

# Note for the Select Committee

## House of Commons

Opening Statement – 31<sup>st</sup> January 2023

**Tim Mould KC offered to provide a summary of the opening submissions he was not able to give due to time.**

During the Promoter's Opening Statement, Tim Mould KC offered to provide a summary of the opening submissions he was not able to give due to time.

Please see the note attached.

## **IN PARLIAMENT**

### **HIGH SPEED RAIL (CREWE – MANCHESTER) BILL SELECT COMMITTEE**

#### **PROMOTER’S OPENING NOTE ON SOME KEY DESIGN ISSUES**

1. During my opening statement on behalf of the Promoter at the Select Committee’s meeting on 31<sup>st</sup> January 2023, I gave a short summary the Promoter’s opening position on the issue of the design of Manchester Piccadilly Station raised in petitions by Manchester City Council, Transport for Greater Manchester and other Manchester local authorities (paragraphs 169-172 of the transcript). The Chair said that the Committee would be willing to receive a note from me summarising the Promoter’s opening position on a number of other key design and construction issues raised in petitions. This is that note.

#### **Key design and construction issues**

##### Cheshire Salts

2. The proposed scheme crosses an area within Cheshire known for its geological production of salts which have been mined over many centuries and continue to be mined commercially. Some petitioners have expressed concern about the routing of the railway over the Cheshire salts area and the ability to construct a railway in such a landscape. HS2 and its team of expert engineers are well aware of these geological conditions and have carried out extensive investigations of past, current and planned future mining activities for the purposes of designing the proposed scheme. As a result, the promoter has been able to align the route of the proposed scheme so as to minimise any effects on known past or present mineral workings. The promoter is satisfied that the proposed scheme will be able to be constructed and operated safely through the Cheshire Salts area. The promoter is engaging with businesses involved with commercial exploitation of minerals in Cheshire and who are affected by the proposed scheme.

##### Viaducts and Embankments

3. A number of petitioners have sought to raise issues regarding the proposed provision of viaducts and embankments and some seeking the provision of more, or indeed longer viaducts to replace the proposed embankments.
4. The promoter has carefully considered the balance between the use of embankments and viaducts in the design of the proposed scheme. One of the important features of the design is to provide a sustainable approach to construction. Embankments (a general feature of most railway design) provide a sustainable solution to what is often referred to as a “cut and fill” balance in the overall approach to construction. In short, where the railway involves the generation of excavated material through construction of a

cutting, it is generally preferable to use that excavated material (where it is suitable) in the construction of other features of the railway, such as embankments or other bunding, in relatively close proximity.

5. This approach enables the nominated undertaker to minimise the need to export large amounts of material to other locations, particularly where that would simply generate additional lorry movements. Embankments also offer the opportunity to provide additional environmental mitigation in the form of landscaping and noise bunds where appropriate. Viaducts are principally included in design of the proposed scheme where it would not be feasible to use embankments (such as when crossing rivers, floodplains or other features), but it is wrong to think that replacing embankments with viaducts is an appropriate or sustainable approach to the design of the railway.

#### Borrow Pits

6. High quality construction material (sand and gravels) will be required to construct earthworks for the proposed scheme. Although much of this material will be provided from excavated material along the proposed route itself, in some locations there is anticipated to be a significant shortfall from that source. Borrow pits (essentially silt and clay quarries) have, therefore, been included within the proposed scheme, to enable material to be extracted for construction close to the railway.
7. The use of borrow pits will enable the promoter to limit the volume of construction traffic associated with the proposed scheme on local roads whilst ensuring the timely and economic delivery of the project. Borrow pits will be backfilled with material excavated during construction of the proposed scheme and restored in accordance with an approved scheme. The borrow pit sites are intended to be consistent with sites identified by local authorities as part of their forward planning for minerals extraction.

#### Tunnels at Crewe and Manchester

8. The Proposed Scheme requires the construction of two significant lengths of tunnel. The first is under Crewe. The second is in the approach to Manchester from Manchester Airport, before the railway line resurfaces and enters Manchester on viaduct (viaducts being a particular feature of Manchester and its railways). Some petitioners are arguing for much longer lengths of tunnel. There are, however, fundamental problems with lengthening tunnels. Firstly, additional tunnelling normally involves very significant additional costs. Unless there is some powerful environmental or construction reason for additional tunnelling which justifies that expenditure, it is not a sensible use of public money. Secondly, additional tunnelling brings its own consequential engineering and design challenges: for example, tunnels require vent shafts to be constructed at appropriate distances along the route of tunnel which have their own environmental impacts. Thirdly, lengthened tunnels affect the journey experience for users of HS2.
9. The design of the proposed scheme and the lengths of tunnel proposed have been carefully considered to strike the appropriate balance between all of the competing

considerations, including the environmental effects of a surface railway and the costs of tunnelling longer sections.

### Traffic effects

10. Construction of a scheme of this kind inevitably will have an effect on traffic and roads in the area during the construction phase. These traffic effects have been the subject of detailed assessment in the environmental statement and the AP1 environmental statement. Those assessments have been carried out in consultation with the affected highway authorities. They provide the basis for the traffic management and mitigation measures included in the proposed scheme. Those assessments provide a robust basis for considering the proposed scheme, as they assess traffic effects on a realistic worst case basis. In reality, the traffic effects would be expected to be less than those shown.

### Ecological Impacts

11. Information Paper E2 Ecology outlines the promoter's approach to assessing, mitigating and compensating ecological impacts of the proposed scheme, including the impact on ancient woodland. Essentially, the promoter has designed the proposed scheme with the objective of achieving no net loss in biodiversity. How this route wide objective has been (and will continue to be) pursued through the design is explained in detail in the environmental statement. The Promoter will also seek to achieve an overall 10% net gain in biodiversity in the delivery of the proposed scheme.
12. Some 5.1 hectares of ancient woodland will be unavoidably lost to the proposed scheme. Extensive measures to address this loss will be developed as part of the detailed design and in accordance with the promoter's published ancient woodland strategy. Extensive new broadleaved woodland planting is also integral to the scheme's design.

Timothy Mould KC

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17 February 2023