



Historic England

Davinder Hothi
Head of Environment Phase 2
HS2 Ltd
One Canada Square
London
E14 5AB

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By email only

HS2EIASMRPhase2B@arup.com

Dear Dav

RE: HS2 Phase 2b DRAFT EIA SMR CONSULTATION

Historic England welcomes the opportunity to take part in the above consultation. We have various comments and recommendations to make which are set out below.

Firstly, the list of technical notes is as expected and is welcomed

Para 2.6.4 – Table 1 – It is noted that the Historic Environment section has taken into account previous comments and includes reference to tranquillity which is welcomed

The Landscape and Visual section has been updated to align more closely with GLVIA (3rd edition, 2010) which we had previously been advised of, and is welcomed. There is a lack of clarity in respect of HLC here taking into account the content of the SMR Sections 13 and 15 and it is recommended that the text be revised to include reference to HLC.

Para 4.1.13 – The commitment to any environmental impacts and effected experienced outside of the Community Areas being reported in an 'off route' volume to the ES is welcomed.

SECTION 13 HISTORIC ENVIRONMENT

General comments - The reference to non-designated assets within this topic is welcomed. The range of data sources and surveys that will be looked at as part of the evidence base is also welcomed. The broad range given to the topic to encompass archaeological and palaeo-environmental deposits is also helpful to the process.



Historic England, 2nd Floor, Windsor House, Cliftonville, Northampton NN1 5BE
Telephone 01604 73 5460 HistoricEngland.org.uk

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Para 13.2.8 – It is noted that the extent of the ZTV will be identified by the Landscape and Visual Assessment work as part of the ES

Para 13.3.4 – HE welcomes confirmation that the EIA will ‘explore the issue of setting, including the development of design options as appropriate’ along the Phase 2b route. However, we recommend that the sentence ‘The sustainability statement recognised these as areas of landscape much changed in the 20th century’ be removed since it is a subjective comment, not agreed with HE, and not relevant to the methodology. In addition, it is recommended that the word ‘explored’ should be removed from the last sentence of this paragraph and that it should read ‘The EIA will assess the impact on the significance of the heritage assets affected, including the contribution that setting makes to significance, including the development of design options as appropriate’ or a similar alternative in order for the scoping methodology to be clear.

Para 13.4.1 – The additional bullet points are noted. We would appreciate clarification that the additional points will be read in the round with other historic environment considerations.

Para 13.5.1 – Clarity is required in relation to the reference to historic landscape in this part of the SMR since HLC has been identified as fitting with Section 15 in Table 1 (linked to Para 2.6.4).

Para 13.5.3 – In the Phase 1 methodology this section included a reference to the fact that archaeological sites might be effectively removed from investigation by engineering works through their burial. This was missing from the draft SMR for phase 2a and we recommended its reinstatement. In the current SMR it says ‘These [construction effects] can also affect the availability of land for future research in cases where archaeological sites may be buried by earth bunding’. This phrase is again missing from the 2b SMR and should be reinstated.

Para 13.5.8 – In the SMR for 2a there is an additional sentence here which states as follows: ‘High Value assets which lie outside of the ZTV, with a heritage significance which professional judgment suggests is likely to be significantly affected by factors such as changes to noise or light will also be considered’. We would be grateful if explanation could be provided as to why this is not included in relation to Phase 2b since it is considered an important contribution to assessment and should apply equally.

Para 13.6.7 – This paragraph is noted and welcomed following on from earlier Phase discussions.

Para 13.6.14 – It is noted that Conservation Areas will be graded using the approach set out. Notwithstanding this we wish to clarify that all Conservation Areas are of national importance, as are Grade II listed buildings which are included in the ‘moderate’ section.



Para 13.7.5 – This wording implies that HLC work will be dealt with under the Section 15 topic of Landscape and Visual Impact as per Table 1, but is not clear in relation to earlier references to HLC in Section 13. It would be helpful for clarity on this issue, even if it is to highlight that there is synergy between topics but also set out clearly whether HLC will be dealt with under the Historic Environment or Landscape and Visual Impact.

SECTION 15 – LANDSCAPE AND VISUAL IMPACT

Para 15.2.5 – HLC is referred to in the landscape baseline information – we would refer back to comments made in respect of Para 13.7.5.

Para 15.2.12 – HE would welcome the opportunity to discuss viewpoints as the EIA work progresses. On the basis Winter and Summer photos would be required as part of considerations, we would welcome input into the Phase 2b route work at the earliest opportunity in order for HS2 Ltd project deadlines to be met.

Para 15.2.15 – Value of viewpoint considerations – in addition to the various sources cited, views may also be cited in asset Conservation Management Plans/Business Management Plans and it is recommended that these be referred to also. These do not fit into any source currently cited.

Para 15.5.17 – Table 29 – Visual Sensitivity – Historic England would wish to highlight that medium sensitivity which includes people travelling along rural/scenic routes where their attention may be drawn to something, could relate to the historic environment in that that view could form part of an asset's setting, therefore the synergy needs to be acknowledged and the approach be flexible enough to allow for the possibility of a landscape medium actually being a landscape/historic environment medium-high. We hope to discuss this further as the EIA work progresses

SECTION 18 – NOISE AND VIBRATION

We have advised previously (in our response to the Phase 2a EIA Scope and Methodology Report Draft, for example) that a simple methodology by which the impact of noise on heritage assets can be assessed should be produced. We understand that various historic assets have been assessed for the impact of noise upon them, either as residential or non-residential properties, within the individual Sound, Noise and Vibration Reports (SV-002-001 to 005). However, it appears to us that the assessment of impact is based on them as *properties*, not as *heritage assets*, with the result that the impact of noise upon the *significance* of the asset does not enter into the assessment until after they have been subject to the impact (screening) criterion. This approach has the potential to miss capturing information in



respect of significance of a heritage asset and potential harm which we maintain is an omission to the methodology.

Historic England looks forward to continuing to work with HS2 Ltd on the Phase 2b technical notes and EIA work as the project progresses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Brennan', is positioned over a background of faint, repeating text: 'tronic electronic electronic elec', 'electronic electronic electroni', and 'electronic electronic elec'.

Mrs Louise Brennan
Planning Director East Midlands



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