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MANCHESTER CITY COUNCIL

Economy Scrutiny Committee

Date: Thursday, 10 March 2022
Time: 2.00 pm
Venue: Council Chamber, Level 2, Town Hall Extension

This is a **Second Supplementary Agenda** containing additional information about the business of the meeting that was not available when the agenda was published

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Membership of the Economy Scrutiny Committee

Councillors - H Priest (Chair), Bayunu, Doswell, Farrell, Johns, Moore, Noor, Raikes, Stanton and Shilton Godwin

Second Supplementary Agenda

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Report of the Strategic Director (Growth and Development)

This report informs the Executive about the deposit of the HS2 hybrid Bill in Parliament on 24th January 2022; the public consultations on the Environmental Statement (ES) and Equality Impact Assessment (EQIA) for the Bill; and outlines the Council's proposed response to these consultations. The report further outlines the key areas on which the Council is proposing to petition against the hybrid Bill, subject to the approval of Council on 4th March to submit a petition.

This report now includes the appendix titled 'Environmental Statement and Equality Impact Assessment'

Further Information

For help, advice and information about this meeting please contact the Committee Officer:

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This supplementary agenda was issued on **Monday, 7 March 2022** by the Governance and Scrutiny Support Unit, Manchester City Council, Level 2, Town Hall Extension (Library Walk Elevation), Manchester M60 2LA

Manchester City Council
Report for Resolution

Report to: Economy Scrutiny Committee – 10 March 2022
The Executive – 16 March 2022

Subject: HS2 Phase 2b Western Leg - Environmental Statement Consultation & Hybrid Bill Petitioning Response

Report of: Strategic Director (Growth and Development)

Summary

This report informs the Executive about the deposit of the HS2 hybrid Bill in Parliament on 24th January 2022; the public consultations on the Environmental Statement (ES) and Equality Impact Assessment (EQIA) for the Bill; and outlines the Council's proposed response to these consultations. The report further outlines the key areas on which the Council is proposing to petition against the hybrid Bill, subject to the approval of Council on 4th March to submit a petition.

Recommendations

The Economy Scrutiny Committee is requested to

(1) Comment on the report and recommendations and to endorse the recommendations as detailed below.

The Executive is recommended to:

(1) Note the deposit in Parliament of the HS2 Crewe-Manchester hybrid Bill and the accompanying ES and EQIA.

(2) Note and comment on the proposed contents of the City Council's submission in response to the consultations on the HS2 Crewe-Manchester hybrid Bill ES and EQIA.

(3) Note Council approval to submit a petition to object to aspects of the HS2 Crewe-Manchester hybrid Bill and comment on the proposed areas for the City Council's petition; and

(4) Delegate authority to the Strategic Director – Growth & Development, in consultation with the Leader and Executive Member for Environment, Planning and Transport, to finalise the responses to the HS2 Crewe-Manchester hybrid Bill Environmental Statement and EQIA and submit to DfT

Wards Affected: Ardwick, Ancoats & Beswick, Baguley Burnage, Didsbury East, Didsbury West, Fallowfield, Levenshulme, Northenden, Piccadilly, Rusholme, and Woodhouse Park.

Environmental Impact Assessment - the impact of the issues addressed in this report on achieving the zero-carbon target for the city
At the national level, whilst there are likely to be additional carbon emissions in the short-term from the construction of HS2, the project is likely to be less carbon intensive than other non-rail alternative transport schemes that would deliver similar transport outcomes. More crucially, high speed rail can encourage a modal shift away from car use, especially where it creates capacity on the conventional railway, to encourage more shorter-distance trips by rail. In addition, improvements to rail capacity will enable more freight to be transported using rail, reducing the number of journeys by road, and has the potential to reduce demand for domestic flights. The integration of HS2 and NPR and investment in new rail infrastructure also provides opportunities for decarbonisation of rail, across the North. All these factors are important contributions to acting on the climate change emergency declared by Manchester City Council, helping to reduce carbon emissions in line with policy aspirations to become a zero-carbon city by 2038, supporting the emerging Clean Air Plan for Greater Manchester. Major investment in both Manchester Piccadilly and Manchester Airport HS2/NPR stations will provide excellent facilities for public transport connections and support the integration of the transport network in Manchester, as part of the wider integration of transport for Greater Manchester and across the North. This would contribute to the city's zero-carbon targets and the planning of sustainable transport infrastructure to support future growth. All new development around Piccadilly under the Strategic Regeneration Framework will be expected to be zero-carbon. Similarly, we expect HS2 Ltd. to use sustainable materials and methods of construction, which will not impact on the city's zero-carbon targets - the target for the city to be zero-carbon by 2038 at the latest aligns with the current estimated completion dates for HS2 in 2036-2041. We will be challenging HS2/DfT on these issues as part of our response to the Environmental Statement. We are also challenging HS2 Ltd on proposals for highways layouts and levels of car parking in the city centre. The City Centre Transport Strategy includes the ambition to reduce vehicles in the city centre and increase the use of public transport and active travel modes for travelling around, to and from the city centre. If proposals appear to be contradictory to our local policies and targets on climate change, then we will look to petition against those aspects as part of the parliamentary process.

Manchester Strategy outcomes	Summary of the contribution to the strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	A high-speed line between Manchester, the West Midlands and London, and improved rail connections in the North of England, as proposed by Transport for the North through Northern Powerhouse Rail (NPR) will support business development in the region. The scheme has the potential to provide a catalyst which can attract further investment into Greater Manchester by creating a new gateway into the regional centre and boost the investor confidence in the area. Specifically, the proposals for HS2/NPR stations at Manchester Piccadilly and Manchester Airport provide major opportunities for stimulating economic growth and regeneration in the surrounding areas.
A highly skilled city: world class and home-grown talent sustaining the city's economic success	The high-speed rail network serving the city centre and the Airport, regeneration of the Piccadilly area, will enable and further development around the Airport, and thus contribute towards the continuing economic growth of the city, providing additional job opportunities, at a range of skill levels, for residents. As part of the high-speed rail Growth Strategy, a Greater Manchester High Speed Rail Skills Strategy has been developed, to best enable residents to access the opportunities created by both the construction of the High-Speed rail infrastructure and from the additional investment and regeneration arising from it.
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	The economic growth brought about by high-speed rail, and the regeneration of the Piccadilly area, will help to provide additional job opportunities for residents, as well as improved connections for our communities to jobs in the city centre and beyond. The area will also provide new leisure opportunities, including new areas of public realm, accessible to all members of the public.

A liveable and low carbon city: a destination of choice to live, visit, work	The Manchester Piccadilly Strategic Regeneration Framework (SRF) provides a vision and framework for the regeneration of the Piccadilly area as a key gateway to the city, with a unique sense of place. Providing new, high quality commercial accommodation, new residential accommodation and the public amenities including public realm, retail, and leisure opportunities, will create a desirable location in which to live, work and visit. HS2 will enable the provision of improved public transport, through the capacity released on the classic rail network and, if aligned with Greater Manchester's plans, integration with other transport modes at Manchester Piccadilly and Manchester Airport. This can encourage more public transport journeys and less reliance on cars. Improvements to rail capacity will also enable more freight to be transported using rail, reducing the number of journeys by road. The provision of HS2 and NPR will also support the planned development around Piccadilly and the Airport included within the draft Places for Everyone Framework.
A connected city: world class infrastructure and connectivity to drive growth	HS2, together with NPR and the proposed Northern Hub rail schemes, will bring a step change in rail connectivity both across GM and to the rest of the UK. HS2 and NPR will radically enhance north-south and east-west connectivity between the country's major cities, which will increase labour market accessibility, open new markets for trade and stimulate economic growth, as well as better connecting people to job opportunities. The city's plans for Manchester Piccadilly and Manchester Airport Station are to provide world-class transport interchanges that can act as gateways to the city and city region.

Full details are in the body of the report, along with any implications for

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

None directly from this report.

Financial Consequences – Capital

Whilst there are no direct financial consequences arising from this report, the Council notes the importance of DfT having an identified funding strategy which guarantees the delivery of the HS2 and NPR schemes in their entirety to ensure the economic benefits of the investment are maximised.

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy, please contact one of the officers above.

- Report to Executive 14 December 2016 - Manchester Piccadilly High Speed 2 (HS2) Phase 2 Route Announcement

- Report to Economy Scrutiny 1 February 2017 - High Speed Rail – High Speed 2 (HS2) and Northern Powerhouse Rail (NPR)

- Report to Executive 18 October 2017 - Greater Manchester HS2 and Northern Powerhouse Rail Growth Strategy

- Greater Manchester HS2 and NPR Growth Strategy: The Stops are Just the Start 2018

- Report to Executive 7 March 2018 – Manchester Piccadilly Strategic Regeneration Framework Update 2018

- Report to Executive 27 June 2018 – Manchester Piccadilly Strategic Regeneration Framework Update 2018

- Manchester Piccadilly Strategic Regeneration Framework 2018

- HS2 Working Draft Environmental Statement 2018, available at: https://www.gov.uk/government/collections/hs2-phase-2b-working-draft-environmental-statement

- Report to Economy Scrutiny 7 November 2018 - HS2 Working Draft Environmental Statement (WDES)

- Report to Executive - 12 December 2018 - HS2 Working Draft Environmental Statement (WDES)

- HS2 Phase 2b Working Draft Environmental Statement Consultation Response of the Greater Manchester Combined Authority 2018

- HS2 Phase 2b Working Draft Environmental Statement Consultation Response of Manchester City Council 2018

- HS2 Phase 2b Design Refinement Consultation 2019, available at: https://www.gov.uk/government/consultations/hs2-phase-2b-design-refinement-consultation

- Report to Executive – 11 September 2019 – HS2 Phase 2b Design Refinement Consultation 2019

- HS2 Phase 2b Design Refinement Consultation 2020, available at: https://www.gov.uk/government/consultations/hs2-phase-2b-western-leg-design-refinement-consultation

- Report to Executive - 9 December 2020 - HS2 Phase 2b Western Leg Design Refinement Consultation Response

- HS2 Phase 2b hybrid Bill and related documents, available at: HS2 Phase 2b - GOV.UK (www.gov.uk)

1.0 Introduction

1.1 Previous reports to Executive have set out the connectivity, economic growth and regeneration benefits that can be brought about by HS2 and NPR for the city, Greater Manchester, and the UK. We believe these schemes are vital to increasing the capacity and connectivity improvements needed to Britain's rail network, and will deliver a transformational step-change in the connectivity of the North's major regions, helping to underpin economic growth and deliver levelling up across the North and the UK.

1.2 Previous reports to Executive have also outlined Government's intention to implement a new high speed rail network (HS2), from Manchester to London via Birmingham and Crewe. A response to The Working Draft Environmental Statement (WDES) Consultation, which was a precursor to the Environmental Statement (ES), was submitted to HS2 in 2018 outlining the Council's Key concerns to a number of matters

1.3 The hybrid Bill for HS2 Phase 2b "Western Leg", between Crewe and Manchester was deposited in Parliament by the Department for Transport (DfT) on 24th January 2022.

1.4 The Council is fully supportive of the introduction of HS2 and NPR and the provision of stations at Manchester Piccadilly and Manchester Airport. However, we have consistently retained a clear position on the need to ensure that the schemes are delivered in a manner that fully complements the connectivity, place-making, local employment, and sustainable growth objectives as set out in the Manchester Piccadilly Strategic Regeneration Framework (SRF) and the Greater Manchester HS2 and NPR Growth Strategy. This has been reiterated in several responses to Government consultations on HS2 made in 2014, 2017, 2018, 2019 and 2020, as well as through ongoing direct engagement with HS2 Ltd and DfT.

1.5 This report summarises our proposed response to the Phase 2b Manchester-Crewe hybrid Bill, including the response to the Bill's Environmental Statement and Equalities Impact Assessment consultations, and the key issues to be covered in a petition to the hybrid Bill.

2.0 Background – the HS2 Crewe-Manchester hybrid Bill

2.1 The Phase 2b Crewe-Manchester Bill includes provision for new high-speed rail stations (providing for HS2 and Northern Powerhouse Rail services) at Manchester Piccadilly and Manchester Airport, along with a tunnelled section of railway that will connect the respective stations. It also covers the provision of other related infrastructure, including new highway layouts, car parking and Metrolink services at the two stations.

2.2 Northern Powerhouse Rail (NPR) is a proposal to deliver a high-speed rail network between Manchester, Liverpool, Leeds, Newcastle, Sheffield, and Hull. The Government's preferred outline plans for NPR are included in the recently published Integrated Rail Plan (IRP). The IRP does not embrace

the ambition for a better connected North as envisaged by Transport for the North (TfN), as key elements including proposals for Sheffield and Hull for examples are not included. The hybrid Bill includes provisions to facilitate the integration of Northern Powerhouse Rail (NPR) at both Piccadilly and Manchester Airport high speed stations. It does not cover the whole of the proposed NPR scheme, but rather elements to enable its future delivery.

3.0 HS2 Crewe-Manchester hybrid Bill Environmental Statement

3.1 The Environmental Statement (ES) is an assessment of the likely significant environmental effects of the proposed HS2 railway, including the effects of construction and operation.

3.2 The council provided a response to the WDES in 2018, which was a high-level overview of the items to be considered in the full ES. The full ES should respond to the issues of concern raised in the WDES consultation. The council's assessment of the ES to date has noted that many of our concerns raised in the WDES have not been addressed.

3.3 The ES is broken down into eight 'community areas'[1] and various topic specific chapters. The community areas which are of most relevance to the council are MA06: Hulseheath to Manchester Airport, MA07: Davernport Green to Ardwick and MA08: Manchester Piccadilly. The ES is also accompanied by a separate Equalities Impact Assessment (EQIA) and an Environmental Impact Assessment (EIA).

