposed construction areas at the Brooks Drive / High Elm Road junction, on High Elm Road and on Brookes Drive, and access to these are of concern to the LHA. It is assumed that these are required for utility works only.</p> <p>Likely Impact Unknown at this stage.</p>	<p>Proposed Mitigation None proposed.</p> <p>Residual Impact Moderate</p>	<p>Clarification from HS2 of what works are to be conducted here and the need for these works.</p> <p>Review and reconsider access arrangements.</p>
Volume 2: Community Area Book MA06	CT-O5- 357a		<p>Issue/ Concern Shay Lane indicated as a construction route. The LHA consider this route to be unsuitable for HGVs, indeed it is signed as such.</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	<p>Clarification of what activities need to use this as a construction route, when and over what period of time.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>It is unclear if this is intended for the utility works only and not the for the main HS2 construction works. Construction traffic from the main construction compounds should not be using this route.</p> <p>Likely Impact Damage to road surface, verges and boundaries, increased collisions and blocking of the route at times.</p>		<p>Use alternative route or make improvements to Shay Lane and Thorley Lane to accommodate construction traffic.</p> <p>Review HGV restriction signage on Thorley Lane, particularly at the junction with Runger Lane.</p>
Volume 5: Map Book Traffic and transport (TR-01, TR-03, TR-04, TR-08)	TR-08-311		<p>Issue / Concern Trafford Council has concerns with respect to construction traffic routing and construction worker associated parking demands on local communities. It is unclear from the Environmental Statement if parking for construction workers is provided contained within the main and satellite compounds. The LHA are concerned that is off street parking is not provided for construction workers at all construction sites then this will have a significantly adverse impact on the</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Potentially Major</p>	<p>HS2 should be required to provide a fully detailed construction management plan with appropriate commitments to minimise any adverse impacts. This should also set out details with respect to appropriate travel initiatives for</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>performance and safety of the local highway network in the vicinity of all construction compounds.</p> <p>Likely Impact Potentially significant congestion and blocking of the Local Road Network.</p>		<p>construction workers including a mini-bus service, a car sharing scheme and cycle parking at each individual construction compound to ensure the workforce can travel by means other than car. In addition, it is imperative to Trafford Council that all construction workers travelling to site by car, park within the confines of the construction compounds to ensure the adopted highway is safeguarded from excessive on-street parking. Mitigation in terms of parking restrictions should be provided for</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					residential areas impacted.

Active Travel

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-05-356 and CT-06- 356		<p>Issue/ Concern</p> <p>The Hasty Lane M56 underbridge is being extended beneath the airport station approach roads, and will be the most direct, fully segregated route between the airport station and the airport (and residential areas to the east and north). However, there will be a considerable level difference between the underpass and the airport access roads, requiring an extensive ramp.</p> <p>The current Hasty Lane underpass is not attractive for pedestrians or cyclists, it is long, narrow and dark. Extending this underpass beneath the proposed gyratory will potentially create an even more unattractive route.</p> <p>Likely Impact</p>	<p>Proposed Mitigation</p> <p>Residual Impact Minor</p>	<p>Trafford Council require further information on how the Hasty Lane underpass route will be delivered. Further information is also required on how this will be made an attractive route to pedestrians and cyclists, as well as confirmation of the design including vertical level proposals.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			A poorly designed Hasty Lane / M56 underbridge will not support increased active travel journeys to / from the station.		
Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08	CT Transport Assessment Part 3 - Report 3 of 4 -06-356	Figure 18- 92: Junction layout diagram (M56 junction 6 permanent layout)	Issue/ Concern Concerned that no cycle facilities to LTN1/20 guidance have been provided at key locations including the New Airport Access gyratory. Whilst information paper E29 states "The design of active-travel infrastructure and connections will be informed by Local Transport Note (LTN) 1/20 'Cycle Infrastructure Design' and relevant advice and guidance published by the DfT" the use of 'informed' does not sound like a commitment to deliver designs to that standard. Additionally, providing LTN1/20 compliant facilities at these locations would result in either (or both) of the following: a) a lower level of vehicular capacity resulting in greater impact to the highway network from traffic congestion and traffic reassignment than presented in the ES or b) The need for an	Proposed Mitigation Residual Impact Minor	Trafford Council require that all relevant infrastructure proposals provide cycle facilities in accordance with current guidance (including LTN1/20).



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>increased junction/carriageway footprint to that presented in the ES.</p> <p>Likely Impact Cycling infrastructure which does need minimum standards will not support active travel journeys to/from the Airport Station and could lead to increase car journeys.</p>		
<p>Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08</p>	<p>Transport Assessment Part 3 - Report 1 of 4</p>	18.1.5	<p>Issue/ Concern Paragraph 18.1.5 of the TA relates to Manchester Airport cycle parking provision. 300 bicycle parking spaces are proposed but there is no distinction in the type of parking (ie. Long stay vs short stay) which have very different requirements. There should also be providing adapted cycle parking for disabled cyclists. High-level assessment highlights HS2 propose 0.14 cycle spaces/peak hour passenger this is very low compared to Reading (0.28 spaces) and Cambridge (2,800 spaces). Any parking should be provided in a dedicated cycle hub facility, like Reading/Cambridge. Much higher cycle</p>	<p>Proposed Mitigation</p> <p>Residual Impact Moderate</p>	<p>Trafford Council require HS2 to work with TfGM's active travel team to design an appropriate facility.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>parking being provided at Old Oak Common HS2 and Crossrail station - 550 now, plus 925 for future. Trafford Council consider that the HS2 provision for cycle parking at Airport Station is inadequate and does not support GM policy objectives.</p> <p>Likely Impact Discourage cycling to the HS2 station</p>		
Volume 2: Community Area Book MA06	CT-06-356	FP9 / FP13	<p>Issue / Concern Existing path to be stopped up and new, diverted path created.</p> <p>Likely Impact Severance of public rights of way will prevent active travel access to some areas</p>	<p>Proposed mitigation n/a</p> <p>Residual Impact Clarification required from HS2</p>	HS2 should provide clarity on whether diverted path will be available for public use during construction phase as diverted path passes through temporary material stockpile and satellite construction compound areas.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-06-356	FP13 / FP9	<p>Issue / Concern Confirmation sought that 'Footpath Ringway 9 Diversion' will either</p> <ul style="list-style-type: none"> • Connect to a newly adopted estate road, or • Connect to realigned adopted highway A538 Hale Road <p>Likely Impact Severance of public rights of way will prevent active travel access to some areas</p>	<p>Proposed mitigation n/a</p> <p>Residual Impact Clarification required from HS2</p>	HS2 should provide clarity on the connection points for FP13 and FP9
Volume 2: Community Area Book MA06	CT-05-356 and CT-05-357A	FP7 and FP16	<p>Issue / Concern FP7 and FP16 to be stopped up and no diversion is proposed in the construction phase. It appears that a temporary diversion route connecting to Hale Road (rather than Hasty Lane) could be offered within "land potentially required for mitigation planting" Justification sought for the decision not to provide any form of diversion.</p> <p>Likely Impact Severance of public rights of way will prevent active travel access to some areas</p>	<p>Proposed Mitigation No mitigation proposed</p> <p>Residual Impact Major</p>	HS2 should be required to consider the footpath diversion proposed by Trafford Council. If this cannot be provided then Trafford Council require clear justification for the decision not to provide a diverted route.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-06- 0357a		<p>Issue/ Concern There is no safe provision for cyclists over the new proposed Thorley Lane overbridge at the M56. It is not acceptable to end the cycle provision as currently shown at the edge of the station footprint. Trafford Council require HS2 to provide appropriate cycle facilities integrating into the Beeline network and in line with guidance in LTN 1/20 and the Greater Manchester Interim Active Travel Design Guide.</p> <p>Likely Impact Discourage cyclists to travel to the HS2 station. Increased traffic congestion and adverse impact on road safety</p>	<p>Proposed Mitigation None proposed</p> <p>Residual Impact Moderate</p>	Re-design to include provision for NMUs in accordance with LTN1/ 20.
Volume 5: Map Book Traffic and transport (TR-01, TR-	TR-04-321		<p>Issue/ Concern Operational severance to NMU is not acceptable as shown in Map Book TR-04-321. Trafford Council require that the HS2 proposals do not sever the NMU route and instead provide mitigation to</p>	<p>Proposed Mitigation Provide a solution which does not sever these NMU routes</p>	



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
03, TR-04, TR-08)			<p>address the severance in order to provide suitable routes.</p> <p>Likely Impact Prevents use of these routes by NMUs. Will discourage NMUs for using routes in this area.</p>	<p>Residual Impact</p> <p>Moderate</p>	

Car Parking

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08	Transport Assessment Part 3 - Report 3 of 4	18.5.73	<p>Issue/ Concern</p> <p>The quantum of proposed private vehicle bays at the airport (c.3,800) is excessive and will encourage greater use of private vehicles which is against national and regional policy objectives on sustainability. Excessive parking provision is clearly at odds with parts of the sustainable travel agenda and also the wider GM 2040 vision and Right Mix targets.</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Moderate</p>	<p>Trafford Council require full justification for the number of parking spaces, including supporting calculations, so that the level of proposed provision can be Fully considered. Trafford Council require that HS2</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>It is also not in accordance with the Council's plans for the Timperley Wedge allocation, which will deliver a sustainable community based on sustainable transport modes and moving away from reliance on the private car.</p> <p>Likely Impact It will encourage greater use of private vehicles which is against national and regional policy objectives on sustainability.</p>		reconsider the parking strategy to encourage greater use of sustainable travel modes over private vehicles.
Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08	Transport Assessment Part 3 - Report 3 of 4	18.5.73 to 18.5.78	<p>Issue/ Concern The ES makes no reference to accessible parking provision Trafford Council consider that this should be approx. 5% of total parking provision), electric vehicle parking (with rapid and regular charging points provided covering at least 10% of all spaces with additional spaces for future proofing), of car club bays or motorcycle parking This aligns with TfGM's vision for eHubs and mobility hubs at major transport interchanges.</p>	<p>Proposed Mitigation n/a</p> <p>Residual Impact Moderate</p>	Trafford Council require an acceptable provision of parking for the aforementioned modes or a justification as to why these levels are not achievable.



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 5: Appendix TR-003- 00006 Traffic and transport MA06, MA07 and MA08	Transport Assessment Part 3 - Report 3 of 4	18.5.73 to 18.5.78	<p>Issue/ Concern Concerned that there is no mention of car club bays (with some of these including EV charging provision) or motorcycle parking provision is made in the ES documentation.</p> <p>Likely Impact Limit the take up of car club modes to / from the Airport Station and promote use of the private car.</p>	<p>Proposed Mitigation</p> <p>Residual Impact Minor</p>	Trafford Council require an acceptable provision of parking for these uses / modes.

Timperley Wedge Spine Road and Access

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area Book MA06	CT-05- 357a and CT- 06-357a		<p>Issue/ Concern The Timperley Wedge allocation for approx. 2,500 homes and 60,000 sqm employment space, will be significantly impacted by the construction of HS2 – specifically the Southern Tunnel portal construction compound which will prevent development coming forward in this area.</p>	<p>Proposed Mitigation None proposed currently apart from diversion of Thorley Lane to enable HS2 tunnel and station construction.</p>	HS2 to construct the section of the proposed Timperley Wedge Spine Road through the tunnel construction compound or provide a financial contribution to the construction of this

			<p>A new Spine Road has been identified as a key infrastructure requirement to support the Timperley Wedge development site, part of which will need to run through the Southern Tunnel Portal construction compound.</p> <p>Likely Impact Development will be delayed, and Trafford will have difficulty in meeting its housing targets.</p>	<p>Residual Impact</p> <p>Major</p>	<p>section of the spine road on a route to be determined and designed at a later date.</p>
--	--	--	--	--	--

Summary

- 9.14.8 The traffic and transport impacts in the MA06 Community Area are significant both during construction and future operation.
- 9.14.9 In conclusion the ES does not adequately assess the Traffic and Transport impact of the route and Manchester Airport Station, during both construction and operation. Without a thorough assessment, that includes background growth and proposed developments in the area, it is not possible to fully understand the impact of construction and operation phases.
- 9.14.10 Trafford Council, with GM Partners, have significant concerns about the proposed M56 Junction 6 design, as well as the proposed Hale Road gyratory. The design does not have sufficient capacity to support future growth and it would create a convoluted junction arrangement on Hale Road, impacting on Hale residents. Public transport and NMU access has not been fully considered in relation to proposed road layouts and access to the station.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

- 9.14.11 Greater consideration needs to be given to sustainable transport access to the station. Metrolink should be operational from Day 1 and be fully integrated with the Station. There is also scope for a greater number of journeys by bus and active travel modes. Access to the station should also consider integration with the Timperley Wedge development site and linking with the transport infrastructure which is required to support this site, such as the Timperley Wedge Spine Road and active travel routes.
- 9.14.12 The impact of construction in this area will be significant, there are several major construction compounds all of which will be serviced by road access only and which propose to access the SRN via M56 Junction 6. HS2 should consider a conveyor / railhead option to remove HGV's from the network and provide a more sustainable means of bringing materials to / from the construction sites.



9.15 Waste

- 9.15.1 The submitted Waste and Material Resources chapter does not include an assessment of individual community areas. There has been no consideration of the proposals against waste policies included in authority area local plan's or of local waste infrastructure capacity.
- 9.15.2 As detailed in [Section 5](#) of this response, **Trafford Council require HS2 to provide a project plan for waste management**. Specifically, for this area, it is considered more detail on the management of waste arisings that would be generated by the required tunnelling works and construction of the station should be provided as well as any associated issues relating to waste management.

9.16 Water Resources and Flood Risk

- 9.16.1 Trafford Council welcome the commitment from HS2 to consider water resources and flood risk and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme.
- 9.16.2 Within Community Area MA06, the proposed station and tunnelling have the potential to create significant hydrological/flood risk issues. The syphon and culverts are of concern regarding their hydraulic efficiency and future maintenance. There are also numerous watercourses in this area. It is not clear what the impacts will be on these watercourses and how they will affect existing property.
- 9.16.3 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the water resources and flood risk related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.
- 9.16.4 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.17-1.

Key Observations and Concerns

- Dewatering of the tunnels and how they will affect Fairywell Brook.
- Maintenance of the inverted syphon.
- Hydraulic efficiency of the new M56 highway culvert.
- Loss of spring during construction which feeds Timperley Brook 1.

- Flood risk to properties along Brooks Drive.
- There has been no indication how surface water within this community area will be managed.
- General concerns about drainage in its broadest sense, including the sewerage system, which is all part of an interconnected system.
- Inadequate consideration of the impact on the groundwater environment

Recommendations and Additional Mitigations Required

- Engagement between HS2 and the EA with regards to dewatering and the potential disposal to Fairywell Brook.
- Confirmation of the maintenance and management of key drainage assets including the inverted syphon.
- Review of the M56 Highway culvert and its connection to Timperley Brook.
- Further detail provided to show how the local watercourses are impacted by the route.
- Further clarification on how the properties along Brooks Drive are affected.
- Further detail provided to consider volumes of runoff and drainage, as well as the methods of how this will drain.

9.16.5 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

Table 9.16-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
<p>Volume 2: Community Area Reports</p> <p>General Point/ Concern</p>			<p>Issue/ Concern Inadequate consideration of the impact on the groundwater environment with respect to United Utilities (UU) groundwater public water supply resources (noting that the route of HS2 passes through a series of groundwater source protection zones)/</p> <p>The Environment Act 2021 places a clear obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health.</p> <p>Consistent with this obligation, Trafford Council and United Utilities are concerned that there is an absence of detail relating to drainage for HS2 and any associated development both during operation and during construction.</p> <p>Likely Impact Unable, to fully conclude the impact on sewerage infrastructure, in terms of flood risk from public sewers</p>	<p>Proposed Mitigation None at present</p> <p>Residual Impact Major</p>	<p>HS2 Ltd should be required to provide full details of surface water drainage design to the relevant local authorities and demonstrate how impacts on rivers and surface water systems have been minimised.</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			and the consequential impact on the environment of any drainage proposals. This is a fundamental failing of the assessment of the environmental impact of HS2.		
Volume 2: Community Area MA06 Report		15.4.30	Issue/ Concern Dewatering for tunnel to Manchester.	Proposed Mitigation None at present	HS2 must be required to agree dewatering process with EA.
Volume 5: Appendix WR-005- MA06		3.2.1 (pg 10)	Likely Impact Potential flooding in the downstream catchment of Fairywell Brook. Reasonable Alternative Option(s) Require clarification where dewatering will be disposed. Limits need to be set for disposal to Fairywell Brook.	Residual Impact Moderate	
Volume 2: Community Area MA06 Report		15.4.13 & 15.4.37	Issue/ Concern Inverted Syphon beneath proposed station. Likely Impact Lack of maintenance leading to flooding.	Proposed Mitigation Modelling suggests there will be no increased flood risk.	HS2 must be required to confirm arrangements for the management and maintenance of inverted syphon with the EA.
Volume 5:		4.1.27	Reasonable Alternative Option(s)	Residual Impact Major	

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Appendix WR-005- OMA06			The Council will need to review the detailed design to ensure either HS2 or the Environment Agency confirm who will manage and maintain the structure.		
Volume 5: Appendix WR-006- 00007 Hydraulic modelling report – Timperley Brook		Pg 28	Issue/ Concern Hydraulic efficiency of new M56 culvert. Likely Impact The connection to the inverted siphon seems to be at 90 degrees and hydraulically inefficient. This could lead to localised blockages and flooding	Proposed Mitigation N/A Residual Impact Minor	HS2 must include in the detailed design a change to the angle of connection in line with the flow of Timperley Brook.
Volume 2: Community Area MA06 Report	15	15.4.48	Issue/ Concern Loss of spring for the tributary of Timperley Brook 1 could be lost during construction. Likely Impact It is unknown what the impacts would be, therefore we must know the potential risks.	Proposed Mitigation There is no mention of this in the hydraulic modelling report. Residual Impact Moderate	HS2 should provide more detail to Trafford Council on the impact to the spring which is the source of Timperley Brook 1.
Volume 5:		Pg 27/28	Issue/ Concern Flood risk to properties on Brooks Drive.	Proposed Mitigation None	HS2 must clarify the hydraulic modelling,

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Appendix WR-006- 00007 Hydraulic modelling report – Timperley Brook			Likely Impact The hydraulic modelling report indicates a minor decrease in flood depths in the 1 in 20-year return period. However, for the 1 in 100-year +CC there is no flood risk.	Residual Impact Major	as the Council would presume there is an existing risk. This location was not originally identified.
Volume 2: Community Area MA06 Report General comment			Issue/ Concern Surface Water drainage for the proposed station. Likely Impact Without knowing what the surface water drainage proposals are, we cannot assess the likely impact.	Proposed Mitigation None Residual Impact Moderate	The Council must see details of the proposed surface water drainage. As with all new developments we will be looking for the use of SuDS, preferably incorporating green infrastructure to balance the level of HS2 hard engineered development in the area.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 2: Community Area MA06 Report			Issue/ Concern Any flood risk mitigations at the HS2 Airport Station should also consider impacts on the wider area, particularly in relation to the Timperley Wedge allocation		
General comment					

Summary

- 9.16.6 In conclusion, further stakeholder engagement is needed, particularly in regard to dewatering and potential disposal to Fairywell Brook. Trafford Council also require clarity on the maintenance and management of key drainage assets, including the inverted syphon and M56 highways culvert.
- 9.16.7 There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows

9.17 **HS2 Airport Station**

- 9.17.1 The inclusion of the Manchester Airport High Speed station within the Proposed Scheme is supported by Trafford Council. The station offers a once in a generation opportunity to deliver a high quality, multi-modal transport hub, which will offer long-term employment opportunities and help facilitate greater usage of public transport. The Council, however, considers that the current proposals for the station can be improved in several areas to maximise its potential benefits, whilst ensuring more suitable integration with the surrounding area.
- 9.17.2 The station will be close to existing residential areas on Brooks Drive, Davenport Green, Shay Lane and the wider Hale Barns area. The substantial height of the proposed structure(s) will be very visible across a wide area and will have a range of impacts during both construction and operation. Davenport Green Ancient Woodland will be significantly reduced in size by the proposals, and the surrounding highway network, including the M56, will also be severely impacted.
- 9.17.3 The significant construction time period and raised height of the station and associated infrastructure during operation mean that the Manchester Airport High Speed station has the potential to become a dominant and overbearing feature of the wider local landscape. An improved range of mitigation measures are therefore fundamental to help significantly reduce the potential long-term adverse impacts of the station.
- 9.17.4 Moreover, Trafford Council recognises the importance of an identified funding strategy which ensures the delivery of the HS2 and NPR schemes in their entirety, and as an integrated integral part of the Integrated Rail Plan, which will include local rail improvements. This, coupled with proposals that are aligned with the range of planned regeneration initiatives adjacent to HS2/NPR infrastructure and Trafford's borough-wide policies, will be fundamental in ensuring that the economic benefits of HS2 are maximised.



HS2 Phase 2b Environmental Statement Consultation

- 9.17.5 Trafford Council and GM Partners have consistently raised with DfT the need for a whole government approach to working on the HS2 Strategy as a shared programme of development and investment. It is also essential that any funding arrangements recognise the impact of the Covid-19 Pandemic and are considered within the overall economic recovery for the city region and the U.K as a whole.
- 9.17.6 HS2, NPR and Metrolink connectivity at Manchester Airport will require a fully integrated station solution, delivered by a funding strategy that it is in line with other HS2 airport stations (the station is currently unfunded within the HS2 and NPR budgets) and agreed by an integrated senior level review by government and local partners.
- 9.17.7 Manchester Airport High Speed Station is currently subject to the agreement of local funding contributions. This is a key issue which Trafford Council and GM Partners have challenged consistently, and our previous consultation responses have requested that Manchester Airport Station is treated consistently with other high-profile, high-speed stations, there is also a need for a whole government approach to working on the HS2 Strategy as a shared programme of development and investment, which overcomes the disparity between local, shorter-term capital funding capabilities and longer-term schemes such as HS2 that provide the catalyst for future growth. The current funding context for local partners makes this issue even more critical. The business case for HS2 and NPR is considerably strengthened by the inclusion of a station at Manchester Airport, whilst the station will also benefit the wider region outside of GM, and this needs to be recognised in the funding approach.
- 9.17.8 Trafford Council and GM partners have continued to engage with, and support, DfT and HS2 Ltd as plans for HS2 and NPR have matured and developed. The support, required by Trafford Council and GM partners, has involved a significant amount of technical development work locally and that has represented a challenge in terms of local funding. This challenge will become considerably greater as work intensifies as HS2 and NPR progress towards delivery, and with local resources under considerable pressure due to the impact of COVID-19.
- 9.17.9 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 9.18-1.

Key Issues / Concerns

- Funding for the Airport Station.
- The significantly increased vertical alignment (as a result of the shallow cutting) of the Manchester Airport High Speed station and associated infrastructure.
- The Proposed Scheme's adverse impact on Davenport Green Ancient Woodland through the proposed retaining wall.
- Lack of full integration of Metrolink infrastructure from day one of HS2 services operating.
- Severance created by the proposals with future planned development at Timperley Wedge and the need to integrate the station with adjacent planned development.
- Quantum of proposed car parking and lack of consideration of active travel and sustainable transport modes in the station area and on the surrounding road network.
- Closures and diversions to existing Public Rights of Way resulting in significantly increase journey lengths.
- The proximity of construction compounds to surrounding residential areas.

Recommendations and Additional Mitigations Required

- A fully integrated station solution, delivered by a funding strategy that it is in line with other HS2 airport stations
- The Manchester Airport High Speed station cutting should be reverted to the previous deep-cut option – 11.5m below ground level

- The design for any retaining wall is developed in partnership with relevant stakeholders.
- The east and west approaches to the Metrolink viaduct constructed and made available for use prior to HS2 services operating at the Manchester Airport High Speed station.
- More appropriate design solutions to help integrate the station with Timperley Wedge, developed with relevant stakeholders.
- Provision of the background information and assessment which have informed the proposed number of car parking spaces.
- HS2 to consider the massing of the car park buildings and identify design solutions to mitigate the landscape and visual impact of the buildings.

9.17.10 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford’s residents, businesses and environment.

Table 9.17-1

ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
General Point/ Comment			Issue/ Concern Manchester Airport High Speed Station is currently subject to the agreement of local funding contributions. This is a key issue which MCC and GM Partners have challenged consistently, and our previous consultation responses have requested that	Proposed Mitigation N/A Residual Impact Major	Trafford Council questions why Greater Manchester is the only part of the country being asked to make a substantial financial



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Manchester Airport Station is treated consistently with other high-profile, high-speed stations, there is also a need for a whole government approach to working on the HS2 Strategy as a shared programme of development and investment, which overcomes the disparity between local, shorter-term capital funding capabilities and longer-term schemes such as HS2 that provide the catalyst for future growth.</p> <p>The current funding context for local partners makes this issue even more critical.</p> <p>The business case for HS2 and NPR is considerably strengthened by the inclusion of a station at Manchester Airport, whilst the station will also benefit the wider region outside of GM, and this needs to be recognised in the funding approach.</p> <p>Likely Impact Insufficient long-term government funding reliant on 'local contributions' for the proposed station will not maximise this 'once in a lifetime' transformational opportunity, will not provide a world class station and a national (and international) gateway to</p>		<p>contribution to the cost of HS2; noting that this will undermine Greater Manchester's ability to maximise the benefits of HS2 in its city region</p> <p>HS2, NPR and Metrolink connectivity at Manchester Airport will require a fully integrated station solution, delivered by a funding strategy that it is in line with other HS2 airport stations (the station is currently unfunded within the HS2 and NPR budgets) and agreed by an integrated senior level review by government and local partners.</p>



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Greater Manchester and the North, and ultimately does not realise the Government’s aim to “level up opportunities across all parts of the UK”.		
General Point/ Comment			<p>Issue/ Concern</p> <p>That the proposed Airport Station construction and design, is as sustainable and energy efficient as possible.</p> <p>That’s the necessary infrastructure to future proof the station should is provided, such as charging EV charging points for cars and cargo bikes etc.</p> <p>That the quantity and type cycle parking and facilities are accessible and of the highest standard.</p> <p>Likely Impact</p> <p>Failure to create a Carbon Neutral and sustainable station as part of a scheme of national significance is missed opportunity to demonstrate how new developments can be both viable and sustainable.</p> <p>National and local net zero targets will be harder to achieve and may be missed.</p>	<p>Proposed Mitigation</p> <p>None</p> <p>Residual Impact</p> <p>Major</p>	<p>The proposed HS2 Airport station must be constructed as sustainably as possible, creating as little carbon footprint as possible and embed sustainable and renewable technologies and principles in its construction and design, so much that it is self-sufficient in terms of heating/ cooling, lighting and energy generation.</p> <p>EV charging points and other future proofing infrastructure should be built into the design.</p>



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Running costs of the station will be cheaper and more sustainable in the long run and will not be reliant on a sensitive and finite energy supply.		HS2 Ltd should be required to liaise and agree with Trafford Council the exact quantity and type etc. of bicycle parking spaces through the detailed design process, in accordance with the latest national and local adopted standards.
Volume 5: Appendix CT-003-00000 Alternatives report (Ref: M97)	6.7	6.7.25 to 6.7.29	<p>Issue / Concern - Vertical alignment at Manchester Airport High Speed station.</p> <p>The Proposed Scheme incorporates a central concourse for the station 11m above existing ground level, with the station roof and canopy structure 30m above ground level. These are significant heights which will have far reaching visual and noise related impacts.</p>	<p>Proposed Mitigation</p> <p>Significant additional landscape earthworks, with associated landscape mitigation planting, to provide visual screening.</p> <p>Residual Impact Major</p>	The depth of the cutting for the Manchester Airport High Speed station cutting is increased from the proposed 4.5m below ground level (at the deepest point). The Council maintains its support for the deep cut option



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>The Alternatives report details the following three options considered for the vertical alignment of the station:</p> <ul style="list-style-type: none"> - Sift baseline option (Option 1): deep cut with HS2 Manchester spur under the M56 and platforms 11.5m below ground level at the deepest point; - Option 2: shallow cut with HS2 Manchester spur under the M56 and platforms 4.5m below ground level at the deepest point; and - Option 3: shallow cut with HS2 Manchester spur over the M56 and platforms 4.5m below ground level at the deepest point. <p>The report states (in para.6.7.27) that Option 2 would cost substantially less to construct than Option 1 and would likely result in less environmental impacts overall than Option 1. This conclusion appears to be based solely on the smaller volume of material generated from the excavations of the shallow cut option.</p> <p>The report then goes on to conclude that Option 2 will result in greater noise impacts during operation</p>		<p>which would situate the platforms 11.5m below ground level (at the deepest point).</p>



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>compared to Option 1 on residents of properties along Brooks Drive and Davenport Green due to shallower cuttings (see para.6.7.28); and that during operation Option 2 will have greater landscape and visual impacts compared to Option 1 (see para.6.7.29). The Council therefore challenges the report's conclusion that Option 2 would have less overall environmental impacts than Option 1.</p> <p>Likely Impact</p> <p>The noise and visual impacts of HS2 during operation associated with Option 2 will have significant long term detrimental impacts on both local residents and the wider landscape. The reduced cutting depth associated with Option 2, would result in the station having a higher visual impact on the wider surrounding area, with it appearing visually intrusive and stark within the landscape.</p> <p>The Council considers that a 'build it once, build it right' approach should be taken which ensures that the design of the station is both appropriate and fit for purpose for the long-term.</p>		



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>Reasonable Alternative Option(s)</p> <p>Whilst it is acknowledged that Option 1 will have much greater associated costs, it is considered necessary that the overall impact of the station is reduced through an increase in the depth of the station cutting. Increasing the depth of the cutting by 7m, as proposed in Option 1, would provide a long-term solution to a significant number of concerns the Council has regarding the physical impact on the station.</p>		
Volume 3: Route-wide effects (Ref: M32)	6.3 – 6.4	6.3.10 – 6.4.4	<p>Issue / Concern – Retaining wall at Davenport Green Ancient Woodland.</p> <p>Davenport Green Ancient Woodland is one of 16 woodlands identified by HS2 Ltd where there would be a direct loss due to construction of the Proposed Scheme.</p>	<p>Proposed Mitigation</p> <p>Offline reinforced soil retaining wall, 175m in length and up to 11m in height, all of which will be above existing ground level, located 50m west of the station, to limit the land required as part</p>	<p>The depth of the cutting for the Manchester Airport High Speed station cutting is increased from the proposed 4.5m below ground level (at the deepest point).</p>
	7.4	7.4.26	<p>The Route-wide effects report (see para.6.4.4) states that Ancient woodland is an irreplaceable resource</p>		



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
<p>Volume 2: Community Area report MA06 Hulseheath to Manchester Airport</p>			<p>and its loss considered to be a permanent adverse residual effect, which is significant at a national level.</p> <p>Construction of the Manchester Airport High Speed station will result in the permanent loss of 1.7ha (50%) of Davenport Green Wood SBI, of which 0.7ha (54%) is ancient woodland habitat. To reduce the need for a greater loss of the woodland, the Proposed Scheme incorporates a reinforced retaining wall up to 11m in height and 175m in length, to overcome the significant change in levels between the elevated position of the station concourse and the ground level of the adjacent woodland.</p> <p>The significant change in levels, and the resulting requirement for a dominant and overbearing reinforced retaining wall at Davenport Green Woodland, are a direct result of the 'shallow cut' option for the station being taken forward. Siting the station in the 'deep cut' option would reduce the station's height above ground level by 6m. This is a significant reduction and would have huge visual</p>	<p>of the Proposed Scheme.</p> <p>5.1ha planting of native broadleaved woodland at Warburton Green and at Davenport Green Wood (in three locations).</p> <p>Residual Impact Major</p>	<p>The design for any retaining wall is developed in partnership with relevant stakeholders to ensure that it minimises its visual impacts and integrates as well as practically possible with the existing woodland, whilst having regard to the integration with the Timperley Wedge development site.</p> <p>Any loss of Ancient Woodland to be compensated for, through additional mature planting in the immediate surrounding area.</p>

ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>benefits on the remaining area of Davenport Green Woodland.</p> <p>Likely Impact The proposed retaining wall would form a dominant and overbearing feature which could significantly alter the character and appearance of Davenport Green ancient woodland and wider landscape. It would have a significant visual impact and would also act as a major barrier to integration with the surrounding area and have a detrimental impact on the area's existing biodiversity.</p>		
<p>Volume 2: Community Area report MA06 Hulseheath to Manchester Airport</p>	2.2	2.2.25	<p>Issue / Concern – Vertical alignment of the Metrolink viaduct at Manchester Airport High Speed Station</p> <p>The Proposed Scheme incorporates a section of viaduct, 216m in length and up to 15m above existing ground level. The significant height of the viaduct is a direct result of the 'shallow cut' option for the station being taken forward. Siting the station in the 'deep cut' option would reduce the station's height above ground level by 6m. This is a significant</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>The depth of the cutting for the Manchester Airport High Speed station cutting is increased from the proposed 4.5m below ground level (at the deepest point).</p>



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>reduction and would greatly reduce the required infrastructure needed to get the Metrolink from ground level to the proposed elevated viaduct within the station.</p> <p>The Proposed Scheme does not include construction of the approaches to the viaduct from the west and east. To maximise the benefits of the station and to encourage modal shift away from private vehicles, it is imperative that Metrolink is fully operational from day one of HS2 services at the station.</p> <p>Likely Impact The raised height of the viaduct along with the necessary east and west approaches will have a significant visual impact on the wider area. This will be further increased via artificial lighting and the movement of trams along the viaduct.</p> <p>Reasonable Alternative Option(s) The Metrolink viaduct is constructed at a reduced height above existing ground level - although this would only be possible with a shallow cutting option.</p>		<p>The east and west approaches to the viaduct are constructed and made available for use prior to HS2 services operating at the Manchester Airport High Speed station.</p>



ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			East and west Metrolink approaches constructed at the same time.		
			<p>Issue / Concern – Integration with future planned development.</p> <p>In order to realise the full development potential of the area around the HS2 Airport Station, it is essential that the Proposed Scheme integrates well with the <i>Places for Everyone's</i> Timperley Wedge development site to the west. The area has been identified for the delivery of approximately 2,500 homes and 60,000 sqm of office floorspace within the joint plan.</p> <p>It is both Trafford Council's and the Greater Manchester Combined Authority's aspiration that the Timperley Wedge development facilitates the creation of a sustainable community which greater levels of active travel and a reduced reliance on the private car.</p> <p>The proposed change in levels between the station concourse and existing ground level makes</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	<p>Full details of a more appropriate design solution which delivers a station that is integrated with Timperley Wedge; to be developed in partnership with relevant stakeholders.</p>

ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>integrating with future development at Timperley Wedge more challenging, particularly in relation to retaining wall by the ancient woodland.</p> <p>Likely Impact The significant change in levels to the west of the Airport Station will make integrating with the Timperley Wedge development area challenging.</p> <p>Reasonable Alternative Option(s) A more appropriate design solution which reduces the visual impact of the proposed retaining wall and helps to better integrate it with Timperley Wedge.</p>		
Volume 2: Community Area report MA06 Hulseheath to Manchester Airport	2.2	2.2.31	<p>Issue / Concern – Scale of car parking provision.</p> <p>The Proposed Scheme includes provision for two multi-storey car parks, providing up to 3,752 car spaces. Dimensions for the car parks are not stated. However, Figure 6 of the Volume 2: Community Area report MA06 indicates that they will be significant in both height and length. These structures will therefore significantly increase the visual impacts of the station, encourage a greater number of car</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Major</p>	To provide Trafford Council with the background information and assessment which have informed the proposed number of car parking spaces has been reached.

