

HS2 Crewe- Fradley Safeguarding Consultation

Response from The Inland Waterways Association

Introduction

The Inland Waterways Association (IWA) is a registered charity, founded in 1946, which advocates the conservation, use, maintenance, restoration and development of the inland waterways for public benefit.

IWA members' interests include boating, towpath walking, industrial archaeology, nature conservation and many other activities associated with the inland waterways.

IWA works closely with navigation authorities, other waterway bodies, and a wide range of national and local authorities, voluntary, private and public sector organisations.

IWA accepts that the overall economic and social case for the proposed High Speed Rail network is for Government to make and for Parliament to decide.

If it proceeds it will have major adverse impacts on the local environment and quality of life of many people on its route, both during construction and operation, including impacts on the inland waterways infrastructure and users. The waterways affected include both existing navigations and canals under restoration for which equal consideration and provision should be made.

IWA considers that the project needs to be designed and implemented so as to minimise its impacts, to mitigate those impacts that cannot be avoided, and to fully compensate all those disadvantaged by its construction and operation.

Questions

1: What are your views on the proposal to safeguard land between Fradley and Crewe? Please provide as much detail on your reasoning as possible.

IWA Response:

If Fradley- Crewe is to be built 6 years earlier than currently scheduled, time is very short to conduct a better and more effective consultation than took place for Phase1.

Narrowing the 'blighted area' as early as possible should offer the opportunity to reduce the number of individuals, organisations and businesses who will be affected by this section of the route. However real uncertainty exists over whether the pre- consultation route chosen to safeguard is the one which will emerge from the government's Phase 2 Consultation, let alone any further modifications to that as detailed design and mitigation proceeds. This may result in people being misled into thinking that their business, property or interest is unaffected by the route when this is not the case, and vice versa.

Given that the Phase 2 consultation closed in January 2014, it is difficult to understand why the government has been unable to make a decision on its preferred route, even if only in relation to this section, to remove this uncertainty.

In IWA's opinion, this safeguarding is premature and should be preceded by an announcement on the government's preferred route for this section of Phase 2, and its substantive reply to responses made to the January 2014 Phase 2 route consultation.

Question 2: What are your views on the content of the proposed safeguarding directions (Annex A)? Please provide as much detail on your reasoning as possible.

IWA Response:

No comment

Question 3: What are your views on the content of the guidance for local planning authorities on the directions (Annex B)? Please provide as much detail on your reasoning as possible.

IWA Response:

Appendix B Background section 4 states: 'HS2 Ltd has undertaken a route consideration process, informed by responses to the Phase Two consultation on the route from the West Midlands to Manchester, Leeds and beyond.' If HS2 Ltd has had time to obtain details of the consultation responses from government, and make their own engineering decisions on the land required for the likely preferred route, why has government not been able to complete and publish its response to the consultation process? The claim made by HS2 Ltd in this section seems intended to give extra weight to the Safeguarding Process, when in reality the document states in several other places that there are likely to be changes as a result of the Phase 2 Consultation outcomes. Surely changes are almost inevitable, and the claim made is at best unhelpful.

In certain situations Local Authorities have already reserved or identified land for specific purposes, such as restoration of a canal, to protect it from development. In other cases, land is occupied by work carried out as part of a planning condition relating to a previous development. Where these existing designations are affected by HS2's proposed route, what safeguarding or guarantees is the Secretary of State offering to protect such prior reservations or mitigation for other development?

Question 4: What are your views on the proposed approach to determining what land is to be safeguarded (see explanatory notes and plans at <https://www.gov.uk/government/publications/hs2-phase-two-fracley-to-crewesafeguarding-consultation-maps>). Please provide as much detail on your reasoning as possible.

IWA Response:

Given the responses provided by IWA to question 1 and question 3 above, the detailed and standardised approach based on experience in phase 1 seems appropriate. However, using a standardised approach would work more effectively on the outcome of the Phase 2 consultation Preferred Route, rather than the current interim position, to allow affected individuals and organisations to know the route was not likely to change in the near future.

Question 5: What are your views on the draft Impact Assessment (Annex C)?
Please provide as much detail on your reasoning as possible?

IWA Response:

A third policy option is available which has not been included in the draft Impact Assessment. Were the government to issue a substantive response to the Phase 2 route Consultation concluded at the end of January 2014, both HS2 Ltd and Local Authorities could be sure that the Safeguarded Area was, given the state of detailed design at each point on the route, as accurate as possible. Equally, affected individuals and organisations would be in a position to take up what options were available to them to mitigate impact of the proposed route with as much certainty as possible. This option should be included in the Impact Assessment as a third option.

The economic assessment completely avoids quantifying the costs to business of the proposed decisions. Detailed NPVs of local authority administrative costs and potential blight costs are given, whilst the real and significant costs to 'UK plc', businesses and organisations of work on design and obtaining planning approvals for developments within the proposed 'Safeguarded Route' are 'Not Quantified'. Such work by businesses would, in all probability have to be written off in the financial year in which safeguarding was confirmed. Again, provided the route did not change between the proposed current route and that subsequent to a substantive response to the Phase 2 route Consultation concluded at the end of January 2014, it could be argued that this impact was unavoidable. However by choosing to safeguard prior to this, further additional costs may be imposed on businesses, organisations and individuals as a result of any difference. This seems unnecessary given the length of time that has transpired, and if due simply to political considerations rather than requirements of the HS2 project, would be extremely disappointing.

End.