3.4 The structure of the ES covers the following:

- **Volume 1 – Introduction and Methodology** - an introduction to the working draft Environmental Statement and an overview of the route and the environmental impact assessment process.
- **Volume 2 – Community Area Reports and Map Books** - The Community area reports describe likely significant route-wide environmental effects of the construction and operation
- **Volume 3 – Route Wide Effects** - This describes the impacts and effects that are likely to occur at a geographical scale greater than the community areas described in Volume 2.
- **Volume 4 – Off-Route Effects -** This describes an assessment of the off-route effects of the proposed scheme i.e., effects in locations remote from the HS2 route corridor.
- **Volume 5 – Appendices and Map Books** – comprising details on:
    - Agriculture, Forestry and Soils
    - Air Quality
    - Climate Change

[1] MA01: Hough to Walley's Green | MA02: Wimboldsley to Lostock Gralam | MA03: Pickmere to Agden and Hulseheath | MA04: Broomedge to Glazebrook | MA05: Risley to Bamfurlong | MA06: Hulseheath to Manchester Airport | MA07: Davenport Green to Ardwick | MA08: Manchester Piccadilly Station

- Community
- Ecology and Biodiversity
- Electromagnetic Interference
- Health
- Historic Environment
- Land Quality
- Landscape and Visual
- Major Accidents and Natural Disasters
- Socioeconomics
- Sound, Noise and Vibration
- Traffic and Transport
- Waste and Material Resources
- Water Resources and Flood Risk
- Scope and Methodology
- Draft Code of Construction Practice
- Alternatives Report
- Planning Data
- Wider Effects Report
- Working Draft Environmental Statement consultation summary report
- Borrow Pit Report
- Other background data and map books

3.5 To secure the best outcome and lay the necessary foundations for any future petition (please see below for more information on petitioning), each of the above volumes and topics must be reviewed and responded to.

3.6 The Council's full response to the ES must be submitted to the Government by 11:45pm on the 31st March 2022. The Council's response fully supports, and is aligned with, the responses being submitted by the Greater Manchester Combined Authority (GMCA), Trafford Metropolitan Borough Council, Wigan Metropolitan Borough Council, and Manchester Airport Group (MAG).

3.7 **MA06 Hulseheath to Manchester Airport Community Area**

3.7.1 This is an area of land between the River Bollin and the M56, as well as the westbound carriageway of the M56 in the City Council's boundary.

3.7.2 Proposed work includes: a viaduct over the River Bollin a balancing pond for railway drainage; an embankment, a cutting at Halebank, closure and realignment of Sunbank Lane and other footpaths; a box tunnel under the M56, the redesign of M56 Junction 6 and improvements to the existing road network around the proposed Airport Station.

3.7.3 It includes a four platform Airport HS2 Station and associated access, servicing, and parking. These lie within Trafford Council's administrative boundary, although the proposal impacts on both Manchester and Trafford Council areas.

3.7.4 In this area, the scheme will provide a connection between HS2 and a future NPR route between Manchester and Liverpool via the Manchester Airport High Speed station. Manchester Airport is located to the south-east of the proposed HS2 Station at Manchester Airport.

3.8 MA07 Davenport Green to Ardwick Community Area

3.8.1 This section is 13.4km long, of which 12.8km is in tunnel under the wards of Ardwick, Longsight, Rusholme, Withington, Didsbury West, Didsbury East, Northenden and Baguley. 573m of the route is in cutting at Ardwick.

3.8.2 There are several features associated with the tunnel. This includes four vent shafts/headhouses proposed at: Altrincham Road/M56 junction 3a (Northenden Ward) (Vent Shaft 1); Withington Golf Course, Palatine Road (Didsbury West) (Vent Shaft 2); The Christie Car Park D, Wilmslow Road (Didsbury East/boundary with Didsbury West) (Vent Shaft 3); and Fallowfield Retail Park, Birchfield Road (Rusholme) (Vent Shaft 4).

3.8.3 The vent shafts/headhouses will be approximately 25m x 43-54 wide and 6m high. Each vent shaft will have a construction compound and there will be additional auto transformer stations at Palatine Road and Birchfield Road.

3.8.4 At the Ardwick end there would be a ‘porous portal’ (a perforated structure at the tunnel entrance, designed to allow the passage of air from the tunnel) with a head house substation and a tunnel portal building.

3.9 MA08 Manchester Piccadilly Community Area

3.9.1 The route would exit the tunnel at the Siemens Train Care Facility, Rondin Road in Ardwick Ward, into a cutting. It then rises to a viaduct that widens to accommodate the 2 NPR “passive provision” viaducts. A viaduct then extends over the Pin Mill Brow Junction and expands to 6 tracks which lead into the 6 platforms at the proposed station. The HS2 station would be located alongside the existing Piccadilly station building at a similar height. All platforms will have a roof and canopy.

3.9.2 The Manchester Piccadilly Station area will be 1km (0.6 miles) in length.

3.9.3 In this area, the Proposed Scheme will provide a connection between HS2 and a future NPR route between Leeds and the Manchester Piccadilly High Speed station.

3.9.4 A new Metrolink station will be constructed underneath the HS2 station which will have 4 platforms. This will replace the existing 2 platform Metrolink station underneath the existing Piccadilly station. The construction of the HS2 station at Piccadilly will severe Metrolink services to Ashton during its construction which presents an opportunity to build a new station which has 4 platforms, which would be much more complex to achieve under the existing Piccadilly station.

3.9.5 The hybrid Bill also proposes a “turnback facility” (used to allow trams which are not continuing their journey to turnaround) at the New Islington tram stop to replace the existing Sheffield Street turnback, which will be out of service due to the construction of HS2.

3.9.6 There will be an Autotransformer station at Midland Street. At Pin Mill Brow and other streets around Piccadilly, changes to the road layout are proposed. Two multi-storey car parks are planned to be constructed on New Sheffield Street (site of the proposed boulevard in the SRF). Eight compounds are proposed for the construction of the railway.

3.9.7 In this area, the Proposed Scheme will provide passive provision for a connection between HS2 and a future NPR route between Leeds and the Manchester Piccadilly High Speed station.

3.10 **Key Themes & Issues**

3.10.1 Due to the volume of material included in the ES, and the timescales involved in responding to the consultation, this report aims to provide an overview of the key topics and areas of the ES where officers consider that avoidance, mitigation and/or compensation is:

a) Critical to Manchester; and
b) Likely to be successfully secured

It should be noted that most the analysis of the ES has highlighted the lack of detail and the need for further information from HS2 Ltd. Many of the issues previously raised by the City Council and partners, in our response to previous consultations, have not been addressed in the ES.

3.11 **Volume 1 – Introduction and Methodology**

3.11.1 Design – The HS2 Ltd Design Vision sets core principles around three themes of people, place and time and creating a sense of place that will stand the test of time. It is important that these high-level principles are followed through to the detailed design of all elements that could singularly or cumulatively have an impact on Manchester.

3.11.2 HS2 Ltd design approach should be consistent with its own guidance. It should fully assess the location and context. It should then develop a suitable and appropriate design response to suit the location and context, rather than providing generic, engineering solutions which would not be appropriate for Manchester.

3.11.3 The resulting structures should be a high-quality design response. This is important in terms of landscaping and integrating and retaining existing features such as trees, as well as ensuring that the structures are of a high-quality design.

3.11.4 The proposed stations and their landscaping and associated works, including

the approach viaduct to the new station at Piccadilly, will need an exemplary design response that responds positively to their context and support the regeneration masterplans in these locations. It is important that the Local Planning Authority (LPA) is engaged in early and detailed discussions over the designs of these new structures to ensure the highest design quality and landscaping, and to ensure that they respond positively to their setting. In the case of Piccadilly, the design should respond sensitively to the historic environment and adjacent Grade II listed train shed.

3.11.5 Further detailed investigation and surveys are needed in terms of historic buildings, character appraisal, archaeology and built heritage to inform the proposals and to enable a proper assessment of impact and mitigation interventions needed.

3.11.6 Volume 1 also states that the route-wide approach has been developed with Historic England and Local Authorities at Phase 1 and Phase 2a. A route wide Written Scheme of Investigation has also been prepared setting out a framework for design, evaluation, and investigation.

3.11.7 Site Investigation is still to be done, which means that it is likely that there are still unknowns about land quality.

3.11.8 In the Landscape and Visual Impacts section, the ES states that measures to mitigate are part of an integrated design approach. It is important that best practice and high-quality design are at the forefront in developing bespoke responses, and that any harm or adverse impact is avoided rather than mitigated.

3.11.9 Electromagnetic Interference (EMI) is mentioned in relation to the 25-kilovolt electrification traction power of trains. It is being assessed and sensitive receptor sites are being identified along the track route corridor. The Christie Hospital and the Airport have been identified and HS2 Ltd are looking to mitigate any impacts.

3.12 **Volume 2 – Community Area Reports and Map Books - Comments Applicable to MA06, MA07 and MA08**

3.12.1 **Agriculture, Forestry and Soils -** Soils have been assessed thoroughly at the same time as the land quality survey. The soils assessment focusses mainly on soils as an agricultural resource, and of ensuring it isn't damaged during construction. There is robust mitigation protocol referenced, which would be effective if rigorously adhered to. Other important aspects of soil management appear to be deferred to other topic areas, for example soils supporting important ecological sites are dealt with in ecology, peat in carbon etc.

3.12.2 The main issue of concern for our ES response is that the assessment methodology makes assumptions about the impact sensitivity of some businesses and therefore a danger that these impacts and their importance are downplayed. There is overlap here with socioeconomic impacts.

3.12.3 There are very few forestry areas affected and the impact is regarded as negligible, which seems appropriate.

3.12.4 **Air Quality, Land Quality, Sound, Noise and Vibration -** HS2 Ltd. will develop Local Environmental Management Plans (LEMP) to supplement the final Code of Construction Practice. There is an expectation that the Plans should be developed in consultation with the Council.

3.12.5 Likely significant sound, noise, and vibration impacts have been identified at certain locations/premises, but the level of detail is not sufficient to properly assess and needs to be provided.

3.12.6 Any buildings that qualify for noise insulation or temporary re-housing are reported in the ES.

3.12.7 Proposed construction hours include Saturday working hours from 0800 - 13.00 hours and 24 hours working. Variations to standard working hours will need to be discussed and agreed with the Council as part of the LEMP work to mitigate potential noise disturbance.

3.12.8 **Noise -** Vibration Impacts of the tunnelling boring machine (TBM) are expected to have significant effect on the use of the MRI scanner at the Christie Hospital for 25-30 days. A Specific Vibration Risk Assessment was undertaken after liaison with the Christie but concludes that HS2 Ltd. will liaise with the Christie further. It is essential that this takes place.

3.12.9 **Climate Change** – There has been no consideration of the impact on climate change at the local level or consideration for the Climate Emergency and local carbon budgets**.**

3.12.10 This is particularly of concern around Piccadilly Station, which is a dense urban environment, with further development planned. Indications show that Manchester is already falling below the levels necessary to meet the overall carbon budget that has been set, and HS2 construction traffic will significantly compound the matter. This needs to be addressed as a priority.

3.12.11 Overall and over the long term, the proposal would meet the aims of assisting with a more sustainable transport system and encourages the use of sustainable construction practices

3.12.12 **Community -** In total – 79 Commercial, 19 Residential and 35 other types of properties are impacted / demolished as part of the scheme in Manchester including several important community services and buildings between Ardwick and Piccadilly.

3.12.13 Multiple residential properties in Chapeltown, Ducie Street, Pollard Street and New Islington will experience temporary impacts associated to construction activity.

3.12.14 The route through Piccadilly Station, involving several level changes, will be

problematic for users of the station, particularly for those with mobility challenges.

3.12.15 The Piccadilly Station proposals locate the HS2 platforms to the north of the existing rail station (facing towards the Inner Ring Road). As proposed, this does not provide adequate integration with the existing station and access to the city centre would be extremely poor from this location, due to the topography, existing buildings, and potential route through a 70-metre-long tunnel at Store Street.

3.12.16 The alternative route through the existing Network Rail station is not considered appropriate given the pressures on the current concourse from more passengers (25% increase in the last four-five years). 2016/17 figures from the Office of Rail and Road show 27 million passengers per year and 41million visitors to the station per annum. DfT figures indicate that rail passenger numbers (alone) will increase to almost 60 million by 2040.

3.12.17 HS2 passengers using only the current entrance is a wholly inadequate solution. A fully integrated station design (as shown in the Piccadilly Strategic Regeneration Framework (SRF) and the GM HS2 & NPR Growth Strategy) would provide a common, accessible approach for HS2 and non-HS2 passengers (see section 5.7 for more information on Piccadilly Station).

3.12.18 The required Ventilation shaft, headhouse and auto-transformer station at Palatine Road continues to have a significant impact upon Withington Golf Club, including its future viability. As proposed, there would be a permanent loss of the club house, car parking and part of the golf course playing area, alongside a temporary loss of wider land impacting 4 of the golf course's holes for a period of 5 years. It's noted that once construction is completed, that the golf course could viably reopen. Ongoing liaison with the club by HS2 Ltd. will be required.

3.12.19 The Birchfields Road vent shaft will continue to have implications for businesses at the Fallowfield Retail Park and the local community through loss of amenity and parking implications. Impacts will include the loss of land/units at the retail park. The car park is also used by parents to drop off children at the nearby Birchfields Primary School and Manchester Enterprise Academy (MEA Central), to improve the safety of children as part of a 'park and stride' scheme promoted by the Council.

3.12.20 **Construction -** Temporary soil stockpiles could contain contaminated soils. More details are needed on the methodology to be employed for soil excavations, transportation and as to how the stockpiles will be managed to prevent contamination from leaving the compounds, in the form of dust of leachate. This will ensure that the lands beneath the compounds does not become contaminated because of the temporary storage

3.12.21 Hoardings to segregate the HS2 construction site will be at least 2.4m high but may up to 3.6m and possibly altered to enhance acoustic performance.

3.12.22 304 residential properties are forecast to experience noise above the eligibility criteria for noise insulation, but below the eligibility criteria for temporary rehousing criteria. This is of concern and HS2 will need to ensure that they are responsive to residents throughout the construction process.

3.12.23 Tunnelling Boring Machine (TBM) expected to have significant effect on the use of the proposed MRI scanner at the Christie for 25-30 days. A specific Vibration Risk Assessment was undertaken after liaison with the Christie, but this concluded that HS2 will liaise with the Christie further.