ES Document	Section	Para	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>journeys to and from the station and appear out of keeping in an otherwise open landscape. Trafford Council and its partners would want to see a greater number of passengers accessing the station via sustainable modes of travel.</p> <p>Likely Impact Significantly increased visual impacts of the station on a wider residential area and a marked increase in the number of private vehicle trips on the local and strategic highway networks.</p> <p>Reasonable Alternative Option(s) A reduction in car parking provision and operation of Metrolink services from day one of HS2 services.</p>		<p>Commitment from HS2 Ltd to facilitate operation of Metrolink services from day one of HS2 services.</p> <p>HS2 to consider the massing of the car park buildings and identify design solutions to mitigate the landscape and visual impact of the buildings. The design solutions should be carefully considered and not follow a generic design approach.</p>

Summary

9.17.11 In conclusion, Trafford Council supports the principle of the HS2 Airport Station. However, the scale of the station will be significant and therefore careful design will be required to help mitigate impacts on the surrounding area. Trafford Council supports the previously considered 'deep cutting' option for the Airport Station which would provide significant benefits and help to address a number of the



HS2 Phase 2b Environmental Statement Consultation

Council's concerns including, the visual impact of the station and ensuring the Station is well integrated with the Timperley Wedge development site.

9.17.12 The successful operation of the station will also require excellent sustainable transport links and the Council therefore requires the Metrolink to be operational from Day 1 and enhanced NMU access to the station.



9.18 Conclusions

9.18.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA04 have not given fully considered Trafford MBC's local planning policy and as such the Environmental Statement is considered to lack the required detail for Trafford Council to provide support for the scheme.

9.18.2 Furthermore, each of the assessments outlined above has given no consideration of the proposed limit of deviation which would materially affect a number of the assessments namely, Landscape and Visual, Historic Environment, Ecology, Noise and Human Health. Trafford Council consider that the true impact of the scheme can only be assessed where a definitive line has been proposed.

9.18.3 A summary of the key points raised in each of the above sections is provided below:

Agriculture, Forestry and Soils

9.18.4 Trafford Council is concerned that the loss of equestrian / livery land and facilities has not been fully recognised / considered in the ES. There is also a need for further clarity in relation to the soil assessment.

Air Quality

9.18.5 Trafford Council is concerned about the effects of poor air quality arising from the construction of HS2, including the significant number of vehicle movements associated with the various construction compounds in the Airport Station area. The modelled concentrations of particulate matter have not been subject to model verification and adjustment, which may result in under predicting of concentrations and sensitive receptors.

9.18.6 HS2 should provide further resources to Trafford Council to help mitigate the significant impact on communities in Trafford.

Community

9.18.7 Trafford Council is concerned about the significant and prolonged impact on communities in terms of local amenity and the environment. This will be particularly acute during the construction phase, but there will also be operational impacts for communities in the Hale area. HS2 must provide compensatory schemes to mitigate



the impact, including provision of alternative space for lost community venues as well as support for local bus services.

Ecology & Biodiversity

- 9.18.8 Trafford Council is concerned about the unjustified loss of valuable habitats which have not been fully assessed in the ES. There are a number of SBIs in the area, as well as Davenport Green ancient woodland, which will be impacted by the scheme.
- 9.18.9 Regard should be had to Environment Act and its requirements for Biodiversity Net Gain in the MA06 community area. HS2 must ensure that all appropriate mitigation and protection measures are implemented before construction begins and habitat fragmentation should be avoided, where possible. In addition, advanced planting of selected mature and semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity.

Health

- 9.18.10 Trafford Council is concerned about impacts on the health and wellbeing of communities in relation to air quality, noise and loss of open, peaceful space.
- 9.18.11 HS2 must have regard to active travel measures during both construction and operation of the scheme, the design of the station must prioritise active travel modes. HS2 must also provide clarification on the date used to determine who is eligible for noise insulation. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.

Historic Environment

- 9.18.12 In conclusion the ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation



Land Quality

- 9.18.13 Trafford Council is concerned about the large amounts of potentially contaminated spoil which be stored and processed at the South Manchester Tunnelling Compound. The ES should also have regard to the Mineral Safeguarding Areas.
- 9.18.14 Further site investigations are required for contaminated land, with particular regards to former historic landfills. This should be set out in a bespoke Strategy. Any resultant remediation requirements should be agreed with the regulator and Trafford Council, confirmation of the mechanisms in place to ensure appropriate consultation with regulator is required.

Landscape & Visual

- 9.18.15 In conclusion, Trafford Council consider that insufficient detail has been provided on the reinstatement of planting and landscape proposals. Based on what is contained within the ES, the harm would be significant. Assessments / viewpoints need revisiting at several locations and advanced planting is required. Significant additional compensation planting is needed at several locations, photomontages are needed for all phases and tree surveys are required.
- 9.18.16 Trafford Council consider there is a significant opportunity to provide advanced planting, well in advance of construction to give time for this to become established and to help mitigate some of the impacts. The design of the Manchester Airport Station must also have regard to the surrounding landscape.

Socioeconomics

- 9.18.17 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.
- 9.18.18 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.



- 9.18.19 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

Sound Noise and Vibration

- 9.18.20 In conclusion, Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works.
- 9.18.21 Clarity is required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.

Traffic & Transport

- 9.18.22 The traffic and transport impacts in the MA06 Community Area are significant both during construction and future operation.
- 9.18.23 The ES does not adequately assess the Traffic and Transport impact of the route and Manchester Airport Station, during both construction and operation. Without a thorough assessment, that includes background growth and proposed developments in the area, it is not possible to fully understand the impact of construction and operation phases.
- 9.18.24 Trafford Council, with GM Partners, have significant concerns about the proposed M56 Junction 6 design, as well as the proposed Hale Road gyratory. The design does not have sufficient capacity to support future growth and it would create a convoluted junction arrangement on Hale Road, impacting on Hale residents. Public transport and NMU access has not been fully considered in relation to proposed road layouts and access to the station.
- 9.18.25 Greater consideration needs to be given to sustainable transport access to the station. Metrolink should be operational from Day 1 and be fully integrated with the Station. There is also scope for a greater number of journeys by bus and active travel modes. Access to the station should also consider integration with the Timperley Wedge development site and linking with the transport infrastructure which is required to support this site, such as the Timperley Wedge Spine Road and active travel routes.



- 9.18.26 The impact of construction in this area will be significant, there are several major construction compounds all of which will be serviced by road access only and which propose to access the SRN via M56 Junction 6. HS2 should consider a conveyor / railhead option to remove HGV's from the network and provide a more sustainable means of bringing materials to / from the construction sites.

Waste

- 9.18.27 The proposals for the management of waste arising do not reference local policies within the Trafford Core Strategy. Further details of how waste is to be managed is required by way of a waste management plan.

Water

- 9.18.28 In conclusion, further stakeholder engagement is needed, particularly in regard to dewatering and potential disposal to Fairywell Brook. Trafford Council also require clarity on the maintenance and management of key drainage assets, including the inverted syphon and M56 highways culvert.
- 9.18.29 There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows

HS2 Airport Station

- 9.18.30 In conclusion, Trafford Council supports the principle of the HS2 Airport Station. However, the scale of the station will be significant and therefore careful design will be required to help mitigate impacts on the surrounding area. Trafford Council supports the previously considered 'deep cutting' option for the Airport Station which would provide significant benefits and help to address a number of the Council's concerns including, the visual impact of the station and ensuring the Station is well integrated with the Timperley Wedge development site.
- 9.18.31 The successful operation of the station will also require excellent sustainable transport links and the Council therefore requires the Metrolink to be operational from Day 1 and enhanced NMU access to the station.
- 9.18.32 The preceding sections in this chapter detail the Trafford Council Consultation response on issues and requirements which are unique to Community Area MA04. To avoid repetition, the Trafford Council Consultation response also presents a Chapter titled "[Trafford Council Points raised to ES Consultation which are Common](#)"



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

[across Community Areas](#)” and those points should be taken as also applying in this Chapter.



High Speed Rail – Phase 2b Western Leg

Environmental Statement Consultation

Chapter 6

[Section 10: Trafford Council Comments on Volume 3: Route-wide effects](#)

[Section 11: Trafford Council Comments on Volume 4: Off-route effects](#)

[Section 12: Trafford Council comments on Cross-topic Technical Appendices: EIA Scope and Methodology Report](#)

[Section 13: Trafford Council comments on Cross-topic Technical Appendices: Code of Construction Practice](#)

[Section 14: Trafford Council comments on Cross-topic Technical Appendices: Alternatives Report](#)

[Section 15: Trafford Council Comments on Cross-topic Technical Appendices: Planning Data](#)

[Section 16: Trafford Council Comments on Cross-topic Technical Appendices: Wider Effects Report](#)

[Section 17: Trafford Council Comment's on Cross-topic Technical Appendices: Borrow Pits](#)



10 Route Wide Effects

Section 10 Table of Contents

Introduction	478
Agriculture, Forestry and Soils	478
Air Quality	479
Climate Change	479
Community	496
Ecology and Biodiversity	496
Health	498
Land Quality	501
Landscape and Visual	502
Major Accidents and Natural Disasters	502
Socio-economics	509
Traffic and Transport.....	513
Waste and Material Resources	515
Water Resources and Flood Risk	515
Electromagnetic Interference	515
General Comments on Part A - EIA Approach	527

10.1 Introduction

10.1.1 This chapter of the response specifically addresses the points set out in Volume 3: Route-wide effects. The document describes the effects that are likely to occur at a geographical scale greater than those described in the Volume 2 Community Area Reports, based on the current proposals. These comments may be in respect of matters already raised within this response or on matters not yet covered by Trafford Council’s response.

10.1.2 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.

10.2 Agriculture, Forestry, and Soils

10.2.1 Trafford Council note that there is potential for effects on agriculture, forestry and soils within the assessed Community Areas.



10.2.2 However, Trafford Council has no comments pertaining to potential route-wide effects.

10.3 Air Quality

10.3.1 Trafford Council note that there is potential for effects on air quality within the assessed Community Areas, which are outlined within the respective chapters for MA04, MA05 and MA06. However, there are not likely to be any observed on a route-wide scale.

10.4 Climate Change

10.4.1 Trafford Council welcome the commitment from HS2 to consider climate change and deploy mitigation measures to the Crewe to Manchester expansion of the Proposed Scheme, following established climate change principles. Trafford Council note that a three-staged assessment was undertaken, including Greenhouse Gas (GHG) emissions, In-combination Climate Change Impacts (ICCI) and Climate Change Resilience (CCR). This approach is welcomed.

10.4.2 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the climate change related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

10.4.3 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 10.4-1.

Key Observations and Concerns

- The net carbon emissions from the Proposed Scheme are positive up to 2050 and over its life-time. This fails to support the national target of Net zero by 2050 as required under the Climate Change act 2008.
- No consideration for the Trafford Climate Emergency and carbon budget(s) (Net Zero date of 2038) with a 13.4% year on year reduction rate from 2020 has been included within the assessment.
- It is unclear what management / monitoring plans and measures will be used to ensure the ongoing assessment/monitoring of the Proposes Scheme.



- HS2 Ltd do not appear to consider the use of 100% green energy during the operational phase of the Proposed Scheme as embedded mitigation.
- A cumulative assessment required under the EIA 2017 Regulations does not appear to have been undertaken for the GHG part of the climate change assessment.
- The end-life stage is excluded from the LCA assessment. As such it is not clear whether HS2 Ltd are confident that the scheme will be operational beyond the 100 year timeframe and that the design will not require decommissioning of any assets partially or fully for the next 100 years.
- No/limited information has been provided outlining the strategy for the proposed carbon sequestration.
- It is unclear how the produced GHG assessment will be used to assess the potential of further carbon reduction on a route-wide level.
- The lowest and highest Regional Climate Models (RCM) projections were not selected to avoid the risk of presenting potential outliers when assessing extreme weather.
- Insufficient mitigation measures have been identified at a local level to combat the potentially effects of the Proposed Scheme on climate change adaptation and resilience.

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- Undertake a thorough cumulative assessment of impacts of GHG as required under the EIA 2017 Regulations
- Further mitigation measures and resources be made available to Trafford Council to ensure a net zero project by the operational phase of 2038
- Trafford Council and other LAs with sufficient resources to manage impacts of the HS2 and implement local climate change adaptations and resilience measures arising from or being exacerbated by the construction and/or operation of the Proposed Scheme.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

10.4.4 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

Table 10.4-1

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Vol 3 General Point/ Comment			<p>Issue/ Concern That the proposed Airport Station construction and design, is as sustainable and energy efficient as possible.</p> <p>Likely Impact Failure to create a Carbon Neutral and sustainable station as part of a scheme of national significance is missed opportunity to demonstrate how new developments can be both viable and sustainable.</p> <p>National and local net zero targets will be harder to achieve and may be missed.</p> <p>Running costs of the station will be cheaper and more sustainable in the long run and will not be reliant on a sensitive and finite energy supply.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Major</p>	The proposed HS2 Airport station must be constructed as sustainably as possible, creating as little carbon footprint as possible and embed sustainable and renewable technologies and principles in its construction and design, so much that it is self-sufficient in terms of heating/ cooling, lighting and energy generation.
Vol 3 General Point/ Comment	4.2	4.2.14 Table 7	<p>Issue/ Concern Volume 3 4.2.14 table 7 illustrates the GHG (Green House Gas) results of the base case. The net carbon emissions from the project are positive (i.e. a net emitter</p>	<p>Proposed Mitigation None</p> <p>Residual Impact</p>	Further mitigation measures must be provided that ensure a net zero project by the operational phase of

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>against the counterfactual) for the period up to 2050 and the life time of the project.</p> <p>This fails to support the national target of Net zero by 2050 as required under the Climate Change act 2008.</p> <p>Likely Impact National and local net zero targets will be harder to achieve and may be missed.</p>	Major	2038. The Tunnel into Manchester creates a significant carbon burden on the project. Considering alternatives to this perhaps using existing services will reduce the burden and possibly deliver a net zero result.
Vol 2 General Point/ Comment			<p>Issue/ Concern No consideration for Trafford Climate Emergency and carbon budgets (Net Zero date of 2038 with a 13.4% year on year reduction rate from 2020.</p> <p>Likely Impact National and local net zero targets will be harder to achieve and may be missed.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Major</p>	HS2 Ltd must take into account local climate change committeemen's and set out the impact that the Proposed Scheme will have on local carbon budgets.
Scope, Assumption s and Limitations	4.2		<p>Issue/ Concern Although there is discussion of a lifecycle approach, it is noted that end-life stage is excluded from the LCA assessment. Although decommissioning is not usually</p>	<p>Proposed Mitigation A discussion of a lifecycle approach</p>	HS2 Ltd must confirm if de-commissioning of any of the HS2 Ltd assets is likely to be required



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>included as part of the EIA of a proposal if the lifecycle of the scheme goes beyond 100 years and the approach is understood, however, it is not clear whether HS2 Ltd are confident that the scheme will be operational beyond the 100 timeframe and the design will not require decommissioning of any assets partially or fully for the next 100 years.</p> <p>Likely Impact Carbon impact of decommissioning are be missed and leads to an inaccurate assessment.</p>	<p>is included is excluded from the LCA assessment</p> <p>Residual Impact Major</p>	<p>within the 120 lifecycle prior to exclusion of this within the assessment.</p>
Vol 3 Scope, Assumptions and Limitations	4.2	4.2.12	<p>Issue/ Concern 4.2.12 excludes transport of plant to and from site - why is this? If deemed insignificant then the same scale deciding inclusion should be applied to any load / benefits.</p> <p>Likely Impact Omitting emissions from 4.2.12 but retaining similar level of significance in loads/benefits creates an unbalanced view of emissions.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Moderate</p>	<p>Provide information pertaining to significance of plant transport to and from site and give basis of exclusion.</p>
Vol 5	2.2	2.2.14	<p>Issue/ Concern</p>	<p>Proposed Mitigation</p>	<p>HS2 Ltd must provide additional supportive</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Scope, Assumptions and Limitations			<p>Volume 5 - climate data and information, paragraph 2.2.14: presents data on extreme weather using the median of 12 available model realisation outputs, with the second lowest and second highest of the 12 model realisations presented as a range (following an approach used in the UKCP18 Science Report). The lowest and highest Regional Climate Models (RCM) projections were not selected to avoid the risk of presenting potential outliers.</p> <p>It is considered that for EIA purposes and in accordance with the EIA Regulations, the worst-case scenario is to be assessed. The lowest and highest projections should therefore be taken into account for the 12 model realisations.</p> <p>Likely Impact The lowest and highest projections have not been taken into account for the 12 model realisations leading to inaccurate or misleading results.</p>	<p>Lowest and highest Regional Climate Models (RCM) projections were not selected to avoid the risk of presenting potential outliers.</p> <p>Residual Impact Major</p>	<p>information which provides confidence to stakeholders that all possible information was used for the purposes of the assessment and if any exclusions are necessary the reason for this should be based on similar case evidence where practical. The lowest and highest projections should therefore be taken into account for the 12 model realisations.</p>
Vol 3 Scope, Assumption	4.2	4.2.27	<p>Issue/ Concern Volume 3, 4.2.27, Volume 5: Appendix CL-004-00000, Should the modal shift calculation method also make an</p>	<p>Proposed Mitigation None</p>	<p>The report notes vehicle mix changes bring diminishing carbon</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
s and Limitations			<p>estimate of embodied carbon savings of potential reduction in vehicles required? The report notes vehicle mix changes bring diminishing carbon returns over time (due to electrification) a fairer comparison for the high speed rail case would be to compare embodied emissions of the alternative modes also.</p> <p>Likely Impact Current approach leads to an inaccurate and unbalanced result</p>	Residual Impact Moderate	returns over time (due to electrification) a fairer comparison for the high speed rail case would be to compare embodied emissions of the alternative modes also.
SMR Scope, Assumption s and Limitations	Section 8.2		<p>Issue/ Concern Section 8.2 SMR - unclear when/how the engagement and consultation process for the three stages of climate change assessment will occur</p> <p>Likely Impact Poor quality consultation process for the three stages of climate change assessment</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact Moderate</p>	HS2 must provide further details on approach
Appendix CL-002- 00000 Scope, Assumption			<p>Issue/ Concern Appendix CL-002-00000, Ag soils: not clear if a management plan for reinstatement of agricultural land has / will be prepared as no references are included. Unclear how changes in climate are being considered as</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact</p>	References to any management plans already prepared should be included. It should be made clear how land

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
s and Limitations			part of the future mitigation proposed such as reinstatement of land Likely Impact Unclear	Moderate	reinstatement and management is being considered against estimated changes in climate and that a climate monitoring plan is being prepared.
Vol 3 Scope, Assumption s and Limitations	4.2	4.2.14 Table 16	Issue/ Concern ES Vol 3, 4.2.14 Table 16 - Construction lifecycle emissions should be displayed within the 'up to 2050' column as this is currently quite ambiguous. Construction and operational lifecycle emissions minus benefits and loads up to 2050 equate to 4,759ktCO ₂ e which is a net addition of GHG emissions. HS2 Net Zero Carbon Plan outlines that HS2's overall operations will be net zero from 2035 - this is seemingly not the case Likely Impact Information is misleading and presents an inaccurate ES result.	Proposed Mitigation None Residual Impact Major	Construction lifecycle emissions should be displayed within the 'up to 2050' column
Vol 3 Scope, Assumption	4.2	4.2.34	Issue/ Concern Vol 3 4.2.34 utilises assumptions to calculate benefits. Intercity Rail is based on national mix of electric and	Proposed Mitigation None	Assess and calculate benefits based on local mix of train fuels.

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
s and Limitations			<p>diesel trains when locally the mix will be different and likely involve a higher proportion of electric trains than nationally therefore reducing the benefits calculated.</p> <p>Likely Impact Inaccurate modelling and results leading to suggesting greater benefits than in reality.</p>	<p>Residual Impact Major</p>	
Mitigation and Monitoring			<p>Issue/ Concern Trafford Council consider that HS2 Ltd must use 100% green energy during the operational phase of the scheme as embedded mitigation. It is expected of a scheme of this scale to consider 100% green operational energy as standard for all HS2 Ltd assets, especially given that the scheme will not be operational until 2038.</p> <p>Likely Impact National and local net zero targets will be harder to achieve and may be missed.</p>	<p>Proposed Mitigation HS2 state that they might consider green energy but make no commitment</p> <p>Residual Impact Major</p>	<p>With the inclusion of this embedded mitigation, Trafford Council require the base level results to be recalculated and that green energy is certified such as Renewable Energy Guarantees of Origin.</p> <p>A scheme of this scale could commit to 100% green operational energy as standard for all HS2 Ltd assets.</p>



Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Assessment	Vol 3	4.2.48 & 4.2.51	<p>Issue/ Concern It is unclear how the produced GHG assessment will be used to assess the potential of further carbon reduction on a route-wide level. In Volume 3, paragraph 4.2.48 the mitigation approach to construction uses the industry standard PAS2080 and implies a detailed carbon management plan will be produced which is presumed to be undertaken at a later stage, with the plan being benchmarked against the worst-case scenario calculation.</p> <p>Paragraph 4.2.51 also identifies that the carbon management process will continue to be applied as the design of the development develops, however, it is unclear what management / monitoring plan will be used to ensure the ongoing assessment/monitoring.</p> <p>Likely Impact Lack of clarity leaves uncertainty over how future carbon reduction measures will be assessed leading to poor uptake of opportunity.</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact Major</p>	Provide clarity how the GHG assessment will be used to assess the potential of further carbon reduction on a route-wide level and on the management / monitoring plan that will be used to ensure the ongoing assessment/monitoring
Assessment			<p>Issue/ Concern</p>	<p>Proposed Mitigation</p>	Given the significant number of projects to be

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>In accordance with the 2017 EIA Regulations, potential cumulative assessment in relation to committed developments is to be undertaken for all technical topics forming the scope of the EIA.</p> <p>Trafford Council note that a cumulative assessment was not undertaken for the GHG part of the climate change assessment, and a justification has not been provided for the exclusion of this from the assessment.</p> <p>It is noted that a cumulative GHG assessment with other committed developments listed in the ES may not be achievable for sites where limited information in relation to potential carbon output is available.</p> <p>Likely Impact Cumulative carbon emissions will be missed from the assessment and lead to an inaccurate result.</p>	<p>None</p> <p>Residual Impact Major</p>	<p>developed in the Trafford and wider GMCA area simultaneously to HS2 Phase 2b scheme, Trafford Council require HS2 Ltd to assess the worst-case scenario in relation to cumulative effects or identify why such an assessment cannot be undertaken.</p>
Assessment	Vol 3	4.2.21	<p>Issue/ Concern Volume 3, 4.2.21 - Limited information has been provided outlining the strategy for the proposed carbon sequestration. Trafford Council would request that HS2 Ltd confirm and provide a management plan outlining</p>	<p>Proposed Mitigation Limited information has been provided</p>	<p>HS2 Ltd must identify timescales, location, plant species and management of the areas chosen for carbon offsetting. To</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>the strategy for the proposed carbon sequestration. Specifically, Trafford Council would request that details on the location, timescales, species type and management of the selected areas are provided.</p> <p>Likely Impact Without this information it is difficult to understand how the reduction in emissions are calculated leading to inaccurate results.</p>	<p>outlining the strategy for the proposed carbon sequestration</p> <p>Residual Impact Major</p>	<p>understand the potential for carbon sequestration, it is vital to understand when the planting will start and what species will be selected and how these feed into the carbon offset figures identified for the construction phase.</p> <p>In addition to the above, Trafford Council require that information is provided on how local communities impacted by the proposal can benefit from GI provided should the locations be chosen within the Trafford area and how these areas align with the BNG</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					requirements for the scheme.
Assessment	Appendix CL-002-00000	Page 31	<p>Issue/ Concern Appendix CL-002-00000, Table 7, page 31: the assessment identifies that the contribution planting as part of the carbon sequestration proposals forms less than 0.1% of the lifecycle carbon footprint. The proposed carbon sequestration as offsetting equals 7% (747,000t) of the whole carbon lifecycle outputs (10.7mt).</p> <p>Likely Impact Given the outlined changes in climate, land proposed to offset 747,165 tCO₂e over the design life of the scheme is significant for consideration of resilience to climatic changes.</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Major</p>	<p>HS2 Ltd to confirm if the 0.1% considered in the ICCI assessment refers to general planting proposals around the scheme.</p> <p>Should the percentages refer to the land proposed for carbon sequestration, Trafford Council require that this is assessed as part of the ICCI. Given the outlined changes in climate, it is unclear why HS2 Ltd would consider that the land proposed to offset 747,165 tCO₂e over the design life of the scheme is not considered significant for</p>

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					consideration of resilience to climatic changes.
Assessment	Vol 3	4.2.51	<p>Issue/ Concern It is unclear how the produced GHG assessment will be used to assess the potential of further carbon reduction on a route-wide level. Paragraph 4.2.51 identifies that the carbon management process will continue to be applied as the design of the development develops, however, it is unclear what management / monitoring plan will be used to ensure the ongoing assessment/monitoring.</p> <p>Likely Impact Substandard assessment of further carbon reduction on a route-wide level</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact Major</p>	HS2 must consult with stakeholders and agree framework for a monitoring / carbon management plan prior to any construction or preparation activities taking place.
Assessment	Vol 5	2.2.6	<p>Issue/ Concern Volume 5 - climate data and information, paragraph 2.2.6: Projection data for the period 2020 – 2039 is taken to represent the construction period, and the operational period is represented by projections from 2080 – 2099 (for probabilistic projection data) or 2060 – 2079 (for Regional Climate Model data).</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact Major</p>	HS2 Ltd to provide additional supportive information which provides confidence to stakeholders that all possible information was used for the purposes of

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>It is unclear why 2040 to 2060 was not included in the operational period assessments</p> <p>Likely Impact Operational period assessment does not provide accurate or realistic account of emissions.</p>		the assessment and if any exclusions are necessary the reason for this should be based on similar case evidence where practical
Assessment	Vol 3	4.2.14	<p>Issue/ Concern Volume 3 4.2.14 table 7 states that the GHG results of the base case. Potential further emissions savings are presented in sensitivity analysis, it would be useful to have sensitivity presented alongside base case. It's not clear how the carbon management plan (PAS080) will measure against the base and alt scenarios.</p> <p>Likely Impact Difficult to judge options and sensitivity leading to an unclear ES</p>	<p>Proposed Mitigation None</p> <p>Residual Impact Minor</p>	Further details should be established to identify the mechanism for measuring the carbon management plan i.e., show sensitivity presented alongside base case. It's not clear how the carbon management plan (PAS080) will measure against the base and alt scenarios.
Assessment	Vol 3	4.2.21	<p>Issue/ Concern Volume 3, 4.2.21 - unclear how carbon sequestration emissions have been calculated; where measures will be implemented and how local communities impacted by</p>	<p>Proposed Mitigation Unclear</p> <p>Residual Impact</p>	State how carbon sequestration emissions have been calculated; where measures will be implemented and how

Document	Section/ Map Number	Para/ Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			<p>the proposal can benefit from improved Green Infrastructure this can deliver.</p> <p>Likely Impact Unclear calculations leading to inaccurate assumptions and results</p>	Major	<p>local communities impacted by the proposal can benefit from improved Green Infrastructure this can deliver.</p>



10.5 Community

- 10.5.1 Tunnelling under densely populated parts of the Manchester local authority area needs to be undertaken and managed in a manner that minimises impact on adjacent communities, particularly at either end of the Manchester tunnel.
- 10.5.2 Trafford Council and GM Partners must be provided with further information on the construction management practices to be employed to ensure impacts upon the community are suitably minimised as far as practicable.

10.6 Ecology and Biodiversity

- 10.6.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council's comments at a route-wide level are set out below.
- 10.6.2 Trafford Council feel there is still a lack of detailed ecological survey information across the Proposed Scheme which needs to inform decision making. While we appreciate the scale and complexity of the Proposed Scheme, the documents are difficult to navigate, preventing a more complete sense of linking mitigation to loss. We would therefore appreciate clearer links to loss and suggested mitigation on a District basis.
- 10.6.3 Trafford Council expect HS2 to deliver smarter and bolder in relation to ecological mitigation. The UK Government has now made a policy commitment to aim to deliver a net gain in biodiversity on this phase of HS2. It is considered the habitat losses are not adequately compensated for in the proposals and Trafford Council would expect a minimum of National Biodiversity Net Gain requirements, which at present the Proposed Scheme does not provide. BNG should be clearly demonstrated by "a development that leaves biodiversity in a better state than before" (Baker, 2016). There is a lack of any detail or information relating to biodiversity net gain and how the current layout and landscape would feed into that. Use of a biodiversity metric will be required to calculate net gains.
- 10.6.4 Trafford Council have key concerns route wide which include, habitat loss, fragmentation, and isolation, both spatially and temporally, as a result of the long period of construction. It is considered that the fragmentation of habitat, and in some cases periods of complete habitat isolation (Wood near Chapel Lane SBI, for example), are not adequately reflected upon, catered for or mitigated against.



