



ENGLISH HERITAGE

FREEPOST RTEC-AJUT-GGHH
HS2 Phase One Bill Environmental Statement
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27 February 2014

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Dear Sirs

HS2 PHASE ONE BILL ENVIRONMENTAL STATEMENT

Thank you for the opportunity to comment on the Environmental Statement. English Heritage (EH) is the Government's statutory adviser on the historic environment in England. It is a non-departmental public body sponsored by the Department for Culture, Media and Sport (DCMS). EH works 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.

We have largely confined our comments to the areas of concern we raised in our response of 10 July 2013 to the draft Environmental Statement. For us, the key issues are:

1. Lack of fieldwork and hence inadequate understanding of the heritage assets that would be affected
2. Assessment of historic landscape impact, especially in the Chilterns
3. Degree of impact upon the Scheduled Monument at Grim's Ditch

In the light of the draft National Policy Statement for National Networks in December 2013, published after our response to the draft Environmental Statement, we have included a fourth key point for us, which is:

4. The opportunity to incorporate the Grade I listed Curzon Street station into the plans for the Birmingham terminus.

Detailed site-specific comments on the impact assessments are included in Appendix 1.



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The Environmental Statement

Regulation 2 (1), Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 specifies that the Environmental Statement (ES) should include (a) a description of the aspects of the environment likely to be significantly affected by the development (including the architectural and archaeological heritage), (b) a description of the likely significant effects of the development upon them, and (c) a description of the measures envisaged to avoid, reduce and if possible remedy significant adverse effects.

HS2 Ltd deserve credit for their effort to assess the huge number of heritage assets, designated or not, that would be affected either directly or indirectly by the Proposed Scheme. Nonetheless, we do have a number of comments to make on the adequacy of the ES which we offer below under the three headings (a) to (c).

(a) Description of Assets Affected

The Environmental Statement should include a description of the heritage assets likely to be significantly affected by the Proposed Scheme including architectural and archaeological heritage and landscape. This is reasonably required in order to assess the environmental effects.

(a1) Insufficient Fieldwork

With respect to archaeological remains, description needs to be based on an understanding of the nature and extent of the remains, and this understanding is acquired through a process which normally includes desk-based assessment and field evaluation.

The ES includes considerable information from desk-based assessment and route-length remote survey methods, and we welcome the fact that substantial areas have been subject to geophysical and other field surveys. In Volume 2 (p88, n39) reference is made to an “archaeological risk model”, and indeed a methodology for a risk-based approach to prioritising fieldwork has previously been discussed with us, but it is not clear to us how particular sites were chosen for survey. Beyond that, some sites were evidently identified for survey where access was apparently denied, and these are identified for example in the Volume 5 Cultural Heritage Survey Reports for Country South, but they are not identified in the equivalent reports for Country North. Consequently, it is impossible for us to assess how much further non-intrusive fieldwork would be required to allow an understanding of the significance of



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known sites, but the ES itself acknowledges that there are considerable areas where further work is necessary.

The ES includes no information on any intrusive fieldwork (principally excavation trenching), and in our response of 10 July we identified this as a key issue. We said then that the ES would need to make clear either why the work was not possible or why it was not considered to be necessary, and we can find no such justification anywhere within the ES. It has been argued elsewhere that in some circumstances, for example where the area of development is relatively constrained and remains are thought to be widely dispersed or ephemeral, a post-consent programme of extensive topsoil stripping followed by sampling is more cost-effective than detailed pre-consent evaluation. This might be true for certain areas of the route of HS2 (and we discuss this further below). If this is thought to be the case, those areas need to be clearly identified and their identification justified, and above all a commitment and methodology produced which accepts the higher risk of this approach and guarantees that sufficient time will be allocated within any construction programme for the stripping and sampling to take place, and for unexpected finds to be dealt with.

There remain areas where intrusive fieldwork is necessary to assess the likely significant effects of the development. This includes areas where known complex archaeological remains might exist (we have previously identified the Roman Villa at Edgcote as an example), or where geophysical survey has revealed extensive archaeological remains whose true character and survival needs to be understood (e.g. at Fleet Marston). We consider that there is a realistic likelihood that archaeological remains of national importance, and therefore of equivalent significance to scheduled monuments, will be affected but have not yet been identified and described. We remain of the view that the limitations on non-intrusive fieldwork and the complete absence of intrusive fieldwork are areas where the purpose of the ES remains unfulfilled.