3.12.24 **Cultural Heritage** – A major adverse effect is predicted in relation to the removal / repositioning of the Grade II listed Milestone adjacent to Withington Fire Station. The repositioning of the asset to a different location would erode the integrity of the asset and undermine its significance. Whilst the retention of the asset is positive, its relocation would still be considered to have a major adverse impact overall.

3.12.25 The Piccadilly hybrid Bill station design will result in considerable loss of non-designated heritage assets in the Ardwick / Piccadilly area. All reasonable options which would avoid the permanent loss of these assets should be appropriately explored.

3.12.26 Prominent late-19th century buildings at 163 Ashton Old Rd and 223 Ashton Old Road (M11 3WU) are of architectural and historic merit and have the potential to be impacted by the construction compounds but are not identified in the ES maps.

3.12.27 Concerns around the potential for movement around the collection of Listed Buildings next to Ladybarn Road. This should be monitored during the construction and operational phases.

3.12.28 **Ecology –** It is noted that a 10% net gain in biodiversity for replaceable habitats along the Crewe to Manchester Route is being implemented by HS2 Ltd. after construction.

3.12.29 The impact on Bollin Bank is unclear (HS2 viaduct over the River Bollin Linking Woodhouse Park in Manchester and Cheshire East). As well as the direct loss, it could be permanently isolated from the rest of Sunbank Wood. This is due to the transition from viaduct to embankment, which occurs directly in the woodland. No consideration has been given to the temporal impacts during the construction period.

3.12.30 No bat emergence surveys were undertaken in any building or structures in MA08; we would not accept an ES for a planning application with this lack of survey effort.

3.12.31 The loss of hedgerows in MA07 is described as of being significant at a local/parish level. Since this includes the loss of native species-rich hedgerows, this is an underestimation of the value of the hedges. Species rich hedges are very rare in Greater Manchester and any loss would be

considered significant.

3.12.32 No details of the black redstart location found in MA08 have been given. The ES identifies that the construction in this area will result "in the disturbance of black redstart nesting habitat". No mitigation is proposed for the loss of nesting habitat because there is "extensive alternative nesting habitat in the area". However, this overlooks the fact that black restarts require nesting habitat linked to nearby feeding areas.

3.12.33 **Health –** The demolition of recreational facilities affecting the ability to participate in specific physical activity at the following locations: In Aldow Industrial Park demolition of Totem Gymnastics, a children's gymnastics club, Cloud Aerial Arts (an acrobatic, gymnastics and yoga centre) and CrossFit Ancoats (a specialised cross fit gym).

3.12.34 The demolition of building providing service, reducing access to service supporting health and wellbeing at the following locations: Manchester Offenders: Diversion, Engagement and Liaison (MO:DEL), and Manchester Action on Street Health (MASH) on Fairfield Street)

3.12.35 The presence of construction traffic, including HGV, on local roads leading to amenity impacts and safety concerns, deterring the use of local roads by non-motorised users in MA08

3.12.36 An increase in HGV traffic and changes to the noise environment will lead to reduced levels of amenity from the local environment in MA07 (A34 Kingsway and A34 Birchfields Road)

3.12.37 **Landscape and Visual** – No reference is made to the Mayfield development which is located within close proximity to Piccadilly Station. The vision for Mayfield is for a distinctive, world class development delivering significant new commercial space, and up to 1,500 new homes alongside a mix of retail and leisure facilities all centred on a new 6.5-acre city centre park. The outdated baseline is likely to impact on the accuracy of the baseline assessment of value, susceptibility to change and overall sensitivity. This is likely to result in an inaccurate assessment of effects and their significance.

3.12.38 No consideration is given to future aspirations as set out within the SRFs which are relevant to the site.

3.12.39 There are concerns that the landscape and visual mitigation provided in the city centre will not be adequate.

3.12.40 The Airport Station itself lies outside the City Council boundary. However, there will be visual impacts from the station, associated multi-storey car parks, new highway layouts and landscaping works. The new station and associated buildings works should be of an exemplary design quality in terms of architectural design and public realm and landscaping works. Mitigation works associated with the construction and operational aspects of the scheme should be carefully considered to minimise any adverse effects.

3.12.41 There is a lack of photomontages to see how the scheme will develop at key points from construction operation and beyond.

3.12.42 There is no assessment of potential increased impacts on the townscape character because of the potentially taller vent shafts at Palatine Road, which may appear incompatible within the largely suburban, residential context. The potential increased visibility of the vent shafts as a result of repositioning may make them a more dominant feature in the local townscape context.

3.12.43 Existing landscape features including high quality trees and hedgerows should be given due consideration at the advanced design stages. The impact caused by any new highways should be minimised and mitigated.

3.12.44 The Mersey Valley Managed Open Space is one area where the character would be significantly affected to a moderate, adverse level. As this landscape is of high value and contributes significantly to the character of the area, opportunities should be taken to avoid any adverse impacts by redesigning the scheme to one where there is less impact.

3.12.45 There are considerable concerns over the proposed loss of mature trees in the Mersey Valley that also contribute significantly to the character of the area. The trees provide a high value mature landscape feature and attempts should be made to avoid loss by redesigning the proposals to retain this existing important feature.

3.12.46 Due to the lack of appropriate criteria within the methodology, there is a reliance on professional judgement to assess the baseline and effects. Whilst this is part of the assessment process and in accordance with the Guidelines for Landscape and Visual Impact Assessment, the overall assessment lacks robustness.

3.12.47 **Major Accidents & Natural Disasters –** There is a general concern that HS2 are controlling everything centrally and seem to be relying on the local authorities to contact other bodies such as GMEU, GMRU and GMRF. These bodies have not been contacted by HS2 to discuss risk and impacts.

3.12.48 Concern that the potential mitigation measures that are put in place by HS2 Ltd. are as low as reasonably practicable, but no testing is proposed to the mitigation systems prior to HS2 becoming operational which leaves doubt that the mitigation measures will work effectively should a disaster / major incident occur.

3.12.49 **Socio Economic –** Members should note that up to 40,000 additional jobs are estimated as a result of HS2/NPR with an implemented Piccadilly SRF.

3.12.50 A total of 490 HS2 jobs will be required within MA07, however, it is not clear what proportion of these can be taken up locally. Similarly, it is not clear what training / guidance HS2 Ltd can provide to ensure local skills can be used, outside of the apprenticeship roles. The GM local industrial strategy

highlights our STEM framework which we need to work with HS2 on.

3.12.51 We oppose any loss of jobs caused by the removal of businesses by HS2 and expect HS2 to actively assist businesses to relocate and to liaise with MCC to support them in this.

3.12.52 We wish to seek financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route within the borough that has been demonstrated to cause businesses to fail or had a significant impact on their income. It is not expected that the local authority should bear the financial consequences to the detriment of its residents and businesses.

3.12.53 Indirect construction employment - it is not clear how supply chain employment will be generated or how businesses may gain early guidance as to how to bid in to/benefit from supply chain activity.

3.12.54 **Traffic and Transport -** MCC are concerned that during construction and operation residential neighbourhoods will suffer with increased non-residential parking from construction workers and later passengers. Travel Plans developed for construction workers must not force off road parking, i.e., parking on grass verges.

3.12.55 HS2 Ltd have completed a traffic modelling study, but we have several concerns on this, notably that NPR traffic hasn't been included in modelling around the airport and major streets have not been included in the baseline data. For example, Oxford Road is open to normal traffic in the model but has been closed to Cars and HGVs for many years. This has resulted in the traffic modelling being unreliable and cast doubt on the validity of the traffic interventions proposed to the road network around Piccadilly and the Airport stations.

3.12.56 Beyond provision of junction improvements to provide direct access to the stations, HS2 Ltd. have not proposed any mitigation for locations on the road network where they have identified their scheme will have impacts on traffic flows, congestion, and bus delays.

3.12.57 Bus journey time impacts are significant during construction and show increases of over 40% on some corridors. This level of impact is not acceptable and there has been no mitigation proposed by HS2 Ltd. in the ES. This needs to be addressed.

3.12.58 Cycle facilities at key locations such as Pin Mill Brow, Thorley Lane, and the New Airport Access gyratory do not meet current standards and need to be improved.

3.12.59 The Council and our partners share a number of concerns about HS2 Ltd.'s highways proposals at the Airport station. These have been raised formally and informally with HS2 Ltd. on numerous occasions.

3.12.60 The Council and its partners feel that inadequate evidence has been provided on how the Airport station can be accessed; what the implications are for Junctions 5 and 6 of the M56 and the wider M56; the wider highways access; and impact on airport operations and accessibility.

3.12.61 Our concerns about highways access cover both the construction phase and the longer-term operation of the Airport station. There is also a lack of detail about how demand from NPR traffic will be managed.

3.12.62 With most of the route through the MA07 area in tunnel, emerging at Ardwick Depot, the key traffic and transport issues are around the vent shaft / headhouse locations shown in the WDES. The parking at the Christie Hospital Car Park D on Wilmslow Road; the A665 Chancellors Lane, the Siemens Ardwick Train care Facility on Rondin Road, the Fallowfield Retail Park on Birchfields Road and Hooper Street could all be affected.

3.12.63 The Council's policies on parking and air quality mean that significant additional private car parking capacity for rail commuters would be difficult to accept, in particular the two multi-storey car parks proposed in the ES, within the city centre. Access to the proposed multi-storey car parks is also not in accordance with the approved Piccadilly SRF.

3.12.64 Pin Mill Brow gyratory junction proposal is not appropriate in scale or function. It occupies a wide area, limiting development potential and creates a hostile environment for cyclists and pedestrians, with no evidence of conformity to current design requirements. It is understood that the design was developed to achieve no major adverse effects on traffic capacity, but the proposed Pin Mill Brow gyratory does not cater for the forecast future demand in either 2038 or 2046.

3.12.65 The proposed quantum of cycle parking (500 spaces) at Piccadilly Station is insufficient. By comparison, Cambridge station currently has 3,000 undercover cycle parking spaces.

3.12.66 Other key specific issues identified in MA08 are:

- There is no consideration of walking and cycling routes or how these would form part of an integrated, place based approach to street design.
- There is little evidence of a holistic place making approach that seeks to link in wider existing networks.
- The hybrid Bill needs to integrate the Beeline proposals within the vicinity of Piccadilly Station and HS2 track alignment.
- There is no mention of enhanced wayfinding to ensure passengers can make their onward journeys easily and in an efficient manner.
- No clear connections heading to the north and the city centre are indicated.
- Station design needs to provide the highest quality arrival experience, with legible onward connection by active modes.
- The scale of the station and multiple rail alignments have the potential to create a severe severance effect. Permeability through these pieces of

infrastructure is key and must be demonstrated through the ES process.

- The HS2 station must be fully integrated with bus and coach services to ensure sustainable transport connections are provided.
- Metrolink forms a key interchange mode that must be fully integrated with the station designs considering future expansion and introduction of increased capacity through initiatives such as tram-train.
- The proposed location of the revised Pin Mill Brow junction impacts on several high-rise buildings and an urban park proposed in the Piccadilly SRF. This is not acceptable to the Council and alternative layouts need to be explored and discussed. Any changes to the highways layout in this location needs to be in accordance with approved planning.

3.12.67 **Water Resources and Flood Risk** – The Palatine Road vent shaft will change the flood flow immediately surrounding the vent shaft site. Modelling is underway and will continue during the passage of the Bill, to identify avoidance and mitigation measures to reduce the impact on peak flood levels around the Palatine Road vent shaft. Any permanent moderate adverse effects are unacceptable.

3.12.68 The hydrology assessment within the Mersey Model report uses event data between 1955 and 2012. The model has been further calibrated against Storm Christoph (Jan 2021). The results outline no substantial change in the overall model results. It is recommended further engagement with the Environment Agency continues to ensure the hydrology is appropriate for future detailed design. We are concerned that the hybrid Bill is going ahead without

3.12.69 Mitigation measures will be required to reduce the impact of the Proposed Scheme on peak flood levels at the receptors in Northenden, Stenner Lane and along Palatine Road. Details of mitigation & 'Significance' need to be agreed with EA.

3.13 **Volume 3: Route-wide Effects**

3.13.1 **Agriculture, Forestry and Soils -** There is a well-established robust land classification methodology for the whole route. The approach assesses all best and most versatile agricultural land (grades 1-3a) as of the same value: there are areas of grade 1 peatland in the western section, which are quite a scarce resource nationally but especially locally.

3.13.2 **Community** – it is noted that details of potential construction worker impacts are to be completed and that community issues will generally be dealt with at the local level. Comments are included in the Community Area sections of this report.

3.13.3 **Socio-economics –** 'it has been assumed that 88% of the business occupiers displaced by the scheme will successfully relocate to alternative locations and no employment will be lost. The other 12% of occupiers are assumed to close rather than relocate'. It is noted that this assumption was based on the research into the relocation of companies and jobs on account

of the London 2012 Olympic Games. Given the potential effects of this estimate and for the purposes of assessing the worst-case scenario, it is considered that the London-based case study does not represent the base case for the Crewe to Manchester route. Similarly, the assumption that a proportion of the 88% of the businesses which are in rural areas will be able to re-locate is not considered representative of the worst-case scenario for loss of FTEs. It should be noted that businesses are likely to be far more vulnerable after the Covid pandemic and their cash reserves may be much lower which will mean they are more fragile to any form of business interruption and as such the 12% figure given could be higher than the London based case study.

3.13.4 There is already significant development in progress and planned around the HS2 stations. This has material implications for economic impact and appropriate mitigation.

3.13.5 As noted above, an estimated 8,870 full time equivalent posts would be created during the construction period. HS2 Ltd. has committed to providing a minimum of 2,000 apprenticeships over Phase 1 and Phase 2a. A similar commitment should be provided for Phase 2b and HS2 Ltd. should work with the Council and Greater Manchester Combined Authority on this.