- 10.6.5 Trafford Council consider the potential impacts during both construction and operation as regards disturbance and movement of non-native Invasive species and potential controls, biosecurity and safeguarding are not adequately considered.
- 10.6.6 Trafford Council consider that the loss of hedgerows is not compensated for adequately and is not reflected by the suggested new planting. Trafford Council require HS2 Ltd to provide a District appraisal of loss against compensation measures. In order to determine whether connectivity has been appropriately addressed it will be necessary to understand proposed permanent hedgerow losses and location of replacements.
- 10.6.7 Trafford Council note that HS2 recognises the significant impact of the proposals with significant loss to Habitat at both County and District Levels. However, it is considered that the scale of habitat loss and impact is not adequately reflected in the proposals submitted.
- 10.6.8 Trafford Council need to see clearer references to Environment Act Priorities, in terms of articulating how Biodiversity Net Gain is being delivered through HS2, and how the GM Local Nature Recover Network opportunity mapping is being used to positively identify ecological receptors.
- 10.6.9 Trafford Council need to see a delivering natural capital assessment for the Proposed Scheme.
- 10.6.10 Trafford Council need to understand the approach to great crested newt mitigation licensing route wide. Given the scale and impact, traditional licensing using a phased approach could potentially reduce risk of significant local losses.
- 10.6.11 Trafford Council consider that insufficient regard has been given to the temporal impacts of the Proposed Scheme. This includes the isolation of habitats and sites during construction works, which is not a short time period, as well as impacts on populations of bats that have been identified as being of regional importance. In addition, it will take many years for some of the compensation habitats to be sufficiently matured to replace the habitat that is being lost. This affects species such as bats, badgers and willow tits. As well as habitats and green hedgerow networks. In this regard, advanced provision of compensation habitats and other appropriate mitigation measures must be provided to limit loss and allow sufficient establishment time.



- 10.6.12 Trafford Council do not consider that the future baseline is robust and that there are no long-term plans for habitat restoration, enhancement and creation such as the Nature Improvement Areas, Nature Recovery Network/LNRs and DLL.
- 10.6.13 Trafford Council consider the terms such as “partly compensate” to be misleading to describe works undertaken in relation to ancient woodland. Losses of irreplaceable habitats are absolute. Other terms such as ameliorate must be used instead.
- 10.6.14 Trafford Council note that the impact on amphibian other than great crested newts have been assessed as being of “local/parish” value. Given the lack of survey for these species and lack of reporting on the results of those surveys that were undertaken it is not clear how this value can be justified. Additional surveys or assessment of current data sets to present this data is required.
- 10.6.15 No specific habitat creation for badgers will be undertaken. Rather losses in habitats that were suitable for use by badger prior to construction will be addressed through compensation provided to address wider habitat loss as a consequence of the Proposed Scheme. This will provide large areas of woodland and grassland which will become suitable to provide replacement habitat for badger. However, in the interim time it takes for these habitats to establish, combined with a protracted construction period, it is considered that there will not be suitable mitigation route wide for badgers. In this regard, advanced provision of compensation habitats and other appropriate mitigation measures must be provided to limit loss and allow sufficient establishment time.
- 10.6.16 Trafford Council consider that HS2 could provide, better cross-cutting, thematic recognition and integration, where related themes can demonstrate multiple benefits e.g., the important roles that walking and cycling access to and through SBIs, and greenspaces has on community cohesion, placemaking, and health and wellbeing.

10.7 Health

- 10.7.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council’s comments at a route-wide level are set out below.
- 10.7.2 The ES identifies that there will be increased stress caused by construction and operation and proposes to mitigate this by engaging and consulting with communities. Although the overall impact is assessed as being low, this will increase



pressure on health and wellbeing services. HS2 should provide financial mitigation to enable Trafford Council and GM Partners to expand and enhance community wellbeing services for communities directly impacted by the construction and operation of the Proposed Scheme.

- 10.7.3 Trafford Council are concerned about the lack of robustness in modelling and assumptions. Adverse concentrations NO₂ and PM₁₀ / PM_{2.5} will impact on health. The lack of identified specific mitigation measures in the draft CoCP for the 13 'moderate' (significant) effects during the construction phase may result in inadequate controls again affecting air quality and health. Poor air quality has well documented adverse health impacts, particularly for children, older people, and people with underlying health conditions. These can manifest as either short or long term conditions, so could lead to immediate increased demands on health services.
- 10.7.4 If the Proposed Scheme is not carbon neutral (as potentially identified) this may contribute to climate change with long term effects on health. Particularly the most vulnerable such as children, older people, and people with underlying health conditions. HS2 must ensure appropriate measures are in place to make the Proposed Scheme carbon neutral.
- 10.7.5 Trafford Council have concerns about the lack of localisation of the CoCP. The potential that lessons have not been learnt from previous phases, and the very limited information on strategies to mitigate construction traffic flows and impacts on public transport may result in inadequate controls of construction activities that impact on health.
- 10.7.6 Trafford Council are concerned that severance of communities is likely to adversely impact on the mental health of those affected. HS2 must minimise severance of communities wherever possible and provide information, support and appropriate compensation to those affected by community severance.
- 10.7.7 Temporary and permanent loss of facilities (including health related facilities) is likely to impact on health through loss of access. HS2 must explore options for permanent retention of facilities that support health and well-being and take all appropriate actions to minimise disruption to retained facilities. It would also be beneficial to explore options for providing alternative facilities to compensate for any losses.
- 10.7.8 Trafford Council are concerned that adverse effects on ecology and biodiversity may affect mental health. HS2 must take steps to reduce loss of ecology and biodiversity and look for options for net gain in these areas.



- 10.7.9 Adverse effects on the landscape and visual environment are likely to have a negative effect on mental health. This includes loss of open space or reduced access to it. Detail and timescales to achieve desired effect of landscaping and noise barriers is needed. HS2 must take all appropriate steps to minimise adverse effects on the visual landscape and to maintain and reduce disruption to access to open spaces. In this regard, advanced provision of compensation planting, soft acoustic measures (i.e., bunds) and other appropriate mitigation measures must be provided to minimise impact from the outset and allow sufficient establishment time.
- 10.7.10 Trafford Council are concerned that consideration of major accidents and incidents has not been sufficiently robust. In particular, as engagement with site operators of any existing major hazard sites has not yet been undertaken, the confidence in the risk being appropriately managed to 'as low as reasonably possible' (ALARP) cannot be assumed and does not represent a reasonable worst-case scenario. HS2 must ensure that consideration of major accidents and incidents is robust and in particular engage at the earliest opportunity with operators of existing major hazard sites. Under the Councils' duty as a CAT 1 responder for the Civil Contingencies Act 2004 there is insufficient emergency response levels in the current LA systems to manage an operation of this size and scale within the LA civil contingencies resources (i.e., we would need to employ more staff to provide that level of cover (34/7 365) needed to manage the potential risk, preparations required to upscale existing levels).
- 10.7.11 If there is a failure to employ local workforce during the construction phase or to provide information to allow the appropriate training and skills to prepare potential local workers for such employment, the full employment health potential and health benefits from such employment may not be gained. HS2 must provide information to allow relevant training and skills development of the local potential workforce and take steps to maximise the use of local workforce in the construction phase. In addition, if a non-local workforce is brought in and housed in the local area, the demand on other public services (such as primary care, schools etc) needs to be factored into the plans.
- 10.7.12 Trafford Council are concerned that that from the investigations undertaken there is an inability to specify correctly the fixed plant and equipment and to determine the potential impact. This may result in adverse noise levels and consequent health effects. If additional mitigations against noise and vibration are not provided there may be adverse effects on health.



- 10.7.13 Effects that are seen as temporary construction issues in some cases extend over years. HS2 must ensure that appropriate compensation measures are in place.
- 10.7.14 Trafford Council are concerned that the lack of strong evidence to support traffic modelling and inadequate mitigations may give rise to increased congestion and journey times and increased exposure to poor air quality. These issues have adverse effects on both physical and mental health.
- 10.7.15 The lack of proposals to adequately address the requirements for non-motorised users (pedestrians and cyclists) may result in reduced use of such travel modes and failure to gain the health benefits from such modes. There are excessive distance / inappropriate routes, e.g., lowering cycleways in areas already subject to flooding. HS2 must ensure that active travel infrastructure is protected.
- 10.7.16 Trafford Council have concerns that road safety has not been adequately considered and will result in a greater number of road traffic incidents.
- 10.7.17 The lack of adequate facilities for disposal of waste may result in excessive vehicle movements and consequent impacts on congestion and air quality, and subsequently health.

10.8 Land Quality

- 10.8.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council's comments at a route-wide level are set out below.
- 10.8.2 Paragraph 9.3.6 (Page 102) relates to mineral resources, it states:

"Table 24 shows the length of the Proposed Scheme that will pass through the different mineral resources present along the Proposed Scheme where there may be some potential for limited sterilisation of resource"

- 10.8.3 Trafford Council require clarification on this statement. Trafford Council consider that the resource is either sterilised or not by the proposal, and request that **HS2 clarify whether at this stage prior extraction of the resource in the identified Minerals Safeguarding Areas (MSAs) will be possible.**



10.9 Landscape and Visual

- 10.9.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council's comments at a route-wide level are set out below.
- 10.9.2 These comments relate to landscape and visual effects where there is the potential for these to occur at a geographical scale greater than the community area. There is only one page in the report which scopes out any landscape and visual effects on a route wide basis.
- 10.9.3 National Landscape character areas should have been considered for impact on landscape effects. For example, MA08, MA07 and MA06 all run within the Manchester Conurbation National Landscape character area (National Character Area 55) so there is potential for this to be affected on a greater scale. This must be considered.
- 10.9.4 The loss of landscape features on a route wide corridor must be considered. This must address the overall loss of woodland, hedgerows, and other landscape features along the route.
- 10.9.5 It is likely that from some locations on the edge of community areas, views will be available of the route running within more than one community area. It is not clear if this has been considered and this must be addressed.

10.10 Major Accidents and Natural Disasters

- 10.10.1 Trafford Council welcome the opportunity to review and provide comment on the topic of Major Accidents and Disasters. It is noted that to date there has been no opportunity for direct consultation with HS2 or for the consultees to influence the proposals, the scope of the assessment or feed into the potential mitigation requirements.
- 10.10.2 We have therefore undertaken a comprehensive review of the relevant sections of the ES and supporting appendices relating to this topic and provide our comments, queries and requests for additional information and consultation on matters. Our response is set out in several parts which include general comments and concerns with regards to baseline data, queries with regards to the scope of assessment, concerns with regards to approach to mitigation and specific issues with risk events identified within the Screening document. Consequently, the section is summarised accordingly.



General Comments and Baseline Data

- 10.10.3 Trafford Council together GMCA are required to keep and maintain a Greater Manchester Community Risk Register (GM CRR) as part of their compliance with the Civil Contingencies Act (2004). This would be an important tool in establishing a robust baseline for both scoping and assessment stages. Reference is made in Volume 5: Appendix MA-001-00000, to consultation with Local Authorities. However, GMCA/GMRU who coordinate risk assessment and mitigation measures for disasters within GM, were not contacted or consulted prior to the production of the assessment. Furthermore, it appears that the Greater Manchester Community Risk Register (GM CRR) has not been used to inform the Background Information and Data collection, which would seem to be a significant oversight. It would therefore be of assistance if HS2 could advise why this consultation was not undertaken or the CRR used to inform their baseline? Can HS2 also confirm that the scope and assessment will be updated to recognise the existence of this document and reflect any additional risks identified therein?
- 10.10.4 Whilst it is noted and appreciated that a reasonable level of detail is provided with regard to the transport impacts it would greatly assist the reader if there was a similar increased level of detail with regards to other risk events identified (e.g. list of water crossing or proposed location of tunnels covered by assessment) rather than an over reliance on the reader to find this information elsewhere within the ES. It is requested that further details are provided by HS2 to signpost the reader to specific features. As a minimum this could be provided within the appendices, to allow local stakeholders to better understand the potential risks in specific areas to which they have local knowledge.
- 10.10.5 Will HS2 have a centralised control centre for the section of the line covered under Phase 2B and if so, what processes will be in place to actively communicate with and work alongside the established multi-agency emergency response command and control structures that ensures an effective emergency response?
- 10.10.6 What consultations do HS2 plan to carry out to establish a fit for purpose process? Can HS2 please set out how they intend to liaise with the Local Resilience Forum and its constituent partners to share an ongoing understanding of risks once the line is operational, prepare emergency plans that are fit for purpose, together with collaboratively training and exercising for the response to a major accident.



10.10.7 The Background Information and Data document (paragraph 1.2.2) states that a data request was made to the HSE to understand hazardous sites present within the area of influence (AOI), which is defined as:

- Centre line of route of the Proposed Scheme + 500m; and,
- Land required for construction of the Proposed Scheme +250m.

10.10.8 Can HS2 provide an explanation as to why this buffer been selected? Given the varying type and nature of the potentially hazardous sites identified, can HS2 provide more information on why these standardised buffers are appropriate and when a more flexible buffer would seem appropriate?

10.10.9 The Background Information and Data document section's 1.2 and 1.3 discuss major hazard sites and major pipelines and it is understood that consultation zones are based on the HSE requirements, and it is assumed that this consultation zone accounts for the existing facilities or pipelines. Given the extended construction programme and lifespan of the proposed development, can HS2 confirm how any potential risk or consideration for new pipelines or expansion to existing hazardous facilities has or will be appropriately considered going forward?

10.10.10 At this stage there is considered to be limited or insufficient detail with regard to any supporting or ancillary infrastructure required to support the proposed development (e.g., pumping stations, energy infrastructure etc). Can HS2 confirm that further consultation and assessment will be undertaken on any local risks these may be subject to and/or whether they may impact risk consequences if, for example, they were to fail?

Comments on Scope and Assessment

10.10.11 As a general comment, there are numerous references within the Volume 5 MAaD risk screening document to, "Community engagement". How does HS2 plan to implement this process? Who from local organisations will be involved? Will these be location specific, on a face-to-face basis or via written communication/ media? Additionally, can HS2 provide assurances to confirm that should any key concerns or risks be identified as a result of this engagement that this will be appropriately documented and subsequently reflected within ongoing design iterations?

10.10.12 Volume 3 paragraph 11.1.3 states that, "The underlying objective of the assessment is to ensure that appropriate precautionary actions are taken for those projects which because of their vulnerability to major accidents and or natural disasters are



likely to have a significant adverse effects on the environment". However, within MA05 there is the mention of a requirement for a pumping station. The proposed location for this feature is not clearly marked on the map, nor are there any details of where flood water will be pumped to or its subsequent impact for localised flooding. Until this is appropriately addressed within the Flood Risk section of the ES to demonstrate that there are no likely significant adverse effects, it is considered that there is potential for vulnerability to major accidents. Can HS2 confirm how this will be addressed?

10.10.13 Paragraph 11.4.11 of the Route Wide Effect's chapter states that engagement to date has informed the design and environmental assessment process, including the identification and consideration of baseline features which contribute a potential source of hazard. This includes engagement with a number of stakeholders. GMRU and Local Authorities who hold, maintain and update the community risk register are not listed, on this basis could HS2 advise who they have consulted to support this comment. The lack of engagement with the GMRU and Local Authorities would seem to be a significant oversight.

Mitigation and Monitoring

10.10.14 For all identified risk events all mitigation is considered to be embedded, but given the lack of detail, context, timeframes and stakeholders, Trafford Council must be provided with sufficient confidence that these measures will be implemented appropriately and that stakeholders will have sufficient overview of these proceedings. HS2 should provide significantly more detail and a robust framework to outline how these concerns will be addressed.

10.10.15 Many of the identified risks are considered ALARP once the embedded mitigation has been taken into account. It would be helpful if HS2 could provide more details on the proven effectiveness of the proposed mitigation measures and therefore the basis on which they have been or will be selected? If not tested prior to operational stage and ineffective, the impacts could be significant. MAaD Risk Screening - OM15 - References mitigation as including Incident Response Plans to be developed with Stakeholders. However, to date no stakeholder engagement has been conducted, as such, can HS2 provide confidence that there will not be any conflicting issues which will prevent the production and/or delivery of Incident Response Plans. Additionally, can HS2 confirm what processes will be in place to actively communicate with and work alongside the established multi-agency emergency response command and control structures that ensures an effective emergency response?



- 10.10.16 Paragraphs 11.2.20 and 11.2.21 of the Route Wide Effect's chapter refer to the draft Code of Construction Practice and state that this will have 'a comprehensive community emergency plan' and that 'when working with the relevant emergency service, that the community can be kept full informed and adequate arrangements are in place for evacuation'. There is a significant assumption here that appropriate measures can be put in place, which in the absence of any discussion or agreement from stakeholder and emergency responders cannot be relied upon to support the assessment. Can HS2 confirm that they will undertake some initial engagement and ensure that, as a minimum, the proposals they are putting forward are achievable or could a framework for emergency plans be included within the CoCP to clearly outline the chain of responsibility for producing detailed plans?
- 10.10.17 Paragraph 11.2.17 - HS2 Ltd approach to risk management states clear accountability for risk will be ensured and risk management will be based on continuous improvement. Under the Civil Contingencies Act (2004) there are three definitions of emergency responder. Can HS2 confirm that they will be considered as a Category 2 responder and if so can HS2 confirm how they will discharge their duties?
- 10.10.18 Paragraph 11.3.6. This paragraph states; "*Major Accidents and Disaster 'risk events', to which the proposed scheme is considered vulnerable, have been identified by referring to risk assessments (including CDM) undertaken for the Proposed Scheme and determining whether there is potential for impact to an in-scope receptor. These risk assessments are part of other processes, many of which are required by law*". No consultation has taken place with GM Resilience Unit or the GM Resilience Forum who have responsibility for risk assessment in GM. Although we note that there are some references later in the document to the National Risk Register, it is not clear how and why some risks were then scoped in or out of the subsequent assessment works. Can HS2 provide further information on this and also explain what consideration has been given to an out-of-scope receptor and the required response to an incident?
- 10.10.19 Paragraph 11.4.2 'the route avoids existing features that have the potential to present a Hazard to the construction or operation of the proposed scheme'. Can HS2 confirm how far does the assessment of potential hazards reach? For example, does it take into consideration the risk posed from Reservoir collapse? All of the following could cause a significant impact to the line in Trafford, if they breached: Lymm Dam, Dunham Park, The Mere, Todd Brook, Tatton Park Mere, Appleton, Sale Ees.



10.10.20 Paragraph 11.4.6 of the Route Wide Effect's chapter explains that for any existing major hazard sites identified where sufficient information is not publicly available, HS2 Ltd will initiate direct engagement with site operators to discuss potential hazards and or impacts. If there are likely to be impacts where a major accident or disaster could directly impact the Proposed Scheme, or such an event at a major hazard site could be made worse by the Proposed Scheme (either by increasing the impact, or by reducing the ability to respond to an incident) appropriate remedial measures to manage the risk ALARP will be implemented. These measures will be integrated into the HS2 design, construction plans, or owned by the site operator, as appropriate. However, we would query how, if engagement with site operators has not yet been undertaken, can HS2 be confident that the risk can be managed to ALARP. Currently this position cannot be justified or considered robust enough to result in ALARP and we request that HS2 provide further explanation of how they intend to identify sites and provide assurance that the methodology and outcomes will be suitably robust.

10.10.21 Route wide effects Table 27 – The document states "Rivers and watercourse crossings i.e., viaducts, bridges and culverts are designed to accommodate 1 in 100 annual probability flood plus climate change for the 2080s as defined by Environment agency guidance on Flood risk assessments: climate change allowances". However, Storm Christoph in January 2021 exceeded modelling for the River Mersey in Didsbury and these flood warning areas will have an impact on HS2 line. Can HS2 confirm that following the EA guidance is going to be sufficient and is there scope within the design to ensure these structures are designed to be in excess of the 1 in 100-year events?

10.10.22 Volume 3 Route wide effects. Table 27 OM7 states "Proposed scheme infrastructure located outside of floodplains where practicable. Appropriate floodplain compensation and defences identified and provided where necessary". Trafford Council welcomes the proposal, but it would be helpful if HS2 could confirm if this includes reservoir inundation zones. Where infrastructure is located in floodplains, it would be helpful if HS2 could liaise with the Local Resilience Forum should the flooding of any of this infrastructure, due to an event beyond the parameters used for compensatory and defence measures, have immediate or cascading consequences that will need factoring into multi-agency emergency response plans.

Specific Concerns with Risk Events Volume 5, MAaD Risk Screening Table

10.10.23 ID-C1 - Tunnel collapse. The mitigation includes Stakeholder engagement/Community Engagement, how does HS2 intend to carry out this engagement? Does



HS2 intend to consult with external agencies in relation to emergency response plans at construction sites?

- 10.10.24 ID C10 Collapse/Damage to structure/Infrastructure. The section refers to 'a CoCP and necessary management plans, LEMP will be in place to control potential environmental impacts of construction works'. Can HS2 confirm if any consideration been given to evacuation requirements should an incident of this nature occur and ensuring that there is a framework in place to outline the chain of responsibility for such plans and where relevant that emergency services and local authorities have had an opportunity to feed into their development?
- 10.10.25 ID-C13 and ID-OM17 - Closure/diversion of emergency response routes. It is recommended that HS2 make early contact with the emergency services in Greater Manchester to establish a dialogue in relation to what mitigations are put in place to avoid disruption to emergency response routes and the identification of effective alternative routes.
- 10.10.26 ID-OM4 - Collapse of Structures. The proposed mitigation includes incident response procedures to deal with bridge strike but does not mention who is responsible for providing or agreeing these procedures. Can HS2 confirm who will be responsible for regulation of these procedures?
- 10.10.27 ID-OM6 - A tunnel fire risk assessment must be carried out under legislation, to ensure the safety of the occupants of the tunnel and those in the immediate vicinity who are at risk. A fire management strategy for tunnels will be drawn up during detailed design in line with the National Technical Specification Notices (NTSNs) for Interoperability. HS2 should involve the local emergency services in the development of their Tunnel Evacuation Strategy. As such HS2 should confirm who will be responsible for producing the strategy and how this will be agreed/secured?
- 10.10.28 ID-OM7, Extreme weather. The document states; "Resilience measures to be implemented through the design process and/or during the construction and operational stages of the Proposed Scheme addresses potential climate change impacts identified so that all climate change risks assessed low or medium with no additional resilience measures recommended". Who do HS2 intend to consult in relation to the design and implementation of these 'resilience measures'?
- 10.10.29 ID-OM15 - Emergency Response Impacts. The embedded mitigation includes, incident management plans which should be developed and communicated sufficiently early enough to influence design. HS2 should provide a clear programme and agenda of how this should be provided and identify when relevant stakeholders



will be involved in developing the plans and have an awareness of incident response plans from an early stage.

10.10.30 ID-OM15 - Emergency Response Impacts. The document states: "Incident Management plans developed and communicated sufficiently early enough to influence design regarding locations of evacuation/emergency refuge areas". Who with local knowledge do HS2 intend to consult in the design and development of these plans?

Summary

10.10.31 Overall, Trafford Council and GM Partners have a number of concerns with the approach to baseline data collection, the scope of the risks identified and that fact that the assessment has a fundamental dependency on a range of high-level mitigation measures which are yet to be determined. The embedded mitigation measures are considered to be particularly concerning as the robustness and deliverability of the measures are almost exclusively reliant on a number of external factors which include detailed site assessments, detailed design as well as engagement, consultation and agreement with a range of parties who are yet to be approached. As such at this stage it is considered that there are too many variables for this to be considered a robust and meaningful assessment.

10.10.32 However, it is considered that a significant number of the issues raised can be appropriately addressed through direct consultation with the relevant local stakeholders. It is clear that a lot of the work is still at a very early phase and it is observed that through some direct dialogue that the scope can be refined, risks appropriately considered and the general concerns can be alleviated. Additionally, by undertaking some direct engagement it is hoped that HS2 can then provide a framework strategy to demonstrate how future engagement and direct consultation on specific design issues relating to major accidents will be conducted. This will allow stakeholders to have the confidence that key issues are being addressed and will continue to be addressed going forwards.

10.11 Socio-economics

10.11.1 The socio-economic assessment is reported at route-wide and local level, i.e., the potential overall changes to employment levels are reported at a route-wide level in Volume 3, Section 12 whilst significant localised effects on employment are reported at a local level in the Volume 2, Section 12. The below section therefore specifically details the GMCA consultation response in respect to issues and



requirements which have been identified at route-wide level within Volume 3 of the ES.

10.11.2 Other chapters within this GMCA consultation response detail issues and requirements identified in relation to individual community areas and assessment presented in Volume 2, Section 12. Where similar comments were raised for all GMCA community areas assessed within Volume 2, Section 12, issues were considered to be route-wide and are therefore set out within Chapter titled “GMCA Points raised to ES Consultation which are Common across chapters and Community Areas”. To avoid repetition, those issues and requirements have been summarised here but in reading this section it should be noted that those issues and requirements also apply to this chapter.

10.11.3 12.1.3 Volume 3, Section 12.7 (paragraphs 12.7.2 to 12.7.3) identifies that:

The Proposed Scheme will generate 87,800 person years of construction employment opportunities¹³⁶ (equivalent to 8,800 full time construction jobs), which will be a major beneficial effect and is, therefore, considered to be significant. Of these, an estimated 60,600 person years of construction employment opportunities (equivalent to 6,060 permanent full-time construction jobs) will be based at worksites along the Proposed Scheme...

Depending on skill levels required, and the skills of local people, these jobs will be accessible to local residents and to others living within the relevant travel to work area...

10.11.4 It is noted that in paragraph 12.7.3, it is assumed based on travel to work areas (TTWAs) that at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. GMCA would request that HS2 Ltd identify the potential proportion of employment opportunities that will be available locally (local residents and those living within the relevant TTWA) and clarify the reference to TTWAs, if a 75% local employment cannot be delivered.

10.11.5 It is acknowledged that a significant number of construction employment will be created at route-wide level and within individual community areas. GMCA would request that HS2 Ltd identify the percentage of the potential employment



opportunities to be required at a local level to identify the potential impacts on the current supply chain. If a significant proportion of vacancies are to be filled locally, GMCA would wish to work with HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages. This is to ensure that skill gaps and needs of the local population can be addressed appropriately for the residents of GMCA to take advantage of the varied employment opportunities both during and after the development of the proposed scheme.

10.11.6 Trafford Council and GMCA would also request that HS2 Ltd confirm if they will work in collaboration with other bodies such as the GMCA and the Education and Skills Funding Agency; whether a Training and Employment Opportunities Management Plan will be developed; what opportunities will be considered to prioritise local employment; and the timeframe for the provision of new training and employment opportunities. Volume 3, Section 12.7, paragraph 12.7.10 identifies that it is predicted that 'a total relocation of 6,500 jobs from businesses as a result of land required for construction of the Proposed Scheme. GMCA acknowledges that a significant number of businesses are identified as being required to be demolished at a route-wide level however, GMCA disagree with the assumption approach that a large proportion of the 6,500 FTE will be replaced by new employment relatively quickly. To comply with the requirements of the EIA Regulations, the worst-case scenario should be presented and assessed as far as evidence allows and given the lack of knowledge in respect to the future economic market, it should be assumed that the estimated 6,500 FTE are jobs which are lost as a result of the proposed scheme and the 6,500 employees are not able to find alternative employment. Trafford Council and GMCA would expect the detailed design to limit the loss of property and assets as far as possible. It also needs to be ensured that adequate and timely engagement and support is provided to the affected businesses and other organisation. Where applicable, details of compensation, mitigation or alternative provision to be provided needs to be established in each case as a matter of urgency.

10.11.7 Volume 3, Section 12.7, paragraph 12.7.11 states that:

'it has been assumed that 88% of the business occupiers displaced by the scheme will successfully relocate to alternative locations and no employment will be lost. The other 12% of occupiers are assumed to close rather than relocate'.



- 10.11.8 It is noted that this assumption estimates that 88% of the businesses affected will be successfully relocated and therefore a total of 5,720 FTE will be re-gained following relocation. It is noted that this assumption is based on the research into the relocation of companies and jobs on account of the London 2012 Olympic Games. Given the potential effects of this estimate, i.e., actual loss of FTEs and for the purposes of assessing the worst-case scenario in line with the EIA Regulations 2017 requirements, it is considered that the London-based case study does not represent the base case for the North West England and Crewe to Manchester route. Similarly, the assumption that a proportion of the 88% of the businesses (which are largely located within the rural areas of GMCA or are users specific) impacted by the proposed scheme will be able to re-locate is not considered representative of the worst-case scenario for loss of FTEs. HS2 Ltd would therefore request that HS2 use evidence which can be related to the scheme locality and use existing experience from the ongoing construction of the earlier phases of HS2 to identify the actual loss of FTEs as a result of business displacement.
- 10.11.9 Similarly, it is assumed that the remainder 12% of the businesses will not continue to trade as a result of the scheme, with a total of 780 FTE likely to be lost directly. As stated above, the selected percentages are based on the London-based case study which is not considered representative of the potential effects for the North West England and GMCA and therefore is not considered to represent the worst-case scenario in accordance with the EIA Regulations. Trafford Council and GMCA therefore request that further details on the potential percentage of business likely to be impacted directly and indirectly by the scheme are provided by HS2 Ltd. The worst-case scenario assessment should therefore identify the likely loss of FTE basing the assessment on evidence which is of similar scope to the site and surroundings assessed in the ES.
- 10.11.10 Trafford Council would also wish to seek financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route within the borough that has been demonstrated to cause businesses to fail or had a significant impact on their income. It is not expected that the partner authorities should bear the financial consequences to the detriment of its residents and businesses.
- 10.11.11 Volume 3 - Section 12.5 outlines the wider socio-economic benefits which identifies that the scheme will allow for increased demand for property development around the Proposed Scheme stations. Trafford Council and GMCA welcome the potential benefits, however, would request that HS2 consider that there is a significant development portfolio already committed, and / or in the pipeline around the



stations locations and whilst the benefits are recognised, given the long-term programme of the scheme development, it is considered that by 2038, this demand will have largely been realised. As such, whilst HS2 is considered to be a benefit in terms of providing supporting infrastructure, it is not a facilitating significant new development that would not otherwise have occurred and therefore limiting developments to only committed developments gives an unrealistic picture of prevailing development levels around HS2 stations. As this has material implications for economic impact and appropriate mitigation. **HS2 Ltd should be required to review the economic impact assessments for the Proposed Scheme to ensure they are rebalanced based on more realistic assessment of prevailing levels of development and the assumption that HS2 is enabling development in this area should be re-considered with greater weight placed upon potential development barriers and therefore the need for mitigation.**

10.12 Traffic and Transport

10.12.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council's comments at a route-wide level are set out below.

Construction

10.12.0 Trafford Council has concerns that road closures proposed during construction along the length of the route will have significant impacts in terms of severance and congestion.

10.12.1 In summary, as stipulated in Chapter 4 of this response, Trafford Council are concerned that the mitigation for construction traffic is not sufficient. The methodology used by HS2 is too simplistic and doesn't sufficiently recognise the scale of the impact and consequently doesn't identify suitable measures. **HS2 Ltd should be required to undertake detailed assessment of routes, vehicle numbers and identify necessary mitigations. This will also require road monitoring and condition surveys are provided to validate proposed mitigation and enable appropriate highway repairs etc to be identified.**

10.12.2 Trafford Council are concerned that the highway modelling does not appropriately assess the impacts of construction traffic on the Strategic Road Network (e.g. motorways which are controlled by National Highways). The Council is particularly concerned about the main road closures and M60/ M56 junction capacities. Consequently, **HS2 Ltd should be required to undertake detailed assessments and modelling which appropriately assess the impacts of HS2 construction traffic on**



the motorway network for agreement with Trafford Council, GMCA and National Highways.

