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Date: 26 July 2011

Dear Sirs

HS2 (LONDON TO WEST MIDLANDS) PROPOSED ROUTE

English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement also signed by CLG and DEFRA. We are the UK Government's statutory adviser and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and underwater, historic buildings, sites and areas, designated landscapes and the historic elements of the wider landscape. We work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment, broaden public access to our cultural heritage, and increase people's understanding and appreciation of the past.

English Heritage is pleased to have the opportunity to comment on the proposals published by HS2 Ltd in February 2011. Our comments relate chiefly to Question 6 of the consultation – the Assessment of Sustainability (AoS) – it not being within our remit to comment on the case for high speed rail nor on the specification used by HS2 Ltd to underpin its proposals. We welcome the constructive dialogue with HS2 Ltd staff which has assisted us with our analysis of the AoS, and look forward to continuing that dialogue in future.

In coming to our conclusions, we have noted that some avoidance measures have already been taken where impacts on historic environment were identified early in the options development (e.g. to reduce the direct impact on the lake adjoining Edgecote House, Northamptonshire). We understand that, if the proposals are to be developed further, a full Environmental Impact Assessment will be prepared in which the 'adjustment to vertical alignment where practicable to avoid deposits of archaeological significance', and the 'refinement of route alignment to further utilise existing topography and land use features to screen views of route ... wherever practicable' promised in the AoS would be set out in detail. Nevertheless, a decision will be taken whether or not to proceed with development of this route option before the EIA is produced. Unless top-up work is commissioned (see below), therefore, the AoS provides all the information currently available upon which the decision to develop proposals for this route will be based.

The initial figures for designated assets that would be affected – two scheduled monuments, three highly-graded Registered Parks and approximately fifteen Grade II Listed buildings – are based on HS2 Ltd's impact appraisal methodology. English Heritage has a number of concerns about this methodology and/or the conclusions in the AoS which we feel ought to be rectified. These include:

- i. The omission from the AoS of desk-based assessment of the known assets of archaeological interest, which leaves open a substantial risk that the effect on assets of equivalent significance to scheduled monuments has gone unrecognised;
- ii. The AoS has limited its assessment of impacts to a zone 350m either side of the line, but this is inadequate for the assessment of impacts on the setting of heritage assets;
- iii. The effect of the noise increase on the setting of heritage assets has not been assessed. In some cases, the noise may affect the viability of heritage assets in hitherto sustainable uses;
- iv. The partial destruction of two scheduled monuments (Grim's Ditch and Edgcote Roman villa) being rated as being "unsupportive of the heritage objective" (i.e. amber) when it should be assessed as "highly unsupportive" (i.e. red);
- v. The classification of the impacts on Grade II (two) Listed buildings as being 'regionally important': a footnote might usefully clarify that Grade II Listed buildings are nationally designated, but English Heritage recognises the need to distinguish them for planning policy purposes from Grade I and II* buildings
- vi. The impact upon historic landscapes being covered only by a short discussion of the Countryside Character Areas traversed by the route.

Items (iii) to (vi) from the above list are all issues that we accept will be subject to detailed impact assessment and mitigation proposals at a later stage. **English Heritage considers, however, that without additional work on (i) the undesignated sites of archaeological interest within the corridor of direct impact and (ii) the identification of those historic assets outside the 350m buffer zone where the setting will be adversely affected, the extent to which the scheme's stated sustainability objective for cultural heritage is met by this route option cannot be properly judged.** Both of these priority concerns could be addressed without delay to the decision-making timetable, and English Heritage would be pleased to advise on appropriate methods.

If the proposals are to be further developed, English Heritage would be pleased to help with the process of selecting appropriate consultants to work on the EIA. We attach high importance to finding advisers who would be able to react positively and imaginatively to the need for innovative approaches to archaeological mitigation. The Annex to this letter sets out the main areas of specific concern in relation to known heritage assets that the EIA should address in due course. In some cases, mitigation options are already emerging from the positive discussions we have had with HS2 Ltd staff. Again, English Heritage would be pleased to help with ensuring that the EIA affords proper weight to the historic environment issues thrown up by the proposed scheme.

