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24<sup>th</sup> May 2012

By email to [HS2EIASMConsultation@hs2.gsi.gov.uk](mailto:HS2EIASMConsultation@hs2.gsi.gov.uk)

Dear Sirs,

## **HS2 – ENVIRONMENTAL IMPACT ASSESSMENT SCOPING CONSULTATION**

The Buckinghamshire Archaeological Society, founded in 1847, is one of the oldest in the country and is the senior body in the county of Buckinghamshire in archaeology, architecture and local history. We have an active project researching the likely impact of HS2 on various heritage sites and buildings in Buckinghamshire and submitted our reports with the Society's response to the public consultation last year. The results of this project are on our website and have also been entered in the county's Historic Environment Record.

The comments below relate to the Cultural Heritage topic of the EIA.

### **Description of the scheme: Para. 1.5**

Generally the description of the Proposed Scheme is not adequate. The maps do not show the route distinctly or in enough detail. It is appreciated that the exact locations of ancillary works such as depots, access roads, labour camps etc. are not yet known but the scoping should give an indication of the range and number of ancillary features which are anticipated, potential locations, and generic information such as the size of a typical work camp.

### **Consultation and Community Engagement: Para. 1.7 & 8.6**

It is not at all clear how county-wide bodies with specialist knowledge of the Cultural Heritage, such as Buckinghamshire Archaeological Society, can contribute to the EIA process. We have had no reply to our request to be involved (submitted with our response to the Public Consultation in 2011). We were not invited to the inaugural meetings of the Community Forums and, having applied to join, there is no guarantee that we will be able to participate in them.

We suggest that the British Geological Survey should be consulted.

### **Code of Construction Practice: Para. 1.8.2**

It is not clear how good archaeological practice will be assimilated into the Code. We suggest specification of the standards and practice approved by the Institute for Archaeologists.

### **Interoperability: Paras. 2.1.8 & 8.4.2**

We would like to see greater emphasis on the inter-operability between the various topics covered in the draft; also an indication as to how the information gathered by the various specialist teams will be shared between them (such sharing should be a positive obligation). Cultural Heritage overlaps several other topics including:

- Chapter 5 - Agriculture and soils: data-gathering methods mentioned include soil-sampling, geology and interviews with farmers. All of these could yield information relevant to the Cultural Heritage baseline. Cumulative impacts could also arise, e.g. the loss of farmland or of access to fields or the splitting-up of land-holdings could lead to the non-viability of farms and possible redundancy of historic farm buildings.
- Chapter 12 – Landscape, townscape and visual assessment: elements of the baseline (outlined in 12.2.7) include several which are relevant to the Cultural Heritage including geology, route-ways, character assessments, designed landscapes (which may be heritage assets) and Conservation Areas. Historic boundaries and field patterns (not specifically mentioned) would also fall within both topics.
- Chapter 13 – Sound and Vibration. It is not clear how potentially vulnerable buildings (Table 22) will be identified. Presumably surveys would be required but would these feed into the Cultural Heritage strand of the assessment? Noise-mitigation measures, such as the creation of bunds or tree-planting, may have adverse effects on the cultural heritage.
- Chapter 14 – Socio-Economics. There is potential for impacts on businesses associated with heritage assets, such as visitor attractions, (e.g. Waddesdon) or, more generally, in the Chilterns AONB where degradation of historic character may contribute to a decline in the use of visitor or tourist facilities.
- Chapter 17 – Water resources and flood risk assessment. Interference with water levels, flood plains etc and mitigation measures could affect archaeological remains and elements of the historic landscape (such as Shardeloes Lake).
- The scoping should provide for a specialist geological/archaeological study to establish the potential for Pleistocene deposits and a mitigation strategy.

Para 8.4.2 is welcome but we would also like to see a specific mention of all these potential “overlaps” in Chapter 8.

**Cumulative effects: Paras. 2.4, 8.3.6 & 8.9.17.**

We do not understand why 8.3.6 has been included bearing in mind the definition in 2.4. Cumulative effects are also dealt with in 8.9.17. We suggest redrafting to bring the relevant provisions together and to ensure consistency throughout the document.

We wish to ensure that the cumulative effects on a particular type of resource will be taken into account. For example, in Buckinghamshire four registered parks and gardens will suffer impacts, directly or to their setting.