- 10.12.3 **HS2 Ltd should be required to outline why over 128 potential weekend closures on different parts of the existing WCML during the construction of the HS2 Crewe-Manchester line are proposed. This will cause unacceptable disruption to passengers (over 9-years), especially given the trend for increased leisure rail travel following the Covid-19 pandemic.**
- 10.12.4 HS2 Ltd recognises (F7 Rail Freight Operations Section 5.7) that both rail freight and passenger operators are likely to have aspirations to increase service levels, such that there is inevitable competition for any spare capacity. **HS2 should be required to explain how can the assumption "that the necessary paths will be available" for freight services to support HS2 construction is valid.**
- 10.12.5 If the paths HS2 Ltd require are not available to support construction, **HS2 should be required to confirm what alternative proposals have been considered and evaluated.**
- 10.12.6 Table 32 in document M32 Route Wide Effects, Section 14.5.18, shows approximately 150 weekend or longer closures of the West Coast Mainline between the south of Crewe to the north of Preston over the main 6-year construction period. **HS2 should be required to provide confirmation what work has been undertaken to assess and mitigate the overall economic impact on Greater Manchester.**
- 10.12.7 Added to this, HS2 should be required to assess available rail capacity for alternative services (passenger and freight).
- 10.12.8 A logical extension of HS2 Ltd's assumption that "the necessary paths will be available" (F7 Rail Freight Operations Section 5.7) is that there is available capacity on the heavy rail network for the movement of freight services to and from the railhead at Ardwick. **HS2 should be required to confirm what assessments have been done to support this statement.**

Operational

- 10.12.9 With respect to Document F3: Rolling Stock Stabling Facilities, Section 4.1 states: "HS2 rolling stock may also be stabled at strategic sites on the conventional railway to allow the circulation of HS2 trains to be more efficient" **HS2 should be required to confirm what locations are being considered for the out stabling of rolling stock and what assessments have been undertaken to consider the capacities of those**



locations and how additional locations have been assessed if the initial locations are found to be insufficient.

10.13 Waste and Material Resources

10.13.1 Waste will be generated along the route, but as the management of waste will take place off route, and are cross GM issues, comments relating waste and material resources are included in other sections.

10.14 Water Resource and Flood Risk

10.14.1 Detailed comments and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report, however Trafford Council's comments at a route-wide level are set out below.

10.14.2 Trafford Council notes there is limited assessment on the route wide effects on posed by water quality for ordinary watercourses. Further assessment will be required at the later stage to demonstrate this is considered.

10.14.3 There are several locations where invert syphons are proposed. Consideration into fish migration has not been given in these locations, and the introduction of these will inhibit fish passage. This must be addressed in the detailed design.

10.14.4 It is noted that inverted syphons are not a preferred option in some route locations but then applied in others. This implies there is an inconsistency in how options are being assessed and applied which requests review. Trafford Council notes that syphons are generally not preferred approaches to convey water.

10.14.5 It is noted that the surface water assessment has not been fully considered at this stage. Detailed assessment will be required to understand and manage existing flow routes of survey water as well as an assessment of new surface water risks following implementation of the Proposed Scheme.

10.15 Electromagnetic Interference

10.15.1 Electric and magnetic fields are produced wherever electricity is used. The electric field is produced by voltage and the magnetic field by current. Electromagnetic fields (EMF), which refers to both electric and magnetic fields, can cause three types of effect:

- interference to electric and electronic equipment. This is called electromagnetic interference (EMI) and is the disturbance that affects an electrical system due to



magnetic and electric fields, electromagnetic induction or electromagnetic radiation emitted from an external source;

- the potential to cause harmful effects in the human body through EMF; and
- the creation of induced voltages in metallic infrastructure where there is parallel running for a significant distance e.g., the Proposed Scheme running parallel and close to overhead electric power lines or metallic fences.

10.15.2 It is noted that the level of EMF diminishes rapidly with distance from the source, so the extent of any interference or harmful effects is likely to be limited to only a short distance horizontally and vertically from the railway boundary or the boundary of any traction power sub-station or switching station.

10.15.3 To this end it is noted that the desktop survey undertaken within a 50m corridor of the proposed rail line identified no potentially sensitive receptors in Community Area MA04 Broomedge to Glazebrook, while a number of potentially sensitive receptors were identified within Community Area MA06 Hulseheath to Manchester Airport.

10.15.4 In preparing this response, Trafford Council have had discussions with relevant local authorities to ensure we provide consistent information and advice on the climate change related aspects on this report. It is noted that there are still a number of issues that could be improved and resolved.

10.15.5 In the interests of ease and legibility, the following points provide a summary of Trafford Councils key comments, concerns, observations. More detail and other comments are set out in Table 10.5-1.

Key Observations and Concerns

- Real-world baseline and post construction/ operational surveys must be undertaken at dwellings and businesses closest to the route of the proposed scheme.
- Potential effects on the proposed North West Hydrogen Pipeline that will intersect with the proposed scheme in the MA04 Community Area need to be considered.
- RF signal interference mechanisms (shadowing, diffraction, reflection, Fresnel zones, etc.) that could adversely impact signal reception needs additional consideration



- Potential significant EMI risk to very sensitive equipment or systems at Manchester Airport (within MA06).
- Exact figures to be given for EMF emission levels at receptors

Recommendations and Additional Mitigations Required

- Detailed clarification and justification on the data, assumptions conclusions reached within its assessment(s)
- Further mitigation measures and resources to be made available to Trafford Council to manage the impacts and effects of the construction and operation phases of the Proposed Scheme
- A suitable compensation mechanism and process for local residents and businesses must be established and agreed for interference on RF transmissions like broadcast radio and TV
- That Trafford Council be informed of the outcome of the engagement with MAG and discussions going forward.

10.15.6 Consequently, Trafford Council makes the following comments and observations and sets out the requirements considered necessary to improve the scheme and/or protect the amenity and minimise the negative impacts of the Proposed Scheme on Trafford's residents, businesses and environment.

Table 10.15-1

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 3: Route- wide effects	17.4	17.4.1	<p>Issue/ Concern A desk-top survey of the Proposed Scheme was undertaken to identify any potentially sensitive receptors within a 50m corridor either side of the centre of the nearest HS2 track and overhead line electrification, along the route of the Proposed Scheme.</p> <p>Likely Impact Unknown.</p> <p>Reasonable Alternative Option(s) N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown.</p>	<p>To verify the desktop-based modelling that has been undertaken in the ES, real-world baseline and post construction/ operational surveys must be undertaken at dwellings and businesses closest to the route of the proposed scheme.</p> <p>HS2 Ltd must also assess the potential effects on the proposed North West Hydrogen Pipeline that will intersect with the proposed scheme in the MA04 Community Area. The results of</p>

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
					this assessment, its methodology and raw data must be shared with Trafford Council prior to any potential interference and/or construction taking place.
Volume 3: Route- wide effects	17.5	17.5.4	<p>Issue/ Concern ‘It is therefore considered that there will be no significant effects on a route-wide basis associated with construction’.</p> <p>While this may largely be correct in relation to electromagnetic field (EMF) effects, this may not be the case in relation to radio frequency (RF) interference effects. Tower cranes used during the construction phase could impact RF transmissions like broadcast radio and TV.</p> <p>Likely Impact Loss of RF transmissions like broadcast radio and TV.</p>	<p>Proposed Mitigation Mitigation will be controlled by adherence to British and European standards, which will be mandatory for all installation contractors. In addition, as set out in the draft Code of Construction Practice (CoCP), the nominated undertaker and its</p>	<p>Consideration must be given to RF signal interference mechanisms (shadowing, diffraction, reflection, Fresnel zones, etc.) that could adversely impact signal reception.</p> <p>Locations where this could occur must be identified by the</p>

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
			Reasonable Alternative Option(s) N/A	contractors will consider the impacts of EMI on wireless telecommunication systems during construction of the Proposed Scheme. This will include site-specific impacts from the demolition of buildings and the installation of tower cranes, and where appropriate will employ best practice technology to ensure that levels of radio frequency interference associated with the Proposed Scheme are low and at acceptable levels.	nominated undertaker and its contractors and shared with the Council prior to any potential interference occurring. Additional mitigation measures must also be identified which will then be considered by and/or agreed with the Council prior to implementation. Interference zones determined by direction of signal transmission (for terrestrial and satellite TV) must be identified by the nominated undertaker and its contractors and

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
				<p>Residual Impact Moderate</p>	<p>shared with the Council prior to any potential interference occurring. Additional mitigation measures must also be identified which will then be considered by and/or agreed with the Council prior to implementation.</p> <p>A suitable compensation mechanism and process for local residents and businesses must be established and agreed with the Council prior to any potential interference occurring.</p>

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
Volume 3: Route- wide effects	17.6	17.6.7	<p>Issue/ Concern In relation to the operational effects of electromagnetic interference (EMI) on electronic equipment within 20m of the centre of the nearest track or very sensitive electrical or electronic equipment.</p> <p>Likely Impact Unknown.</p> <p>Reasonable Alternative Option(s) N/A</p>	<p>Proposed Mitigation Replacement with less sensitive equipment or relocation of equipment where practicable.</p> <p>Residual Impact Moderate</p>	In instances where this isn't feasible or effective, other measures such as passive shielding or active cancellation systems must be provided.
Volume 5: Appendix EM-001- 00000		Page 42 Table 11	<p>Issue/ Concern The assessment concludes that there is a potential significant EMI risk to very sensitive equipment or systems at Manchester Airport (within MA06).</p> <p>Likely Impact Affected Airport's communication and navigation systems.</p> <p>Reasonable Alternative Option(s) N/A</p>	<p>Proposed Mitigation Requirement for mitigation not yet identified (if any required).</p> <p>HS2 Ltd advise that there is ongoing engagement with the facilities to agree on any required mitigation measures.</p>	That Trafford Council be informed of the outcome of the engagement with MAG and discussions going forward. MAG must be satisfied and approve any mitigation measures identifies.

Document	Section/ Map Number	Para / Page	Comment	HS2 Proposed Mitigation	TMBC Requirement
				Residual Impact Moderate	Should any additional mitigation measures be necessary, the Council must be informed.
Volume 5: Appendix EM-001- 00000	3.6	3.6.5	<p>Issue/ Concern The estimated EMF emission levels at receptors only outline if the levels are lower or greater than the prescribed immunity limits.</p> <p>Likely Impact Unknown.</p> <p>Reasonable Alternative Option(s) N/A</p>	<p>Proposed Mitigation N/A</p> <p>Residual Impact Unknown</p>	<p>The exact estimated figures must be provided so the magnitude of the difference is known.</p> <p>It is imperative that mitigation measures must be provided for properties where immunity limits are exceeded.</p>



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

10.15.7 The preceding sections in this Chapter detail the Trafford Council Consultation response on issues and requirements which are unique to Route-wide Effects. To avoid repetition, the Trafford Council Consultation response also presents a Chapter titled "[Trafford Council Points raised to ES Consultation which are Common across Community Areas](#)" and those points should be taken as also applying in this Chapter and vice versa.



11 Trafford Council comments on Volume 4 – Off-Route Effects

11.1.1 This section specifically details the Trafford Council consultation response comments in respect of issues and requirements which have been identified within the Off-route Effects Report and an opportunity for additional benefit off-route.

11.1.2 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.

Wigan Hub

11.1.3 Trafford Council supports the GMCA position on the need for a Wigan Hub/ station.

Rail Possession/Blockades

11.1.4 Over 60 weekend possessions / blockades on different parts of the existing West Coast Main Line (WCML) during the construction of the HS2 Crewe-Manchester line are proposed. Trafford Council considers that this will cause unacceptable disruption to passengers travelling to Manchester (over approximately 9 years), especially given the trend for increased leisure rail travel following the Covid-19 pandemic. **HS2 must be required to provide further information and fully assess alternative options to minimise the disruption on rail passengers.**

11.1.5 Once HS2 Phase 2b is complete, there is likely to be an impact to the availability of paths on the WCML north of Wigan. In particular, there is likely to be a challenge in finding paths for services which cross the WCML (such as Manchester to Blackpool) due not only to the paths taken up on the WCML itself but also the difficulty in finding space for crossing movements at at-grade junctions such as at Euxton. It will therefore be difficult to maintain existing levels of frequency and reliability on the local network; improving service levels to meet the aspirations of GM and other partners in the NW will be more difficult still. There is as yet no assessment of the impact on local services from HS2 services north of Wigan. **HS2 should be required to fully assess the impact of its proposed timetable on paths available to local services and put in place any infrastructure required to maintain existing service levels – this might potentially include grade separated junctions and/or four-tracking certain sections of the WCML.**



12 Trafford Council comments on supporting documents – EIA Scope and Methodology Report

Section 12 Table of Contents

Introduction	526
General Comments on Part B – Topic Areas.....	528

12.1 Introduction

12.1.1 The following chapter sets out Trafford Council’s comments on Volume 5: Appendix CT-001-00001 Environmental Impact Scope and Methodology. Trafford Council comments on specific Community Areas / Specific Topics are provided in detail in other chapters of this response and are therefore not repeated here. As such the Trafford Council response should be read as a whole.

12.1.2 The executive summary of the Scope and Methodology Report (hereafter referred to as SMR) states that the SMR sets out the proposed methodology for determining the likely environmental impacts and effects; and for assigning values of magnitude and significance to them. It also sets out the approach to the reporting of reasonable alternatives in the ES.

12.1.3 The original SMR was published for consultation in July 2017 and a further updated version of the SMR which took account of the first round of consultation comments was published alongside the WDES for Phase 2b in October 2018. As such this document therefore represents the third iteration and is reflective of two previous rounds of consultation.

12.1.4 Part A of the SMR sets out the key changes made since the SMR was published in October 2018. It also sets out:

- EIA methodology and scope of assessment;
- Approach to mitigation;
- Cumulative effects;
- Defining significant effects;



- Notes assumptions and limitations in undertaking the EIA; and
- The approach to the study of reasonable alternatives.

12.1.5 Part B of the SMR then covers the scope and methodology for each environmental topic section.

12.1.6 Trafford Council's response to the SMR covers both Part A and Part B. Text within this chapter which has been presented in **bold**, highlights Trafford Council requirements.

12.2 General Comments on Part A - EIA Approach

12.2.1 This section sets out a series of comments with regards to specific areas of concern or where it is felt that additional information or more robust justification is required. For ease of reading the comments are set out in the order they occur within Part A.

1.7 Monitoring of performance against sustainability and environmental goals

12.2.2 The SMR will identify the likely significant environmental effects of the Proposed Scheme and determine options for further mitigation. Paragraph 1.7.6 states that a set of controls known as Environmental Minimum Requirements (EMRs) are expected to be established to ensure that the environmental effects of the Proposed Scheme will not exceed those identified within the ES.

12.2.3 A significant proportion of the ES assessment work is, however, heavily reliant on further survey and technical assessments to fully understand the impacts and effects, and thus determine appropriate mitigation. **HS2 should be required to demonstrate how the EMRs are robust enough to be relied upon to ensure impacts identified within the ES and subsequent assessment work will not be exceeded.**

12.2.4 Paragraph 1.7.10 sets out a list of documents the EMRs are expected to include. With the exception of the draft Code of Construction Practice (CoCP) document, the remaining EMR documents are very high level and lack any meaningful detail. **HS2 should be required to update the EMRs which include detailed information to offer confidence to consultees that the mechanism for ensuring the impacts identified will not be exceeded, and that the documents are robust and fit for purpose. HS2 should also be required to provide further details on how the EMR will capture changes or adjustments to identified effects and impacts going forward as assessments work evolves.**



4.3 Approach to mitigation

- 12.2.5 Paragraph 4.3.2 indicates that it has been recognised by HS2 Ltd that at this stage, mitigation may not be included within scheme drawings and / or may need to be delivered through further measures. Paragraph 4.3.4 also states that further engagement and consultation will allow stakeholders to raise issues and purpose design and mitigation changes. **HS2 should be required to provide further detail to explain how further engagement will be mapped out to give stakeholders clarity and confidence that this will happen at the relevant stages.**

4.4 Cumulative effects

- 12.2.6 Section 4.4 outlines the approach to cumulative assessment throughout the ES. It is noted however, that in some topic sections both within Community Areas and route wide effects that there are no cumulative assessment sections. **HS2 should be required to provide additional information to explain why cumulative effect assessment has not been undertaken for some topics.**

12.3 General Comments on Part B – Topic Areas

Agriculture, Forestry and Soils

- 12.3.1 There are well-established methodologies for classifying the quality and agricultural land. The Phase 2b post-consultation Sustainability Statement indicates that the appraisal of the sustainability process has sought to limit the loss of the highest quality, Grades 1 and 2, agricultural land.
- 12.3.2 Most of the agricultural land within Community Area MA04 is of high quality (grade 2 on average). HS2 Ltd have concluded that the effect on land quality is moderately adverse (rather than major) because such land is abundant in the area. Trafford Council therefore consider that the loss of such land has likely been downplayed. **HS2 should be required to make it clear in the ES to what extent it is possible or desirable within the Proposed Scheme to avoid all best and most versatile agricultural land as far as practical.**
- 12.3.3 Community Area MA04 also includes significant areas of peatland. SMR paragraph 6.6.39 recognises that peat has a higher organic matter content than other soils and represents a large reservoir of organic carbon. If disturbed peat could release a significant amount of captured carbon and result in the loss of important natural resource to combat climate change.



- 12.3.4 It is acknowledged within the SMR that substantial peat deposits to the west of Manchester (within Trafford) will be disturbed by the construction of the Proposed Scheme. **HS2 should be required to undertake a more detailed assessment of the impacts of disturbance of large areas of peat deposits, which reflects the greater role peat has over other soil types in the storage of carbon.**

Air Quality – Traffic emissions

- 12.3.5 Paragraph 7.6.8 states that with regards to the assessment of the effects of emissions arising from changes in traffic flows during construction, traffic data will be screened and then subject to a detailed assessment using the atmospheric dispersion model ADMS-Roads.
- 12.3.6 Paragraph 7.6.9 also states that the above assessment would comply with the requirements of Defra's LAQM Technical Guidance. Defra's LAQM Technical Guidance TG(16) states that where Particulate Matter (PM) verification is not possible, it may be required to use the NO_x/NO₂ adjustment factors.
- 12.3.7 The modelled concentrations of PM₁₀ and PM_{2.5} have not been subject to model verification and adjustment. The modelled concentrations are therefore likely to underestimate the air quality impacts at sensitive receptors. **HS2 should be required to model particulate concentration for PM₁₀ and PM_{2.5} in accordance with verification guidance contained within Defra TG(16) and in consultation with Trafford Council.**

Climate Change

- 12.3.8 Section 8.2 of the SMR is unclear as to when and how the engagement and consultation process for the identified three stages of climate change assessment (GHG assessment, in-combination climate change impacts assessment and climate change resilience assessment) will occur. Equally, the list of key stakeholders is non-specific and therefore it is difficult to validate that adequate and appropriate consultation will be undertaken. **HS2 should be required to provide more comprehensive information with regards to engagement and consultation, with a clear list of stakeholders identified.**
- 12.3.9 Employment estimates are for 6,060 Full Time Equivalents (FTE) based at the proposed construction compounds and the travel associated with those is considered significant in respect to the potential GHG emissions, however, this element was not included in the carbon calculations and assessment presented in Volume 3. **HS2 should be required to include carbon calculations associated with**



travel of construction workers to and from the proposed construction compounds in the GHG lifecycle assessment or that a stronger justification for scoping this aspect out of the assessment.

- 12.3.10 Particular areas of concern are compounds located in proximity to the busier areas such as M56 J6 and Manchester city centre where transport related issues are identified to be the most significant. **HS2 should be required to justify their exclusion of plant transportation to and from construction compounds as done in Volume 3 paragraph 4.2.12.** If this has been excluded because it is deemed to be insignificant then the same scale for deciding inclusion/exclusion should be applied to any load/benefits included in the assumptions.

Community

- 12.3.11 Paragraph 9.3.2 indicates that further engagement will take place with relevant organisations and communities. No detail is provided as to how further engagement and consultation with impacted community stakeholder or organisations will be coordinated or the programme for further engagement. **HS2 Ltd should be required to provide a more comprehensive set of information with regards to engagement and consultation with a clear list of stakeholders identified.**

Ecology and biodiversity

- 12.3.12 Paragraph 10.7.1 states that the ecology and biodiversity section of the ES will include a section to explain any assumptions made in undertaking the ecological assessment. Trafford Council do not consider the following a reasonable assumption to make: *"Based on current best evidence, it is considered unlikely that ecological features will be significantly different by either 2025 (construction baseline) or 2038 (operational baseline)"*.
- 12.3.13 The extended period of construction itself will in some cases significantly alter the baseline for some ecological features. **HS2 Ltd should be required to clarify how the assessment and associated mitigation will account for anticipated changes in the intervening time period between construction and operational baseline.** It is not clear within the assessment or the mitigation how this is accounted for.

Designated Sites

- 12.3.14 Without a robust survey baseline information as listed above it is not possible to comment on the overall suitability and appropriateness of proposed mitigation in these areas. **HS2 Ltd should be required to justify how and when robust survey**



effort will be undertaken and how this will be reflected within the proposed mitigation strategy.

Biodiversity Net Gain

- 12.3.15 Trafford Council considers there to be insufficient reference to the Environment Act and its requirements for Biodiversity Net Gain. It is also unclear how the GM Local Nature Recover Network and opportunity mapping is being used to positively identify ecological receptors. **HS2 Ltd should be required to undertake a Biodiversity Net Gain condition assessment (Metric 3.0) and produce a Biodiversity Net Gain Strategy demonstrating an overall minimum 10% net gain across the route within Trafford boundaries.**

Habitats

- 12.3.16 Trafford Council is concerned by the extent of proposed hedgerows to be lost, with only 9.6km being replaced within Trafford. In addition, 16.6km of hedgerow within Trafford has not been surveyed, as newly planted hedgerows have been excluded from mapping within the Phase 1 and hedgerow survey.
- 12.3.17 The Proposed Scheme construction phase is 2025 – 2038. It is considered that within this timeframe many of the newly planted hedgerows will be in a condition worthy of record and note as part of the overall network of ecological connectivity. By excluding these and not accounting for them within other calculations i.e., Biodiversity Net Gain, the figures reported for overall hedgerow lost over the life of the construction period are not reflective of actual losses.
- 12.3.18 It is also not clear where replacement hedgerows will be planted, how far replacements will be from original sites of loss and which networks of connectivity will be maintained or impacted. Furthermore, it is unclear how the loss of known and unknown Important Hedgerows will be accounted for. **HS2 Ltd should be required to provide hedgerow assessments for any impacted hedgerows which have currently not been assessed, identifying whether the hedgerow is important under the Hedgerow Regulations (1997) and stipulating appropriate mitigation / compensation.**
- 12.3.19 It is not clear where a lot of the ecological mitigation will be provided. The Ecological Registers of local level effects for each community area provides a summary of adverse effects at a local/parish level that merely stated that these impacts will be addressed by mitigation. **HS2 Ltd should be required to provide additional**



information which cross-references what and where mitigation will be, as at present sufficient mitigation has not been demonstrated.

Electromagnetic Interference

- 12.3.20 The scope and methodology of the electromagnetic interference (EMI) assessment is based on desktop modelling. **HS2 Ltd should be required to undertake real-world baseline and post-construction/operational surveys at dwellings/receptor sites closest to the route of the Proposed Scheme to verify the desktop modelling of electromagnetic field (EMF) emissions undertaken for the ES. Results of post-construction surveys should be shared with the relevant local authorities and any additional mitigation required should be provided by HS2 Ltd and fully implemented in a timely manner.**

Health

- 12.3.21 The health methodology, particularly those associated with mental health, is subjective with limited access to supporting studies (often a single study), and therefore, the effects may well be underestimated. The health-related impacts of the Proposed Scheme are wide ranging and diverse. Impacts include severance to facilities affecting older residents, loss of health facilities (public health and fitness, temporary loss during construction and permanent), noise impacts during construction, lack of information on contractor parking and vehicle movements. Additional impacts will also arise from increased construction traffic and vehicular traffic once the station is operational exacerbating air quality issues and leading to short and long term health consequences. Any loss of easy access to open space, including play areas for children, is likely to lead to reduced levels of physical activity, with detriment to mental and physical health.

Historic Environment

- 12.3.22 There is a concern regarding the methodology used, in particular the application of the ICOMOS criteria and how this has been applied to assessing significance and impact of works on heritage assets. All Grade II Listed Buildings have been assessed as only having moderate significance rather than high. The result is the downgrading of impact when the matrices are applied, leading to a lack of appropriate and required mitigation. The HS2 approach undervalues significance and does not align with NPPF 194 and 200. Historic England advocates the use of BSI Standards Publication BS 7913:2013 Guide to the conservation of historic buildings. This issue has previously been raised with HS2 without a satisfactory response. **HS2 Ltd should be required to provide revised analyses which aligns with NPPF 194 and 200.**



Without this assessment, the information presented as part of this consultation exercise is considered deficient and additional consultation with the relevant consultees is required.

- 12.3.23 With regards to the collation of baseline information, despite a number of previous requests, HS2 did not agree the baseline of affected designated and non-designated heritage assets with stakeholders. As a result, there is a significant concern that a number of heritage assets have been omitted and are not considered. Additionally, the curtilage of listed structures and buildings have also not been included in the assessment of designated heritage assets. **HS2 Ltd should be required to undertake further consultation with stakeholders and update the baseline information of affected designated and non-designated heritage assets accordingly.**

Land Quality

- 12.3.24 Paragraph 212 of the National Planning Policy Framework (2021) states that Local Planning Authorities should not normally permit other development proposals in MSAs if it might constrain potential future use for mineral working. Trafford Council is aware that there are six Mineral Safeguarding Areas (MSAs) for sand and gravel in the study area, three of which are crossed by the Proposed Scheme.
- 12.3.25 The appropriateness of using a 'Medium Sensitivity' value for all MSAs, particularly given the current regional shortage in sand and gravel supplies in the North-West of England (which is below the 7-year requirement). **HS2 Ltd should be required to provide further clarification on how the sensitivity values for Mineral Safeguarding Areas were calculated, and the mitigation in place to protect these resources.**

Landscape and Visual

- 12.3.26 The most recent Landscape Institute guidance note on value has not been referred to (Assessing Landscape Value outside National Designations, TGN 02/21). **HS2 Ltd should be required to include Assessing Landscape Value outside National Designations, TGN 02/21 within the methodology.**
- 12.3.27 The Landscape Assessment is considered deficient as it assesses the impact and effect of the development on the Landscape Character Areas of the study area only. GLVIA3 (para 5.34) states that components of the landscape that are likely to be affected by the Proposed Scheme should be identified – e.g., individual elements or features. These may be identified in relation to the landscape character areas, but the impact and effect on the individual elements is not considered separately from the landscape character areas within the LVIA. Nor is the effect on landscape



- designated areas considered separately. There is no consideration of the loss of landscape features including hedgerows, trees and ponds, some of which are important or valued. This is a significant oversight and renders the assessment of effects on landscape inadequate. **HS2 Ltd should be required to revise their landscape assessment accordingly so that the potential effects and mitigation measures can be adequately considered by consultees.**
- 12.3.28 The methodology explains that no night-time photography has been included due to 'difficulties in providing accurate representation of the night-time environment'. The consultation is deficient in that regard. **Night-time photography is possible, therefore HS2 should be required to appraise consultees of visual impacts during the hours of darkness.**
- 12.3.29 Paragraph 15.5.15 contains insufficient detail to explain how significance of effect is determined. It needs to be explained how a high sensitivity x low magnitude = minor effect. In most cases this would be considered to be 'moderate' as such GMCA consider this to be important as it has led to some effects being deemed non-significant and the opportunities for providing adequate mitigation are potentially overlooked as a result. **HS2 Ltd should be required to provide more information on how significance of effects are determined.**
- 12.3.30 Table 40 (Part 1, Page 187) outlines the significance of effects for visual assessment and includes typical descriptions in relation to the level of effect. These descriptions are very short and not particularly well explained. Determining significance relies on professional judgement, therefore a thorough description should be provided. **HS2 Ltd should be required to provide further detail within Table 40 to better explain the descriptions of what the proposed development would result in, for each level of significance.**
- 12.3.31 Paragraph 15.2.13 states that 'all viewpoints will be agreed wherever possible with local planning authorities'. It is unclear to what extent the viewpoints have been agreed. **HS2 Ltd should be required to provide sufficient evidence that these viewpoints have been agreed and with whom; and where necessary engage further with Trafford Council.**
- 12.3.32 Paragraph 15.5.34 states that all photomontages are to be 'agreed with statutory consultees'. It is unclear to what extent the photomontages have been agreed. **HS2 Ltd should be required to provide sufficient evidence that these photomontages have been agreed and with whom; and where necessary engage further with Trafford Council.**



- 12.3.33 Paragraph 15.4.7 - The visual assessment at Yr15 and Yr30 take account of vegetation planted in the summer. There appears to be no indication of the assumed heights of trees for the visual assessment to be based on at the these given timeframes (within Volume 5: Appendix CT001-00001 EIA Scope and Methodology Report Part 3: Technical Note - Landscape and Visual – Approach to Verifiable Photomontages, there is reference to assumed heights of vegetation ie 7.5m high at Yr15). Is the reader to assume that the visual assessment has also been based upon a height of 7.5m for proposed tree planting at Year 15? **HS2 should be required to present information as to what the assessment assumed regarding the anticipated heights of trees at Yr 15/Yr30.**
- 12.3.34 Paragraphs 15.4.7 and 15.4.8 - Temporal Scope - General comment re application - The visual assessment in Volume 5: Appendix LV-001-0MAxx considers the visual effects associated with each viewpoint at Construction, Yr1, Yr15 and Yr30. The Year 1 effect is considered in winter, the Yr15 and Yr30 Visual Effects are considered in Summer. As a result, the Yr1 effects consider worst case scenario with regards to visual effects and the screening provided by broadleaf vegetation, whereas the Yr15 and Yr30 effects use the best-case scenario ie summer, when intervening broadleaf vegetation is providing the highest levels of screening. This approach seems inconsistent and has the effect of underplaying the longer term residual visual effects of the proposals. **HS2 should be required to provide assessment of worse case/winter visual effects consistently across all assessed phases.**

Socio-economic

- 12.3.35 In Section 17.3 (part 1, Page 207) it is unclear how consultation engagement will be undertaken as part of the EIA process and when this can be expected to occur. **HS2 Ltd should be required to detail how the approach to engagement will address and track issues raised in this response alongside any additional issues raised as further information becomes available.**
- 12.3.36 Throughout the Volume 2: Community Area assessments the determination of effects on the identified receptors is significantly inconsistent, with the sensitivity of receptors selected without clear justification and often underestimated. **HS2 Ltd should be required to justify the sensitivity of identified receptors given the inability of some facilities to relocate and adapt new facilities for their users (for example the Holiday Inn Express at Manchester Airport in MA06). HS2 Ltd should also be required to ensure that stakeholders and all businesses affected will be supported prior to and throughout the construction works to mitigate any potential effects.**



- 12.3.37 Failure to utilise the most up to date Census data may lead to incorrect assumptions on the number of people or business affected by the route and therefore the proposed mitigation approached may be limited in their success. **HS2 Ltd should be required to use Census 2021 datasets for any strategies prepared after April 2022 to ensure the latest information is used. HS2 Ltd should also be required to engage with Trafford Council for information relating to local business and associated full-time employees.**

Sound, Noise and Vibration

- 12.3.38 Baseline noise data omits 'background noise level' data (LA90), which is required for the assessment of plant in line with BS4142 and identifies several incorrect baseline values (without the Proposed Scheme) in the operational phases assessment at some receptors. **HS2 Ltd should be required to provide information regarding surveyed background levels, regardless of whether any assessment can currently be undertaken using the data.**
- 12.3.39 Trafford Council notes that certain receptors could experience major impacts but as impacts are not deemed significant on a 'community level' then no impact is predicted. Ultimately, these receptors will experience major impacts and it is not clear whether they would be eligible for noise insulation. **HS2 Ltd should be required to provide justification as to the conclusions reached in determining eligibility for noise insulation.**
- 12.3.40 Numerous monitoring locations presented within Map Books across the scheme are not presented within Baseline Noise Level Tables within Community Area Appendices. For example, no baseline data is presented for measurement locations ML712754 and ML712804. HS2 Ltd should be required to provide baseline data from all monitoring locations.
- 12.3.41 Predicted baseline noise levels from road traffic modelling are also inconsistent with the actual measured baseline noise levels. At some receptor locations, the predicted baseline level from road traffic predictions is 15dB higher than nearby measured baseline levels within a similar area or even along the same road. The existing baseline noise level forms the basis for the noise assessment criteria. Therefore, overpredicting the baseline noise level at receptors could allow more relaxed noise thresholds/criteria in the impact assessment. This in turn could have major adverse impacts at receptors and may significantly under-predict the resulting noise impacts associated with the scheme. HS2 Ltd should be required to ensure that baseline



noise levels from all monitoring positions are fully/accurately reported to ensure appropriate levels have been used within assessments.