Please do not hesitate to contact me if you would like to discuss our comments or any additional work to address our concerns.

Yours sincerely

Dr Andrew Brown
Planning Director, South East

ANNEX TO ENGLISH HERITAGE RESPONSE TO CONSULTATION ON HS2

This Annex to our formal response sets out our concerns in relation to specific designated heritage assets identified in the Assessment of Sustainability (AoS) as potentially being directly impacted. It is not intended to be an exhaustive list of historic environment issues; as set out in our formal response to the consultation above, there are likely to be other and potentially significant impacts to significant historic assets which have yet to be identified. It is, however, intended to form the basis of continuing discussions between English Heritage and HS2 Ltd in an effort to minimise, and where appropriate mitigate, any harm to the historic environment.

Euston

Within the footprint of the proposed new station at Euston there are a number of Listed structures identified within the AoS which might be affected to a greater or lesser degree. In particular, the AoS refers to direct impacts upon 9 Melton Street and which is described as a Grade II Listed building. It does appear, however, that the Grade II* Listed part of this structure would be harmed, whether or not the current review of the extent of the listing results in the whole of this building being Listed at II*. Government guidance states that substantial harm to a Grade II* Listed building should be 'wholly exceptional'. In preliminary discussions with HS2 Ltd staff, it appears that there might be an opportunity to adjust the proposals here, and we strongly recommend further consideration of this at an early stage.

It appears from the proposals that the lower level of the new terminus compared with the current one might allow some reconstruction of the street pattern in this area which was lost in earlier expansions at Euston. This might present an opportunity to enhance the setting of 9 Melton Street as well as the character and appearance of the locality.

One of the listed structures at Euston sits within St James Garden. This was the former cemetery of St James' church and it is likely that large numbers of burials might be anticipated here which will require appropriate treatment and archaeological recording and appropriate provision for assessment and analysis of the remains if they are to be disturbed.

Shardeloes

At Shardeloes the proposed route cuts across the designed landscape which is Registered at Grade II* as well as affecting the setting of the Grade I Listed house at Shardeloes. A highly visible cutting across the designed landscape is likely to cause substantial harm to its significance. Our advice is that HS2 Ltd should look at this as soon as possible with a view to determining what kind of mitigation is possible.

Buckinghamshire Grim's Ditch

The route impacts directly upon the scheduled monument and would cause substantial harm, but we understand that the alignment of the line and the linear earthwork is such that substantial deviation here might not be possible. Nevertheless, the published drawings show a deep – and thus wide – cutting, which effectively removes a large proportion of the earthwork. The possibility of reducing this width substantially, either through a retained cutting or through a fully retained section, should be investigated.

Hartwell House

The proposed route crosses the Grade II* Registered park at Hartwell House. The route published in December 2010 was altered from that of March 2010 here and has been moved further away from the main focus of the park. The impact cannot be judged without a detailed assessment of the development of the landscape, and in particular what the visual impact is likely to be where the route crosses the main north-south avenue as viewed from the house.

Roman Villa at Edgcote

The route impacts directly on the site of the scheduled monument and there is likely to be substantial harm. The site was scheduled on the basis of antiquarian excavations, but the precise location of the most significant components is not certain. A Roman bath house was found here in the nineteenth century; this will have been associated with a villa complex and there is evidence to suggest that significant Roman remains probably lie outside of the currently scheduled area. Further, in order to construct the line in this area, we anticipate that there will be wider impacts than simply the cutting and foundations for the bridge supports, such as construction compounds, temporary access and crane hard standings. We strongly recommend some early assessment and evaluation of the whole area, if the route is intended to pass through or near the monument, and we would be happy to assist with a brief for this work.