(a2) Archaeological character

Section 7 of the Cultural Heritage Baseline Report for each CFA discusses Archaeological Character Areas (ACAs), and divides these into Archaeological Sub Zones. Section 8 then offers Research Potential and Priorities, but it appears that these are only cross-referenced to ACAs in certain areas (mainly in Country South); elsewhere they are tied to particular CFAs which are not useful units of understanding. In some cases the reasoning in the Research Potential is rather circular, e.g. CFA9, s8.1.10, where it is stated that “there is considered to be limited potential for currently unrecorded Romano-British remains in the study area, though the limits of our present understanding may in part be the product of limited development.” We



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recommend that this is an area that should be addressed more fully within the research design discussed below (see *c1*).

(b) Significant effects upon heritage assets

The Environmental Statement should include a detailed description of the likely significant effects of the Proposed Scheme on the historic environment including direct and indirect effects, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative. This is reasonably required in order to assess the environmental effects.

(b1) Historic Landscape

We raised this as a concern in our response of 10 July. While the historic landscape is discussed in the Cultural Heritage Baseline Report in Chapter 5 for all CFAs, there does not appear to be any assessment of the impact of the Proposed Scheme upon it. Volume 5 does contain Landscape and Visual Assessments, but these do not appear to address the specifically historical elements of the landscape to any extent, even though the necessary initial assessment is available in the equivalent Cultural Heritage Baseline Report.

With regard to the Chilterns AONB in particular, given the contribution of historical processes to that particular landscape, a reasonably detailed assessment of historic landscape character and the impact of the Proposed Scheme upon it might have been expected for this area. However, the discussion of it is limited to two paragraphs, the impacts upon it are limited to three, and the conclusion is simply that the impact upon the historic settlement and environment will be limited.

We recommend that a fuller assessment of the impact of the Proposed Scheme on historic character – ideally on the whole scheme but at least in the Chilterns AONB – is undertaken to meet the reasonable requirements of the ES regulations.

(b2) Detailed design at Grim's Ditch

Grim's Ditch is a scheduled monument and is directly affected by the proposed route. In our response of 10 July 2013 we expressed concern over the proposed planting here, and the fact that a cutting width of around 20m was envisaged. It appears that around 150m of a nationally important earthwork feature which is around 300m long is now at risk. In addition to this, while the tree planting has been removed, a "sustainable placement" is now located to the north of the line. It is very disappointing that no consideration appears to have been given to the reduction of direct impacts on a nationally



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important scheduled monument, and we ask that this be addressed as a priority. We will be happy to advise further.

(b3) Detailed design generally

While the proposed route submitted with the hybrid Bill is now constrained within the Limits of Deviation, and the limits of land to be acquired or used are also defined, Section 5.8.19 of the Draft Environmental Statement Consultation Report stated that work would continue into the detailed design stage on reducing impacts. This will mean particularly that details of associated works (e.g. balancing ponds, woodland and grassland habitat creation, sustainable placement, construction compounds) remain to be established. Each of these can have harmful effects on cultural heritage.

We expect to continue in discussion with HS2 Ltd as the Bill progresses to help to identify and assess significant effects on the historic environment. In particular, we look forward to further discussions on proposals for Grim's Ditch, Doddershall DMV, the Edgcote area, Radstone, and Euston and Curzon Street Stations.

(c) Measures envisaged to avoid, reduce or remedy significant effects.

The Environmental Statement is required to include a description of the measures envisaged to avoid, reduce and if possible remedy significant adverse effects likely to be caused by the Proposed Scheme. There are a number of areas in which we consider the ES to need improvement:

(c1) Contribution to Understanding

NPPF (para. 141) says that, where an asset is to be lost in whole or in part, the developer should be required to 'record and advance understanding' of the asset, and to make the evidence publicly available. In planning for this, it is important to consider the landscape as a whole over which the proposed route will pass, rather than as a series of individual sites, each to be dealt with independently. While there are obviously certain areas where archaeological work will need to be concentrated, significant evidential value may lie in the whole area affected by the proposed route.

Recent research has demonstrated that an understanding of the development of the English countryside can be gained as much from isolated features like pits and field boundaries as from settlement sites. Even areas where there is an absence of evidence of land-use can tell us much about the pattern of exploitation of the land over millennia. Compared with the evidence-rich sites, such areas are inexpensive to deal with archaeologically, and should present little risk to overall construction programmes, but their investigation must be



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integrated with those programmes and time allowed for that investigation. While relatively small areas are assessed in the form of Archaeological Sub Zones, this wider opportunity to remedy impact remains unexplored within the ES. We are very willing to work with HS2 Ltd to produce a research design which sets out what might reasonably be achieved at this level to advance understanding.