- 12.3.42 Section 18.3.3 states there are anticipated changes in operational road noise, but no formal assessment is presented. **HS2 Ltd should be required to fully present the methodology/assumptions for assessing the change in operational road noise, as currently no evaluation can be made of the assessment presented.**
- 12.3.43 Trafford Council would have assumed that piling may be required due to the size of some of the proposed works (overpasses, viaducts, retaining walls etc), and expect it to be a significant source of noise and vibration. **HS2 Ltd should be required to provide further justification for the scoping out of piling activity within the construction assessment.**
- 12.3.44 **HS2 Ltd should be required to provide further clarification of the monitoring measures to be implemented during the operational phase of the project, as well as indication of the mitigation measures to be implemented should operational limits be found to be exceeded.** This extends to commitment to the maintenance of the operational line, and how measures will be taken to ensure noise assessments remain robust throughout the lifespan of the future network.

Traffic and Transport

- 12.3.45 The strategic modelling underpredicts the likely traffic impacts of the Proposed Scheme. The modelling does not include committed highway infrastructure, ignores Places for Everyone allocations and NPR demand. The traffic modelling is therefore fundamentally flawed. **HS2 Ltd should be required to update their traffic modelling in line with the comments above and provide a validation report for traffic modelling.**
- 12.3.46 Trafford Council has a number of concerns about the ability of various highways within the borough to accommodate the predicted amount of construction traffic. Trafford Council cannot confirm the acceptability of any resultant highway mitigation proposed on the basis of the traffic modelling as provided alongside the ES. **HS2 Ltd should be required to update their traffic modelling to accurately define the baseline and include committed developments and revised traffic forecasts so that it can provide a robust assessment of the baseline and post-HS2 conditions.**



Waste and Material Resources

- 12.3.47 Within Appendix CT-001-00001 Part 3 Rationale for Landfill significance criteria paragraph 2.5.4 (Page 7) provides threshold values for moderate and major adverse environmental effects which have been based on professional judgement. **HS2 Ltd should be required to provide the detailed analyses to demonstrate how the threshold values for moderate and major adverse environmental effects have been determined.**
- 12.3.48 Section 20.6 (Part 1, Pages 262 to 263) provides limited reference to local policies and does not mention Planning Practice Guidance. **HS2 Ltd should be required to provide the reference to applicable waste policies including Planning Practice Guidance.**

Water Resources and Flood Risk

- 12.3.49 The methodology to select options is not consistent across each Map Book area. For example, in MA07 syphons are used as a preferred option to channel watercourses under the route, whereas in MA04 it states they are not a preferred choice. This implies an inconsistency between how options are promoted for use across the project. **HS2 Ltd should be required to share the methodology for how options are assessed and selected.**
- 12.3.50 There is no visible consideration of underground assets within the borough. For example, there is an un-named culverted watercourse on the edge of the construction boundary by Paddock Lane which hasn't been identified. **HS2 Ltd should be required to consider underground assets in their assessments to avoid any unforeseen risk.**



13 Trafford Council comments on supporting documents - Code of Construction Practice

Section 13 Table of Contents

Introduction	539
General Comments	540
HS2 CoCP Section 2 - Purpose	540
HS2 CoCP: Section 3 – Policy and environmental management principles	541
HS2 CoCP: Section 4 - Implementation.....	542
HS2 CoCP: Section 5: General Requirements	544
HS2 CoCP: Section 6 – Agriculture, Forestry and Soils	550
HS2 CoCP: Section 7 – Air Quality.....	550
HS2 CoCP: 8 – Cultural Heritage/ Historic Environment	552
HS2 CoCP: Section 9 - Ecology	553
HS2 CoCP: Section 10 – Ground Settlement.....	557
HS2 CoCP: Section 11 – Land Quality	558
HS2 CoCP: Section 12 – Landscape and Visual.....	559
HS2 CoCP: Section 13 – Sound, Noise and Vibration	562
HS2 CoCP: Section 14 – Traffic and Transport	563
HS2 CoCP: Section 15 – Waste and Materials.....	565
HS2 CoCP: Section 16 – Water Resources and Flood Risk.....	566
HS2 CoCP: Annex 1 - Glossary	567

13.1 Introduction

- 13.1.1 This chapter specifically details the Trafford Council consultation response to the draft Code of Construction Practice (CoCP) for High Speed Two (HS2) High Speed Rail (Crewe – Manchester).
- 13.1.2 This should be read in conjunction with comments relating to construction and the CoCP in the Trafford Council consultation response to the Community Area Reports.
- 13.1.3 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.



13.2 General comments

- 13.2.1 Trafford Council notes the document is high level and is lacking detail in many areas which need specific measures/strategies. The document focuses on the environmental impacts of the construction process rather than dealing with the full range of impacts.
- 13.2.2 The CoCP discusses mitigating, monitoring, managing environmental issues but does not adequately address the key areas of avoidance or protection. HS2 need to review and update the CoCP to include a requirement to avoid or protect environmentally sensitive locations in preference to mitigating, monitoring or managing.
- 13.2.3 Trafford Council and partners note the generic nature of the document does not recognise the statutory duties of the Manchester Airports Group (MAG) to safeguard the travelling public under the Air Navigation Act. A formal process for consultation, discussion and approval is essential for the airport. HS2 need to provide a clear commitment to recognise the MAG as a statutory consultee. Furthermore, any lessons learnt from HS2 works with Birmingham Airport should also be reflected in the latest CoCP.
- 13.2.4 Trafford Council and partners would like to understand how the CoCP will ensure technicalities of process and design requirements are picked up, particularly to facilitate interaction with Trafford Council and other local authority partners. The CoCP is high level leading to a concern that contractors will approach delivery in very different ways. HS2 need to update the CoCP to provide strategy and direction to contractors, to ensure consistency between different HS2 contractor submissions to public and local authorities, including a detailed minimum standard.
- 13.2.5 Trafford Council would like HS2 to update the CoCP to provide a commitment to share lessons and best practice examples throughout the supply chain.

13.3 HS2 CoCP: Section 2 – Purpose

- 13.3.1 Trafford Council and local partners recognise the importance of the Local Environmental Management Plans (LEMPs) and require rights of approval to ensure appropriately informed and site-specific controls are implemented. **HS2 need to update the CoCP to provide such commitment.**



13.4 HS2 CoCP: Section 3 – Policy and Environmental Management Principles

- 13.4.1 Section 3.1.1 indicates that ‘HS2 Ltd has adopted a sustainability policy that sets out the principles for sustainability in the HS2 programme. These are: economic growth and community regeneration; skills, employment and education; health, safety and wellbeing; environmental protection and management, and design that is future-proof’. Section 3.1.2 then indicates that ‘Each of the Sustainability Policy principles is further described in our sustainability approach document’. Trafford Council and partners feel that the principles are not adequately described in the approach document as is stated and further development is required. HS2 need to review and update the document.
- 13.4.2 Section 3.2.3 states that *‘The components of the EMR are described in paragraph 3.1.1 of the EMR General Principles document. These include requirements on the nominated undertaker to comply with this document, the Heritage Memorandum, the Planning Memorandum, and undertakings and assurances concerning the project specified in the HS2 Register of Undertakings and Assurances, and to adopt and implement the Environmental Memorandum’*. Trafford Council and local partners feel they are lacking in sufficient detail and need to be further refined by HS2 as environmental baseline information is collated.
- 13.4.3 Section 3.3.1 states that the hybrid Bill requires the nominated undertaker to seek certain additional approvals from statutory bodies and undertakers (e.g., the Environment Agency and highway authorities). Trafford Council seek clarification as to whether Greater Manchester Combined Authority and Transport for Greater Manchester are considered a statutory body under this definition and what protection this gives. HS2 need to confirm that Trafford Council and TfGM will be considered as a statutory body.
- 13.4.4 HS2 need to update section 3.3.2 to include for:
- road cleaning around sites, compounds and material routes;
 - site compound design;
 - maintenance, rectification or renewal of highway construction in areas of high increases in road users (construction plant or diverted traffic), or regular use by weight class of construction vehicles that would not normally be forecast on the roads.



- 13.4.5 Trafford Council and partners seek right of approval and audit to the EMS referenced within section 3.4, for both the nominated undertaker and lead contractors, along with a clear escalation procedure and sanctions for non-compliance.
- 13.4.6 Section 3.4.3 indicates that *'the works will also be subject to approval processes set out in this draft CoCP by the nominated undertaker'*, but such processes are not evident. HS2 need to update the CoCP to reflect these processes, to ensure the nominated undertaker and contractors follow well defined and consistent processes.

13.5 **HS2 CoCP: Section 4 – Implementation**

- 13.5.1 **Trafford Council and partners seek rights of approval to the site-specific management plans referenced within section 4.3.2. HS2 need to update the CoCP to reflect this.**
- 13.5.2 Sections 5.2.1, 13.2.4 and 13.2.5 of CoCP indicate the nominated undertaker's contractor will apply for consents but then section 4.3.8 indicates that the nominated undertaker will make the notification for exceedance. **HS2 Ltd should be required to clarify to Trafford Council whether the nominated undertaker or the nominated undertaker's contractor will make the notifications, given they are the organisations making the application for the consent.**
- 13.5.3 In respect of section 4.4.3, contractor method statements also need review and acceptance by Trafford Council and partners when HS2 are working in close proximity or where they may impact their infrastructure. HS2 need to update the CoCP to reflect this.
- 13.5.4 Under 4.3.8, the requirement for HS2 to notify the relevant local authority of trigger level exceedance as soon as reasonably practicable after it has been informed by its contractors is noted; but Trafford Council would expect to see more detailed timeframes laid out for the timely notification by contractors, to ensure that rapid reporting and action is achieved. **HS2 Ltd should be required to commit to 'as soon as reasonably practicable, and no later than 24 hours following exceedance', along with an action plan in relation to timely notification by contractors of exceedances.**
- 13.5.5 Trafford Council would anticipate the reference to monitoring with equipment capable of streaming real time data to be strengthened. Trafford Council would anticipate all monitoring to be capable of streaming real time data, unless specifically agreed with HS2 and the relevant local authority. It is also expected that



monitoring equipment will have the capability to send an automatic and immediate notification when approaching upper limits and for exceedances, in order that activities which may cause an exceedance can be suspended as soon as safely possible and mitigation measures considered. **HS2 Ltd should be required to update the CoCP to ensure all monitoring equipment is capable of streaming real time data unless specifically agreed with HS2 and the relevant local authority and have the capability to send an automatic and immediate notification when approaching upper limits and for exceedances.**

- 13.5.6 The CoCP identifies a requirement for monthly reporting on noise, dust and air quality data. There is no requirement for reporting of other issues including interactions with the public, complaints, accidents involving members of the public, incidents on the highway and the like. **HS2 Ltd should be required to provide GMCA and partners with a full monthly report covering all aspects where the project interacts with the public and/ or the demise of the local authorities and partners. This should include a full monitoring and reporting schedule which is agreed with the local authorities and statutory bodies in advance of construction.**
- 13.5.7 Trafford Council note that the CoCP often refers to the requirement for remedial actions if the CoCP is not complied with, but there are no indications of the consequences or sanctions if the contractors fail to rectify. **HS2 Ltd should be required to provide a framework for escalation and remediation of non compliance with the CoCP within the CoCP.**
- 13.5.8 Section 4.3.15 indicates that all lead contractors will be required to sign up and adhere to the Considerate Constructors Scheme but sets no target level. **HS2 Ltd should be required to set a benchmark / target level in relation to the Considerate Constructors Scheme as part of the CoCP.**
- 13.5.9 Trafford Council and partners recognise the importance of the Local Environmental Management Plans (LEMPs) and welcome consultation/engagement in agreeing appropriate solutions. Trafford Council and partners do however require rights of approval to final LEMPs to ensure appropriate controls and mitigation measures are planned. Furthermore, Trafford Council would welcome HS2 setting out the quality management arrangements for the LEMPs.
- 13.5.10 Trafford Council and partners note that supervision is dealt with from an environmental perspective but not for the wider works, for example ensuring quality of roadworks. **HS2 Ltd should be required to update the CoCP to provide a supervision management plan for the whole of the works (e.g. quality of roadworks), to direct their contractors on requirements.**



13.6 HS2 CoCP: Section 5 – General Requirements

- 13.6.1 Trafford Council and partners support the development of a community engagement framework referenced in section 5.1.1. **HS2 Ltd should be required to tailor the community engagement framework to suit the nature of the communities, construction works and impacts within a specific community area or appropriate area of the route.** As highlighted as part of the 2018 WDES comments, **HS2 Ltd should be required to ensure the CoCP reflects engagement with key stakeholders and local authorities in respect to developing and agreeing the community engagement framework**, with this not being left to the nominated undertaker, without controls being committed to as part of the CoCP or Bill. **HS2 Ltd should be required to develop and agree a framework for engaging with local authorities, and organisations such as GMCA and TfGM through the design and delivery stages of the proposed scheme. The development should be referenced within Figure 1 of the CoCP. HS2 Ltd should be required to update the CoCP to this.**
- 13.6.2 Figure 1 shows the CoCP within the context of other documentation for the proposed scheme and this appears to indicate that the Stakeholder Engagement Framework only applies for part of the construction period. Trafford Council believes it is essential that this framework continues throughout the construction, testing and commissioning phases. **HS2 Ltd should be required to apply the Stakeholder Engagement Framework through the construction, testing and commissioning phases and provide GMCA with a copy of the Stakeholder Engagement Framework.**
- 13.6.3 **HS2 Ltd should be required to consult rather than just informing parties in relation to advance notice of works (section 5.1.4).** GMCA also seek clarity on what is meant by ‘as outlined in the ES’, and whether this is related to works or processes outlined in the ES. Overall, GMCA feel the CoCP requirements should be wide ranging, and not just limited to areas outlined within the ES.
- 13.6.4 In section 5.1.13 there is reference to the £10k maximum claim value being periodically subject to review. **HS2 Ltd should be required to confirm to Trafford Council whether the £10k maximum claim value being periodically subject to review is an upwards and downwards review, or an upwards review only.** If the limit is reduced, then the rationale in section 5.1.11 that it is designed to give a prompt response at minimum cost and inconvenience to claimants may not hold good. If the amount of the maximum claim is reduced too far so that most claims fall outside the limit set and therefore the scheme itself then claimants will have no



option but to seek redress through the Courts which will inevitably be more expensive and inconvenient for a claimant.

- 13.6.5 Section 5.1.14 indicates that the Small Claims Scheme will not apply to local authorities, Government departments or agencies. **HS2 Ltd should be required to confirm to Trafford Council and partners how they claim their costs back if they have to deal with emergencies, consultation or generally remediating/ managing the impacts of HS2. This includes claims made to authorities by the public/third parties. HS2 Ltd should be required to provide a wider claim strategy in this respect.**
- 13.6.6 **HS2 Ltd should be required to amend section 5.1.15 to insert 'by the Secretary of State' between the words '...will be required' and '...to appoint' not only for the sake of clarity but also to fully reflect the Phase 2b Western Leg Information Paper C10 referred to in section 5.1.10.**
- 13.6.7 **HS2 Ltd should be requested to notify residents of approved out of hours working in advance, and develop the CoCP to give guidance on appropriate notice periods depending on the scale and duration of out of hours working. It is also expected that minimum notice periods for submitting out of hours working to local authorities would be developed, agreed and included.**
- 13.6.8 The core hours stated within section 5.2.2 are not in line [with Trafford Council's hours of operation for construction and demolition](#) for Saturday working which is from 0900 until 1300. This will be a requirement within the LEMP.
- 13.6.9 The working hours are generally fixed across the site with opportunities to extend in specific locations and for specific activities. There is no identification of particularly sensitive areas, or areas where reduced working hours should be applicable. **HS2 Ltd should be required to provide an increased level of detail in the CoCP, to allow for the identification of sensitive receptors and provide for amended/reduced working hours if necessary to mitigate impacts.**
- 13.6.10 In respect of 5.2.5, some of the activities during the start-up and close-down period can be noisy for nearby residents, for example unloading materials and deliveries, particularly when reversing. Trafford Council recognise the need to maximise efficiency of the working day and recognise the intent that plant and machinery would not be operated during the start-up and close down. However, this may not be practicable and this allows activities from 0700 until 1900 Monday to Friday; and 0700 until 1400 of a Saturday. **HS2 Ltd should be required to provide a commitment within the CoCP for start up and close down periods to be agreed as part of the**



LEMP, for each individual site, allowing consideration of specific circumstance, with controls and interventions to be agreed and approved.

- 13.6.11 Trafford Council note working hours are extended to 24/7 for tunnels. However, there is no indication of how this would be managed at tunnel mouths, shafts etc which would impact the local community just as much as normal site works. **HS2 Ltd should be required to provide further detail on proposals for removal of excavated materials from tunnelling works, including further definition on what is meant by tunnelling works.**
- 13.6.12 **HS2 Ltd should be required to provide Trafford Council and partners further definition within the CoCP on the mechanism for consultation with residents/ local authorities if extended working hours are required.**
- 13.6.13 Trafford Council and partners note there are exceptions to working hours for emergency works, but HS2 need to provide further definition of what this means. **HS2 Ltd should be required to provide further definition on emergency works.**
- 13.6.14 Section 5.2.9 indicates '*Certain other specific construction activities will require extended working hours for reasons of engineering practicability. These activities include, but are not limited to, major concrete pours and piling/diaphragm wall works. Surveys (e.g. for wildlife or engineering purposes) may also need to be carried out outside core working hours.*' **HS2 Ltd should be required to update the CoCP to require prior consent of the relevant local authority for work during extended working hours.**
- 13.6.15 **HS2 Ltd should be required to provide commentary within the CoCP that a detailed abnormal load route assessment will be prepared prior to the commencement of construction in order to quantify areas of risk, physical constraints, structures, and need for escorts based on the site-specific conditions. HS2 need to include that this assessment will be agreed with both local highway authorities and National Highways.**
- 13.6.16 **HS2 Ltd should be required to update section 5.3.1 of the CoCP to include the following, along with right of approval to specific measures proposed:**
- **Full-time gate person/security;**
 - **Noise barriers in sensitive areas and also placed locally around loud plant, equipment and works;**



- **Stockpile areas controlled to prevent migration of material, and kept away from sensitive receptors;**
- **On-site dust suppression;**
- **Local road cleaning in proximity to the site;**
- **Accessible alternative pedestrian routing and appropriate diversion signage;**
- **Construction signage setting out hazards around construction sites;**
- **Pull off areas for vehicles and pedestrians to prevent blocking of the highway and paths;**
- **Perimeter hoardings shall be regularly inspected and contain a project logo with contact information;**
- **Any waste and/or materials susceptible to spreading by wind shall be stored in enclosed containers; and**
- **Storage sites, fixed plant and machinery and equipment shall be locked to limit adverse environmental effects.**

13.6.17 Section 5.3.1 discusses preventative pest and vermin control/treatment. The HS2 construction work will undoubtedly lead to displacement of rodents and an increase in the number of complaints from residents and local businesses. This will result in a significant increase in the amount of local authority time spent investigating complaints, carrying out investigatory work and subsequent treatment. Furthermore, a baiting programme is required before and throughout the construction works, including surveying and baiting ahead of any demolition. **HS2 Ltd should be required to provide Trafford Council and partners compensation and funding to deal with the increase in pest control work resulting from the construction and operation of HS2.**

13.6.18 Section 5.3.1 discusses 'adequate welfare facilities', where Trafford Council would seek further direction within the CoCP to require contractors to encourage sustainable travel with the likes of cycle facilities, showers and lockers as a minimum. This should include but not be limited to what construction staff car and cycle parking is being provided/permitted at this stage. **HS2 Ltd should be required to update the CoCP to encourage sustainable travel for construction staff including cycle facilities, showers and lockers as a minimum.**



- 13.6.19 Trafford Council and partners are concerned about interpretation of what will be deemed reasonably practicable by the nominated undertaker and contractors within section 5.3.3 for inclusive access, therefore seek rights of approval by local authorities to any proposals or lack thereof. **HS2 Ltd should be required to update the CoCP to require approval by local authorities for inclusive access.**
- 13.6.20 **HS2 Ltd should be required to update section 5.4.2 of the CoCP to include tram/light rail operations.**
- 13.6.21 **HS2 Ltd should be required to update section 5.5.2 of the CoCP to include minimisation of material storage at remote sites.**
- 13.6.22 **HS2 Ltd should be required to provide further direction to contractors within the CoCP on safety and security in respect of hoardings, fencing and screening. This will include designing such that pedestrian entrances are located to avoid conflicts between vehicles in/out of site or adjacent to the site; construction workers walking to/from site; or the public passing the site. This will also include the security aspect with dedicated systems to only permit access for workers only, for example the use of turnstiles with secure touchpad entry.**
- 13.6.23 **HS2 Ltd should be required to update section 5.6.1 of the CoCP to include minimisation of dust and debris migration and that the hoardings shall not be used for commercial advertising without consent of the local authority. Furthermore, this should include a measure that construction worker welfare entry/exit points within the hoarding will be located at suitable locations from a road safety perspective (i.e. not exit straight onto the highway – need footway/pedestrian walkway in place adjacent to hoarding), and additionally will be in the form of turnstiles with secure keypad or fob entry/ face recognition for maximum site security.**
- 13.6.24 As highlighted as part of the 2018 WDES comments, **HS2 Ltd should be required to include timeframes for removing graffiti within the CoCP.**
- 13.6.25 **HS2 Ltd should be required to expand Section 5.6.5 of the CoCP which indicates that ‘Adequate lighting will be installed near hoardings’, but HS2 need to expand to clarify to contractors the purpose of the lighting, to ensure appropriate design. The design also needs to ensure the hoardings and fencing are not inhibiting the environment for highway users (in particular pedestrians and cyclists), with no hiding places, long areas with no egress or reduced visibility. Furthermore, Trafford Council and partners seek local authority approval for hoardings, fencing**



and any screening as referred to within all of section 5.6, or for any areas with temporary site designs.

- 13.6.26 **HS2 Ltd should be required to update section 5.6.7 of the CoCP to require approval of the local highway authority, local authorities and other statutory bodies, where the contractor/nominated undertaker feel it is not reasonably practicable to locate fencing and hoardings without damaging sensitive habitats, trees or hedgerows.**
- 13.6.27 Other than for unexploded ordnance (UXO) within section 5.7, the CoCP omits anything about the management of public safety incidents, reporting, coordination of response, collaboration and the like. **HS2 Ltd should be required to provide an emergency response plan as part of the CoCP, with monthly reporting of incidents during construction.**
- 13.6.28 **HS2 Ltd should be required to make available to GMCA and partners a full UXO desktop study before works commence on any moderate to high-risk sites, so that detailed methods of working can be presented where appropriate.**
- 13.6.29 **HS2 Ltd should be required to clarify why section 5.8 of the CoCP limits impacts of electromagnetic interference to wireless telecommunication systems. GMCA require update to the CoCP to require wider consideration of the impact of electromagnetic interference.**
- 13.6.30 In respect of section 5.11.1, Trafford Council and partners are concerned 'subsequent' could result in significant duration for leaving sites unoccupied, resulting in a compromised environment / impact on footways for longer than strictly necessary. **HS2 Ltd should be required to update the CoCP to impose limits for leaving sites unoccupied, with a maximum of 30 days for plant left unoccupied/unused, and 90 days hoardings and buildings left unoccupied.**
- 13.6.31 **HS2 Ltd should be required to update section 5.12.5 of the CoCP to reflect that the nominated undertaker shall be required to recognise and comply with local procedures as part of the LEMP, given this will require compliance with Metrolink procedures not just railway procedures.**
- 13.6.32 **HS2 Ltd should be required to update the emergency procedure within 5.12.6 to contain notification to TfGM, in addition to local authorities.**
- 13.6.33 **HS2 Ltd should be required to update the CoCP to give better direction to contractors on what is seen as an extreme weather event as part of section 5.14.**



13.6.34 **HS2 Ltd should be required to review and update section 5.15.1 of the CoCP to require further consideration of embodied carbon as part of the carbon management plans.**

13.6.35 As highlighted as part of the 2018 WDES comments, GMCA see that managing interfaces between sites is essential in terms of taking a holistic view on minimising disruption. Trafford Council note a short paragraph is included in the CoCP but the interface needs to consider wider than adjacent boundaries. In addition the CoCP needs to be more specific on type of management measures (both physical and managerial), to ensure the nominated undertaker has direction on expectations. **HS2 Ltd should be required to update the CoCP to take a holistic view on minimising disruption and consider wider than adjacent boundaries. In addition the CoCP needs to be more specific on type of management measures (both physical and managerial), to ensure the nominated undertaker has direction on expectations.**

13.7 **HS2 CoCP: Section 6 – Agriculture, forestry and soils**

13.7.1 No comments.

13.8 **HS2 CoCP: Section 7 – Air Quality**

13.8.1 **HS2 Ltd should be required to update section 7.2.2 of the CoCP to require an assessment to be undertaken to identify and assess activities which will generate high levels of dust. This should be then be used to proactively undertake suppression based on forecast dust levels, rather than reactive treatment.**

13.8.2 **HS2 Ltd should be required to update section 7.2.6 of the CoCP to include a requirement to comply with the Construction Logistics and Community Safety standard (CLOCS).**

13.8.3 **HS2 Ltd should be required to update section 7.2.9 of the CoCP to reflect that works which will result in the need for seeding and planting are to align with planting seasons.** The current plan for *'as soon as reasonably practicable following completion of the earthworks'* may not work if this isn't adequately planned.

13.8.4 In respect of section 7.2.17, Trafford Council note that no Route-wide Traffic Management Plan (RTMP) has been provided, compared to Phase 1 of HS2 where the draft plan was provided and updated to comments prior to Royal Assent. **HS2 Ltd should be required to reflect the development of the Route-wide Traffic Management Plan within Figure 1 of the CoCP, and provide the draft for Phase 2B**



- to GMCA and partners. Section 7.2.18 indicates ‘monitoring, reviews, assessments and action plans will be developed in consultation with local authorities’, but HS2 need to update the CoCP to require approval by local authorities.**
- 13.8.5 Section 7.3.12 discusses monitoring adjacent to highways but refers to outdated guidance from February 2018. **HS2 Ltd should be required to update the reference in Section 7.3.12 in relation to monitoring adjacent to Local Air Quality Management Technical Guidance (TG16) - April 2021.**
- 13.8.6 No specific construction phase mitigation measures are proposed as part of the draft Code of Construction Practice (CoCP), but it outlines the procedures. Specific measures, where available, should be provided to outline how the significant effects predicted will be mitigated during the construction phase of the development. **HS2 Ltd should be required to undertake further review and assessment of construction phase air quality impacts and proposed mitigation measures should be undertaken prior to any works, to inform an Air Quality Action Plan outlining all mitigation measures as required.**
- 13.8.7 Although the Greater Manchester Clean Air Plan is under review, **HS2 Ltd should be required to include an obligation in the CoCP for HS2 contractors to comply and account for any associated charges to the Greater Manchester Clean Air Plan at the time. If this is to become part of a LEMP, then HS2 need to update the CoCP to require contractors to comply with local policy.**
- 13.8.8 HS2 Ltd must explain, in sufficient detail, exactly what workstreams Local Authorities would be expected, or required, to be involved in during the construction programme including any approval processes under the Act/Environmental Minimum Requirements (EMRs) or other Legislation during the implementation of the ‘Proposed Scheme’. The Council note that 'consultation' is suggested on various environmental issues in the draft Code of Construction Practice, but further detail on the practical reality and full scope of this is required.
- 13.8.9 The Council understands that the ES and EMRs (including the draft CoCP) set out high level expected effects, mitigation principles and implementation mechanisms, but when in the programme and how will LA’s receive the final modelling/reports of air quality effects, mitigations and verifications i.e. will schedule 17 applications contain air quality report on site/area specific basis and would HS2 Ltd provide post-construction verification reports to LA’s?
- 13.8.10 Within the respective map book areas different construction scenarios have been assessed for their impact on air quality, e.g table 13 Appendix AQ-001-0MA06. HS2



It shall confirm whether the construction scenario(s) which have least impact on local air quality will be selected and what the key decisions are for selecting the chosen construction scenario(s).

- 13.8.11 HS2 Ltd shall provide a commitment for air quality assessments undertaken at key impact areas to be reviewed and updated as construction plans are confirmed. The updated air quality assessment shall be provided to the Council for review at the first available opportunity.
- 13.8.12 Additional resources shall be provided to local authorities to assist with regulatory burden, dealing with complaints and the regular liaison with chosen contractors in relation to s.61/CEMP permissions and data review.
- 13.8.13 HS2 Ltd shall provide a commitment that compound plant and equipment, vehicle AADT are reviewed on a regular basis to ensure that factors used within the air quality assessment are met and maintained.

13.9 **HS2 CoCP: Section 8 – Cultural Heritage / Historic Environment**

- 13.9.1 Section 8.1.5 discusses Heritage Agreements; however, further details of the proposed '*project-specific regime*' are required from HS2. It is noted that method statements will be a requirement of those Heritage Agreements, but that heritage statements should also be required as part of the CoCP so that there is a full understanding of the significance of the asset prior to works commencing. HS2 need to update the CoCP. **HS2 Ltd should be required to provide further details in relation to Section 8.1.5 and Heritage Agreements and of the proposed '*project-specific regime*'. The heritage statements should also be required as part of the CoCP.**
- 13.9.2 Section 8.1.7 sets out general cultural heritage/historic environment management measures which will include: '*provision by the nominated undertaker to its contractors of locations and descriptions of all known cultural heritage/historic environment assets within and adjacent to construction works, including restrictions to construction methods to protect cultural heritage/historic environment assets, where these have been identified in the ES, undertakings and assurances, subsequent consultation and through the development of the detailed design*'. **This should also include all cultural heritage/historic environment assets affected by construction works rather than just limited to '*within or adjacent to construction works*' and the CoCP updated to reflect this.**



- 13.9.3 Section 8.1.8 states that: *'The lead contractor will carry out construction works in such a way as to ensure that disturbance to all heritage assets is managed in accordance with accepted historic environment practice and, where disturbance cannot reasonably be avoided, is controlled and limited as far as reasonably practicable'*. Trafford Council and partners consider that the above is too ambiguous and consider that **HS2 Ltd should be required to prepare a detailed conservation management plan for each heritage asset which has the potential to be directly impacted by temporary or permanent construction works. This should be informed by a professional in conservation and the CoCP updated to reflect this.**
- 13.9.4 Section 8.1.9 should also include the monitoring of affected heritage assets such as those of timber framed construction during the period of construction works and any repair, structural support and/or consolidation required following the completion of the programme of works.