3.13.6 As highlighted above, the Council and partners would like to see schemes in place to ensure that as many of the HS2-related jobs as possible go to local people. HS2 Ltd. should engage with the City and GM partners to ensure this, building on work already in place in GM.

3.14 **Code of Construction Practice**

3.14.1 The ES includes a Code of Construction Practice, including mitigation measures to reduce and manage traffic and transport impacts as well as issues such as noise. The document also includes a commitment to limit the use of materials and the generation of waste.

3.14.2 Details of how construction would be managed are still emerging and officers will continue to work with HS2 Ltd. to further understand the impact and the proposed mitigation to limit this.

3.14.3 **Waste Material –** 'The disposal of 10,000,000 tonnes per annum of inert waste represents approximately 100% of the total inert landfill capacity in the North West region' is of concern. More information is needed on estimated levels of inert waste over the project (2025-2038) and disposal measures employed to allow WPAs to understand capacity requirements.

3.15 **Conclusion – Environmental Statement**

3.15.1 We welcome the opportunity to comment on the Environment Statement. However, there is a lack of detail on issues of major significance and clearly much more work needs to be done to satisfy the Council and that the scheme has holistically considered all the impacts and mitigations what Manchester

requires during and after construction. There are a significant number of areas of concern which we will raise as part of the Council's response to the ES. We will also continue to press HS2 Ltd. and DfT to work with the City Council and our GM Partners on the gaps that have been identified.

3.15.2 Officers will continue working with HS2, DfT, TfN and other partners on the detailed design development of the proposed scheme. We will continue to argue for world class, fully integrated stations with a build it once, build it right approach.

4.0 HS2 Crewe-Manchester hybrid Bill EQIA

4.1 Equalities Impact Assessment Report – this considers the potential effects of the construction and operation of HS2 Phase 2B on people with protected characteristics and explains how HS2 Ltd. proposes to avoid /reduce any adverse effects. These are people protected by the Equality Act 2010.

4.2 Christie Hospital - The landscape and visual assessment in the ES has identified a significant adverse visual effect at The Christie Hospital because of the construction of the Wilmslow Road vent shaft and associated construction traffic. There will also be night-time effects associated with additional lighting required for the Wilmslow Road vent shaft satellite compound, which will intensify existing night-time sky glow. Evidence from Cancer Research suggests that some drugs used in chemotherapy treatment can increase sensitivity to light or change in visual stimuli. There is therefore the potential for wider impacts on patients at The Christie Hospital.

4.3 Christie Hospital -The permanent loss of Car Park D, including the loss of all Blue Badge parking spaces and wheelchair shelters, will give rise to disproportionate and differential effects for disabled people including those with cancer attending the hospital for treatment or to visit other patients.

4.4 Disabled people, older people and children are being particularly disadvantaged by disruption construction, loss of public spaces, impacts of routes changing, less parking, air quality, replacing accessible trams with buses, relocating bs stops, temporary access and impact on loss of play areas and disruption to children's education etc. Further consideration is needed on the cumulative effect on these groups when developing mitigations. There is a lack of clarity on what the mechanisms will be for ongoing equalities analysis, equality stakeholder engagement and the need to refresh the data based on Census 2021. HS2 is required to revise the disproportionate data analysis model. Disability groups most likely to be affected are mobility, mental health, neurodiversity and sensory and this will be for all ages.

4.5 Housing impact – Vulnerable householders are at risk of mental health or physical impact due to uncertainty of HS2 altering existing routes or evictions if residences are compulsory purchased and not considering the residents surroundings (e.g., specific accessibility needs for your house).

4.6 The Council is concerned that the proposed HS2 station is not appropriately integrated with the facilities of the existing Piccadilly Station. A more integrated design would provide a common and more legible approach for HS2 and non-HS2 passengers, enabling choice between a wider variety of ancillary facilities and reducing unnecessary changes of level and therefore allowing better accessibility for all.

4.7 Buildings and structures are required to be demolished in most community areas assessed within the Councils boundaries. The Council would wish to ensure that adequate engagement, assistance, and support is provided for all affected, specifically those that would require additional support with understanding and going through the compensation process. Further support and information are required for impacted local businesses and community facilities and homes on the mechanisms being considered, alongside what support can be provided with the financial compensation

4.8 **Conclusion - EQIA**

4.8.1 We are concerned at the lack of detail within the EQIA. We hope to work with HS2 to resolve the issues to identified to make sure HS2 works for everyone in our city.

4.8.2 Lighting around the Christie for construction of the Ventilation shaft needs HS2 to mitigate the impacts to patients who have a light sensitivity due to cancer treatment by working with the Christie Hospital.

4.8.3 The loss of disabled car parking at the Christie needs replacing by HS2 Ltd.

4.8.4 Disabled, older and vulnerable people (including children) are being particularly disadvantaged by the disruption caused by HS2 construction activities. The level changes in the HS2 station integration with the classic Piccadilly Station is one shortfall.

4.8.5 Demolitions and compulsory purchases must ensure that residents and business are adequately compensated and have their needs considered during relocation.

5.0 Petitioning the Crewe-Manchester hybrid Bill

5.1 The extraordinary Council meeting on 4th March 2022 granted delegated authority to the Strategic Director for Growth and Development in consultation with the Leader of the Council to petition against the HS2 Phase2B hybrid Bill.

5.2 The paper presented at the Council meeting gave an overview of likely petitioning items. This Executive paper describes the issues of concern in more detail, although it should be noted that, due to the size and complexity of the hybrid Bill further issues may be identified following this report, which it is felt may need to be included in the final petition.

5.3 As with previous responses to HS2 Ltd consultations, Manchester is continuing to work closely with Greater Manchester (GM) Partners in preparing their respective petitions. The Council's petition will be aligned with those of other GM partners, whilst emphasising and highlighting issues of particular concern for the city.

5.4 As part of the Council and GM partner's ongoing work with HS2 Ltd on development of the scheme, a series of Critical Issues have been identified and these have been regularly raised and discussed with HS2 Ltd and DfT. The Critical Issues relate to areas of concern for the city and GM Partners and are issues which are fundamental to the success of HS2 Phase 2b in GM. The Critical Issues form the basis of our petition response, which has been refined in line with the exact contents of the hybrid Bill.

5.5 The Council's response to previous consultations on HS2 notes the critical importance for the HS2 and NPR proposals to be aligned with, and support, the city's range of existing and emerging strategies and policy documents. These include:

- City Centre Transport Strategy to 2040
- Manchester Climate Change Framework 2020-25
- Our Manchester Strategy and Our Manchester Industrial Strategy
- City Centre Strategic Plan (CCSP)
- Greater Manchester HS2 & NPR Growth Strategy
- Greater Manchester Clean Air Plan
- Greater Manchester Spatial Framework (GMSF)
- Strategic Regeneration Frameworks (SRFs) for the localities surrounding, and linked to, the Stations including:
    - Piccadilly SRF 2018
    - Mayfield SRF
    - Portugal Street East SRF
    - IQ Manchester (North Campus) SRF
    - Wythenshawe Hospital Campus SRF
    - Airport City

5.6 The key issues proposed to be included within the Council's petition are set out below. All these issues have been raised previously with DfT and HS2 Ltd on numerous occasions, both through our formal consultation responses and informal engagement.

5.7 **Manchester Piccadilly Station**

5.7.1 It is imperative to create a station at Manchester Piccadilly that is a world class, fully integrated transport hub which can actively maximise economic growth and the regeneration of the eastern side of the city centre. A 'Build it Once, Build it Right' strategic approach to transport investment at Piccadilly can ensure the earliest transformation of Piccadilly Station; avoid significant and long-term disruption and blight; and promote investor confidence. We believe that the design for Manchester Piccadilly High Speed station should

specifically consider Piccadilly in terms of the integration between HS2, NPR, the wider rail network and local growth and regeneration.

5.7.2 The surface terminus station proposed for Manchester station within the hybrid Bill does not deliver the right solution to provide the required level of reliability and resilience to effectively support the wider High-Speed network. Furthermore, it significantly impacts on the delivery of the place-making and economic growth agenda set out in the approved Piccadilly SRF and the GM HS2 / NPR Growth Strategy. The hybrid Bill proposal illustrates a 'bolt on' of NPR onto the HS2 scheme, as opposed to taking a holistic view of how to best deliver a fully integrated HS2 and NPR solution, considering long term capacity, reliability, connectivity, and future proofing.

5.7.3 A report commissioned by MCC and TfGM from Bechtel to review the proposed HS2/NPR station at Piccadilly Station concluded that a fully underground and re-orientated through-station could address the constraints of the existing proposal, offer much more flexibility and long-term capacity for future train service provision, as well as potentially reducing the amount of track and tunnel required to connect to the Airport station. Specific issues at Piccadilly highlighted in the report, and to be raised in the Council's petition, relate to:

- **Capacity, Reliability, Resilience & Future Proofing** – lack of capacity in the current surface station, which would be at full capacity on day 1 of its operation.
- **Customer Experience** – the need for a fully integrated and connected multi-modal transport hub, able to accommodate predicted future user numbers.
- **Place making & Supporting Economic Growth** - the loss of development land, and therefore economic and regeneration benefits because of the combined HS2 and NPR surface station.
- **Sequencing of investment** – "build it once, build it right" approach,
- **The application of onerous standards for HS2** – which may have impeded the development of an optimum solution for Piccadilly station.

5.7.4 In addition, the provision of a NPR route towards Leeds, included within the Integrated Rail Plan, suggest that a significant amount of surface infrastructure will be needed in the Ardwick area to enable the NPR trains to use a surface station. This infrastructure will cause blight and severance to the surrounding communities, as well as leading to a loss of a significant amount of developable land, impeding future economic growth and provision of jobs. Such infrastructure would not be needed with an underground station.

5.7.5 The Council's petition will request a fully underground HS2/NPR station be designed and approved for Piccadilly Station".

5.8 **Gateway House**

5.8.1 Gateway House is a building completed in 1969 and located on Station

Approach at Manchester Piccadilly Station. The HS2 Manchester-Crewe hybrid Bill does not include powers for HS2 Ltd to acquire and demolish Gateway House and therefore fails to provide an adequate interchange facility at Manchester Piccadilly Station. It further fails to provide an attractive and fit for purpose gateway into the city centre that will meet anticipated increased pedestrian capacity through Piccadilly Station and facilitate the regeneration set out in the Manchester Piccadilly SRF. This failure will create congestion, unnecessary pressure on the station entrance, an unappealing and low-quality arrival plaza and gateway to the city centre and discourage the use of public transport. Furthermore, the retention of Gateway House restricts sustainable connection between the Western end of the Boulevard envisaged in the SRF, the new station, the core of the city centre and the Piccadilly SRF area.

5.8.2 We believe that the removal of Gateway House is necessary to deliver regeneration and support economic growth, which is a stated objective of HS2. Its removal would enhance connectivity across the city centre and align with the SRF for Piccadilly. The proposals within the hybrid Bill also assume that Metrolink will be routed underneath Gateway House. It is currently not clear if this will be technically possible while Gateway House remains. We will, therefore, request that the hybrid Bill be amended to include the acquisition and demolition of Gateway House and an undertaking given that the final design of Manchester Piccadilly provides an integrated station and station approach, that delivers a high-quality gateway which is in accordance with the strategic vision for Manchester.

5.9 **Piccadilly Highways Works**

5.9.1 The hybrid Bill gyratory junction layout at Pin Mill Brow is too expansive and does not consider local transport and environment, zero carbon and clean air policies, which look to reduce car trips into the city centre, or of the station's city centre location. They also take a considerable amount of land in the SRF area, creating a loss of vital development land, and a poor local environment. The proposed gyratory will, therefore, result in significant adverse impacts on the regeneration proposals within the city centre.

5.9.2 The Council is also concerned about the quality of traffic modelling that has been undertaken by HS2 Ltd to inform the highway design that is proposed. The modelling does not consider some recent GM led highways improvements (for example Oxford Road traffic calming and bus lane improvements) or take account of the "Right Mix" plans within the GM 2040 Transport Strategy and City Centre Transport Strategy. This is important as it will have a fundamental impact on traffic flows across the city centre including the assumptions made for Pin Mill Brow, which seek to reduce the amount of private car journeys in favour of an increase in public transport and active travel journeys.

5.9.3 The Council's petition will, therefore, request that DfT replaces the hybrid Bill gyratory design with an alternative which takes up a much smaller land area and so better integrates with the Piccadilly SRF and is more closely aligned

to policies aimed at reducing journeys into the city centre by private car, as well as being less of a barrier to pedestrians and cyclist.

5.10 **Parking & Multi Modal Interchange at Piccadilly Station**

5.10.1 The hybrid Bill includes two multi storey car parks with a total capacity of approximately 2,000 parking spaces, situated on the proposed Boulevard included in the Piccadilly SRF, adjacent to the HS2 Manchester Piccadilly station. The amount and location of car parking at Manchester Piccadilly is unacceptable to the Council and needs to be appropriate to its city centre location, next to a major transport hub, and in the context of the Piccadilly SRF and wider policy initiatives, including Manchester's Climate Change Framework, the City Centre Transport Strategy, GM 2040 Strategy and GM Clean Air Plan, as well as the government's own Transport Decarbonisation Plan.

5.10.2 The Boulevard within the SRF is envisaged as a major piece of public realm, connecting the Piccadilly Central areas and East Manchester into the city, and providing a key business address which can drive development within the area. It is intended to be pedestrian dominated space, with traffic movements restricted to access only. Placing two large car parks with 2,000 spaces will result both in the loss of prime development land, but will also detract from the environment, attractiveness, and purpose of the Boulevard, as well as un-necessarily encourage car trips.

5.10.3 Our petition will request that parking numbers are considerably reduced (ideally providing spaces for essential rail operation uses only); that parking is moved to a different location; and that HS2 Ltd. work with MCC and other GM partners to find an acceptable solution which promotes a move to public transport and other sustainable transport modes.

5.10.4 We will also be requesting that HS2 Ltd. work collaboratively with Council and GM Partners to provide a "multi modal interchange" adjacent to the HS2 station, providing a bus/coach facility, that can enable easy switching between bus, heavy rail and Metrolink transport.