(c2) Specialist expertise

In respect of industrial and transport archaeology (particularly with respect to the railway heritage), we do feel that the coverage and understanding shown within the whole ES is rather uneven (this is particularly noticeable with respect to the railway and canal heritage in the Camden area, Euston Station, Mornington Street Bridge and Parkway Tunnel). The commissioning of a single specialist consultant for this particular area of expertise might benefit the specification of remedial work to record and advance understanding.

Similarly, Pleistocene archaeology, where the knowledge required is highly specialised and where the evidence itself is of a very specific nature (e.g. isolated environmental deposits), the appointment of a single specialist consultant might provide a cost-effective and consistent approach to remedial work by recording and advancing understanding.

(c3) Below ground works and ground settlement

There are risks to standing structures from tunnelling and other below-ground structures and these risks clearly apply to some listed buildings. We acknowledge the commitments given in the Code of Construction Practice (s.10) and understand that monitoring will take place as a matter of course (and that appropriate agreement is sought through the hybrid Bill to carry this out on listed buildings) but the actual proposals need to be made clear and we would welcome an opportunity to discuss this further.

(c4) Burial grounds

We note in the Appendix the potential risks and challenges offered by human burials encountered along the route, in particular at the two eighteenth- and nineteenth-century burial grounds at St James's Gardens in Euston and Park Street in Birmingham, and at the medieval and post-medieval cemetery at Stoke Mandeville. We must emphasise the importance of adequate programming in dealing with these sites. In addition, further consideration should also be given to a suitable resting place and memorial for the dead in consultation with the Church of England and taking account of the long-term research potential of such assemblages of human remains.



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(c5) Code of Construction Practice

In our response of 10 July 2013 we suggested a number of changes to the draft Code of Construction Practice, but none of these appear to have been accepted. Section 8.2.1 still only relates to assets of potential national significance, which suggests it only relates to archaeological finds which might be equivalent to scheduled monuments. Government policy is to require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. There is also an ambiguous reference to a procedure “previously agreed” with English Heritage and local authorities; clarification here would be helpful.

The relationship between the Environmental Statement and the National Planning Policy Framework (NPPF)

In our response of 10 July 2013 we noted that the Government’s policy on the historic environment is set out in the National Planning Policy Framework (NPPF). An important component of the NPPF to achieve sustainable development is the protection and enhancement of the historic environment. The conservation of heritage assets in a manner appropriate to their significance is one of the core planning principles that underpin the planning system. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits. Where changes are proposed to a heritage asset, the NPPF sets out a clear framework for decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a way consistent with their significance and thereby achieving sustainable development.

It is therefore important to understand the significance (which includes the contribution made by their setting) of heritage assets affected by proposed development which can then be taken into account when considering the impact of the proposal in order to avoid or minimise conflict between the conservation of heritage assets and the proposed scheme. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

In relation to designated heritage assets, the NPPF advises that the more important the asset, the greater the weight that should be given to the need for its conservation (paragraph 132). It advises further that substantial harm to assets of the highest significance should be “wholly exceptional”. This policy



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framework is closely echoed in the draft National Policy Statement for National Networks, published in December 2013.

In the ES, in particular in the Cultural Heritage Impact Assessment Tables in the CFA Specific Appendices in Volume 5, the scale of the impact from both construction and operation is assessed for all identified assets. This is combined with an assessment of the value of the asset in order to produce an assessment of the effect. The highest value assets equate with those considered to be of the highest significance in the NPPF, and include scheduled monuments, grade I and II* listed buildings, grade I and II* Registered parks and gardens, Registered battlefields and archaeological sites considered to be of equivalent significance to scheduled monuments. With regard to levels of harm, we consider it reasonable to assume that, where the scale of impact has been assessed as 'high adverse', this is equivalent to the substantial harm envisaged in the NPPF.

On this basis we estimate that there are at least twenty heritage assets of the highest significance to which the harm will be substantial. Only if it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss should consent for such harm be granted.

There are a larger number of designated assets of lesser significance where the harm is substantial and where the government advises that the granting of consent should be "exceptional" rather than "wholly exceptional". The same test of public benefit applies.

Many more heritage assets affected are undesignated, but harm to them still needs to be clearly and convincingly justified (paragraph 135 of the NPPF). A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

It is against this degree of harm to the historic environment that any public benefits of the Proposed Scheme will need to be weighed.