13.10 HS2 CoCP: Section 9 – Ecology and Biodiversity

- 13.10.1 Trafford Council and partners would like to see clearer references to Environment Act Priorities, in terms of articulating how Biodiversity Net Gain (BNG) is being delivered through HS2, and how the Greater Manchester Local Nature Recover Network opportunity mapping is being used to positively identify ecological receptors. The design and construction of HS2 will require completion of net gain condition assessment (Metric 3.0) and a Biodiversity Net Gain Strategy with consideration of the GMCA Biodiversity Net Gain Guidance for Greater Manchester (2021) which aims to deliver 10% biodiversity net gain for at least 30 years. This is in line with the National Planning Policy Framework (NPPF) (2021) and the following local planning policies: GM Places for Everyone Policy JP-g 9, Trafford Core Strategy Policy R2, Manchester Local Development Framework, Core Strategy, Development Plan Document, 2075 - EN15, TfGM's IMS Environment and Sustainability Criteria – Biodiversity and Wigan Local Plan, Core Strategy, Development Plan Document, 2013- CP12. HS2 Ltd are required to undertake a Biodiversity Net Gain condition assessment (Metric 3.0) and produce a Biodiversity Net Gain Strategy demonstrating an overall net gain (with an aim for 10% net gain). **HS2 Ltd should be required to provide additional information on how they intend to align the BNG requirements with Greater Manchester's Local Nature Recovery Strategy and how this will be agreed.**
- 13.10.2 Trafford Council and partners feel the expected loss of ponds is not adequately compensated for. Trafford Council would expect a minimum of two for one on pond replacement to be specified in line Trafford Core Strategy Policy R2 and **HS2 Ltd**



should be required to provide a minimum of two replacement ponds for every pond lost.

- 13.10.3 Trafford Council and partners consider that the HS2 project does not consider the importance of individual street and highway trees of note that are not veteran trees but are important landscape features regardless. **HS2 Ltd should be required to include in the CoCP a requirement to carry out a full Capital Asset Valuation of Amenity Trees (CAVAT) assessment on trees of note to ensure a fuller Ecosystem Services understanding and appreciation of their value and function is considered in mitigation.**
- 13.10.4 **HS2 Ltd should be required to provide to Trafford Council and their partners clarification on the proposed tree replacement** policy for the Proposed Scheme. There is discussion in the CoCP around replacement and planting where accidental felled/they die as a result of the works, but more detail is required around management where there is planned impact on trees. The CoCP is too generic with *'minimise ecological effects'* and *'in consultation with Natural England, the Environment Agency, local wildlife trusts and relevant planning authorities'*.
- 13.10.5 Trafford Council and partners feel that the loss of hedgerows is not compensated for adequately and is not reflected by the suggested new planting. For example, a full hedgerow assessment has not been included therefore in line with Trafford Core Strategy Policies R2 and R3 a full assessment is required is to ascertain 'Important' hedgerows under the Hedgerow Regulations, 1997. The loss of hedgerows indicated is considered to be of County, not just of District, value. As such the scale and importance of hedgerow loss to Greater Manchester is not adequately compensated. HS2 Ltd need to correctly assess impacts on all hedgerows (for example in MA05 31.3km have not yet been surveyed) and provide adequate mitigation in agreement with the relevant local authority. HS2 Ltd should be required to prepare a much stronger hedgerow replacement plan and programme in Greater Manchester.
- 13.10.6 **HS2 Ltd should be required to provide details within the CoCP on how they and their contractors will deal with the issues associated with areas of ecological value that are isolated temporarily as a result of the works and incorporate an Ecology Strategy as part of the CoCP and Bill.** For example there is an SBI in Manchester (MA06 - Wood nr Chapel Lane and Sunbank Wood) that will be completely isolated and cut off for over 6 years.
- 13.10.7 Trafford Council and partners feel the potential impacts during both construction and operation as regards to disturbance and movement of non-native invasive



species and potential controls, bio-security and safeguarding are not adequately considered. HS2 need to update the CoCP in this respect. **HS2 Ltd should be required to revise the assessment to fully consider the impact of non-native invasive species.**

13.10.8 No clear figures are given on the long-term management of either compensation habitats or BNG habitats. As a requirement of the Environment Act 2021, a statutory Greater Manchester Local Nature Recovery Strategy will be produced over the coming years, to which the construction of HS2 and its approach to biodiversity net gain (particularly for offsetting) will need to pay regard. For woodland outside of the final land ownership boundary of the proposed scheme, for example, HS2 will only *'seek to make agreements with local landowners and/or other interested parties to ensure that the objective of the planting is maintained in perpetuity'* (Information Paper E20: Maintenance of landscaped areas, section 7.6). **HS2 Ltd should be required to clarify what the proposals in place are for the long-term management of compensation habitats and BNG habitats, should agreements not be reached.**

13.10.9 Trafford Council and partners note that the measures taken in response to loss of ancient woodland will be set out in the Ancient Woodland Strategy document, which will not form part of the Environmental Statement. It is considered that this information is essential in determining whether a potential impact is adequately mitigated for, therefore this should have been included as part of the Environmental Statement. **HS2 Ltd should be required to provide and agree the Ancient Woodland Strategy document at the earliest opportunity prior to Royal Assent.**

13.10.10 Trafford Council and partners feel there is still a lack of detailed ecological survey information across the scheme which needs to inform decision making as detailed in the table below:

Habitat Survey Information Required	Altrincham Road, Wilmslow Road and Birchfield Road Vents Shafts
	Infrastructure at Ardwick (which includes an area of potential Open Mosaic Habitat which could be a Habitat of Principle Importance).
	Rostherne Mere Site of Special Scientific Interest (SSSI), RAMSAR and National Nature Reserve
	Hennersley Bank Ancient Woodland site
	Wood near Chapel Lane Site of Biological Importance (SBI)



	Davenport Green Wood SBI and Ancient Woodland Inventory (AWI) site Wood near Chapel Lane
	Ashley Brickworks Local Wildlife Site (LWS); Ecclesfield Wood LWS; Ashley Mill Wood LWS; Castle Mill LWS; Brickhill Wood LWS and (AWI) site
Hedgerow Survey Information Required	GMCA estimate percentage of hedgerows requiring survey: 52% in MA07; 70% in MA08; 52% in MA04; and 74% in MA05.
Pond Habitat Suitability Index (HSI) Information Required	GMCA estimate percentage of ponds requiring survey: 63% in MA06; 69 % in MA04; and 43% in MA05
	Any additional ponds not already recorded between the distances of 100m and 500m from site (through desk study and Phase 1 habitat survey).
Ancient Woodland Assessment Required	Ancient Woodland Strategy (with detailed measures in response to ancient woodland loss) is required to determine if the potential impacts are appropriately mitigated.
Species Survey Information Required	Cross reference between the metapopulations of great crested newts identified in the community area map books (e.g. GCNMP1.6.1) and the actual ponds within the metapopulation.
	1.1.0 Updated bird assessment in line with updated best practice guidance - British Trust for Ornithology (BTO) fifth edition of Birds of Conservation Concern (BoCC) December 2021 – to account for likelihood of an increased number of birds on the red list in need of conservation interventions.
	Natural Environment and Rural Communities Section 41 species impact assessment and appropriate mitigation/compensation (e.g. hedgehog and common toad).



	Confidential badger assessment and mitigation strategy (a request was submitted for this information and denied. Without access to this information, it is not possible to provide meaningful comment as to whether mitigation is appropriate).
	Confidential Schedule 1 bird assessment and mitigation strategy (a request was submitted for this information and denied. Without access to this information, it is not possible to provide meaningful comment as to whether mitigation is appropriate).

13.10.11 While Trafford Council and partners appreciate the scale and complexity of the scheme, the documents are difficult to navigate, preventing a more complete sense of linking mitigation to loss. **HS2 Ltd should be required to provide clearer links to loss and suggested mitigation on a District basis.**

13.10.12 **HS2 Ltd should be required (in respect of section 9.3.1 of the CoCP), to provide an outline programme for updates to ecological baseline information.**

13.10.13 In section 9.3.3 reference is made to the HS2 Ecology Review Group, but as highlighted as part of the 2018 WDES comments, Trafford Council and partners seek clarification from HS2 that they will be invited to sit on the referenced group. **HS2 Ltd should be required to clarify if Trafford Council and partners will be invited to sit on the HS2 Ecology Review Group.**

13.11 **HS2 CoCP: Section 10 – Ground Settlement**

13.11.1 In respect of section 10.1.1, Trafford Council and partners are concerned that there may be dispute on what is deemed reasonably practicable in respect of the techniques to control and limit the effects of settlement. HS2 need to provide further direction to contractors within the CoCP. **HS2 Ltd should be required (in respect of section 10.1.1 of the CoCP) to provide further direction to contractors in respect of the techniques to control and limit the effects of settlement.**

13.11.2 Trafford Council and partners are aware that construction of the proposed scheme may lead to a small amount of ground movement (settlement) which may have an effect on heritage assets. Little information is provided on specific mitigation for assets within the Environmental Statement. **HS2 Ltd should be required to ensure that for ground movement (settlement) which may have an effect on heritage assets appropriate mitigation is identified prior to any construction works and the details of such measures should be agreed in writing with the relevant partner**



authority/authorities. HS2 need to provide a commitment to this as part of the CoCP.

- 13.11.3 The C14: Ground Settlement Information Paper concentrates on the effect of ground settlement on buildings and their associated services. **HS2 Ltd should be required to provide clarification on whether there is provision for assessing the likelihood of effects on the adjacent environment e.g. in areas of known ground instability (mining, former depressions, landfills etc) to ensure settlement does not occur that can lead to longer term damage, for example change in drainage patterns.**
- 13.11.4 It is unclear whether the settlement analysis stated within the C14 information paper will include varying ground conditions locally to faulting e.g. if buildings potentially straddle a fault. **HS2 Ltd should be required to provide clarification relating to natural structural features in rock i.e. faulting. Advance risk assessment should include identification and assessment of construction risks relating to potential inducement of fault movement or natural fault movement. HS2 need to reflect this within the CoCP.**
- 13.11.5 **HS2 Ltd should be required to update the CoCP to confirm that the British Geological Society will be included in any consultations/risk assessments in relation to ground settlement.**
- 13.11.6 **HS2 Ltd should be required to update the CoCP to confirm settlement assessments will include the potential for groundwater dewatering to extend potential settlement zones.**
- 13.11.7 **HS2 Ltd should be required to ensure that all geotechnical assessments are in accordance with Eurocode 7 parts 1 & 2, BS1377 and where the proposed scheme crosses areas of Made Ground/Fill then reference should be made to BRE 424 'Building on Fill' guidance. HS2 need to update the CoCP to reflect this.**

13.12 **HS2 CoCP: Section 11 – Land quality**

- 13.12.1 In respect of section 11.1.1, Trafford Council and partners are aware that excavated material will be managed in accordance with the controls specified by the CL:AIRE Definition of Waste: Development Industry Code of Practice. **HS2 Ltd should be required to confirm that the criteria for re-use of site won material will be agreed with the local authorities.**



13.12.2 **HS2 Ltd is required (in respect of section 11.2 of the CoCP), to provide Trafford Council and partners rights of approval to measures to reduce potential impacts on geology and soils.**

13.12.3 In respect of sections 11.2.4 – 11.3.4, there are no mechanisms/agreements to ensure consultation with the regulator takes place regarding ground investigation results, the development of a remediation strategy/verification plan and subsequent validation of remediation. Trafford Council and partners note that site investigation is still to be undertaken to determine if any mitigation is required but **HS2 Ltd is required (in respect of sections 11.2.4 – 11.3.4) to provide detail on the mechanism for consultation with the regulator within the CoCP.**

13.12.4 In respect of sections 11.2.15 and 11.2.16, although temporary, they should be designed in line with the intended design for that area as handed back. **HS2 Ltd is required (in respect of sections 11.2.15 and 11.3.4 of the CoCP) to reach agreement with the land owner and the local authority.**

13.13 **HS2 CoCP: Section 12 – Landscape and Visual**

13.13.1 **HS2 Ltd is required to update section 12 of the CoCP to reflect works which will result in the need for seeding and planting to be planned to align with planting seasons.**

13.13.2 Section 12.1.1 relates to controls to be put in place to protect landscape and visual receptors from construction activities. **HS2 Ltd should be required to confirm within section 12.1.1 of the CoCP that proposals to protect landscape and visual receptors from construction activities should be subject to the consideration of the Local Planning Authority (LPA) for approval prior to their implementation.** In addition, the last bullet point listed suggests that proposals could include the translocation of existing vegetation. This point has been raised already with regards to ancient woodlands, parts of which will be lost to the development. **HS2 Ltd should be required to clarify to Trafford Council if proposals incorporate provision to translocate ground flora and trees.**

13.13.3 **HS2 Ltd should be required to update section 12.1.1 to clarify this is including but not limited to ‘designated landscape areas, heritage assets, parks, open spaces and smaller green spaces in urban areas’.** This also needs to include consideration on planting in and around Metrolink, specifically in relation to sight lines, maintenance and leaves on the track.



- 13.13.4 Section 12.2.3 lists tree protection measures to be implemented in line with BS5837. These should be adhered to, particularly the monitoring to ensure the tree protection measures are retained and maintained appropriately. Section 12.2.5 states that *'where individual stands of trees require felling and the requirement for felling was not identified in the Environmental Statement, the nominated undertaker's contractor will undertake an arboricultural assessment by appropriately qualified specialists and where necessary, appropriate mitigation shall be employed.'* The Environmental Statement does not make specific reference to all areas of vegetation that will be removed, **HS2 Ltd should be required to make specific reference to all vegetation that will be removed. Appropriate tree protection should be provided to all retained vegetation and this should be agreed with the LPA. All tree and hedgerow removal should be agreed in advance with the LPA. HS2 need to update the CoCP to reflect this.**
- 13.13.5 Furthermore section 12.2.3 indicates maintenance of trees on highway, but maintenance during occupation of third-party land, including local authorities may be required. This should also include a requirement to hand back trees in similar or improved condition. **HS2 Ltd should be required to hand back trees in similar or improved condition .**
- 13.13.6 Section 12.2.6 states that any accidentally felled trees or those which die as a consequence of the works will be replaced with a size and species similar to the original tree, where reasonably practicable. No tree survey has currently been provided. This will be needed to determine the size and age of existing trees. The tree survey should be in accordance with BS5837. When replacing trees, consideration needs to be given to the future aspirations for green linkages, particularly in the city centre where numerous Strategic Regeneration Framework areas cover the station and surrounding area. Instead of replacing existing size and species of trees, consideration needs to be given to provision of size and species which result in an overall enhancement/positive contribution to aspirations for green streets/linkages. The replacement tree planting should be agreed with the LPA. **HS2 Ltd should be required to update the CoCP to provide a commitment to agree replacement tree planting with the LPA.**
- 13.13.7 Section 12.3.1 relates to advanced planting and the contractor considering where measures can be implemented early. The programme for advanced planting should be taken into account in the Environmental Statement as this affects the landscape and visual assessment; it should not be left to the contractor to determine. There is a commitment here to implement landscape works as early as is 'reasonably practicable'. There is no mention of advance planting. Greater Manchester has



identified a number of locations where advanced planting could be undertaken on the peripheries of construction/compound/storage areas, well in advance (i.e. several years) of the commencement of construction activities. This advance planting could moderate significant effects during construction and year 1. **HS2 Ltd should be required to update the CoCP to account for advanced planting.**

13.13.8 Section 12.3.3 states that relevant local authorities will be consulted regarding the landscape and planting proposals. This should be carried out and recorded so it is clear where requests have been incorporated. **HS2 Ltd should be required to update the CoCP to confirm landscape and planting proposals need to be agreed and approved by the relevant local authorities.**

13.13.9 Section 12.3.4 states that the positioning of site access and egress points will consider the potential impacts on trees or vegetation to avoid unnecessary impact. When positioning site access, consideration will also need to be given to sensitive visual and townscape receptors in order to minimise potential impacts. Consideration will also need to be given to the siting of materials storage and compounds. **HS2 Ltd should be required to update section 12.3.4 of the CoCP to account for sensitive visual and townscape receptors and siting of material storage and compounds.**

13.13.10 **HS2 Ltd should be required to clarify to Trafford Council and partners around section 12.4.2, particularly in respect of timing, to understand why this information is not provided prior to design.**

13.13.11 Section 12.4.3 discusses the monitoring of the planting works during the construction period. **HS2 Ltd is required to update the CoCP to confirm planting works will also be monitored for an agreed duration post construction, to ensure they are establishing appropriately.**

13.13.12 Section 3.3 on statutory requirements suggests that detailed applications to discharge conditions associated with topsoil, lighting, dust suppression etc will be subject to planning authority approval. However, this should also include the protection of landscape features, i.e. protection of retained trees, hedgerows, ponds and the like. There is a lack of information about landscape features, such as woodland, trees, ponds, hedgerows etc i.e. what is being lost and what is being retained - this is particularly relevant to construction compounds and material stockpile areas. **HS2 Ltd should be required to update section 3.3 of the CoCP to provide clarification in relation to the protection of landscape features, i.e. protection of retained trees, hedgerows, ponds etc.**



13.13.13 Section 5.6.1 relates to hoardings and that these will be painted and kept free of graffiti. Consideration should be given to the setting of the hoardings - townscape or countryside and what is appropriate in terms of painting. 5.6.2 discusses the potential for artwork and vegetation on hoardings. Section 5.6.3 states that site hoarding of 2.4m in height are proposed raised to 3.6m in specific locations. 3.6m hoarding is likely to have a greater visual impact, particularly within close-range views in urban environments. Specific locations for 3.6m hoarding will be needed in order to accurately assess 'worst-case' construction phase effects. **HS2 Ltd should be required to update the CoCP to confirm that requirements relating to hoardings (section 5.6.1 of the CoCP) should be agreed with the local authority.**

13.13.14 Within section 5.6.1 the desire to retain existing walls, fencing and hedging where appropriate is noted. **HS2 Ltd should be required to update the CoCP to confirm that existing walls, fencing and hedging should be given sufficient protection to ensure the longevity of these features, particularly hedgerows where root protection would be required.**

13.14 HS2 CoCP: Section 13 – Sound, Noise and Vibration

13.14.1 Trafford Council and partners seek clarity around the intent to use Section 61 notices. Trafford Council and partners appreciate that for the scale of the proposed development this may be the best option, but some authorities tend to liaise with contractors for construction projects through the use of a live Construction Environmental Management Plan (CEMP) for the duration of the works, with enforcement powers under COPA 1974 s60 and EPA90 being available as required. This allows a collaborative and co-ordinated approach to disruption management. **HS2 Ltd should be required to provide a wider strategy as part of the CoCP on how local authorities are consulted for approval in relation to noise and vibration management and the use of Section 61 notices.**

13.14.2 **HS2 Ltd should be required, in respect of the noise and vibration management plan discussed within section 13.2.4, to seek Trafford Council and partners approval as part of the LEMP. Trafford Council require HS2 to update the CoCP to ensure contractors comply with this.**

13.14.3 Trafford Council and partners query the implementation of the one-hour start-up and close-down periods for construction activities, particularly the process for review should complaints arise due to noise during these periods. **HS2 Ltd should be required to provide details for a process of review of start-up and close-down periods should complaints arise due to noise.**



13.14.4 It is not clear whether the Consolidated Construction Boundary (land available for construction) covers potential receptors for noise management or sites for noise mitigation. **HS2 Ltd should be required to consider where surveys and potential mitigation measures are required now, with potential changes to the consolidated construction boundary, to allow certainty for noise receptors and how sites for noise mitigation will be accessed. This may also apply to vibration management.**

13.14.5 **HS2 Ltd shall provide a commitment that compound plant and equipment, vehicle AADT are reviewed on a regular basis to ensure that factors used within the noise assessment are met and maintained.**

13.15 **HS2 CoCP: Section 14 – Traffic and transport**

13.15.1 In respect of the requirement to share information relating to traffic management and monitoring construction traffic, as highlighted as part of the 2018 WDES, Trafford Council would anticipate that some maximum timeframes would be included within the CoCP. It is also anticipated that this would include timeframes and processes for escalating issues in this regard. This has not been recognised and HS2 need to update the CoCP to reflect this. **HS2 Ltd should be required to provide a timeframe for sharing construction traffic management and monitoring information and include maximum timeframes for sharing information and processes for escalating issues within the CoCP.**

13.15.2 **HS2 Ltd should be required to consult local authorities on haul roads insofar as it impacts wider construction traffic routes and to ensure Trafford Council and partners maximise opportunities for the haul routes to be part of a longer-term highway network where appropriate. HS2 need to update the CoCP to commit to this.**

13.15.3 Section 14.2.2 on the route-wide traffic management plan includes '*measures which may include engagement with vulnerable road users (pedestrians, motorcyclists, cyclists, equestrians), to provide for road safety for all modes for the public and construction staff during traffic management works and temporary traffic control measures*'. **HS2 Ltd should be required to develop and subsequently include within the CoCP an Accessible Construction Sites guidance document.** This would supplement the guidance provided by DfT and others, with photographic examples of good (and bad) practice in relation to the design of temporary works which could impact on pedestrian movement. The objective would be to influence the inclusion of features which assist disabled pedestrians travelling through the sites. For example, provision of high-quality step free routes and avoidance of features which



could restrict the movement of guide dog users or introduce trip hazards for visually impaired pedestrians. The high-level plans within section 5.3.3 of the CoCP are not sufficient and **HS2 Ltd should be required to provide further traffic management controls to ensure the nominated undertaker implements appropriate and agreed measures in respect of pedestrians including disabled pedestrians.**

- 13.15.4 **HS2 Ltd should be required (in respect of section 14.2.2), to include plans for pre-condition surveys and agreed predicted deterioration of road condition.** Trafford Council and partners seek a strategy for dealing with the potentially significant impacts of construction traffic on areas of public highway outside of the works boundary, including but not limited to the approach to Ardwick Depot. The CoCP discusses an RTMP with *'measures to ensure that the timely maintenance and condition of public roads, cycleways and PRow do not deteriorate due to use by the construction traffic, including monitoring arrangements with local highway authorities'*. **HS2 Ltd should be required to provide clear commitments and understanding of processes to agree timing, scale and specification of highway interventions; along with dispute resolution, to ensure appropriate maintenance and residual life of impacted assets. HS2 need to update the CoCP to reflect this.**
- 13.15.5 **HS2 Ltd should be required to update section 14.2.7 to include for appropriate level of car and cycle parking provision at each construction site for workers, along with retaining access for cyclists and pedestrians, and encouragement of car-sharing schemes, to help maximise active travel mode shares and reduce private car travel.** This can be planned as part of workforce travel plans but with appropriate infrastructure required.
- 13.15.6 While Trafford Council recognise the planned use of workforce travel plans to help mitigate impact on the road network, there is insufficient information on wider strategies to mitigate construction traffic flows and impacts on public transport. **HS2 Ltd should be required to provide a clearly defined strategy for the mitigation of increased traffic flows and impacts on public transport, with this recognised and committed to as part of the CoCP.**
- 13.15.7 **HS2 Ltd should be required to the second bullet within section 14.3.2 on workforce travel plans to explicitly mention provision of cycle parking with facilities such as lockers and showers.**
- 13.15.8 Section 14.3.4 indicates that workforce travel survey results will be shared with relevant stakeholders. **HS2 Ltd should be required to update Section 14.3.4 to recognise Trafford Council and partners as relevant stakeholders.**



13.15.9 **HS2 Ltd should be required to update the CoCP to reflect and recognise that agreement of changes to bus routes take at least 6 months to enact.**

13.15.10 The CoCP indicates the local traffic management plans (LTMPs) will provide specific routing details during construction with avoidance of peak times adjacent to schools. **HS2 Ltd should be required to update LTMPs to avoid roads that directly pass schools at all times of a weekday. Other sensitive locations such as hospitals, churches and historical buildings should also have considerations mentioned around construction routing and/or traffic management measures. As highlighted within the Community Area report, Trafford Council and partners note that the vent shaft at Birchfield Avenue next to a school needs further specific consideration.**

13.15.11 **HS2 Ltd should be required to include within LTMPs a commitment to undertaking a road safety audit / review to identify any 'problem' areas existing on the network, which should influence routing during construction. HS2 Ltd should update the CoCP to reflect this.**

13.15.12 Trafford Council and partners are concerned that there is no requirement to inform or coordinate impacts on the highway using the Greater Manchester Road Activities Permit Scheme (GMRAPs). **HS2 Ltd should be required to provide a commitment to the use of GMRAPs within the CoCP, to allow authorities to co-ordinate and manage the impact of roadworks on the network.**

13.16 **HS2 CoCP: Section 15 – Waste and Material Resources**

13.16.1 Trafford Council note there are no plans for separate planning consent for materials storage areas, spoil and topsoil. **HS2 Ltd should be required to provide clear protocols within the CoCP for consultation with local residents and approval from local authorities regarding temporary site establishment facilities and storage sites. HS2 also need to clarify what will enforceable via the Bill.**

13.16.2 **HS2 Ltd should be required to seek a commitment that the site will be designed to ensure waste operatives do not need to transport waste materials too far, to avoid sustaining injury which is important for health and safety during construction. For example the City of Westminster use the following which could be adapted for the HS2 construction:**

- **Max of 20m for carry dustbins/waste sacks/wheeled bins (up to 360l)**
- **Max of 10m for eurobins (660l and 1100l)**



- **Always ensure there is an even gradient for transporting waste**

13.17 HS2 CoCP: Section 16 – Water Resources and Flood Risk

- 13.17.1 **HS2 Ltd should be required (in respect of Section 13.2) to ensure vibration impact mapping reflects ground stability risk or underground assets at risk. HS2 need to update the CoCP to reflect this.**
- 13.17.2 **HS2 Ltd should be required to update the CoCP to reflect that decommissioning of sewers will need consent from the relevant risk management authority, with demonstration that there is sufficient capacity in the extant system to take the diverted flows/volumes and manage risk of surface water flooding.**
- 13.17.3 Furthermore, discharge during dewatering to the public sewer or any other receptor should have consent from the relevant risk management authority to ensure there is adequate capacity with no increased flooding risk. **HS2 Ltd should be required to update the CoCP to ensure that discharge during dewatering to the public sewer or any other receptor should have consent from the relevant risk management authority to ensure there is adequate capacity with no increased flooding risk.**
- 13.17.4 **HS2 Ltd should be required to update the CoCP to confirm ordinary watercourse assets are in the scope of the document, as well as associated documents such as the LEMP.**
- 13.17.5 **HS2 Ltd should be required to update the CoCP to clarify that ordinary watercourse assets should be considered during site investigation, e.g. exploratory boreholes to monitor ground water level, with measures to ensure damage is avoided to such assets.**
- 13.17.6 **HS2 Ltd should be required to update the CoCP to ensure compounds and other off-route infrastructure, along with borrow-pits and other excavations such as public sewer realignments take into account underground ordinary watercourse assets.**
- 13.17.7 Due to data used for ordinary watercourses and their assets, Trafford Council and partners will require additional surveying to be completed to ensure these assets and watercourses are accurately mapped and understood before final decisions on the route design can be agreed. It is noted in some areas, ordinary watercourse and their assets have been missed. **HS2 Ltd should be required to engage with Lead Local Flood Authorities to ensure that all ordinary watercourses and their assets are mapped and known to the project.**



- 13.18 **HS2 Ltd should be required to account for appropriate easements from all watercourses in terms of potential risk from vibration asset stability and dewatering.** This is particularly important for assets within built up environments where the route crosses and space will be more limited and interactions may become shallower as the route comes to the surface, such as at the proposed Manchester Airport Station.



14 Trafford Council comments on Cross-topic Technical Appendices - Alternatives Report

14.1 Introduction

14.1.1 The following chapter sets out Trafford Council's comments on Volume 5: Appendix CT-003-00000 Cross-topic Alternative's report. Trafford Council comments on specific Community Areas are provided in detail in other chapters of this response and are therefore not repeated here. As such the Trafford Council response should be read as a whole.

14.1.2 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Trafford Council welcomes the consideration of reasonable alternatives set out within the report, along with the description of their evolution.

14.1.3 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require an ES to include:

14.1.4 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'

14.1.5 A requirement of the Bill, Parliamentary Standing Order 27A11 12 requires:

'A report which identifies, describes and evaluates reasonable alternatives to the works authorised by the bill, taking into account the objectives and geographical scope of the bill.'

14.1.6 Volume 5 Appendix CT-003-00000 Cross Topic Alternatives Report seeks to fulfil those statutory requirements. It sets out four categories of alternative, namely: strategic alternatives, route wide rail alternatives, route corridor alternatives and local alternatives.

14.1.7 The report describes the sifting, dismissing and selecting of alternatives over the last nine years and presents a record of that historical process.



- 14.1.8 Part I of the report presents a summary of the strategic alternatives to the high-speed rail network (nationally) and then reasonable strategic alternatives to the full Phase 2b scheme, including the consideration of a 'do nothing' scenario. Part II of the report then summarises the reasonable route corridor alternatives to the full Phase 2b scheme. Trafford Council maintains its support for HS2 Phase 2b and its route to Manchester, via the proposed Manchester Airport High Speed station. Comments on Parts I & II of the Alternatives Report are therefore not considered necessary.
- 14.1.9 Part III of the report describes the reasonable local alternatives considered and the main reasons for the decisions taken before and after the announcement of the 2017 preferred route to Manchester. Trafford has a number of concerns regarding these decisions and considers the decision-making process to be lacking in transparency.

14.2 Strategic Alternatives

- 14.2.1 Nine years ago, the Government concluded that action was needed to meet the future travel needs of Britain and that 'doing nothing' is not an option.
- 14.2.2 Prior to the introduction of the Phase One hybrid Bill into Parliament in November 2013, the Government considered and reported on alternative configurations of the high-speed rail network. The Government's conclusion and reasons for promoting the Y network were reported in the Command Paper, High Speed Rail: Investing in Britain's Future report (2012) and subsequently in the Phase One alternatives report (2013), deposited in Parliament alongside the Phase One hybrid Bill. The Phase One hybrid Bill was enacted in February 2017 and construction works on Phase One have commenced.
- 14.2.3 The reasons for dismissing strategic alternatives were taken nine years ago and the time has long passed in the process for commenting on potential Strategic Alternatives to the current proposals.
- 14.2.4 Trafford Council supports HS2 Phase 2b

14.3 Route-wide Rail Alternatives

- 14.3.1 The Phase 2b strategic alternatives report (2016) for the full Phase 2b scheme, was completed by Atkins in November 2016 and updated previous work completed on route-wide rail alternatives by Atkins in 2013, taking account of design updates including the decision by Government to deliver Phase 2a ahead of the remainder



of Phase Two. The report identified upgrades to existing rail infrastructure as alternatives and analysed how those would perform compared to the full Phase 2b scheme infrastructure and train services. Route wide rail alternatives were looked at again following the Oakervee report.

14.3.2 The DfT specified that the appraisal of rail alternatives be undertaken against the Government's strategic objectives for HS2, and in particular, for Phase 2b. In addition to the consideration of costs, the following were considered at high level:

- generation of additional network capacity that could be used for other future services;
- on train/seating capacity and crowding;
- reliability and punctuality;
- disruption during construction; and
- environmental impacts.

14.3.3 In concluding this section, it is noted that key service characteristics such as journey time, frequency and potentially punctuality would improve when compared of a "do minimum" scenario (with Phase 2a but no Phase 2b Western leg provision) but not all of the benefits of constructing the Phase 2b Western Leg would be realised.

14.3.4 It also notes that a major upgrade of the existing Crewe – Manchester Piccadilly rail corridor as part of the route-wide rail alternatives could deliver a comparable number of services to the Phase 2b Western Leg and an overall improvement in punctuality/resilience versus the do-minimum scenario where only HS2 Phase 2a is delivered.

14.3.5 It is also noted that even with the maximum infrastructure specification the upgrade alternative cannot deliver several key benefits of the Phase 2b Western Leg such as connection to the Manchester Airport and the wider catchment, additional journey time savings to /from central Manchester over the upgrade alternative of around 17 minutes and integration / provision (active and passive) for NPR. The added disbenefits associated with the disruption to existing rail services of the upgrade alternative demonstrated further that this was not the optimal future proof solution required to drive transformation and level up the country. **Trafford Council and GM Partners support the decision to progress with Phase 2b Crewe to Manchester but question why Greater Manchester is the only part of the county being asked to**



make a substantial financial contribution to the cost of HS2; noting that this will undermine Greater Manchester's ability to maximise the benefits of HS2 in its city region.