5.11 **Network Rail Maintenance Ramp**

5.11.1 The hybrid Bill proposes the relocation of the current ramp used by Network Rail to access the viaduct at Piccadilly Station for maintenance and catering. MCC have significant concerns about the proposed vehicle route to the new access ramp, as set out in the hybrid Bill, which routes vehicles through an area of the Mayfield development. This area is not suitable for road vehicles and is planned for closure under proposals in the approved Mayfield SRF and significantly compromises the development by routing heavy duty traffic through the area. The proposals will impact the first phase of the Mayfield development and the overall quality of the environment of the area, detracting from the ability to secure and retain business in the area, and consequently the ability to deliver the growth and jobs outcomes. Therefore, the current proposals are unacceptable.

5.11.2 The Council's petition will request that HS2 work with the Council, the Mayfield Partnership and TfGM to develop an alternative, locally acceptable route for the Network Rail ramp, that minimises adverse impacts on one of the city's most significant growth and regeneration areas.

5.12 **Relocation of North Block Services**

5.12.1 To construct the new HS2 station, it is necessary to demolish and relocate an office block which is situated next to Gateway House. This building is known as "North Block". The proposal within the hybrid Bill is to build a replacement facility over the Network Rail "relay room", which is located between the proposed Network Rail Ramp and the train operator catering facilities. These proposals are likely to extend the disruption to residents, because the relay room itself is likely to need to be upgraded in the 2040s, shortly after HS2 and NPR construction completes. The petition requests an amendment to the hybrid Bill to include provision to enable the relay room to be relocated during HS2's construction.

5.13 **Metrolink at Manchester Piccadilly**

5.13.1 The Council are in full support of the relocation and enhancement of the Metrolink stop at Piccadilly Station to beneath the HS2 station, as proposed in the hybrid Bill. The relocation and improvement of the Metrolink Stop is essential to both the future capacity of the Metrolink system and the experience of passengers. The Metrolink stop at Piccadilly needs to align with the proposals set out in the Piccadilly SRF and GM Growth Strategy, to enable the transformative growth and regeneration of the area, creating a world-class, 'one station solution.'

5.13.2 The relocation of Metrolink enables a future Metrolink stop to be provided at Piccadilly Central to serve the SRF area. The hybrid Bill only provides "passive provision" for future construction of the Piccadilly Central stop. We believe that the hybrid Bill should provide the powers to enable the full delivery of Piccadilly Central.

5.13.3 We consider that further work needs to be done to properly mitigate the impacts on Metrolink operations during the construction of HS2's Piccadilly station. We expect HS2 Ltd. to manage this in partnership with Transport for Greater Manchester and to prioritise reducing disruption to Metrolink customers and operations.

5.13.4 The hybrid Bill proposals include the full closure of the Ashton Line for a period of approximately 2 years, with a replacement bus service. This level of disruption is totally unacceptable to MCC and GM partners.

5.13.5 MCC oppose the location of the tram turnback at New Islington as it impacts on the adjacent Pollard Street development (which has received planning permission), resulting in potential delays to the project and loss of jobs. We believe that the turnback facility should instead be located at the Velopark

tram stop, which would both avoid the impact on Pollard Street and provide the potential opportunity for additional future services to be run to serve the Etihad Campus and Coop Live Arena. Our petition will request that the turnback is located at Velopark, rather than New Islington, and that the potential disruption to Metrolink services and passengers is minimised.

5.14 **Issues with the Manchester Tunnel: Tunnel Portal Relocation & Ventilation Shafts**

5.14.1 Changes made to the track alignments during previous reviews of the HS2 route to Manchester, to avoid the Ardwick depot, the widening of the viaduct, and inclusion of the passive provision for NPR, conflict with existing and approved plans set out within the Piccadilly SRF and cause severance to the Mayfield area. The Council requests that a 'place based' approach is taken at the Piccadilly and Ardwick areas, to ensure that the proposals fully support the regeneration and growth plans at Piccadilly and Mayfield. There is also a need to consider the impact of the new alignment on proposed future alignments for NPR, as well as future alignments for tram train, and alternative highways layouts, re-emphasising the need for a fully holistic approach.

5.14.2 The proposal in the hybrid Bill to locate a ventilation shaft immediately adjacent to Birchfields Primary School, on part of the Fallowfield Retail is unacceptable. It will have a significant impact on both the primary school and the nearby MEA Central Academy School particularly during construction; remove local retail facilities; and cause job losses through the impacts on the retail park. It will also remove the 'Park & Stride' scheme, which helps to improve children's safety. The Council have previously suggested 4 alternative locations for the ventilation shaft in the immediate area, which we do not believe have been adequately considered by HS2 Ltd. MCC's petition will request that the hybrid Bill be amended to relocate this ventilation shaft to another location, as previously suggested, preferably at the site of the University of Manchester Armitage Sports Centre.

5.14.3 The final designs of the ventilation shafts and headhouses need to provide for appropriate flood mitigation at the proposed Palatine Road site; respond sensitively to the local environment; and fully mitigate any impact on residents and business during constructions.

5.15 **Manchester Airport Station Design & "Shallow Cutting"**

5.15.1 As the UK's third busiest airport after Heathrow and Gatwick, and which plays a pivotal role in providing access to international markets from the North of England, Manchester Airport and is central to delivering the levelling up agenda and post COVID-19 economic recovery. HS2, NPR and Metrolink connectivity at Manchester Airport will require fully integrated station solutions. The design of the HS2 Airport Station also needs to be fully integrated with local development plans and existing planning policies, including Places for Everyone, ensuring proper connections to the surrounding development areas included within this plan.

5.15.2 In the hybrid Bill, the HS2/NPR station forecourt is raised by approximately 5m above the level previously proposed in the 2018 Working Draft Environmental Statement, i.e. a change from 'deep cutting' to 'shallow cutting'. We are also concerned that these design changes will give rise to unacceptable impacts on nearby residents, as well as causing significant integration problems for the surrounding development site. There is concern that residents in the Newall Green area of Manchester will be impacted by the shallow cutting as this community sits just above the tunnel portal entrance. There is the potential for the shallow cutting to result in a greater impact from the noise of HS2 trains entering and leaving the tunnel, as well as its proximity to the construction site. Our petition will request that the hybrid Bill be amended to mitigate these impacts, including further engagement on design amendments and environmental impact mitigation, particularly the noise impacts near the tunnel portal for Newall Green residents during and after construction.

5.16 **Metrolink at Manchester Airport**

5.16.1 The HS2 Ltd hybrid Bill proposals sever TfGM's existing Metrolink powers to operate and maintain a Metrolink route that connects to the HS2/NPR Manchester Airport Station. The hybrid Bill includes provision for an isolated Metrolink stop above the high-speed station without providing the necessary replacement powers to connect to the wider network. This is a totally inadequate and unacceptable approach which needs to be rectified through the hybrid Bill process.

5.16.2 Furthermore, because of HS2's proposal for a disconnected Metrolink stop, the hybrid Bill proposes access to Manchester Airport from the HS2 station by a shuttle bus. These shuttle buses will add congestion to an already congested highway network. This does not align with local policy.

5.16.3 Our petition requests that the hybrid Bill is amended to include sufficient powers for the construction, operation, and maintenance of a Metrolink route that connects to the Airport high speed station. These powers should also be sufficient to enable TfGM to construct a turnout immediately to the west of the high-speed station for its proposed tram-train extension to the southwest.

5.16.4 A further issue is caused by the shallow cut station design, which has resulted in the Metrolink tram stop and approach viaducts being similarly raised to a significant height above existing ground level, leading to an increase in construction cost, embodied carbon, and environmental impacts. MCC and GM Partners expect that any increase in costs to the Metrolink scheme and mitigation will be covered by the DfT

5.17 **Highways Issues at Manchester Airport**

5.17.1 The Council and GM Partners do not believe the proposed highway accesses between the HS2 Airport station and Junction 6 of the M56 will accommodate future demand relating to the Strategic Road Network as a result of HS2,

NPR and committed local developments. It is evident that significant changes are needed to the highway works in this location. These should be agreed with the Council and the other affected local highway authorities.

5.17.2 The Council is further concerned about the fact that the local highway network will be used by approximately 1,000 HGVs per day during construction. This will have significant adverse impacts on the Airport, the local economy, residents, the highway network, and the environment.

5.17.3 MCC and GM partners have previously requested that HS2 Ltd. consider options to use rail to move a proportion of materials required to construct the Airport station and tunnel portal, to reduce the level of road-based construction traffic. As part of our petition, we will set out our expectation that HS2 Ltd. undertake a specific, comprehensive study on the use of a railhead system to transport materials to and from the Manchester Airport high speed station site, and, if supported by this study and a full environmental impact assessment, that an Additional Provision is promoted to provide for the use of a conveyor/ railhead system. We would expect that this work considers the impact on residents and maximises the legacy opportunities from the temporary rail links needed for the construction material.

5.17.4 Further information will also be requested on how vehicle parking numbers have been determined, to ensure the right level of provision at the Airport Station, which also considers the impact on congestion and zero-carbon policies, and policies to encourage travel by public transport and active modes.

5.18 **Other Potential Petitioning Issues: Impact on the West Coast Main Line (WCML)**

5.18.1 The hybrid Bill documents refer to over 60 potential weekend closures on different parts of the existing WCML during the construction of the HS2 Crewe-Manchester line. We believe that this will cause unacceptable disruption to passengers (over 9-years), especially given the trend for increased leisure rail travel following the Covid-19 pandemic. MCC's petition will seek further information on this and request that alternative options are looked at to minimise the disruption on rail passengers.

6.0 Immediate Next Steps

6.1.1 The immediate priority is for the formal response to the ES to be finalised and submitted by 31st March 2022.

6.1.2 Officers will continue to work on developing the Council's petition and the evidence to support it. The exact dates of the formal petitioning period are currently unknown, however when the period does start, the Council will have 25 days to submit its petition (objection) to the hybrid Bill.

7.0 Next steps on the wider HS2 programme

7.1 Table 3 below sets out the anticipated high-level timetable based on the latest information available.

Table 3: HS2 Phase 2b Hybrid Bill programme (estimated dates)

Key Activities	Timelines
hybrid Bill deposit (including Environmental Statement)	24th January 2022
Environmental Statement Consultation	25th January – 31st March 2022
Second Reading/ Petitioning Period (inc. preparation time)	Mid-May – Summer 2022
Negotiations with HS2 Ltd	Summer - Autumn 2022
Select Committee Hearings (Commons)	Autumn 2022 – Winter 2023
Overall hybrid Bill parliamentary process	2022 – 2024/25
Royal Assent	Late 2024 / Early 2025
Construction	2025 – 2035
Testing and Commissioning	2035 – 2040
Operation	2040

Manchester Council, with GM Partners, will continue to work with HS2 Ltd. and DfT on the HS2 Phase 2b hybrid Bill to ensure that it delivers the maximum benefit to Manchester and GM.

8.0 Hybrid Bill – Conclusion

8.1 The City Council and partners have reiterated their strong support for HS2 and the station locations at Manchester Airport and Piccadilly Station. HS2 is vital in increasing the capacity and connectivity of Britain's rail network, and the combination of HS2 and NPR improvements can help deliver a transformational step-change in the connectivity of the North's major city regions, helping to underpin economic growth across the North of England and deliver levelling up.

8.2 However, there remain several concerns that still need to be resolved with the HS2 scheme as set out in the hybrid Bill, before the full benefits can be realised. As a result, the Council are proposing to petition certain elements of the hybrid Bill to ensure Manchester gets the right infrastructure for this once in a generation opportunity we need to future-proof our city and drive economic growth and levelling up.

8.3 Officers will continue working with HS2 Ltd., DfT, TfN and other partners on the design development during negations through and following the hybrid Bill process. It is important that MCC are engaged in detailed discussions over the designs of the new stations and associated infrastructure (including vents shafts) to minimise their impact on our residents, local communities and ensure seamless integration with their surroundings.

8.4 Recommendations appear at the front of the report.

9.0 Urgency of Decision

9.1 This report is considered to be 'urgent business' and as such the decision should be exempted from the 'call-in' process for the following reason(s):

9.2 There is an absolute deadline of 31st March for the submission of the response to the ES & EQIA. Calling in this decision puts the Council at risk of missing this deadline as if the decision were to be called-in there would be no further Economy Scrutiny Committee before 31st March and the Council would have missed its chance to make representations in respect of the effects the ES and EQIA would on the city the residents.

10.0 Key Policies and Considerations

(a) Equal Opportunities

10.1 HS2 and NPR, and the development of the areas surrounding the stations are anticipated to provide additional job opportunities available to residents and improved transport connections to those opportunities. As part of the GM Growth Strategy, a GM High Speed Rail Skills Strategy has been developed to ensure that residents are able to acquire the skills to access the jobs created, and work continues with the Greater Manchester Combined Authority to deliver this.

(b) Risk Management

10.2 The Council will work closely with Government, Transport for the North (TfN), TfGM and other partners to minimise risks arising from the design, construction and delivery of HS2, NPR and the GM Growth Strategy.