Edgcote House

This is Listed at Grade I, and it does appear to us that there could be substantial harm to its setting, but it does not appear at all in the AoS as it lies outside the 350m buffer zone that HS2 Ltd has used. This is clearly an asset which must feature in any further assessment of impacts.

Edgcote Battlefield

This site was considered for designation as a registered battlefield in the 1990s, but it was then felt that the evidence was insufficient to allow certainty about which area should be designated. We understand that there might be more recent information which would cause this to be reconsidered, and in any case we do feel that this is a site which should feature in any further assessment of impacts. This type of assessment is a fairly specialist task, and given the possibility that it might suggest the site should be designated we recommend that this be carried out as soon as possible.

The Edgcote landscape and similar groups of heritage assets

The landscape at Edgcote (including villa, house and battlefield together with neighbouring Grade II Listed buildings and other undesignated assets) represents a complex of historic assets upon which the cumulative effect is likely to be greater than the sum of the individual components. There are likely to be similar cumulative impacts at several other locations along the route. This issue needs to be considered in any further assessment of impacts.

Stoneleigh Abbey

The proposed route cuts across the Grade II* Registered landscape here, and might impact upon a Grade II Listed building associated with it. The published information does not allow us to form a judgement on the level of impact here, and we feel that this is a particular area where early and more detailed information should be provided in order to understand the level of harm concerned.

Birmingham Interchange Station

The site of the proposed new station adjoins Park Farmhouse, a Grade II* Listed building and its associated farmyard recently converted to a business complex. Although already lying close to major roads, the proposals – particularly the multi-storey car park – potentially have a harmful impact on its setting. We recommend that detailed design proposals be considered here at an early stage to minimise the harm that might otherwise be caused.

Birmingham Curzon Street

The AoS suggests that three Grade II Listed structures might be directly impacted: the section of railway bridge into Curzon Street that bridges the Birmingham Canal, the Lawley Street viaduct, and the Fox and Grapes Public House. With respect to the latter, it is difficult to see how it might be retained within the currently proposed footprint of the Curzon Street Terminus, but we feel that investigation should be carried out into the possibility of dismantling and reconstructing it nearby, and would be happy to advise further

on this. The Park Street Gardens, adjacent to the Fox and Grapes, was a former cemetery; burials might be anticipated here which will need to be archaeologically excavated, with appropriate provision for assessment and analysis of the remains.

The Grade I Listed structure nearby, which was the former Curzon Street terminus of the London and Birmingham railway, formed part of the first mainline inter-city link both in this country and the world. It currently stands empty and is on our Buildings at Risk Register. To bring it back into an active use that would lead to its ongoing maintenance would in our view constitute a substantial offsetting of harm to other heritage assets.

Conservation Areas

The limited level of assessment afforded to impacts on Conservation Areas within the AoS will need to be addressed within the EIA.

Archaeological Mitigation

HS2 would be one of the largest developments carried out in recent decades. Government policy, set out in PPS 5, on 'advancing understanding' and the Government's objective of 'contributing to our knowledge and understanding of the past' is particularly noteworthy. This does not fundamentally affect the need to carry out a full assessment in order to identify and establish the significance of 'heritage assets with archaeological interest'. It does, however, offer the opportunity to take innovative approaches to capturing evidence from the historic environment where it would be lost.

We would encourage an approach which takes advantage of the specific characteristics of the HS2 project – that is, a very long transect across southern and central England, cutting through a range of strongly contrasting landscapes. Working with the local authorities affected, we would be pleased to advise on what form such an innovative and targeted approach might take, so that it ensured the highest possible value for money in terms of advancing understanding for the resources which would be deployed. There are elements of this approach which would need to be implemented at an early stage, and we recommend that consideration is given to this in your planning as soon as possible.

Storage of archive

One issue which a review of the development of the Channel Tunnel Rail Link has raised is the long-term storage of any archaeological archive that might result. CTRL generated a huge amount of archive material and the storage issues still remain to be resolved, and so we recommend that it is taken into account at an early stage.

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