14.4 Route Corridor Alternatives

14.4.1 Similar to the strategic alternatives and route-wide rail alternatives, the consideration of route corridor alternatives took place between 2012 and 2017. It is stated that sustainability including environmental impacts has been integral to the development of the proposed scheme but adequate detail on environmental impacts was not provided (even in the 2018 Phase 2b WDES consultation).

14.4.2 The chapter notes that the route via Manchester Airport will be progressed since the key driver is the opportunities associated with provision of a high-speed station at Manchester Airport. Having this station was seen by government and key stakeholders as vital for maximising connectivity to international markets and also for unlocking further development potential building upon the success of the Airport City Enterprise Zone.

14.5 Local alternatives considered before July 2017

14.5.1 The last 158 pages of the Alternatives Report is given over to describing local alternatives. Although many of the alternatives were considered and dismissed as long ago as 2014, this section also identifies considerations and evolution of options as recently as 2019.

14.5.2 The Alternatives Report again offers no detail to enable comment to be made upon the decision-making which it describes.

14.5.3 However Trafford Council makes the following brief observations and comments.

Northern Chord (further refinement)

14.5.4 The Northern Chord refers to an approximately 8km long link which would connect across the HS2 Y-network to the south of Trafford. The connection would enable empty trains to move between the rolling stock depot at Golborne and Manchester Piccadilly High Speed station.

14.5.5 The Northern Chord refinement considered the requirement for the northern chord of the Manchester delta junction following the decision to relocate the rolling stock depot from Golborne to Crewe north and the associated costs.



- 14.5.6 Two options were considered for a full sift appraisal. Option 00 would have no northern chord and Option 01 included a northern chord from a connection with the HS2 Manchester spur north of Rostherne to a connection with the HS2 West Coast Main Line connection towards Golborne.
- 14.5.7 HS2 Ltd determined that the Northern Chord was not required to support the rolling stock depot at Golborne, which was relocated to Crewe north.
- 14.5.8 Inclusion of the Northern Chord would increase the number of trains on the Golborne Link and thereby increase the impacts on communities within Trafford close to the route, who would be subject to greater detrimental impacts resulting from increased visual impacts, noise and vibration etc. from increased movements along the route.
- 14.5.9 Trafford Council supports the decision not to include the Northern Chord (either in full or passive provision to enable a future connection) within the Proposed Scheme.

Manchester Ship Canal

- 14.5.10 This refinement area covered approximately 12km of the route along the HS2 WCML connection towards Golborne, with a focus on the southern section of the route over the Manchester Ship Canal.
- 14.5.11 Trafford Council's detailed comments on the Proposed Scheme's impacts in this area are set out within the response to Volume 2: MA04 (Broomedge to Glazebrook) community area report and map book. To avoid repetition, those issues and requirements have not been re-stated here. The following section should be read in conjunction with the Council's comments on community area MA04.
- 14.5.12 This refinement sought to reduce landscape, visual and noise impacts where the route would cross the Manchester Ship Canal by consideration of six options. The Baseline Option 00 would approach the Manchester Ship Canal on embankment and would cross the canal on a viaduct (approximately 28m high). The line speed over the canal would be 345kph (214mp). This along with the following three additional options were taken to the full sift appraisal:
- Option 01: would follow a similar route to the Baseline Option 00 but would cross under the Manchester Ship Canal in an approximately 2km long cut and cover box structure and would surface south of the M62.



- Option 3: would follow a similar route to the Baseline Option 00 but would cross under the Manchester Ship Canal in an approximately 3.2km bored tunnel and would surface south of the M62.
- Option 5: would follow a similar route to the Baseline Option 00 but with a line speed to 300kph (186mph) on the crossing over the canal. The height of the embankments either side of the canal could be lowered.

14.5.13 HS2 Ltd determined that Option 5 be taken forward as the preferred option. However, paragraph 5.2.85 of the Alternatives report states that the preferred option, Option 5, would have major landscape and visual impacts as a result of the high viaduct crossing of the Manchester Ship Canal. The embankments either side of the canal crossing were also considered to have moderate landscape, visual, townscape and noise impacts. These impacts were identified as particularly impacting residents of Hollins Green, Partington and Glazebrook.

14.5.14 Options 1 and 3 were both considered to have minor to moderate landscape and townscape impacts associated predominantly with the section of the route north of the M62. Both crossing options under the Manchester Ship Canal were identified as having major hydrological impacts associated with the construction of underground works through an area of significant hydrological activity and high flood risk.

14.5.15 Moreover, the option of tunnelling under the MSC is also rejected on the grounds that 'Options to cross under the canal would potentially require a diversion of the canal.' It is not clear, however, that this would necessarily be the case, and there does not appear to be evidence that such a diversion would be needed.

14.5.16 Trafford Council acknowledges the hydrological related issues of both options for underground crossings of the Manchester Ship Canal. However, the Council is extremely concerned by the report's conclusions regarding the major landscape and visual impacts and associated visual and noise impacts for residents of Partington.

14.5.17 Limited engagement has been undertaken by HS2 Ltd with Trafford Council in preparing the Environment Statement. Trafford Council therefore requests that further work is undertaken or shared regarding the feasibility of tunnelling under the canal (either by cut and cover or TBM) before this option is rejected.

14.5.18 Additional discussions with HS2 Ltd must also be held to consider the underground crossing options for the Manchester Ship Canal, to help minimise the long-term major adverse landscape, visual and noise impacts associated with the high crossing viaduct.



Manchester Ship Canal (further refinement)

- 14.5.19 Following further engagement with Peel Ports Ltd who operate the ship canal, a further refinement considered the viaduct span and clearance over the canal. The Baseline Option 00 would include an approximately 60m span viaduct with a rail height of up to 28m above the canal. Option 01 would include a viaduct span approximately 120m, with a rail height of up to 32m above the canal. Option 02 would only increase the rail height above the canal to 29m from the Baseline option.
- 14.5.20 The Baseline Option 00 was determined to be the preferred option as no significant improvements were identified when compared to the other options. All options were identified as having major landscape and visual impacts associated with the high crossing, particularly for residents of Partington who would also experience noise impacts.
- 14.5.21 The Alternatives report states that opportunities to lower the viaduct height are precluded by the operational requirements of the Manchester Ship Canal. As stated within the previous section, Trafford Council has significant concerns regarding the long-term detrimental impacts the high-crossing viaduct option would have on both local residents and the wider landscape.
- 14.5.22 In its current form, the viaduct would comprise a highly visual and dominant feature of an otherwise open and rural setting. The Council would not support any proposals to further increase either the height or the span of the viaduct and consider that additional consideration is given towards pic crossings of the Manchester Ship Canal.

Alternative rolling stock depot locations

- 14.5.23 Trafford Council supports the alternative rolling stock depot location, north of Crewe. This option was selected as it would be centrally located on the Phase 2b Western Leg, provide efficient connectivity to the WCML, and cost the least to construct. It would also negate the requirement for the Northern Chord, which Trafford Council does not support.

Manchester Airport vicinity

- 14.5.24 This refinement area covered approximately 19km of the route from Ashley, through the Manchester Airport High Speed station and then an approximately 12.8km tunnel surfacing at West Gorton, east Manchester. The stated aim of this refinement was to mitigate the impacts close to Tatton Park, Ashley, Rostherne Mere and Manchester Airport.



14.5.25 Trafford Council's detailed comments on the Proposed Scheme's impacts in this area are set out within the response to Volume 2: MA06 (Hulseheath to Manchester Airport) community area report and map book. To avoid repetition, those issues and requirements have not been re-stated here.

Manchester Airport High Speed Station (further refinements)

14.5.26 This refinement considered a review of the operational requirements and layout of the Manchester Airport High Speed station near Warburton Green.

14.5.27 Two options were proposed for this section of the route, both of which were taken to a full sift as follows:

- Option 00: the DRR would provide a high-speed station at Manchester Airport in cutting to the west of the M56 and to the east of Hale Barns, but with no provision within the station footprint for connection to the highway network; and
- Option 01: would provide a high-speed station at Manchester Airport in cutting to the west of the M56 and to the east of Hale Barns, including provision within the station footprint for highway connections to the M56 junction 6 and A538 Hales Road.

14.5.28 HS2 Ltd determined that Option 01 was the preferred option to be taken forward, ensuring consistency in the design with other proposed stations, which also included connections to the existing highway network.

14.5.29 Trafford Councils agrees and supports this decision.

14.6 Alternatives considered since July 2017

14.6.1 This section of the Alternatives Report sets out the reasonable alternatives studied since July 2017 and the main reasons for selecting the option to be taken forward into the Proposed Scheme.

Route alignment over the Manchester Ship Canal

14.6.2 Consideration was given to the HS2 WCML connection where it will pass over the Manchester Ship Canal to the east of Hollins Green. For all options considered, the viaduct will be up to 29m in height at the point where it will cross the canal.



- 14.6.3 Opportunities to lower the viaduct height are precluded by the operational requirements of the Manchester Ship Canal.
- 14.6.4 As previously stated within this chapter, Trafford Council has significant concerns over the proposed height of the viaduct and considers that the major adverse landscape, visual and noise impacts require a much greater level of consideration and investigation.

Railhead at Ashley

- 14.6.5 Consideration was given to alternative locations for the proposed railhead at Ashley. The railhead is required to be located at a strategic location along the route with a rail connection to both the HS2 Manchester spur and the existing conventional rail network. It will be temporarily used as the delivery location for bulk rail-borne materials required for construction.
- 14.6.6 Of the three options taken forward to a detailed appraisal, the option to locate the railhead 400m south of the village of Ashley (immediately to the south of the HS2 Manchester spur and immediately west of the Mid-Cheshire Line) was taken forward.
- 14.6.7 As a result of further design development paragraph 6.7.10 of the Alternatives report states that the connection to the Network Rail Mid-Cheshire Line will be removed, although the proposed highway access will be retained. The decision to remove the connection to the Mid-Cheshire Line has been stated as being due to a better understanding of operational maintenance requirements.

A538 Hale Road

- 14.6.8 Consideration has been given to the highways arrangements for the A538 Hale Road where it will cross the Manchester spur and connect to the M56 Junction 6. Four options were taken forward to detailed appraisal stage to ensure that the design for Manchester Airport High Speed station took into account any additional road traffic flows resulting from the users of the Proposed Scheme and, insofar as reasonably practicable, future NPR users.
- 14.6.9 Trafford Council's detailed comments on the highways arrangements around the Manchester Airport High Speed station are set out within the response to Volume 2: MA06 (Hulseheath to Manchester Airport) community area report and map book. To avoid repetition, those issues and requirements have not been re-stated here.



14.6.10 In summary, Trafford Council considers the scale of the junction and highway infrastructure for the Manchester Airport area to be insufficient to accommodate existing trips, which will be further exacerbated when additional growth is added to the network. In addition, the proposed Hale Road gyratory is considered to create a convoluted route, which would extend journey times and provides limited active travel / public transport infrastructure.

Vertical alignment at Manchester Airport High Speed station

14.6.11 Further consideration has been given to the feasibility of raising the level of Manchester Airport High Speed station. Opportunities were considered to reduce construction costs associated with excavation of large volumes of material to develop the station below ground level.

14.6.12 Trafford Council's detailed comments on the vertical alignment at Manchester Airport High Speed station are set out within the response to Volume 2: MA06 (Hulseheath to Manchester Airport) community area report and map book. To avoid repetition, those issues and requirements have not been re-stated here.

14.6.13 In summary, Trafford Council considers that a 'build it once, build it right' approach should be taken which ensures that the design of the station is both appropriate and fit for purpose/future-proofed for the long-term.

14.6.14 Reducing the depth of the cutting for the station will lead to significant visual impacts with the station forming a stark feature in the wider landscape.

14.6.15 Trafford Council therefore requests that the depth of the cutting for the Manchester Airport High Speed station is increased from the proposed 4.5m below ground level (at the deepest point) and maintains its support for the deep cut option which would situate the platforms 11.5m below ground level (at the deepest point).

14.7 Conclusion

14.7.1 The Alternatives Report simply summarises the historic sifting of alternatives without giving the necessary data to allow an independent evaluation of that process. It describes those which have been dismissed by HS2 Ltd on the way to arriving at the Proposed Scheme.

14.7.2 It is evident that, the current proposals do not always represent the best option as derived from the sifting process. The proposed route seeks to deliver the



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

government's objectives irrespective of whether elements of the route are outperformed on cost or environmental terms by better alternatives.

- 14.7.3 The Alternatives Report understandably reflects a point in time, and Trafford Council would therefore welcome a dialogue with HS2 Ltd, GMCA and the Partner Authorities to assess and determine e emerging alternatives that meet current and future requirements.



15 Trafford Council Comments on Planning Data and Committed Developments

15.1 Planning

15.1.1 This section and the table below provides Trafford's response on the Planning Data identified within Volume 5: Appendix Ct-004000000_Part 2 M102. The appendix highlights the committed and proposed planning applications and development plan allocations which have been used in the baseline assessment for the Environmental Impact Assessment within the Environmental Statement (ES).

15.1.2 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.

Committed & Proposed Development

15.1.3 Volume 1 of the ES defines committed developments in Paragraph 7.4.2 (page 163) as:

"Developments with planning permission and sites allocated for development, or safeguarded for minerals in adopted development plans, on or close to the land required for the proposed scheme [.] Developments expected to be completed between 2025 and 2038 (i.e. before the Proposed Scheme is operational), may give rise to cumulative effects [.] People living in developments to be completed before 2025 are included as receptors of construction of the Proposed Scheme and those in developments to be completed before 2038 are included as receptors of the operational development"

15.1.4 Paragraph 7.4.7 in Volume 1 of the ES (Page 164) states:

"planning applications yet to be determined and sites where proposed allocations in development plans are yet to be adopted, are termed proposed developments and have not been included in the assessment. However, the progress of these proposals will continue to be monitored by HS2 Ltd until Royal Assent"



- 15.1.5 1.1.4 Trafford have a number of concerns with the data identified, specifically that it is unclear how the ES has concluded the anticipated completion dates for each development and have provided no explanation or commentary on why the cut-off point of the 30 November 2020 was chosen, or any criteria for the applications identified.
- 15.1.6 This length of time between the data cut off point and the publication of the ES, 15 months apart, is considered to be significantly outdated. Whilst Trafford appreciate that there will always be a data cut off point and a delay between this and publication this time lag has seen a number of applications excluded from the listings. Trafford request that HS2 review and update this baseline appropriately to reflect the current up to date position.
- 15.1.7 Trafford have identified that a number of relevant and significant approved applications which fall within the specified base date have not be included. These are detailed within the table below. Trafford request that HS2 review and update this baseline appropriately to reflect the current position.
- 15.1.8 Trafford is particularly concerned that Place for Everyone Plan (PfE) and draft allocations, are omitted from ES and the planning data. The draft allocations in Trafford are of particular relevance to HS2 and should be included within the baseline data.
- 15.1.9 For community area MA04 the New Carrington proposed allocation (PfE Strategy Policy JP Allocation 33, pages 356-363) which is likely to come forward for development within the same time period as HS2, is particularly important. It will likely have considerable implications in terms of highways, air quality, impact on residential amenity and other planning matters which need to be considered in conjunction with HS2.
- 15.1.10 Similarly, for community area MA06 the Timperley Wedge proposed allocation (PfE Strategy Policy JP Allocation 3.2, pages 244-249) which is likely to come forward for development within the same time period as HS2 is also critically important. It too, will likely have considerable implications in terms of highways, air quality and other planning matters which need to be considered in conjunction with HS2.
- 15.1.11 It is therefore considered that both the proposed New Carrington and Timperley Wedge allocations will be operational receptors during the HS2 construction period.
- 15.1.12 A review of the Community Area Reports has found there are no developments listed which inform the assessment of the operational phase of development.



Notwithstanding these omissions, relevant proposed developments should be recorded and tracked throughout the duration of the evolution of the ES up to the Hybrid Bill achieves Royal Assent. At this stage, the baseline should be reviewed and appropriate analysis and assessment conducted to determine the true baseline and HS2 should engage with local planning authorities to ensure that a robust planning data baseline is achieved.

- 15.1.13 **Trafford Council require HS2 Ltd to demonstrate, clearly and in detail, how it would take into account both committed and proposed developments at the point of Royal Assent. Trafford Council would expect HS2 Ltd to re-assess all relevant environmental topic technical assessments, taking into account updated baseline planning data. Trafford Council would expect HS2 Ltd to provide the results of these updated assessments and work, in collaboration, with Trafford Council and other GM Partners in agreeing any additional or altered mitigations required following the outcomes of the updated assessments.**
- 15.1.14 Trafford Council do not accept that draft allocations contained within the Places for Everyone (PfE) strategy have been omitted. Whilst Trafford Council understand and recognise the PfE strategy was published for public consultation on 8th August 2021, the majority of the draft policies and allocations contained within were carried over from the former Greater Manchester Spatial Strategy (GMSF). The draft versions of the GMSF were published in 2016, 2018 and in October 2020 and relevant allocations from this are also absent from the ES.
- 15.1.15 **Trafford Council requires HS2 Ltd to ensure that due regard and consideration of the relevant policies and draft allocations contained within the PfE strategy is given to future environmental assessments, given its long term and strategic importance to the city region as a whole, including; Timperley Wedge Policy JP Allocation 3.2, New Carrington Policy Allocation JP 33; MediPark Manchester Policy JP Allocation 3.1; Global Logistics, Manchester Policy JP Allocation 10; and North of Irlam Station Policy JP Allocation 28.**
- 15.1.16 Other matters pertinent to community areas MA04 and MA06 are set out in turn in the following tables.

15.2 MA04 – Broomedge - Glazebrook

Table 15.2-1

Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
Volume 5: Appendix Ct- 004000000_Part 2 M102	5.1	5.1.1	<p>The draft allocations contained within the Places for Everyone (PfE) strategy have been omitted. Whilst it is understood and recognised the PfE strategy was published for public consultation on 8th August 2021, after the planning data cut off point, the majority of the draft policies and allocations contained within were carried over from the former Greater Manchester Spatial Strategy (GMSF). The draft versions of the GMSF were published in 2016, 2018 and in October 2020 and relevant allocations from this are also absent from the ES.</p> <p>Likely Impact Wider implications for the New Carrington Allocation of PfE in terms of impact on infrastructure.</p>	That HS2 to review the PfE strategy and appropriately incorporate it into the ES given its long term and strategic importance to the city region. Failure to do so invalidates the ES assessment and will be detrimental to the allocations and PfE Strategy.
Volume 5: Appendix Ct- 004000000_Part 2 M102	5.2	5.2.1	<p>Issue/Concern Cut off point of 30 November 2020 appears to provide a significantly out dated list of applications and therefore an inaccurate baseline. The 15 month gap between this list being compiled and the bill being deposited. No reasoning or justification appears to have been provided to support this.</p>	That HS2 should review the cut-off point and include more accurate data.



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			Likely Impact The baseline date is out of date therefore the EIA does not assess the current position.	
Volume 5: Appendix Ct- 004000000_Part 2 M102	5.2	5.2.1	Issue/Concern Inclusion of irrelevant applications in the Appendix section. Lack of clarity as to what and why specific applications were included in the Appendix data. No parameters or criteria (distance from alignment, scale etc) are specified as to why applications are listed. Building on this the comments section offer minimal and in some cases no explanation as to if they are included within the main assessment or not. Numerous small scale applications included within appendix list of committed and proposed developments, which will have no bearing or will be implemented well in advance of the construction of HS2 Phase 2b. Likely Impact Potential for applications to be included in the baseline data that are not relevant and for one which are to be missed.	That HS2 should clarify the approach and criteria used to identify the relevant applications and amend planning data accordingly
Volume 5: Appendix Ct- 004000000_Part 2 M102	5	Table 1 D	In relation to MA04/003 - Carrington Relief Road this scheme will be implemented and should form part of the baseline assumption. The provision of this Infrastructure is key to the Council realising its aspiration for the Carrington Strategic Location within the Trafford Core Strategy Policy SL5, in addition to the proposed allocation of a wider area New Carrington in the PfE plan.	That HS2 include this development within the baseline and appropriately incorporate it into the ES



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			<p>Likely Impact</p> <p>This route is already at, or very near, capacity as indicated by the junction modelling. The LHA are extremely concerned by the volume of additional traffic proposing to use this route, the effect on the existing junctions, and the impact on the village of Partington.</p> <p>Congestion, there is a significant volume of construction traffic and a long period of time over which this will be experienced.</p> <p>See also Traffic and Transport Comments in Chapter 3 for MA04.</p>	
Volume 5: Appendix Ct- 004000000_Part 2 M102	5	Table 1 D	<p>Issue/ Concern</p> <p>MA04/105 - Reserve matters application 100110/RES/20 along with full planning application 100109/FUL/20 were granted in Jan/March 21 for this site and an adjacent site to deliver 449 new homes these two applications should be included within the proposed development list. They are incorrectly included within the proposed development list for community area MA06 refs MA06/P/03, and MA06/P/04.</p>	That HS2 include this development within the baseline and appropriately incorporate it into the ES
Volume 5: Appendix Ct- 004000000_Part 2 M102	5	Table 1 D	<p>Issue/ Concern</p> <p>MA04/121 this scheme is being implemented.</p>	That HS2 remove this development from the baseline assessment.



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
Volume 5: Appendix Ct- 004000000_Part 2 M102	5.2/5.3	Table 1 D & Table 2 D	Issue/ Concern The planning data omits of the Carrington Strategic Location for Development (as designated under Policy SL5 of the Trafford Core Strategy). The proximity of Carrington to the proposed alignment, paired with the level of development the Policy proposes (1,560 dwellings, 75 hectares employment land, community facilities, new road infrastructure by the end of the plan period 2025/26), would have significant implications on the baseline and assessments of the impacts in this area. There are also a number of large developments which hold planning permission within the strategic location which have not been included namely 88439/HYB/16 for <i>“Hybrid application comprising: - a) Application for full planning permission for the demolition of existing buildings and structures, re-contouring of the site to form development platforms, new access(s) off Manchester Road to serve residential, employment, retail/health development and new emergency access(s) off the A1 private road to serve employment development, improvements to the A6144 Manchester Road/Flixton Road/Isherwood Road junction and the A6144 Carrington Lane/Carrington Spur/Banky Lane junction; b) Application for outline planning permission for the construction of up to 725 dwellings, erection of up to 46,450sq m employment floorspace (Use Classes B1/B2/B8), erection of up to 929 sq m of retail (Use Class A1)/ health (Use Class D1) floorspace, creation of public open space, rugby pitch relocation along with new training pitch,</i>	That HS2 include this allocation and these developments within the baseline and appropriately incorporate it into the ES. HS2 should be required to engage with partner authorities to provide and establish a robust baseline of planning data.



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			<p><i>erection of replacement rugby clubhouse, replacement car park for retained parts of Carrington Business Park, drainage principles, landscaping and ecological works, noise mitigation measures, electrical sub stations, pumping stations, car parking and vehicle, cycle and pedestrian circulation”; & 94949/HYB/18, Hybrid application comprising: - a) Application for full planning permission for the clearance and remediation of the existing site and the erection of 148 dwellings with access from Broadway and associated works including the provision of internal estate roads, parking and turning circle, landscape works (including provision of public open space, tree clearance/replacement/woodland management and ecological management), electrical sub-station, and sustainable urban drainage works; and, b) Application for outline planning permission for the erection of up to 452 dwellings with access from Broadway and associated works including the provision of internal estate roads and parking, landscape works (including provision of public open space, tree clearance/replacement/woodland management and ecological management), electrical sub-stations, and sustainable urban drainage works drainage principles’ both these permissions should be included within the baseline assumptions. It is noted that application 94949/HYB/18 is identified within the proposed development reference MA04/P/03.</i></p>	

Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			<p>Impact</p> <p>The omission of applications leads Trafford to question the processes used to identify the applications included in Volume 5 Planning data lists, as well as the robustness, accuracy and validity of the overall planning data used to inform the baseline of the ES.</p>	

15.3 MA06 Hulseheath to Manchester Airport

Table 15.3-1

Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
<p>Volume 5: Appendix Ct- 004000000_Part 2 M102</p>	7.1	7.1.1	<p>The draft allocations contained within the Places for Everyone (PfE) strategy have been omitted. Whilst it is understood and recognised the PfE strategy was published for public consultation on 8th August 2021, after the planning data cut off point, the majority of the draft policies and allocations contained within were carried over from the former Greater Manchester Spatial Strategy (GMSF). The draft versions of the GMSF were published in 2016, 2018 and in October 2020 and relevant allocations from this are also absent from the ES.</p>	<p>That HS2 to review the PfE strategy and appropriately incorporate it into the ES given its long term and strategic importance to the city region. Failure to do so invalidates the ES assessment and will be detrimental to the allocations and PfE Strategy</p>



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			Likely Impact Wider implications for the Timperley Wedge Allocation of PfE in particularly with regards to highway capacity and other infrastructure impacts.	
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	7.2.1	Issue/Concern Cut off point of 30 November 2020 appears to provide a significantly out dated list of applications and therefore an inaccurate baseline. The 15 month gap between this list being compiled and the bill being deposited. No reasoning or justification appears to have been provided to support this. Likely Impact The baseline date is out of date therefore the EIA does not assess the most up to date position.	That HS2 should review the cut-off point and include more accurate data.



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	7.2.1	Issue/Concern Inclusion of irrelevant applications in the Appendix section. Lack of clarity as to what and why specific applications were included in the Appendix data. No parameters or criteria (distance from alignment, scale etc) are specified as to why applications are listed. Building on this, the comments section offer minimal and in some cases no explanation as to if they are included within the main assessment or not. Numerous small scale applications included within appendix list of committed and proposed developments, which will have no bearing or will be implemented well in advance of the construction of HS2 Phase 2b.	That HS2 should clarify the approach and criteria used to identify the relevant applications and amend planning data accordingly
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	Table 1 F	Issue/Concern PfE will include an allocation for Trafford to the northeast of the MA06 community area called Timperley Wedge. This allocation will use and rely on the same infrastructure as the airport station - this should be included within the baseline assumptions as the delivery period will be concurrent with the delivery of HS2 Phase 2b and the implications from HS2 for this allocation are significant. This will be cross referenced in the highways response.	That HS2 include PfE allocations in baseline assessments and cross reference with highway comments.
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	Table 1 F	Issue/Concern MA06/262 - appears to relate to the extension of the metrolink to Davenport Green. There should be sufficient information available to	That HS2 include PfE allocations in baseline assessments and cross



Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			HS2 to include within the baseline - see further comments in the highways section.	reference with highway comments.
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	Table 1F	<p>Issue/Concern MA06/P/03 & MA06/P/04 - both application sites are some significant distance from the MA06 Community Area and are more relevant to MA04. Both applications now have permission and are being implemented. They are not included within the list of either committed or proposed developments for Community Area MA04.</p> <p>Impact The omission and incorrect listing of applications leads Trafford to question the processes used to identify the applications included in Volume 5 Planning data lists, as well as the robustness, accuracy and validity of the overall planning data used to inform the baseline of the ES.</p>	That HS2 amend planning data chapter accordingly and update map area impact assessments
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	Table 1 F	<p>Issue/Concern MA06/P/06 - as above are in closer proximity to MA04 and are not included within the proposed development for that community area.</p>	That HS2 amend planning data chapter accordingly and update map area impact assessments
Volume 5: Appendix Ct- 004000000_Part 2 M102	7.2	Table 1 F	<p>Issue/Concern No reference to the wider Manchester Airport expansion plans within the planning data and made no mention of the Manchester Airport Sustainable Development Plan, which was published in 2016.</p>	That HS2 to amend planning data chapter accordingly and update map area impact assessments



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

Document	Section/ Map Number	Para/ Page	Comment	TMBC Requirement
			Likely Impact Significant increased impact on the highway network within the area and likely to coincide with the delivery and construction of HS2.	



15.4 Conclusion

15.4.1 In conclusion Trafford have a number of concerns related to the Planning Data that HS2 have gathered to underpin the ES. These have been detailed above, however, in summary the key issues are:

- Trafford require that HS2 provide clarification of the methodology used to determine the development delivery timescales.
- Trafford require clarification on what criteria or parameters were used to identify applications which would be relevant and included within the baseline.
- Trafford require that the published committed developments and proposed developments need to be revisited by HS2. The current list excludes major applications of significance, include entries and applications which are of no relevance to the proposed development. A key point of concern is the exclusion of the Places for Everyone strategy from the Proposed Developments section of the ES. Trafford will work with HS2 to identify applications of relevance to ensure a robust baseline.
- Trafford are concerned that the exclusion of the draft allocations contained within the PFE strategies, and the policies contained within the plan, and require HS2 to review and include within the ES as appropriate. The same applies to the Manchester Airport Sustainable Development Plan. Trafford require HS2 to take these into account in the ES.



16 Trafford Council Comments on Wider Effects Report

- 16.1.1 This chapter specifically details the Trafford Council consultation response comments in respect of issues and requirements which have been identified within the Wider Effects Report document (CT-006-00000).
- 16.1.2 Text within this chapter which has been presented in **bold**, highlights Trafford Council requirements.
- 16.1.3 The Report titled “Wider Effects Report” is a misnomer. It does not relate to the wider effects of the Proposed Scheme. Instead it purports to describe the potential worst-case effects from changes in alignment that are allowed for through the hybrid Bill.
- 16.1.4 The ES contains mapping within Volume 2 and environmental map books, which shows the Proposed Scheme on the centre line for the permanent works. Limits of Deviation (LOD) shown on the Parliamentary plans and sections described in the hybrid Bill, define an envelope within which the Proposed Scheme may deviate as may be required following detailed design. The report describes the extent of permissible deviation as:
- “laterally to any extent within the limits of deviation for that work, as identified on the Parliamentary Plans;*
- *vertically downwards to any extent from the level shown on the Sections; and*
 - *vertically upwards to any extent not exceeding three metres from the level shown for that work on the Sections, **except for** stations, depots or ventilation (intervention) shafts for which specific limits are shown.”*
- 16.1.5 The Wider Effects Report seeks to describe whether deviating the alignment or level of the route within these statutory limits would alter the significant predicted effects reported elsewhere in the ES or create new or different significant effects.
- 16.1.6 HS2 state that a sensitivity analysis has been undertaken to identify where along the route, such spatial changes are feasible and that they have then assessed the environmental implications of such changes.
- 16.1.7 Firstly, a sensitivity analysis would be based around and refer to the findings of the analysis of the proposed alignment. Flaws in the main analysis will therefore translate into the sensitivity analysis, rendering it inaccurate.



- 16.1.8 Secondly, Consultees have not been furnished with the details of the sensitivity analysis sufficient to enable checking. **HS2 Ltd should therefore be required to provide Trafford Council with the analysis and data describing the LOD sensitivity analyses to enable adequate checking of the accuracy of that exercise.** Without that information, Trafford Council has in effect not been consulted.
- 16.1.9 The third issue is that deviations in level or alignment will have consequential effects which will not be captured by assessing just one or several aspects. For example the Report describes assessment of visual impacts arising from raising the line level by 3m but it is unclear whether HS2 have then also assessed the associated aspects of more material import, more carbon, more agricultural land take, less room for mitigation etc. That level of assessment is required in order to establish suitable mitigation or indeed if mitigation is feasible. There is also the issue that where a change in significance is reported, the reader is not advised of the degree of change e.g. from moderate to major adverse. **HS2 Ltd must therefore be required to undertake this assessment and set out degree of change, with particular attention to the consideration of the cumulative impacts.**
- 16.1.10 HS2 state that where information may be incomplete, their assessment has been based on a precautionary approach using worst case assumptions. No evidence has been presented to substantiate that claim. Instead, Consultees are presented with a description of just the areas where HS2 say there will be significant effects. **HS2 Ltd must be required to demonstrate that they have assessed worst case assumptions to a sufficient level of detail to allow Consultees to verify that claim.**
- 16.1.11 HS2 state at paragraph 1.2.4 (Page 3) that *“Locations where amendments to the alignment within the statutory LOD are judged not to give rise to new or different predicted significant effects are not considered further in the report.”*, but there is no evidence or descriptions of how such *“judgements”* have been defined.
- 16.1.12 In contrast to the HS2 claim that they have assessed the worst case, they then clearly confirm that not to be the case, as set out in their paragraph 1.4.5 (Page 4). There, HS2 state:

“Following any change in alignment within the LOD, further detailed modelling would be undertaken to confirm the predicted noise effects described in this report. If significant effects are confirmed, suitable mitigation, such as in the form of noise barriers, would be provided within



the LOD. With this mitigation in place, no additional residual significant noise effects are considered to be likely.”