(c) Legal Considerations

10.3 The team are being supported by the city solicitor’s department throughout the ES and hybrid Bill petition process.

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High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement and Equality Impact Assessment

Manchester City Council Consultation Response Summary

Table of contents

List of Abbreviations

Abbreviation	Meaning
CP1	Control Point 1
CP2	Control Point 2
CP3	Control Point 3
DfT	Department for Transport
EIA	Environmental Impact Assessment
EQIA	Equalities Impact Assessment
ES	Environmental Statement
EZ	Enterprise Zone
GM	Greater Manchester
GMASS	Greater Manchester Archaeology Advisory Service
MCC	Greater Manchester Combined Authority
GMS	Greater Manchester Strategy
GMSF	Greater Manchester Spatial Framework
HS2	High Speed 2
IEMA	Institute of Environmental Management and Assessment
LA	Local Authority
LPA	Local Planning Authority
MAG	Manchester Airport Group
MCC	Manchester City Council
NPPF	National Planning Policy Framework
NIC	National Infrastructure Commission
NPEIR	Northern Powerhouse Independent Economic Review
NPR	Northern Powerhouse Rail
NTS	Non-Technical Summary
SRF	Strategic Regeneration Framework
TC	Trafford Council
TfGM	Transport for Greater Manchester
TfN	Transport for the North
WC	Wigan Council
WDEQIA	Working Draft Equalities Impact Assessment
WDES	Wording Draft Environmental Statement

MANCHESTER CITY COUNCIL

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement and Equality Impact Assessment

Introduction

1. Introduction

1.1. Background to the hybrid Bill, ES and EqIA

1.1.1. The High Speed 2 (HS2) Phase 2b: High Speed Rail Crewe to Manchester hybrid Bill was deposited in Parliament on 24 January 2022. The hybrid Bill was supported by an Environmental Statement (ES) and Equality Impact Assessment (EqIA) produced by HS2 Ltd. Parliament opened a public consultation on the ES and EqIA on 25th January 2022 which closes on 31st March 2022.

1.1.2. The Environmental Statement (ES) is an assessment of the likely significant environmental effects of the proposed HS2 railway, including the effects of construction and operation.

1.1.3. The Equalities Impact Assessment (EqIA) considers the potential effects of the construction and operation of HS2 Phase 2b on people with protected characteristics and explains how HS2 Ltd. proposes to avoid or mitigate any adverse effects.

1.1.4. The Council intends to submit a formal response to these consultations. As part of our approach to reviewing these documents, the Council, has been working in partnership with Greater Manchester Combined Authority (GMCA), other GM Local Authorities and Manchester Airports Group in reviewing the ES and EqIA to ensure our local and regional responses are aligned appropriately.

1.1.5. This report provides a summary of the issues identified by the Council, so far, which are likely to be included in the Council's ES & EqIA responses. The Council's review of the ES & EqIA documents (which are over 30,000 pages) is ongoing.

1.2. Assessment of the ES and EqIA

1.2.1. Overall, we welcome the opportunity to comment on the ES and EqIA. However, there is a lack of detail on issues of major significance and clearly much more work needs to be done to satisfy the Council that the scheme has holistically considered all the impacts and mitigations that Manchester requires during and after construction. There are a significant number of areas of concern which we will raise as part of the Council's response to the ES. We will also continue to press HS2 Ltd. and DfT to work with the City Council and our GM Partners on the gaps that have been identified.

1.2.2. Officers will continue working with the Department for Transport (DfT) HS2 Ltd. and Transport for the North (TfN), and other partners, on the detailed design development of the proposed scheme. We will continue to argue for world class, fully integrated stations with a "build it once, build it right" approach.

1.3. Manchester Context

1.3.1. The Council has continually supported the introduction of HS2 and NPR and the provision of stations at Manchester Piccadilly and Manchester Airport. We believe these schemes are vital to increasing the capacity and connectivity improvements needed no Britain's rail network and have the capacity to deliver a transformational step-change in the connectivity of the North's major regions, helping to underpin economic growth across the North and the UK.

1.3.2. However, we have consistently retained a clear position on the need to ensure that the schemes are delivered in a manner that fully complements the connectivity, place-making, local employment, and sustainable growth objectives in the Manchester Piccadilly Strategic Regeneration Framework (SRF) and the Greater Manchester HS2 and NPR Growth Strategy.

1.4. Key Issues

1.4.1. As part of the Council and GM partners' ongoing work with HS2 Ltd. on development of the scheme, a series of 'critical issues' have been identified and these have been regularly raised and discussed with HS2 Ltd. and DfT and have been the subject of formal responses to previous consultations on the Phase 2b route. The critical issues relate to areas of major concern for the city and GM Partners and are issues which are fundamental to the success of HS2 Phase 2b in Manchester and GM. As covered in the main report, the critical issues form a substantial base for the Council's intended petition against specific aspects of the hybrid Bill.

1.4.2. The critical issues are set out in more detail in the main report and are summarised below:

- The design of **Manchester Piccadilly station** as a surface, turn back station, as opposed to an underground, through station, which could provide greater capacity, reliability, resilience, future proofing and passenger experience and result in a reduced land take.
- The **retention of Gateway House**, which inhibits connectivity to the rest of the city centre and fails to provide a suitable entrance and arrival point to the city at the Manchester Piccadilly HS2 station.
- The extent of **highways infrastructure proposed at Piccadilly**, which are overly large, would unduly encourage car travel and increase pollution, sever areas of the city, and do not allow for active travel.
- The level and location of **car parking proposed at Manchester Piccadilly**, which is too high and not in keeping with the adjacent station's role as a city centre public transport hub, unnecessarily encourages car travel, and takes up prime development land.
- The need for a **multi-modal interchange** which provides bus and coach parking facilities.

- The proposed **access to a new ramp for Network Rail maintenance**, which routes traffic through the Mayfield development, having an unacceptably negative impact.
- **Inadequate integration of, and powers for, Metrolink** at both Manchester Piccadilly and Manchester Airport. The location of the proposed **Metrolink turnback at New Islington** rather than our preferred site at Velopark, and the proposal to sever the Ashton line for two years.
- The **relocation of the 'North Block' facilities** above the relay room at Manchester Piccadilly, which are likely to extend the disruption to local residents.
- The proposed location of the **ventilation shaft and headhouse** on the Fallowfield Road Retail Park on Birchfields Road, and the need to provide adequate flood storage required for the proposed Palatine Road ventilation shaft.
- An **inappropriate design for highways access to Manchester Airport Station** at Junction 6 of the M56, which does not take into account future demand from NPR services, planned development and Airport growth.
- The **level of construction traffic** proposed and the need for consideration of measures to enable materials to be removed using rail at Manchester Airport.

1.4.3. A review of the hybrid Bill document has confirmed that the Council's critical issues have not been resolved within the hybrid Bill design. The ES and EqIA response provides an opportunity to highlight environmental concerns the Council and GM partners have with the current hybrid Bill design, in the context of the overall critical issues.

1.5. Further engagement

1.5.1. Through the Council's response to the ES and EqIA we will seek the opportunity to engage further with Government and HS2 Ltd. to resolve issues of concern.

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement

Chapter 1

MCC Comments on Volume 1

2. MCC comments on Volume 1: Introduction and Methodology

2.1. Introduction

2.1.1. The following section sets out MCC comments on Volume 1: Introduction and Methodology in terms of its purpose and presentation. MCC comments on the specific technical scope and methods are provided in detail in other sections of this report and are therefore not repeated here. As such the MCC response should be read as a whole.

2.1.2. Volume 1: Introduction and Methodology presents a technical summary of the Environmental Impact Assessment (EIA), the need for an EIA and the role of this as part of the hybrid Bill. It also summarises the description of the development, the location and its characteristics, evolution of the development design and alternatives considered and introduces the scope and methods used for individual topics assessed as part of the EIA.

2.1.3. However, whilst Volume 1 provides high-level summary of the EIA, it also includes statements which rely on technical assessments.

2.1.4. On the basis of our review, our response concludes that insufficient detail on the technical scope and methods, the Proposed Scheme design commitments, and the consultation and engagement undertaken to date has been provided to enable an appropriate assessment of the Proposed Scheme. That is due to the high-level nature of the document and the lack of background information provided.

2.2. The Proposed Scheme (Background to HS2 and Stakeholder Engagement and Consultation)

2.2.1. Volume 1, Section 2 provides a list of milestones of the Proposed Scheme development and outlines the need for them within the location selected, including opportunities for faster journeys between London Euston and Manchester Piccadilly and more employment and trading opportunities.

2.2.2. Whilst MCC welcomes the opportunities for local employment, no evidence is provided on the proportions of local employment or confirmation on how the estimated construction jobs will be accommodated from the supply chain. MCC would welcome the opportunity to engage with HS2 Ltd. to discuss the local requirements for construction employment and seek to secure the training opportunities provided by HS2 Ltd. to allow for local employment to be secured at the scale required.

2.2.3. Volume 1, Section 3 lists how and when engagement was undertaken on the design and assessment of the Proposed Scheme, and the Working Draft Environmental Statement (WDES), and parties involved in the process.

2.2.4. However, this section does not provide any specific detail of the main issues raised via consultation nor on how the main issues pertinent to the EIA have been considered.

2.2.5. Whilst some engagement has taken place with MCC and GM Partners since the WDES consultation, this has been limited and high level. MCC and the GM Partners have been disappointed at the detail provided and feel that further meaningful engagement is needed, particularly in terms of understanding the outcome of impact assessments and developing mitigation measures.

2.2.6. MCC and GM Partners reiterate the importance of a truly collaborative approach to the delivery of the HS2 proposals, particularly where there are major interfaces between schemes and developments. Failure to work effectively in a joined up, transparent manner will significantly increase cost, programme risk and disruption caused of the HS2 programme, and will impact on the ability of the scheme to provide a fully integrated solution which can fully deliver the benefits and opportunities anticipated.

2.2.7. MCC has welcomed the opportunity to engage with HS2, albeit this has been limited, to develop the design of the Proposed Scheme to ensure that it is integrated with the wider Manchester and Greater Manchester aspirations. However, there are a number of areas where proposals do not currently achieve this, as set out in our response to the WDES and other Phase 2b consultation responses.

2.2.8. MCC would request that HS2 demonstrate records to identify how/when stakeholders were approached or consulted directly. In addition, MCC would request that HS2 Ltd. provide an engagement strategy which details the ongoing strategy for engagement and consultation with the stakeholders, local communities and organisations / businesses impacted by the Proposed Scheme. This process is expected to be ongoing prior to the construction phase and during the construction works.

2.3. **Permanent Features**

2.3.1. The Permanent Features of the Proposed Scheme section sets out nine design principles, within the parameters of being cost effective and sustainable and respecting the operational and maintenance requirements of a high-speed railway. It also offers overview descriptions across different categories.

2.3.2. It is of significant note that only one of the nine design principles relates to *"the natural world",* i.e., that the proposals should *"demonstrate a commitment to the natural world"*.

2.3.3. It should also be noted that the statements in this section are very generalised, making it difficult to provide specific comments. Key issues in this section include the following.

2.3.4. Reference is made to “The Green Corridor”, to reduce and compensate for the impacts of constructing the railway, including the creation of wildlife habitat, screened spaces, footpaths and bridleways, as well as additional funds to help stakeholders adjacent to the route to carry out green infrastructure projects. No specific details are provided in respect of the MCC area. MCC request that HS2 engage with MCC and other local partners to ensure that such additional funds are allocated to environmental projects of benefit to local communities.

2.3.5. HS2 state that relevant design standards and guidance will be considered during the detailed design stages. MCC seek confirmation from HS2 that they will rigorously apply current and future design standards and guidance, including for highway capacity and levels of operation, both during and following construction.

2.3.6. The heights, and therefore impact, of structures such as embankments and viaducts are under-stated, in that they are only measured to the top of the rail, and do not take into account the additional heights of overhead line equipment, telecommunications masts, noise fence barriers, or the trains themselves. MCC request confirmation from HS2 that their assessment of visual impacts has gauged the impacts arising from the full heights of the permanent installations rather than just the heights of viaducts and embankments.

2.3.7. This section describes how the quantity of surplus excavated material is not known at present, which casts doubt on the assessments for the traffic movements associated with its removal.

2.3.8. It is stated that land used only for construction purposes will be restored as agreed with the owner of the land and the relevant planning authority once the construction works are complete. MCC seeks clarification on who the *“relevant planning authority”* is, and clarity on whether they will have a role in conditioning or approving schemes to restore construction land.

2.3.9. The timing of compensation for, or replacement or enhancement of resources adversely affected during construction, such as habitat for wildlife species, needs to be carefully considered to avoid a detrimental impact on wildlife species. MCC requires confirmation from HS2 that necessary habitat replacement and creation is undertaken prior to disturbing sensitive habitats.

2.3.10. A description is given of how the design of stations will integrate with local development plans and strategies, but there is no indication that the traffic or pedestrian flows associated with such future strategies have been included within the assessments. MCC request clarification on this matter.

2.4. Construction of the Proposed Scheme

2.4.1. MCC sees the Code of Construction Practice (CoCP) as a cornerstone document to support minimising disruption during the delivery of the Proposed Scheme. MCC concerns regarding the CoCP are set out later in this document.

2.4.2. Engagement with MCC on the development of the Local Environmental Management Plans (LEMPs) in Manchester is essential. MCC would request that HS2 set out the quality management arrangements for LEMPs, in particular if there are areas that MCC feel a LEMP does not adequately address.

2.5. Environmental Impact Assessment

2.5.1. Section 7 of Volume 1 provides a staged overview of the EIA, with the aim of providing an objective and systematic account of the likely significant environmental effects of the Proposed Development and identify how these are used throughout the EIA.

2.5.2. It is noted that no further refinements to the scope and methodology since the publication of the working draft in 2018 have been made.

2.5.3. Further information and clarification are required on the following issues:

- If assessments were based on local policies and baseline information, and the extent to which stakeholders were engaged as part of the baseline gathering.

- A breakdown of the Proposed Scheme, in addition to justification on why any phases of development are omitted.

- The selection criteria for committed developments and the potential zone of influence chosen for individual topic chapters, and how any future developments will be considered, including the cut off point for further assessment for updating any cumulative assessment.

- Information on the geographical scope of the cumulative assessment (route-wide or community area) i.e.whether topic sections include a cumulative assessment, and if those cumulative assessments include interactions between the Proposed Scheme and other projects. HS2 are requested to explain and justify where cumulative assessments are not undertaken in any topic section.

- That where surveys have not been carried out, and assumptions used, that additional information and supplementary assessment in the form of a revised ES will be deposited to Parliament, further consultation is undertaken.

2.6. Scope and Methodology Summary for Environmental Topics & Approach to Mitigation & Monitoring

Agriculture, Forestry and Soils

2.6.1. Further clarification is required on:

- What business impacts are covered in this chapter and to what extent they are covered in other topics.
- Primary functions for soil other than for supporting food production (e.g., flood water attenuation and carbon storage

Air Quality (AQ)

2.6.2. The AQ monitoring does not appear to have taken into account the GM Clean Air Plan (CAP), approved in July, within the assessment. MCC would request that justification is provided regarding the omission of the CAP monitoring data, and any further assessment should include the CAP monitoring data within any baseline review or modelling works where appropriate.