Cumulative effects could also arise from natural processes or other activities which do not amount to development in terms of planning.

**Heritage Assets: Para. 8.2.1**

We think the definitions should follow those in the NPPF.

In 8.3.4 – we think “or its significance” should be added at the end of this paragraph.

In 8.4.3 the reference to PPS5 should be replaced with NPPF para.139.

**Baseline: Para 8.4**

The first item in 8.4.4 should read “Details of designated **assets** held by English Heritage.” Archaeological assets of schedulable quality etc. should read NPPF para 139, not 130.

It is generally acknowledged that Historic Environment Records have limited information on historic buildings, often containing nothing more than the listed building description (usually based on a cursory external inspection). Therefore for building assets the baseline should be extended to wider documentary sources sufficient to understand the significance of the asset, whether designated or not. We suggest that Chapter 7.2.1 of Clark, K. *Informed Conservation* (English Heritage 2001) is relevant guidance.

As well as mapping, historic landscape characterisation reports (for example those done by Buckinghamshire County Council and the Chilterns Conservation Board) should be included.

In 8.4.4. and 8.4.5 we are surprised to note the lack of specific reference to curatorial involvement at county and district level. Surely the programme of survey and investigations should be agreed with the County Archaeologist, and local planning authority heritage curators.

**Definition of survey: Para. 8.5**

There appears to be a yawning gap between 8.5.6 and 8.5.7 with no reference to Buckinghamshire north of the Chilterns! The Vale of Aylesbury and North Buckinghamshire are likely to be severely impacted by the Proposed Scheme and surely deserve a mention.

In 8.5.8 we can envisage situations where a study area of 500m from the edge of the land take might not be sufficient– e.g. in the case of a deserted medieval village or a designed landscape.

8.5.9. - the proposed programme of limited visits and surveys is woefully inadequate. More detailed fieldwork is required bearing in mind the almost totally rural landscape through which the line would pass in the Chilterns where lack of development means there has been little archaeological investigation. What does field-visit mean in the context of listed buildings? Also this limited programme does not tally with the holistic landscape approach outlined in 8.5.1. A programme should be agreed with English Heritage and local authority archaeologists and conservation officers as a priority but this should be flexible enough to accommodate findings made during the EIA research.

8.6.4 – We believe the last sentence should read “Significance-based criteria (refer to NPPF Annexe 2 Glossary) are therefore proposed as set out in **Table 7**” (not table 8 which deals with magnitude of impact).

Whilst we think EH’s *Conservation Values* are helpful in establishing significance we think that they are not always readily understood by a lay-audience and risk a lack of transparency. We believe the IFA Stewardship Scheme is also relevant.

**Scope of assessment: Para.8.8**

8.8.2 – we assume this paragraph has been included in error and should be deleted and that the present 8.8.3 should be renumbered. This deals with spatial and not temporal scope.

We have already made the point that we believe the study area and extent of investigations are inadequate. Also the rural and metropolitan sections have not been properly defined.

**Guidance: Para.8.9**

We suggest that the Planarch review “*Planarch 2 Review of Cultural Heritage Coverage in Environmental Impact Assessments* (2005)

[http://www.planarch.org/downloads/library/england\\_eia-report.pdf](http://www.planarch.org/downloads/library/england_eia-report.pdf) would also be helpful.

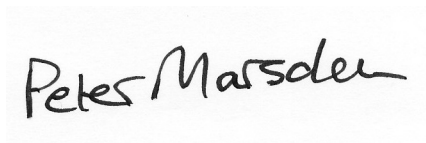
**Quality in Assessment Methodology: Para 8.9**

Research and surveys should be carried out in accordance with “best practice” and by professionally accredited experts in accordance with their appropriate professional codes of conduct, for example Institute for Archaeologists or Institute of Historic Building Conservation.

**Geological interfaces**

There are important Pleistocene deposits on the proposed route of HS2 but there are also a number of solid geology interfaces which are little understood. Advance consideration should be given to the location of these so that appropriate recording mechanisms can be put in place should construction proceed.

Yours faithfully,

A handwritten signature in black ink that reads "Peter Marsden". The signature is written in a cursive, slightly slanted style.

**Peter Marsden**  
**Chairman**