

This is a joint response to the High Speed Two Phase Two (Fradley to Crewe) safeguarding consultation prepared by Staffordshire County Council, Stafford Borough Council and Lichfield District Council.

### **What are your views on the proposal to safeguard land between Fradley and Crewe?**

The Authorities support the principle of safeguarding as a means of identifying and protecting land which is needed to facilitate the development and subsequent operation of HS2 Phase Two.

However, in noting the contents of the consultation document and supporting plans, the Authorities are concerned that the detailed outcome of the Phase Two route consultation is not yet known; safeguarding and associated consultation in this respect is as such considered rather premature. Whilst the consultation document makes it clear that the Secretary of State is in favour of an onward connection from Phase One through to Crewe, it is the detail of this route which needs to be better understood. The Authorities' response to the previous route consultation outlined sections along the line of the Staffordshire route where modifications needed to be made; it is believed that such modifications could reduce the impact of the railway on the environment and communities - and as a result could alter the current safeguarding areas as outlined in the accompanying plans.

In addition to the main purpose of safeguarding as described it is noted that, the safeguarding directions, if adopted, will trigger the statutory blight regime which in turn enables qualifying owners in the safeguarded area to serve blight notices on the Government. This is a welcomed step and does provide some certainty to property owners within the proposed safeguarded area, though again to reiterate there is a need for the safeguarded area to be correctly defined and as early as possible in the process.

### **What are your views on the content of the proposed safeguarding directions?**

In terms of the content of the proposed safeguarding directions, these appear to be standard and follow from the same principles and guidance applied in Phase One.

The following comments relate to the planned safeguarding area as defined on the plans which accompany the draft directions:

The route affects a number of areas that are proposed to be defined as mineral safeguarding areas in relation to the underlying sand and gravel resource.

Between Fradley and Pipe Ridware in Lichfield District the route affects a proposed 'area of search' for sand and gravel extraction included in the draft Staffordshire Minerals Local Plan. The intersection of the route with the proposed area of search was acknowledged in comments received from HS2 Ltd in respect of the consultation on the draft Plan and will be considered in the preparation of the final

draft of the Plan. The proposed route does not cause any adverse impact on any of the site options submitted by quarrying interests within the area of search but one site proposed nearby would fall within the proposed safeguarded route. The draft directions do not appear to make reference to Local Plans for minerals and waste development and it is noted that Staffordshire County Council, responsible for Waste and Minerals planning and 'County Matter' development control, is not listed as a consultee as part of this current consultation.

Between Whitmore Heath and Madeley the safeguarded route affects a site option for sand and gravel extraction known as Netherset Hey; this is currently the subject of an objection to the emerging Staffordshire Minerals Local Plan. The objector seeks to include the Netherset Hey site in the Plan and the proposal is being promoted on the basis that minerals would be transported via rail using the former Silverdale Colliery rail line and its connection onto the West Coast Main Line. It is understood, based on the current plans that HS2 would pass over this rail junction (and flood plain) but it is not clear how the safeguarding directions would impact the proposals at the Netherset Hey site.

### **What are your views on the content of the guidance for local planning authorities on the directions?**

Scope:

As far as the Phase Two route relates to Staffordshire, it should be noted that Staffordshire County Council is the responsible local authority for Minerals and Waste and 'County Matter' Development. The Guidance omits any reference to Minerals and Waste or County Matter development and this should be amended.

In other respects the guidance as proposed to be issued is clear and logically structured. It is particularly helpful to have included wording confirming when and how the directions will be reviewed as the project develops.

### **What are your views on the proposed approach to determining what land is to be safeguarded?**

It is disappointing that the safeguarding directions haven't been issued when more detail about the construction and operation of the railway and associated infrastructure is known and can be better understood. Experience from Phase One has demonstrated that much more land is needed to build and operate the railway than currently shown on the plans; this is evidenced by the 'Connection with Phase One at Fradley' plan.

In addition, and as alluded to in the draft directions, the proposed Fradley to Crewe route is still subject to change which means the safeguarded zone may not reflect the final route. This means there is a risk that developers/land owners may develop land which is currently outside of the safeguarded zone but could fall within it as a result of any future change. If this happens, it has the potential to be a costly

exercise for all interested parties - least of all those who have invested money in such developments whether large or small. Without any feedback on the route consultation response, and premature consultation on safeguarding, developments which take place outside the proposed safeguarded zone have the potential to act as a 'barrier' to any route modifications – some of which could entail improved social and environmental benefits.

Going forward, it is hoped that safeguarded areas are swiftly and regularly updated to provide certainty and clarity to those affected by the proposals.

**What are your views on the draft Impact Assessment?**

No comments.