The NPPF further provides that where heritage assets are to be lost (wholly or in part) developers should be required to record and advance understanding of the significance of those heritage assets in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.



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One of the key potential public benefits that might be weighed against the harm identified above is the re-use of the Grade I listed Curzon Street station in Birmingham, located beside the proposed new terminus. Paragraph 5.125 of the draft NPS for National Networks requires applicants to look for opportunities to enhance or better reveal the significance of heritage assets. We consider that the incorporation of the Curzon Street station building into the design process for the new terminus to be a prime opportunity to put this policy into practice.

We will, of course, be pleased to work with HS2 Ltd to address the concerns raised above and in the detailed commentary in Appendix 1.

Yours faithfully

Dr Andrew Brown
Planning & Conservation Director, South East



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Appendix 1 – Detailed comments by English Heritage on affected heritage assets

The impact assessment tables and gazetteer within Volume 5 are very useful documents and make an understanding of the assessment process fairly straightforward. On whole we consider the assessment of impact to be logical and consistent. There are a few internal inconsistencies, as might be expected in a document of this size. For example, the undesignated Edgcote House Park (CFA 15, GLB134) is described as being of moderate value in paragraph 6.3.6 of Volume 2, but referred to as being of high value in both paragraph 6.4.12 and in the Volume 5 tables. Thorpe Mandeville Conservation Area (CFA15, GLB080) is described as being of moderate value in paragraph 6.3.3, but shown as high value in Volume 5.

Our detailed comments are organised below by CFA:

CFA 1

General

There are risks associated with the widening of Euston Cutting, above which sit the Grade II* listed paired villas of Park Village East. These properties may be vulnerable to ground movement caused by construction of the expanded cutting. Monitoring would be appropriate here.

The proposed redevelopment of Euston Station offers opportunities to re-engage the station with the adjacent streets, particularly on its east and west sides which currently lack interaction with the surrounding area. The station is within a viewing corridor identified as worthy of protection by the London View Management Framework, and English Heritage welcomes HS2 Ltd's commitment to constrain potential over-station development to a maximum height of 40m, which will preserve the view of St Paul's Cathedral from Parliament Hill.

We encourage consideration of mitigation measures to compensate for the loss of historic buildings to enable expansion of the station on its west side. This could include restoration of Euston Square, erection of a new Euston Arch, salvage and reuse of decorative elements of the disused Underground station, and repositioning of the Robert Stephenson statue and LMS war memorial in appropriate locations.



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The HS1 to HS2 link has the potential to impact upon the disused Camden winding engine vaults, due to the proximity of the link's tunnelled section. This listed structure is vulnerable and not currently in beneficial use, although we are aware of tentative proposals to turn it into a museum of Robert Stephenson. We encourage HS2 Ltd to work with the promoters of the museum proposals to enable creative reuse of the winding engine vaults.

EUS 14

This assessment is rather confused. St James's Gardens and the National Temperance Hospital are identified under reference EUS014 as a listed building. This is not correct. The National Temperance Hospital is not a listed building and should be referred to separately as a non-designated asset with a low value. The scale of impact caused by the demolition of the National Temperance Hospital will be high and therefore the effect "moderate adverse".

We understand the reason for grouping the listed structures within St James's Gardens, but in the interests of accuracy, it should be stated that there is a group of three structures listed here.

EUS 40 St James Garden burial ground

The main archaeological impact at Euston would be the loss of the eighteenth- and nineteenth-century burial ground at St James's Gardens. It is estimated that the burial ground may have received 50,000 or more burials. This is correctly assessed as a major adverse impact which requires a programme of archaeological works to investigate, analyse, report and archive these assets so as to advance understanding. The existence of such a burial ground at St. Pancras Old Church during the construction of HS1 caused considerable difficulties for (and conflicts between) the archaeological and construction works. This site will require a very significant commitment of resources and offers an element of risk in the timetable for construction which must be adequately allowed for.

CFA 2

Camden Road station, listed at grade II, will be affected by the proposals. Platform 1 retains its original canopies, and this platform will be closed when HS2 Ltd take the line over. This could make the listed platform canopies vulnerable to neglect. The risk to the platform canopies could perhaps be mitigated by moving the listed canopies onto the adjacent platforms, currently disused and without canopies but scheduled for reopening by London Overground as part of HS2 Ltd's proposals.