2.6.3. MCC would request details in relation to modelling of ventilation and intervention shafts (if required) within the stretch of tunnelled railway.

2.6.4. Whilst it is noted that electric locomotives will be used during the operational phase, no reference has been made regarding non-exhaust pollutant emissions. MCC would therefore request that emissions caused by sources such as braking and friction between wheels and the tracks, are considered within the assessment.

2.6.5. Design Manual for Road and Bridges (DMRB) guidance has been used to inform where further air quality assessment is required, rather than Institute of Air Quality Management (IAQM), as required in GM. DMRB guidance appears to be more conservative, and hence more extensive assessment may be required. E.g., this could result in an underestimation of affected roads, and therefore of potential impacts as a result of the Proposed Scheme. MCC request that HS2 Ltd. address the requirements of the locally required guidance.

2.6.6. The air quality assessment has included future year background concentrations sourced from DEFRA's background mapping database, for the construction year of 2025 and operational year of 2030 (background concentrations are not available beyond 2030). The use of these background concentrations does not represent worst-case predictions and may result in significant underpredictions of future concentrations. MCC would therefore request that HS2 Ltd. identify this as a significant limitation and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.

Mitigation:

2.6.7. Only permitted crushing, screening, concrete batching plant shall be used within compounds.

2.6.8. Mitigation will be implemented to ensure negligible impact of dust throughout the entirety of each phase of construction.

2.6.9. The CoCP states that exemptions will be sought by HS2 for plant and machinery that is not compliant with Greater Manchester's Clean Air Plan (CAP) and Clean Air Zone (CAZ), however, it should be noted that exemptions within the CAP and CAZ will be statutory, and thus additional exemptions cannot be applied for. All plant and machinery used within the construction phase of the development should be compliant with the CAP and CAZ.

Climate Change

2.6.10. A three-staged assessment was undertaken in relation to climate change, including Greenhouse Gas emissions, In-combination Climate Change Impacts and Climate Change Resilience. It is however not made clear whether similar methodologies for identifying effects was applied for the three assessments.

2.6.11. It is noted that de-construction is excluded from the assessment of Greenhouse Gases (GHG) which is understood given the long-life of the Proposed Scheme. However, further assumptions are required to identify any assets which may have a shorter timescale than the 120-year lifecycle assumed, e.g., if any assets are required to be demolished and replaced within the 120-year lifecycle or for the destruction of the rolling stock which is replaced every 30 years, and whether the GHG emissions associated with those have been taken into account.

2.6.12. MCC note that a cumulative assessment was not undertaken for the GHG section of the climate change assessment, and MCC requests that this assessment is either included or a justification for scoping this out be provided.

2.6.13. Employment estimates are for 6,060 FTE based at the proposed construction compounds and the travel associated with those is considered significant in respect to the potential GHG emissions. MCC would request that these are included in the lifecycle assessment. Areas of concern are compounds located in proximity to J6 of the M56 and Manchester city centre where transport related issues are identified to be the most significant. MCC would also request that HS2 justify the exclusion of plant transportation to and from construction compounds.

Mitigation:

2.6.14. MCC would expect the operational phase of the development to commit to the use of 100% green energy for HS2 assets.

2.6.15. MCC have welcomed for proposals for carbon capture and request clarification on the planting strategy in relation to planting timing and locations.

Community

2.6.16. A summary of the topic scope is provided in Volume 1. Given the high-level information provided, MCC's comments on the specific technical scope and methods are provided in detail in other sections of this report and are therefore not repeated here.

Mitigation:

2.6.17. Appropriate mitigation, compensation and support will be required for residents, businesses, and community groups whose properties are significantly impacted.

2.6.18. Support through an agency service to assist existing businesses to find suitable alternative premises should be offered to all impact businesses, and not just where HS2 Ltd. consider there to be 'sufficient demand'.

2.6.19. MCC request that HS2 Ltd. provide a Community Task Force established with a remit to specifically consider and address community issues, including the agreement of appropriate mitigation, compensation or reprovision of community services and facilities.

2.6.20. Where compulsory purchase is required, MCC expect a definitive commitment to providing a longer notice period than the minimum three-month period specified in the Bill to notify businesses who are to be displaced. A minimum 12-month notice period should be committed to.

2.6.21. Landowners and impacted business owners are being provided 3-hours access to funded, initial independent advice and signposted to services to assist their understanding of their rights to compensation and to recover costs associated to any such claims for compensation. This needs to be directly requested by the business / landowner to HS2 Ltd. More engagement and outreach should be provided to local businesses to make them aware of this support in a timely way

Ecology and Biodiversity

2.6.22. MCC expect HS2 to deliver smarter and bolder in relation to ecological mitigation. The UK Government has now made a policy commitment to aim to deliver a net gain in biodiversity on this phase of HS2.

2.6.23. MCC has key concerns including habitat loss, fragmentation, and isolation through land loss but also due to the duration of construction disruption.

2.6.24. The ES does not consider the importance of trees of note (for example significant numbers of highway trees will be affected in MA07/MA08) that are not veteran trees but are important landscape features.

2.6.25. MCC have concerns regarding the potential impacts during both construction and operation phases with reference to movement of non-native invasive species (such as Japanese Knotweed) being imported into Manchester from the rail network.

Mitigation:

2.6.26. MCC would like to see species action plans developed for supporting the delivery of the new Manchester Biodiversity Strategy and Nature Recovery Network.

Historic Environment

2.6.27. The impact on all Grade ll Listed Buildings has been assessed as “moderate” rather than “high” significance. The result is the downgrading of impact, with a resulting lack of required mitigation. HS2 Ltd. must identify this as a significant limitation and consider appropriate mitigation for effects which may be considered more significant than assessed at this stage.

2.6.28. MCC are concerned with the lack of agreement regarding the baseline of affected designated and non-designated heritage assets with heritage stakeholders. As such, MCC have concern that a number of heritage assets have been missed from the assessment.

2.6.29. There is concern that not all areas required for construction have been adequately assessed due to access, particularly in more rural areas.

2.6.30. Non-designated heritage assets have been identified on some but omitted from others. This inconsistency provides an opportunity for error in assessment. MCC would request that HS2 Ltd. provide reasoning for this.

Electromagnetic Interference

2.6.31. The scope and methodology of the electromagnetic interference (EMI) assessment is based on desktop modelling, therefore MCC would request that real-world baseline and post-construction/operational surveys are undertaken at dwellings/receptor sites closest to the route of the Proposed Scheme to verify the desktop modelling of electromagnetic field (EMF) emissions undertaken for the ES.

2.6.32. Tower cranes can cause temporary interference to TV reception during the construction phase. The locations where this could occur should be identified and highlighted. Interference zones determined by direction of signal transmission (for terrestrial and satellite TV) should also be outlined.

Land Quality

2.6.33. Please see the comments in the construction section on-site investigations, the temporary railhead and noise control embankments. This can be found I the code of construction practice section – 8.2.4.

Mitigation:

2.6.34. MCC expect that detailed remediation strategies/options appraisals will be produced by HS2 following site investigation works to determine the most appropriate remedial technique.

Landscape and Visual

2.6.35. The ES does not describe how, post completion, the landscape elements of the construction areas will be reinstated as part of the mitigation.

Major Accidents and Disasters

2.6.36. All identified risk events and all mitigation is included, but given the lack of detail, context, timeframes, and stakeholders, there is no assurance that these measures will be implemented appropriately and that stakeholders will have sufficient oversight of these proceedings.

Socio-economics

2.6.37. The ES assumes that 88% of the business occupiers displaced by the scheme will successfully relocate to alternative locations and no employment will be lost, while the other 12% of occupiers will close rather than relocate. It is noted that this assumption was based on the research into the relocation of companies and jobs on account of the London 2012 Olympic Games. The London-based case study does not represent an appropriate base case for the Crewe to Manchester route, and this should be reassessed.

2.6.38. Mitigation:

2.6.39. It is acknowledged that a significant number of facilities, businesses and properties are identified as being required to be demolished at a route-wide level. MCC would expect the detailed design to limit the loss of property as far as possible.

2.6.40. MCC would wish to seek financial compensation for the loss of any part of its business rate income caused by the development of the HS2 route within the city that has been demonstrated to cause businesses to fail or had a significant impact on their income. It is not expected that MCC should bear the financial consequences to the detriment of its residents and businesses.

2.6.41. MCC would request that HS2 Ltd. identify the percentage of the potential employment opportunities to be required at a local level to determine the

potential impacts on the current supply chain. MCC would wish to work with HS2 Ltd. to establish a brokerage and skills support approach for equipping the needs of HS2 during the construction and operational stages, to enable maximum advantage to local residents.

Sound, **Noise & Vibration**

2.6.42. It is considered that the transitory nature of works does not justify the scoping out of vibratory rollers or pneumatic breakers, particularly given the duration of these works, which we anticipate could start during the first phase of construction works and continue intermittently throughout the works.

2.6.43. Paragraph 8.14.28 (Vol 1, Page 204) makes mention of diesel-powered specialist engineering trains undertaking maintenance from 00:00-05:00. It is assumed that the trains will be operated so that any adverse noise levels are no greater than for night-time passenger services. While it is understood a full assessment of these vehicles may not be possible at this time, MCC considers it insufficient to assume the vehicles will not exceed these limits without any evidence, given the sensitivity of operational hours.

Mitigation:

2.6.44. It is currently unclear whether additional mitigation is proposed (outside of the embedded mitigation incorporated into the design). There is also no assessment on the residual impacts, and as such it is unclear how effective any proposed mitigation is.

2.6.45. More narrative would be beneficial to understand how the benefits per mitigation type are balanced across the various disciplines (i.e. what are the main determining factors when prescribing mitigation?).

2.6.46. MCC questions the proposed timetable for the selection and dissemination of information regarding mitigation measures to relevant Local Authorities.

2.6.47. MCC would welcome an explanation of the justification for the screening out of potential noise impacts associated with operational road traffic. It appears that changes to the road layout are considered but it is not clear whether the assessment includes operational phase traffic associated with the Proposed Scheme (if required).

2.6.48. The ES states that during construction and operational phases, noise and/or vibration monitoring shall be attached to moving vehicles. MCC do not believe that this will be useful in determining potential environmental noise and vibration impacts given the significant uncertainty regarding environmental conditions and from a noise environment surrounding a moving source.

2.6.49. An assumption is made that in practice, noise barriers may differ from the general performance assumption, while maintaining the required acoustic

performance. Clarity is needed on the method used to ensure variations on general assumptions remain valid.

2.6.50. MCC would welcome the justification for day-time and night-time noise trigger levels used, as well as the 20 times per night metric, as these do not appear to correspond to guidance outlined within 'The Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996', as stated in the ES.

2.6.51. It is noted that the draft CoCP provides provisions for rehoming, noise insulation and/or compensation to minimise impacts from noise due to construction. While this is welcomed by MCC, it is requested that a scheme of works is drafted as a priority, for meeting noise insulation requirements.

Traffic and Transport

2.6.52. MCC have no comments in relation to the scope and methodology summary provided in Volume 1, as the specific impacts of traffic and transport are considered in more detail in other sections.

Mitigation:

2.6.53. Mitigation for construction and operational traffic is not sufficient – the methodology used is too simplistic and doesn't sufficiently recognise the scale of the impact and consequently doesn't identify suitable measures.

2.6.54. Beyond provision of junction improvements to provide direct access to the stations, HS2 have not proposed any mitigation for locations where they have identified the Proposed Scheme will have impacts on traffic flows and bus delays on the wider road network.

Waste and Material Resources

2.6.55. Waste and Materials Resources are considered as a route wide effect with no consideration given to individual areas. The assessment considers the impact of the off-site disposal of solid waste to landfill. However, MCC request further information as to why a similar assessment has not been undertaken for treatment capacity.

2.6.56. There is no consideration of the practicalities and realities of the movement of waste as it is unlikely waste will be disposed at a significant distance from the place of production.

2.6.57. The ES suggests that it is the responsibility of Waste Planning Authorities to provide sufficient waste infrastructure and future capacity. Further detail and engagement on this with Waste Planning Authorities is necessary.

2.6.58. The statement that *"The disposal of 10,000,000 tonnes per annum of inert waste represents approximately 100% of the total inert landfill capacity in the Northwest region'* is a significant concern. MCC would request more

information on estimated levels of inert waste over the lifetime of the project to allow Waste Planning Authorities to understand capacity requirements.

Mitigation:

2.6.59. Mitigation for the impacts identified within the document are for the sustainable use of materials and reuse within the wider works. Whilst there are references to the circular economy and the waste hierarchy, there are no commitments to targets for diversion from landfill other than that they will be explored through detailed design. This is considered insufficient.

Water Resources and Flood Risk

2.6.60. Construction monitoring does not outline the approach to managing flood events during construction for both the site and off-site impacts. MCC would request that HS2 Ltd. provide reasoning for this.

2.6.61. Climate change has been assessed based on February 2016 guidance. Guidance has been revised twice since this time which will now be more representative of catchment characteristics, and this needs to be addressed.

Mitigation:

2.6.62. Application of the Higher (H++) climate change allowance within hydraulic modelling for the stage is deemed appropriate. However, at the detailed stage, it would be expected that a wider suite of return periods is modelled using the Central allowance so exceedance events and less frequent flood events can be better understood for designs.

2.6.63. The process to determine appropriate options to manage watercourse diversions or the routing above or below the new line appears to be inconsistent. A clear understanding and rationale of how options have been selected and discounted is required to demonstrate that a sequential and consistent approach has been taken is required.

2.6.64. Surface water flood risks have not been taken into account at this stage. A detailed understanding of surface water risks, flow routes and new risks created by the line will require a detailed assessment at the next stage.