16.1.13 That paragraph confirms:

- That necessary modelling of effects has not actually been undertaken yet
- That HS2 do not yet know whether there will be significant effects,
- That if significant effects are found, HS2 simply presume that suitable mitigation will be feasible and will be deliverable within the LOD/LLAU.
- That HS2 also presume that the unassessed mitigation will suitably mitigate the unassessed significant impacts.

16.1.14 That demonstration of how worst-case effect haven't been assessed also illustrates why there should be no confidence in the HS2 claim that they have "judged" where there will or won't be significant effects.

16.1.15 Paragraph 1.4.6 (Page 4) repeats this flawed approach in respect of tunnelled sections but stops short of presuming that mitigations will address the impacts. In the case of tunnelled alignment changes, the matter is put no more strongly than "*reasonably practicable steps will be taken to mitigate significant effects*" Trafford Council cannot accept a position where HS2 have not assessed impacts and do not commit to mitigate significant impacts when they occur. **HS2 Ltd must be required to provide the details of sufficient assessments of worst-case impacts to demonstrate that suitable mitigations have been derived. HS2 Ltd must be required to demonstrate that proposed mitigations are deliverable.**

16.1.16 HS2 state that the changes to the predicted effects in this report have considered residual effects only (i.e., allowing for the adoption of mitigation). They therefore make the assumptions above on the efficacy of mitigations. They do not go on to consider the environmental impacts of the mitigations themselves, such as the visual impacts of 4m high sound barriers, which could be 3m higher. Nor do the assessments address the impacts during the construction phase of the potential deviations within the LOD. **HS2 Ltd must be required to assess the impacts of the proposed mitigations and of the consequential impacts of delivering those mitigations. HS2 Ltd must be required to provide the data and analysis to enable checking of the accuracy of that exercise.**



- 16.1.17 Presenting evidence of the impacts of HS2 within the latitude afforded by the LOD should have been straightforward. An assessment of the route at its highest on one lateral extremity of the LOD, then on the other extreme, then of the proposed route. No data or analyses on any of those scenarios has been presented.
- 16.1.18 The Wider Effects Report contains section 1.3 “Environmental Minimum Requirements” which states the purpose of ensuring that environmental impacts do not exceed those assessed in the ES. That is indeed a necessary requirement, but it will be unenforceable since the impacts have not been fully or clearly quantified.
- 16.1.19 Paragraph 1.3.4 (Page 3) appears to set an even more rigorous requirement to reduce reported impacts but the extent to which that could be enforced in practice is very limited. HS2 state *“The EMR will also impose a general requirement on the nominated undertaker to use reasonable endeavours to adopt measures to reduce the reported adverse environmental effects, provided that this does not add unreasonable cost or delay to the construction or operation”*. Put plainly HS2 offer a requirement to reasonably try to reduce the unquantified levels of impact so long as it doesn’t cost more or take more time. **HS2 Ltd must be required to remove the latitude in that open and arguably unenforceable undertaking and ensure that EMR criteria are not breached.**

16.2 Assessment of Likely Significant Effects – MA04

Landscape and Visual

- 16.2.1 Trafford Council agree with the statement in paragraph 2.5.1 (Page 13) that raising the vertical alignment of the Warburton cutting and Warburton Embankment by up to 3m would increase the visual effects for a number of viewpoint locations resulting in higher levels of significant effect. The Year 15 and Year 30 Landscape and visual effects upon the Warburton area are generally assessed (within the ES) as significant and adverse during construction, at Year 1 and at Year 15. It is considered that in some cases, significant effects will prevail at Year 30.
- 16.2.2 Raising the level of the vertical alignment through this section could increase the level of effect from Minor to Moderate Adverse or from Moderate to Major adverse, it is not clear whether HS2 have properly thought through all the environmental topics e.g. raising by 3 metres potentially means more material import, more carbon, more agricultural land take, less room for mitigation etc. and the impact of doing so is not currently known. There is also the issue that where a change in significance is reported, the degree of change is unknown e.g., from moderate to major adverse



- 16.2.3 Paragraphs 2.5.3 and 2.5.4 (Page 14) state that, for the Warburton cutting and embankment, raising the height of the proposed scheme by 3m would give rise to increased visual effects. It does not state the magnitude of change, just that the effects would all become '*new and different (increased) significant effects*'. It is not explained for each viewpoint, only addressed generally. It does not address landscape effects.
- 16.2.4 The same is true of Paragraph 2.5.6 (Page 15) which states that raising the vertical alignment of the Manchester ship canal viaduct and Glazebrook embankment south by 3m would increase the predicted significant landscape effects to the landscape character area and introduce a new significant visual effect on adjacent communities. **HS2 Ltd must be required to assess potential landscape effects and provide further detail on visual effects assessment.**

16.3 **Assessment of Likely Significant Effects – MA06**

Landscape and Visual

- 16.3.1 There are no comments on landscape and visual issues for MA06 within the Wider Effects report within Trafford or indeed within the GMCA Area.
- 16.3.2 However, should lateral or vertical deviations of the route occur that would affect Trafford or the GMCA area, a reassessment is likely to be required.

16.4 **Conclusions**

- 16.4.1 The Wider Effects Report gives advance notice that environmental impacts are likely to be worse than those which are described in the other ES chapters.
- 16.4.2 HS2 will have the ability to deviate the line and level of the Proposed Scheme within their limits of deviation, and whilst the wider effects Report states that it seeks to apply a precautionary approach using worst case assumptions, this is clearly not the case.
- 16.4.3 HS2 state that they have assessed only locations where they judge those amendments to the alignment are likely to have a significant effect but offer no information on how that judgement has been reached.
- 16.4.4 Paragraph 1.2.5 states that the changes to the predicted effects have been considered in terms of residual effects only i.e. post construction and post mitigation. There is an assumption that the envisaged mitigation will be effective,



but HS2 state that in some cases the assessments of impact have not yet been undertaken to inform type and extent of mitigation. There is also neither assessment of construction impacts nor of impacts over the many years prior to mitigation being in place and/or effective.

- 16.4.5 HS2 have not assessed the knock-on consequential effects of providing different mitigation such as 3m higher embankments and raised noise barriers.
- 16.4.6 HS2 are fully aware of their Limits of Deviation and should have provided assessments and model data to describe the impacts arising from varying the Proposed Scheme across those limits.
- 16.4.7 They have chosen not to do so, making it impossible for Trafford Council to comment upon the likely potential effects which are acknowledged by HS2 to be worse than those of the current Proposed Scheme.
- 16.4.8 **HS2 Ltd must provide the worst-case modelling assessments so that the impacts arising from varying the alignment and level of the route within the allowable limits of deviation can be assessed.** Without this, HS2 has not identified likely impacts and Trafford Council has not been adequately consulted.
- 16.4.9 **HS2 Ltd must be required to ensure that robust controls are introduced to ensure that Environmental Minimum Requirements are met and adhered to.** The current HS2 suggestion to use reasonable endeavours, so long as there are no unreasonable cost or delay implications is insufficient and unenforceable.
- 16.4.10 **HS2 Ltd must be required to consult Trafford Council and the Greater Manchester Authorities on the 'wider effects' and/or likely impacts of the Limit of Deviation prior to the conclusion of the detailed design for the Proposed Scheme.**



17 Trafford Council Comments Cross-Topic Technical Appendices - Borrow Pit Report

17.1 Introduction

17.1.1 This chapter provides a brief summary of information presented in the Borrow Pit Report (Volume 5: Appendix CT-008-00000).

17.1.2 To construct the Proposed Scheme, the aim of HS2 is to maximise the reuse of excavated materials, limit the import of materials and reduce the export of surplus materials. This report considers the use of alternative sources such as borrow pits, where the amount of acceptable material available through reuse is insufficient.

17.2 Summary

17.2.1 The presence of natural halite (salt) deposits within the geological bedrock crossed by the Proposed Scheme between Warmingham and Hoo Green has informed a design decision to minimise the number of cuttings in this area. This has resulted in a significant deficit of engineering material in the Community Area MA02. The location therefore of a limited number of borrow pits within the MA02 area will provide the acceptable materials required to support the construction of the Proposed Scheme. The Borrow Pit report provides an appraisal of potential borrow pit locations within the MA02 area and their potential impacts.

17.2.2 As the potential borrow pit locations are within the MA02 area, they do not directly impact Trafford Council of GMCA and therefore comments on the appropriateness of the borrow pit locations have not been provided.

17.2.3 Should HS2 decide upon alternative locations within the Trafford Council or GMCA community areas of MA04-MA08 then this information will be reviewed and subsequently commented upon.



TRAFFORD
COUNCIL

HS2 Phase 2b Environmental Statement Consultation

High Speed Rail – Phase 2b Western Leg Environmental Statement Consultation

Chapter 7

Section 18: Summary and Conclusions



18 Summary and Conclusions

- 18.1.1 HS2 Phase 2b, along with Northern Powerhouse Rail (NPR), is key to the future success of Greater Manchester and the North, and an essential part of the levelling up agenda. Trafford Council has consistently supported HS2 Phase 2b, whilst maintaining its position that the proposals developed need to be delivered in a way that complements the local objectives of the places they serve.
- 18.1.2 Trafford Council welcomes the opportunity to respond to the Environmental Statement (ES) and Equality Impact Assessment (EQIA). Our responses to both those documents should be read together.
- 18.1.3 For the purposes of this response, the reference “GM Partners” is a collective term to refer to: the Greater Manchester Combined Authority (GMCA); Transport for Greater Manchester (TfGM); the directly affected Greater Manchester Local Authorities – primarily Manchester City Council (MCC) and Wigan Metropolitan Borough Council (WBC), and Manchester Airports Group (MAG).
- 18.1.4 This report should be read in conjunction with the consultation responses from the individual GM Partners. This Trafford Council response provides consolidation of views and issues in the context of Trafford policies and strategies for the future.
- 18.1.5 Trafford Council have adopted a highly collaborative approach to working and in reviewing the ES and EqIA involving over 100 experts and advisors from across the GM Partners. GM Partners have mobilised and collaborated to a pre-defined plan to meet the short consultation deadlines.
- 18.1.6 Trafford Council and GM Partners reiterate the importance of a truly collaborative approach to the delivery of the HS2 Phase 2b Proposed Scheme, particularly where there are major interfaces between schemes and developments. Failure to work effectively in a joined up, transparent manner will significantly increase – unnecessarily in Trafford Council’s view - cost and programme risk for the HS2 Phase 2b programme.
- 18.1.7 Text within this chapter which has been presented in **bold**, highlights points of contention and Trafford Council requirements.

18.1 Summary of the ES Review

- 18.1.1 Following review of the ES, Trafford Council considers that overall, the HS2 Phase 2b Crewe to Manchester’s ES fails to meet the requirements of the 2017 EIA



Regulations. Issues identified include the method of assessment, the lack of baseline information, the impact assessment and the suitability of mitigation and monitoring measures.

- 18.1.2 Other issues identified relate to the lack of consideration of several committed developments, the assessment of flexibility within the scheme design, deficiencies in the method for the assessment of alternatives and a lack of information on the totality of impacts at individual receptors.
- 18.1.3 The main purpose of an EIA is to report on likely significant effect to inform decision making. The ES falls short of this purpose. These deficiencies within the ES have resulted in an inability to understand the significance of environmental effects of the Proposed Scheme and the appropriateness of proposed mitigation measures. Making decisions on information currently presented in the ES is unacceptable and therefore HS2 Ltd should be required to provide additional environmental information to inform decision making and address the deficiencies identified in the ES.
- 18.1.4 The ES review has also considered the impacts of the Proposed Scheme in relation to GM Partners policies and plans which transpose national legislation. The proposals generally fail to accord with these policies. HS2 Ltd should ensure HS2 Phase 2b aligns and complies with these policies including those in relation to clean air, biodiversity net gain, bus priority, active travel, local employment and carbon.

18.2 **Critical Design Issues**

- 18.2.1 As a result of the inadequacies within the ES critical design issues remain to be addressed as the Bill proceeds. An outline of those critical issues for HS2 is provided below:

MA04: Broomedge to Glazebrook

- Address visual impact, noise and severance including at Warburton and Partington, particularly those associated with the routes elevated alignment.

MA06: Hulseheath to Manchester Airport

- Provide Metrolink connection at Manchester Airport, design to take into account latest Metrolink alignment, address shallow cutting effects at Manchester Airport's high-speed station, account for future planned developments, make provision for public transport and active travel.



- Mitigate effects of Sunbank Lane temporary closure including for residents at Ringway and avoid major disruption to the Global Logistics Hub.
- Further investigate a conveyor / railhead system to transport spoil from the Manchester Airport area.
- Further investigate alternative highways designs (including provision for active travel and public transport) for Junctions 5 and 6 of the M56 which will be fit for purpose in accommodating planned and committed developments in the area, HS2 traffic and airport growth.

18.3 **MA04 Broomedge to Glazebrook Conclusions**

18.3.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA04 have not given fully considered Trafford MBC's local planning policy and as such the Environmental Statement is considered to lack the required detail for Trafford Council to provide support for the scheme.

18.3.2 Furthermore, each of the assessments outlined above has given no consideration of the proposed limit of deviation which would materially affect a number of the assessments namely, Landscape and Visual, Historic Environment, Ecology, Noise and Human Health. Trafford Council consider that the true impact of the scheme can only be assessed where a definitive line has been proposed.

18.3.3 A summary of the key points raised in each of the above sections is provided below:

Agriculture, Forestry and Soils

18.3.4 Protection is required to ensure that impacts on the best and most versatile agricultural land and peatlands are in the first instance avoided, and second suitably mitigated. Without a thorough assessment of the adverse impacts of the Proposed Scheme on these soils and their functions, the potential for any losses is likely to be significantly downplayed. A number of agricultural and rural non-agricultural businesses will also be affected. These impacts need to be understood on a case-by-case basis for both the construction and operational phases of the Proposed Scheme.



Air Quality

- 18.3.5 Justification is required as to why monitoring locations have not been accurately verified. There are concerns that some monitoring locations are being under predicted. Additional monitoring and verification is therefore required which meets the guidance contained within DEFRA TG(16), and is undertaken in consultation with Trafford Council.

Community

- 18.3.6 Compensatory schemes should be provided for lost woodland in addition to, improvements to footpaths and signposting, mitigation for affected residents and businesses during construction and operation, including compensatory funding, and provision of alternative space for lost community venues as well as support for local bus services.

Ecology & Biodiversity

- 18.3.7 Given the species & habitats assessments undertaken, and the lack of reference to the Environment Act, it is unclear whether the Proposed Scheme will deliver a minimum 10% biodiversity net gain within the community area. Without thorough assessments of the adverse impacts of the Proposed Scheme on species and habitats, the potential for any losses is likely to be understated. HS2 must therefore be required to engage with Natural England and accredited ecologists to ensure that no adverse impacts arise either during construction or operation. This will require HS2 and its contractors and undertakers ensuring that all appropriate mitigation and protection measures are implemented before construction begins and maintained through the construction phase.

Health

- 18.3.8 Trafford Council requires provision to include protected active travel infrastructure for new, diverted, reinstated routes. Proposed routes to be diverted should not be more commodious than original routes. Any future amendments to the Trans Pennine Trail or cycle networks should not be liable to flooding. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.



Historic Environment

- 18.3.9 The ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation.

Land Quality

- 18.3.10 There are a number of landfill / historic landfill sites in the community area which are thought to contain potentially hazardous waste. Site investigation data for contaminated land should therefore be made available to Trafford Council for review prior to any works commencing on potentially contaminated land sites. Any resultant remediation requirements should be agreed with the regulator and Trafford Council. There are also six Mineral Safeguarding Areas for sand and gravel in the community area, three of which are crossed by the Proposed Scheme. Further clarification is required on how the sensitivity values were calculated, and the mitigation proposed to protect this resource.

Landscape & Visual

- 18.3.11 Limited engagement has been undertaken with Trafford Council in the preparation of the Landscape and Visual Impact Assessment for the community area. The assessment identifies significant effects on the River Bollin Meadowland and Warburton Settled Sandlands Landscape Character Areas (LCAs). Trafford Council also considers the Dunham Woodhouses Settled Sandlands LCA will be significantly affected, however this is not included in the assessment.
- 18.3.12 There are also concerns about the viewpoint locations used across the community area and the inconsistent approach to photomontages. Some of the assessment of the effects at construction and Year 1 for the River Bollin Meadowland and Warburton Settled Sandlands LCAs are disagreed with, and there are questions as to whether the effects on landscape character could be mitigated to any extent by the proposed planting in the Warburton Settled Sandlands LCA.



- 18.3.13 The HS2 route will also result in landscape severance between Warburton Village and Moss Brow, and there are concerns about the impact of views from public rights of way and the Trans Pennine Trail with very limited mitigation proposed.

Socioeconomics

- 18.3.14 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.
- 18.3.15 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.
- 18.3.16 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

Sound Noise and Vibration

- 18.3.17 Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works.
- 18.3.18 Clarity is required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.

Traffic & Transport

- 18.3.19 The primary impact on traffic and transportation of HS2 in the MA04 community area will be experienced during the construction period. Trafford Council require more evidence to be provided to show how the anticipated volumes of construction traffic will be accommodated on the highway network, particularly at



M60 J8, on the A6144 through the already congested junctions and through Partington.

18.3.20 Trafford Council also require detailed clarification and justification on the transport modelling data used, and the conclusions reached within the transport assessment. Contributions will also be sought towards both local public transport improvements and key highways likely to be significantly affected by the Proposed Scheme (including M60 J8).

18.3.21 Severance to the Village of Warburton, caused by the HS2 alignment will also need to be addressed for non-motorised users, and bus stops, and service information will need to be provided for bus users.

Waste

18.3.22 The proposals for the management of waste arising do not reference local policies within the Trafford Core Strategy. Further details of how waste is to be managed is required by way of a waste management plan.

Water

18.3.23 Further stakeholder engagement is needed. There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows

18.4 MA05 Risely to Bamfurlong Conclusion

18.4.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA05 have not given full consideration of the impacts on designated biodiversity sites nearby the proposed route or adequately modelled transport impacts of Places for Everyone strategic allocations, including the nearby New Carrington proposal.

18.4.2 A summary of the key points raised in each of the above sections is provided below:

Ecology

18.4.3 Trafford Council and its Partners will require assurance that the HS2 route will fully assess impacts on the Great Manchester Wetlands Nature Improvement Area or Manchester Mosses Special Area of Conservation (SAC). Where impacts are unavoidable, these should be mitigated for appropriately.



- 18.4.4 In particular, there is a concern that HS2 in its operational and construction phases may result in the loss of part of the tree belt that shields Holcroft Moss, within the Manchester Mosses SAC. Any loss is likely to have adverse impacts on air quality as emissions from traffic using the M62 will become more apparent.

Traffic and Transport

- 18.4.5 The Trafford Centre is already congested and any additional traffic in this area is likely to cause significant congestion. Junction 10 to the M60 also currently operates at capacity during peak times and the M60 already suffers with queuing traffic at peak times, so any additional traffic is of serious concern to Trafford Council.
- 18.4.6 Construction traffic HGVs operating along construction routes / to and from construction compounds are likely to substantially change in traffic flows in some locations. The ES confirms that there will be a 'major adverse effect' on traffic in some areas as a direct result of construction traffic.
- 18.4.7 Trafford Council would therefore request a review of the construction route to and from M60 giving particular emphasis to removing HS2 construction related traffic from WGIS and the Trafford Centre rectangle.
- 18.4.8 Trafford Council is also disappointed that the HS2 transport modelling used does not take into account future demands on the network from significant development proposals at New Carrington within Places for Everyone.

18.5 MA06 Hulseheath to Manchester Airport Conclusions

- 18.5.1 The preceding sections indicate that further consideration of both local and national planning policy for a number of the chapters is required. The proposals within MA04 have not given fully considered Trafford MBC's local planning policy and as such the Environmental Statement is considered to lack the required detail for Trafford Council to provide support for the scheme.
- 18.5.2 Furthermore, each of the assessments outlined above has given no consideration of the proposed limit of deviation which would materially affect a number of the assessments namely, Landscape and Visual, Historic Environment, Ecology, Noise and Human Health. Trafford Council consider that the true impact of the scheme can only be assessed where a definitive line has been proposed.
- 18.5.3 A summary of the key points raised in each of the above sections is provided below:



Agriculture, Forestry and Soils

- 18.5.4 Trafford Council is concerned that the loss of equestrian / livery land and facilities has not been fully recognised / considered in the ES. There is also a need for further clarity in relation to the soil assessment.

Air Quality

- 18.5.5 Trafford Council is concerned about the effects of poor air quality arising from the construction of HS2, including the significant number of vehicle movements associated with the various construction compounds in the Airport Station area. The modelled concentrations of particulate matter have not been subject to model verification and adjustment, which may result in under predicting of concentrations and sensitive receptors.
- 18.5.6 HS2 should provide further resources to Trafford Council to help mitigate the significant impact on communities in Trafford.

Community

- 18.5.7 Trafford Council is concerned about the significant and prolonged impact on communities in terms of local amenity and the environment. This will be particularly acute during the construction phase, but there will also be operational impacts for communities in the Hale area. HS2 must provide compensatory schemes to mitigate the impact, including provision of alternative space for lost community venues as well as support for local bus services.

Ecology & Biodiversity

- 18.5.8 Trafford Council is concerned about the unjustified loss of valuable habitats which have not been fully assessed in the ES. There are a number of SBIs in the area, as well as Davenport Green ancient woodland, which will be impacted by the scheme.
- 18.5.9 Regard should be had to Environment Act and its requirements for Biodiversity Net Gain in the MA06 community area. HS2 must ensure that all appropriate mitigation and protection measures are implemented before construction begins and habitat fragmentation should be avoided, where possible. In addition, advanced planting of selected mature and semi-mature native trees in combination with saplings must be agreed and provided at the earliest opportunity.



Health

- 18.5.10 Trafford Council is concerned about impacts on the health and wellbeing of communities in relation to air quality, noise and loss of open, peaceful space.
- 18.5.11 HS2 must have regard to active travel measures during both construction and operation of the scheme, the design of the station must prioritise active travel modes. HS2 must also provide clarification on the date used to determine who is eligible for noise insulation. There is also a need for funding for local health/community/leisure facilities to support construction workers, and a requirement to provide active travel infrastructure for redesigned junctions.

Historic Environment

- 18.5.12 In conclusion the ES does not adequately identify or assess the significance of designated and non-designated heritage assets affected by HS2. Without a thorough assessment it is not possible to fully understand the impact of construction and operation phases on the affected heritage assets nor propose appropriate remediation and mitigation principles to protect and/or enhance these heritage assets. This should also include appropriate recording where the loss of heritage assets cannot be demonstrably avoided. The design principles of all proposed infrastructure also need to be agreed with HS2 at ES stage in order to improve mitigation as well as a greater level of landscaping and full details of all noise and vibration mitigation

Land Quality

- 18.5.13 Trafford Council is concerned about the large amounts of potentially contaminated spoil which be stored and processed at the South Manchester Tunnelling Compound. The ES should also have regard to the Mineral Safeguarding Areas.
- 18.5.14 Further site investigations are required for contaminated land, with particular regards to former historic landfills. This should be set out in a bespoke Strategy. Any resultant remediation requirements should be agreed with the regulator and Trafford Council, confirmation of the mechanisms in place to ensure appropriate consultation with regulator is required.

Landscape & Visual

- 18.5.15 In conclusion, Trafford Council consider that insufficient detail has been provided on the reinstatement of planting and landscape proposals. Based on what is contained



within the ES, the harm would be significant. Assessments / viewpoints need revisiting at several locations and advanced planting is required. Significant additional compensation planting is needed at several locations, photomontages are needed for all phases and tree surveys are required.

- 18.5.16 Trafford Council consider there is a significant opportunity to provide advanced planting, well in advance of construction to give time for this to become established and to help mitigate some of the impacts. The design of the Manchester Airport Station must also have regard to the surrounding landscape.

Socioeconomics

- 18.5.17 The assessment of effects on the identified receptors is significantly inconsistent throughout the Community Area assessment, with the sensitivity of receptors selected without clear justification and often underestimated. Justification is therefore required for scoping out listed receptors, along with reassessment of the effects to receptors and appropriate mitigation.
- 18.5.18 Trafford Council expect HS2 Ltd to establish a brokerage and skills support approach to equipping the needs of HS2 during the construction and operational stages, to ensure any skills gaps and needs of the local population can be addressed. This will help enable residents of Trafford to take advantage of the varied employment opportunities both during and after the development phase of HS2.
- 18.5.19 Trafford Council must also receive financial compensation for the loss of any part of its business rate income caused by the construction and operation of the HS2 route that has caused businesses to fail or had a significant impact on their income. It is not expected that the Council should bear the financial consequences to the detriment of its residents and businesses.

Sound Noise and Vibration

- 18.5.20 In conclusion, Trafford Council require that further evidence is provided to ensure that modelled noise and vibration levels are accurate and do not underestimate the impact of any construction or operational works.
- 18.5.21 Clarity is required on the basis of all sound, noise, and vibration assessments along with proposals for mitigation measures and residual effects. This includes justifications for any deviations from the relevant standards, methods, or criteria.



Traffic & Transport

- 18.5.22 The traffic and transport impacts in the MA06 Community Area are significant both during construction and future operation.
- 18.5.23 The ES does not adequately assess the Traffic and Transport impact of the route and Manchester Airport Station, during both construction and operation. Without a thorough assessment, that includes background growth and proposed developments in the area, it is not possible to fully understand the impact of construction and operation phases.
- 18.5.24 Trafford Council, with GM Partners, have significant concerns about the proposed M56 Junction 6 design, as well as the proposed Hale Road gyratory. The design does not have sufficient capacity to support future growth and it would create a convoluted junction arrangement on Hale Road, impacting on Hale residents. Public transport and NMU access has not been fully considered in relation to proposed road layouts and access to the station.
- 18.5.25 Greater consideration needs to be given to sustainable transport access to the station. Metrolink should be operational from Day 1 and be fully integrated with the Station. There is also scope for a greater number of journeys by bus and active travel modes. Access to the station should also consider integration with the Timperley Wedge development site and linking with the transport infrastructure which is required to support this site, such as the Timperley Wedge Spine Road and active travel routes.
- 18.5.26 The impact of construction in this area will be significant, there are several major construction compounds all of which will be serviced by road access only and which propose to access the SRN via M56 Junction 6. HS2 should consider a conveyor / railhead option to remove HGV's from the network and provide a more sustainable means of bringing materials to / from the construction sites.

Waste

- 18.5.27 The proposals for the management of waste arising do not reference local policies within the Trafford Core Strategy. Further details of how waste is to be managed is required by way of a waste management plan.



Water

- 18.5.28 In conclusion, further stakeholder engagement is needed, particularly in regard to dewatering and potential disposal to Fairywell Brook. Trafford Council also require clarity on the maintenance and management of key drainage assets, including the inverted syphon and M56 highways culvert.
- 18.5.29 There is a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows

HS2 Airport Station

- 18.5.30 In conclusion, Trafford Council supports the principle of the HS2 Airport Station. However, the scale of the station will be significant and therefore careful design will be required to help mitigate impacts on the surrounding area. Trafford Council supports the previously considered 'deep cutting' option for the Airport Station which would provide significant benefits and help to address a number of the Council's concerns including, the visual impact of the station and ensuring the Station is well integrated with the Timperley Wedge development site.
- 18.5.31 The successful operation of the station will also require excellent sustainable transport links and the Council therefore requires the Metrolink to be operational from Day 1 and enhanced NMU access to the station.
- 18.5.32 HS2, NPR and Metrolink connectivity at Manchester Airport will require a fully integrated station solution, delivered by a funding strategy that it is in line with other HS2 airport stations (the station is currently unfunded within the HS2 and NPR budgets) and agreed by an integrated senior level review by government and local partners.
- 18.5.33 The preceding sections in this chapter detail the Trafford Council Consultation response on issues and requirements which are unique to Community Area MA04. To avoid repetition, the Trafford Council Consultation response also presents a Chapter titled "[Trafford Council Points raised to ES Consultation which are Common across Community Areas](#)" and those points should be taken as also applying in this Chapter.



18.6 Additional Mitigation and Compensation Requirements

18.6.1 Specific and detailed mitigation and compensation measures and requirements are set out in the responses to the Community Areas [MA04](#), [MA05](#) and [MA06](#) of this report.

18.6.2 However, following a review of the MA04, MA05 and MA06 Community Area Reports and Map Books and wider ES components, Trafford Council has identified that additional resources will be needed across the Council in order to support and facilitate the delivery of the HS2 Phase 2b Proposed Scheme as follows.

- 1) **HS2 Ltd must be required to provide additional resources to Trafford Council in accordance with the Information Paper C12: Local Authority funding and new burdens. This is essential in order to assist with the additional regulatory burden associated with dealing with complaints from members of the public, and regular liaison with HS2's selected contractors and associated S17 and S61 applications.** Without additional resources Trafford Council will be unable to efficiently expedite its existing regulatory duties and those arising from the Proposed Scheme.
- 2) **HS2 must be required to make funding available under the New Burdens Policy (Information Paper C12) to support Trafford Council in delivering mitigations.** Without additional resources Trafford Council will be unable to efficiently expedite the expected and/or required mitigation measures arising from the Proposed Scheme.
- 3) **HS2 must be required to provide financial compensation to provide additional and / or alternative space in close proximity to enable specific sport, physical activity and health and wellbeing activity to be delivered of an equal or better standard than exists at the time of temporary or permanent loss.** Without additional resources Trafford Council will be unable to provide the type, quantity and quality of facilities needed by the borough's residents.

18.7 Conclusion

18.7.1 Trafford Council welcomes and fully supports the Government's intention to progress with the proposed HS2 Phase 2b extension from Crewe to Manchester. We also welcome the Government's decision to incorporate provision for Northern Powerhouse Rail (NPR) within the designs for the HS2 hybrid Bill. Trafford Council believes that Manchester Piccadilly and Manchester International Airport are the optimum locations for HS2 and NPR stations, and welcomes the opportunity to work with HS2 and partners to develop these plans to ensure they are integrated with our



aspirations for Trafford and the airport areas to capitalise on the economic stimulus of the airport and its growth.

- 18.7.2 The Council recognises the significant potential that HS2 and NPR offers for economic growth in Greater Manchester (GM) and the North. And for the wider agenda for rebalancing the economy in the UK. It is essential that the opportunities afforded by HS2 and NPR are maximised.
- 18.7.3 In March 2018, Trafford Council, along with the GMCA and Manchester City Council (MCC) and input from Manchester Airport Group (MAG), published a comprehensive Growth Strategy for the stations at Manchester Airport and Manchester Piccadilly, which sets out how HS2 can have maximum impact through station planning; wider connectivity; full support for committed and new economic and residential growth and regeneration; and local skills and supply chain benefits.
- 18.7.4 Trafford Council, and our GM partners, will continue to engage with Government, HS2 Ltd and DfT to ensure the appropriate development of infrastructure and to seek opportunities to deliver Phase 2b in a way which is optimally integrated with NPR.
- 18.7.5 However, Trafford Council together with GM Partners have a number of critical issues and concerns about the construction and operation of the Proposed Scheme, and the level of information provided in the deposited Environmental Statement. Much work and collaboration will be needed to satisfactorily overcome these issues.
- 18.7.6 Notwithstanding this, Trafford Council and GM Partners welcome the opportunity to continue to engage with HS2 Ltd and DfT to develop the Proposed Scheme and associated plans to ensure they are integrated with both Trafford specific and the wider Greater Manchester aspirations whilst minimising the effects on local communities and environments.
- 18.7.7 Finally, Trafford Council and GM Partners reiterate the importance of a truly collaborative approach to the delivery of the HS2 proposals, particularly where there are major interfaces between schemes and developments. Failure to work effectively in a joined up, transparent manner will significantly increase – unnecessarily in Trafford Council’s view - cost and programme risk for the HS2 programme.