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CFA 3

Kensal Green Cemetery is registered at Grade I on English Heritage's register of historic parks and gardens, and contains a great number of listed burial monuments. HS2 Ltd will tunnel beneath the uncompacted soil of the cemetery, and we are concerned at the implications of this for the various listed monuments. A method statement for how these heritage assets will be safeguarded would be appropriate, on which we would be happy to comment.

If HS2 Ltd considered it appropriate to remedy some of its impact on the historic environment by offering enhancement of other heritage assets, this would be a high priority opportunity. The cemetery and many of its monuments are included on English Heritage's register of Heritage at Risk. Recent survey information is available which we can share, including a 2004 management plan, a 2009 condition survey of the Anglican Chapel with recommendations and budget costings, and a 2013 condition report of all listed monuments on the Heritage at Risk Register providing a recommended schedule of repair works, an indicative cost and priority rating.

PRM 004 Alexandra Road Listed Building/Conservation Area

Reference PRM004 refers to "Alexandra Road Listed Building / Conservation Area." Presumably this reference refers to the conservation area and not the listed buildings, which are covered by PRM021 (see below)? We disagree that the value of the asset (the conservation area) is "moderate"; the majority of buildings within the conservation area are listed at II* and we believe their quality reinforces the value of the conservation area as being worthy of recognition as "High".

PRM 021 Alexandra Road Estate

We disagree that there will be no change as a result of construction impact. The demolition of the shopping parade and its replacement with a ventilation shaft will have a moderate adverse impact.

CFA 4

KIL042-084

Only the Grade II* listed tombs (KIL 038-041) are identified as subject to moderate adverse effect during the construction phase. The Grade II listed tombs (KIL 042-084) will be subject to the same effects and this should also be noted as moderate adverse.



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CFA 6

We disagree with reference RU002 which states that Brackenbury Farmhouse (Grade II listed and within a Scheduled Ancient Monument) is of moderate value. We consider it to be of high value.

CFA 7

CVA021 Mesolithic activity at Dews Farm.

This is noted as of moderate value with a major adverse effect identified. However, if in-situ Upper Palaeolithic/Mesolithic occupation is present then this site could be of national importance and therefore of high value. Field evaluation might be necessary to establish the appropriate remedial measures here.

CVA 023 The Savay

The Baseline Report in Volume 5 states that the wider setting makes no contribution to the significance of this building. In our view, although the setting has changed, it still retains some element of its original rural character and the origins of this building as a farmhouse means that it makes some contribution to its significance. We would agree with the assessed scale of impact, however, at both construction and operation.

CFA 9

CC073 Jenkins Wood

The Impact Assessment Table regards this site as predominantly ancient woodland, but the gazetteer makes it clear that there are earthworks here which Buckinghamshire County Council considers might be equivalent in significance to a scheduled monument. As a woodland, the Table finds the effect to be neutral, but as a high value archaeological site immediately adjacent to the proposed route, the impact might be considered to be high and adverse and the effects, both at construction and operation, to be major adverse.



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CFA 10

DWH008 Grim's Ditch

This is a scheduled monument and is directly affected by the proposed route. In our response of 10 July 2013 we noted the presence of planting here, and the fact that a cutting width of around 20m was envisaged. It is with great concern, therefore, that we learn that allowance is being made to remove around 150m of an earthwork feature which is around 300m long in total. In addition to this, while the tree planting has been removed, a 'sustainable placement' is now unhelpfully located to the north of the line. We raised this issue in our response to the Assessment of Sustainability in July 2011, and it is disappointing that no consideration appears to have been given to the reduction of direct impacts on a scheduled monument (i.e. one of national importance). We ask that this issue be addressed as a priority.

In terms of the impact on what survives, we cannot agree that there will be no operational impact. What survives of this monument will still have a setting which will include the proposed route, and the significance of the remaining section of the monument will be affected.

Bucks HER Ref. 0066300000 Mound at Fleet Marston

While the extensive Roman remains at Fleet Marston are assessed, there is no assessment of this individual element, considered to be either a barrow or a windmill mound. As either, it might merit high value in its own right and lies adjacent to the proposed route. Additional desk-based assessment and/or field evaluation would be necessary to ascribe value properly.

CFA 11

SMA44 Glebe House

Although this building is shown within the Limits of Deviation on the plans submitted with the hybrid Bill, and is listed in Table 1 of Schedule 17 of the Bill, plan CT-06-044 appears to suggest that its retention might be possible, and in our view its demolition requires further justification.

CFA 12

WAD 063 Diddershall Deserted Medieval Village

This is clearly an important site and does appear to merit the high value ascribed to it in the Impact Assessment Table. The proposed route passes through the site. We note, however, the proposal to locate two ponds within it



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(CT-06-051), and furthermore it is stated in Volume 2 (6.4.21) that the planting of a grassland habitat will largely remove the deserted medieval village associated with the house. This suggests that environmental mitigation might result in the complete destruction of an archaeological site which might be considered to be equivalent in significance to a scheduled monument, and we urge that the proposals be reconsidered.

CFA 13

CAL 025 Shepherd's Furze

In our response of 10 July 2013 to the Phase One Design Refinement Consultation Document we queried the necessity of demolishing this structure, given the uncertainty over the location and design of the proposed EWR link chord. The uncertainty remains, but we note its inclusion in Table 1 of Schedule 17 of the hybrid Bill. In our view, the necessity of this demolition of a listed building needs further justification.

CAL 056 St Mary's House

While this is a grade II listed building, we stated in our response of 10 July 2013 that this building might in fact merit a higher grade. No further assessment of the structure appears to have been carried out and in our view, in the absence of further information this building should be accorded a precautionary 'high value' pending further consideration of its listing grade.

CFA 15

GLB138 Roman Villa, Blackgrounds Farm, Edgcote

We disagree with the statement in the Impact Assessment table with respect to this scheduled monument that "as a buried archaeological asset with no upstanding remains it has no setting". This is inconsistent with the advice given in the EH guidance *The Setting of Heritage Assets* (2011), which states that assets might still have a setting which can be affected even if they are obscured or not readily visible. This assessment needs to be revised accordingly.

GLB 108 Edgcote Battlefield

We would welcome further discussion regarding the construction and mitigation proposals around Edgcote given the level of potential impact on the several heritage assets in the vicinity. The assessment and mitigation of impacts on the battlefield near Trafford Bridge, where the new viaduct will



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pass, needs particular care and attention. The current mitigation proposals around the viaduct, as shown in the ES, appear to be driven by landscape and habitat creation outcomes rather than following an historic environment approach. Any working areas, soil strips and planting schemes proposed within or near to the registered battlefield must be regarded as purely indicative and open to redesign owing to the as yet unexplored nature of remains in that area. Further great effort should be made to minimise soil strip and working areas and tree planting in parts of the battlefield where extensive archaeological evidence may be present and important views exist.

It is worth noting that the geophysical survey at Trafford Bridge, as described in Volume 5 Appendix CH-004-015 was of a relatively small area and yet revealed well-defined archaeological anomalies of particular interest. Further archaeological investigation in the vicinity of Edgcote and its battlefield may well reveal much more of interest, requiring refinement of construction and mitigation proposals.

GLB 083 Lower Thorpe Barrow

Impacts on the scheduled monument at Lower Thorpe are noted, although the impact at construction phase is given as moderate adverse, while during operation phase it increased to major adverse. We suggest that it would be major adverse at both phases.

CFA 19

COL 051 Coleshill Hall Farmhouse

We note the proposal to demolish this grade II listed structure and we note its inclusion in Table 1 of Schedule 17 of the hybrid Bill. In our response to the Phase One Design refinement Consultation of 10 July 2013 we noted that no consideration appears to have been given to proposals to retain this listed building. It does not appear to us that its loss is fully justified and we would encourage further consideration here.

CFA 26

WCS041 Curzon Street Station

This building is discussed in some detail in the Cultural Heritage Baseline Report, but the assessment of impact in the Impact Assessment Table is limited to an assumption that the new terminus building will have a medium adverse effect on the setting of the listed structure. While we understand the need to make some assessment for the purposes of the ES, we very much hope that this is not the actual effect and do not believe this is inevitable.



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As we have said in our response of 10 July 2013, this is a grade I listed structure which is the world's first mainline terminus building, and which will stand directly alongside the new terminus. The specific historic relationship between the two can only increase the importance that should be attached to providing a setting which does not detract from the significance of the structure, but instead enhances it. We note that the building is included within the Limit of Land to be Acquired or Used, and so it will be entirely within the power of HS2 Ltd to provide it with a suitable and sustainable future and an appropriate setting. We look forward to discussions on this as design proposals for the new station are developed.

A significant bibliographical omission in the CFA26 report is:

George Demidowicz, 'Medieval Birmingham; the Borough Rentals of 1296 and 1344-5,' *Dugdale Society Occasional Papers*, No 48 (2008)

which demonstrates that the new station here has the potential to impact upon the extent of medieval Birmingham. This part of the ES should be reviewed in the light of this evidence.

[END]

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