2.7. Strategic, route-wide and route corridor alternatives

2.7.1. Volume 1, Section 10, sets out the alternatives considered during the development of the Proposed Scheme, under four categories - strategic alternatives, route wide rail alternatives, route corridor alternatives and local alternatives. However, the Alternatives Report does not provide sufficient detail to describe or allow consideration of the alternatives sifting and decision-making process, nor does it seek any ES consultation response.

2.7.2. From the evidence provided, it appears that the latest proposals do not always represent the best option as derived from the sifting process. The report does not invite comment from consultees, and it seems that the decisions have been taken on an inconsistent basis.

2.7.3. For example, in relation to traffic around M56 Junction 6, HS2 acknowledge that the traffic volumes upon which they based their decision making on access to the Airport Station were only one third of the actual traffic forecast, yet the original decision has been retained. MCC require that adequate modelling be shared to demonstrate the adequacy of the proposals and to confirm the validity of the decision making on alternatives.

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement

Chapter 2

MCC Comments on Volume 2: MA06 (Hulseheath to Manchester Airport) community area report and map books

3. MCC Comments on Volume 2: MA06 (Hulseheath to Manchester Airport) community area report and map books

3.1. Introduction

3.1.1. This is an area of land between the River Bollin and the M56, as well as the westbound carriageway of the M56 in the City Council's boundary.

3.1.2. Proposed work includes: a viaduct over the River Bollin a balancing pond for railway drainage; an embankment, a cutting at Halebank, closure and realignment of Sunbank Lane and other footpaths; a box tunnel under the M56, the redesign of M56 Junction 6 and improvements to the existing road network around the proposed Airport Station.

3.1.3. It includes a four platform Airport HS2 Station and associated access, servicing, and parking. These lie within Trafford Council's administrative boundary, although the proposal impacts on both Manchester and Trafford Council areas.

3.1.4. In this area, the scheme will provide a connection between HS2 and a future NPR route between Manchester and Liverpool via the Manchester Airport High Speed station. Manchester Airport is located to the south-east of the proposed HS2 Station at Manchester Airport.

3.2. Agriculture, Forestry and Soils

3.2.1. MCC have no comments on this section in MA06.

3.3. Air Quality

3.3.1. Two 'slight' adverse, not significant, impacts are predicted during the construction phase traffic assessment.

3.3.2. MCC require HS2 to undertake further review and assessment prior to any works, to inform an Air Quality Action Plan outlining all mitigation measures as required.

3.4. Community & Construction Impact

3.4.1. The Ringway area will experience significant and prolonged amenity, environmental and traffic disruption impacts associate with their proximity to the proposed route, as well as multiple construction compounds in the area and road closures. MCC require HS2 to provide greater details of mitigation for construction activity across these areas, alongside early notification of residents for any disruption to be caused. This should include permanent landscaping with acoustic barriers offered to the properties closest to the construction activity. Noise Insulation is proposed for residents at Sunbank Lane such as additional glazing to windows glazing.

3.4.2. In addition, the impact of the Sunbank Lane satellite compound on the Ringway community has not been appropriately and fully mitigated for, both in terms of impacts upon their amenity and in respect of visual impacts.

3.4.3. The loss of five residential properties and permanent impacts upon the amenity of 10 further residential properties will occur in Ringways, Sunbank Lane.

3.4.4. Major highway works at M56 Junction 6 would be expected to cause significant traffic impacts, and this needs to be mitigated.

3.4.5. The M56 East Satellite Compound, Manchester Airport High Speed Station North and South Satellite compounds and the Manchester Airport High Speed Station Main Compound will each be accessed via the A538 creating substantial traffic disruption, which again must be mitigated.

3.4.6. A number of public footpath closures and diversions would be required, affecting footpaths in Ringway. HS2 need to provide replacement footpath routes where existing routes would be impacted.

3.4.7. The closure of Sunbank Lane is not acceptable given the duration (6yrs 3 months) and 2.8km increase in journey distance for the alternative route. MCC requests that HS2 re-assess proposed diversions and consider providing a route adjacent to the construction route which would provide direct access for pedestrians.

3.4.8. The cycle facilities at the New Airport Access junction are not provided to current standards.

3.5. Ecology and Biodiversity

3.5.1. MCC note the impact on the River Bollin in Manchester. MCC require HS2 Ltd. to ensure protection and enhancement of key strategic green infrastructure assets.

3.5.2. Ponds located within MA06 will be permanently lost. Mitigation plans do not show the creation of the 2 for 1 pond replacement policy.

3.5.3. Native woodland planting should include ground flora not just saplings.

3.5.4. MCC note that within MA06 it is proposed to create 5.2ha of species rich and marshy grassland in response to the loss of grassland in three locations: south of Ashlar, east of the River Bollin and south of Davenport Green Wood.

3.5.5. MCC note there will be a high loss of hedgerow resulting in a permanent adverse residual effect.

3.5.6. Bats of regional importance have been identified within MA06. Loss of foraging habitat for the bats will be addressed by the provision of hedgerows. Given the

high loss of hedgerows in the area and the lack of compensation for these losses, it is unclear whether compensation provided will be sufficient.

3.5.7. The impact on the arm of Sunbank Wood Site of Biological Importance (SBI) is unclear. As well as the direct loss of habitat the arm could be permanently isolated from the rest of Sunbank Wood. This is due to the transition from viaduct to embankment, which occurs directly in the woodland. HS2 have given no consideration to the impacts during the construction period.

3.5.8. It is not clear once construction is completed how connected the woodland near Chapel Lane SBI/Hennersley Bank AWI will be to Sunbank Wood SBI. While HS2 crosses the Bollin on a viaduct, the route appears to become an embankment at the location of the arm of Sunbank Wood.

3.6. Health

3.6.1. MCC welcome the presence of a High-Speed station providing employment opportunities with direct operational employment and training at Manchester Airport.

3.6.2. However, HS2 Lt. have not provided adequate mitigation for all health-related impacts. MCC require HS2 to provide appropriate mitigation for loss of any community facility.

3.6.3. Safe cycle routes are not in place to take cyclists all the way to the proposed cycle parking at the HS2 Manchester Airport station. MCC require HS2 Ltd. to ensure protected cycle routes continue fully into the proposed cycle parking. HS2 Ltd. should also ensure that cycle parking is undercover, closest to the station/platforms, easy to find, and include a direct, undercover route to the station concourse and storage and changing facilities.

3.6.4. MCC has concern that demolition of residential properties and relocation of residents could potentially reduce the beneficial health and social networks gained through social contact around Sunbank lane.

3.6.5. The increase in HGV traffic and changes to the noise & visual environment will lead to reduced levels of satisfaction with the local environment.

3.7. Historic Environment

3.7.1. The ES does not detail the noise and vibration mitigation, and therefore, an assessment on the impact on historic landscape has not been carried out.

3.7.2. MCC require HS2 Ltd. to undertake further analysis of the River Bollin East Viaduct as a requirement.

3.8. Land Quality

3.8.1. MCC understand that potentially contaminated spoil from the tunnelling process is likely to be stored and processed at South Manchester Portal Tunnelling Compound. HS2 Ltd. need to make clear how these soils will be transported and managed.

3.9. Landscape and Visual

3.9.1. There is insufficient information about vegetation lost due to construction. The land potentially required for construction covers a broad area and there is no indication of trees, some of which are ancient woodland, hedgerows and grassland lost.

3.9.2. MCC disagree with the effect upon the landscape of the River Bollin Broad Urban Fringe. HS2 will cross via the River Bollin East Viaduct and carve a large cutting through the area. MCC are concerned that the findings are understated and are likely to be significant. As a result, the River Bollin Broad Urban Fringe should have been considered in more detail.

3.9.3. The viewpoint from Yew Tree House on Sunbank Lane requires that HS2 provide landscape works in the vicinity of the new turning access adjacent to proposed balancing pond off Sunbank Lane to the west of Yewtree House, close to FP13.

3.9.4. Viewpoint from Sunbank Lane by Keepers Cottage requires that HS2 should ensure that the large compound areas to north (adjacent to Yew Tree House) are to be reinstated with hedgerows, trees and pastoral fields.

3.9.5. The Manchester Tunnel South Portal Main Compound will result in the loss of extensive areas of scrub, trees, hedgerows, rough grassland and an extensive, informal network of footpaths. MCC require HS2 to increase the proposed depth/quantity of planting adjacent to the tunnel portal and associated pumping station and storage tank.

3.10. Socio-economics

3.10.1. MCC require that HS2 Ltd. consider using the Census 2021 datasets for any strategies prepared after April 2022 to ensure that the latest information is used.

3.10.2. Approximately 1,480 FTE staff will be required within MA06 during the construction phase. MCC require that HS2 Ltd. work with local partners on a recruitment strategy to ensure as many as possible are locally employed. MCC further request that HS2 Ltd. identify the potential impacts on the current supply chain.

3.10.3. The Holiday Inn Express at Manchester Airport is dependent on its prominent location adjacent to the Airport and the M56, along with its customer parking provision, however the sensitivity of the hotel is considered to be medium. The

Holiday Inn Express should be the same sensitivity level as the Manchester Airport during the construction phase.

3.10.4. 320 jobs are expected to be displaced or lost as a direct result of the HS2 scheme. This is considered by HS2 to be minor in the context of the total number of people employed in the area. The businesses impacted should be compensated along with MCC for loss of business rates.

3.11. Sound, Noise and Vibration

3.11.1. Piling may be required and is expected to be a significant source of noise and vibration around the Airport Station.

3.11.2. It is not currently clear how construction impact criteria are being applied. Businesses / residents could experience major impacts for extended periods but are not eligible for noise insulation. Some of the works near to these receptors will be ongoing for 40-50 months.

3.11.3. Noise Levels at Keepers Cottage, Thorley Lane and Ringway are predicted to exceed daytime triggers, however no mitigation measures are proposed.

3.12. Traffic and Transport

3.12.1. The scale of the junction and highway infrastructure for Manchester Airport is not appropriate. HS2 should ensure that the highway infrastructure around Manchester Airport is fit for purpose.

3.12.2. HS2's traffic modelling assessment at the airport does not consider the cumulative effects of development around the area for HS2 and future NPR traffic demand. It is, therefore, considered that the HS2 proposals to deliver only an upgrade to M56 J6 is not adequate and will require subsequent further works that will be highly disruptive to the operation of the HS2 station and surrounding Strategic Road Network.

3.12.3. All highway improvements and mitigations must be supported by robust highway modelling, and this is currently not the case

3.12.4. There is no evidence of a M56 and M60 link assessment. This section of the motorway around M56 J6 already suffers from insufficient capacity.

3.12.5. The proximity of the HS2 alignment to M56 J6, and the proposed design for the 'operational' junction layout, highly constrain the ability to increase road capacity should it be required in the future.

3.12.6. The M56 tunnel requires the existing M56 to be diverted onto a temporary alignment and then switched back to its original alignment at the end of construction. This will cause 4+ years of disruption to a critical part of the strategic motorway network. HS2 need to justify this against the alternative of building a new alignment for the M56 'offline' to minimise disruption.

3.12.7. The proposed access to the HS2 Manchester Airport station diverts the A538 into a gyratory. This lengthens journey times for all vehicles including buses.

3.12.8. The HS2 provision for cycle parking (300 spaces) at Airport Station is inadequate (Cambridge station has 2,800 spaces) and does not support active travel policy objectives. There is no distinction in the type of parking (i.e., long stay vs short stay and adapted cycle parking for disabled cyclists is not provided. The closure of Sunbank Lane overbridge will cause a reduction in active travel due to removal of the M56 bridge.

3.12.9. MCC are concerned that logistic movements have not been considered on Sunbank Lane. It is not clear if the businesses (DHL, Amazon etc) in that area have been engaged. Traffic management in the area at peak seasonal times can already be challenging.

3.12.10. Some local roads, such as Thorley Lane and Mill Lane are not considered suitable for construction traffic.

3.12.11. There is a major utilities connection required from Styal Road to the Airport HS2 Station along significant highway network lengths. HS2 Ltd. have provided no details of the impact of this and how traffic will be managed.

3.12.12. The access and integration of bus facilities at the HS2 Manchester Airport station is insufficient. Onward bus connectivity is vital from the Manchester Airport station if national and regional (GM 2040) policy objectives on sustainability are to be met.

3.12.13. The impact of not having a Metrolink connection at the HS2 Manchester Airport station from Day 1 of the operation has not been considered. The proposal to use shuttle buses from the HS2 station to the Airport terminals in advance of Metrolink will cause further traffic congestion and air quality impacts.

3.12.14. The amount of car parking at the HS2 Manchester Airport station is excessive (3,800 spaces) and will encourage use of private vehicles.

3.12.15. There is no mention of accessible parking provision at the Airport station. This should be at least 5% of all spaces. Similarly, there is no electric vehicle parking identified. At least 10% of all parking spaces should be provided with EV charging provision. No Motorcycle parking provision has been made. MCC require adequate provision for all the user types mentioned in HS2 parking designs.

3.13. Waste and Material Resources

3.13.1. The Waste and Material Resources chapter does not include an assessment of individual community areas. There has been no consideration of the proposals against waste policies included in authority area local plan’s or of local waste infrastructure capacity.

3.14. Water Resource and Flood Risk

3.14.1. MCC require further details with respect to the proposed tunnel dewatering at the Fairywell Brook and its impacts downstream.

3.14.2. The syphons proposed within the area are not a favourable solution to the management of the watercourses as they have the potential for high maintenance burdens and blockage, and it is not clear who the final maintainer would be.

3.14.3. Given the importance of the flows within the Timperley Brook for discharge of surface water from Manchester Airport, MCC recommend a gauging station to calibrate future hydrology assessments.

3.14.4. There is concern regarding the hydraulic efficiency of the M56 culvert which joins the Timperley Brook via the inverted syphon as well as the rationale for locating this at a 90-degree angle.

3.14.5. A spring which feeds into the Timperley Brook appears to be lost during construction and no mitigatory measures are put in place.

3.15. Conclusion

3.15.1. The information provided to date does not allow for environmental effects or the adequacy of any proposed mitigation in the MA08 (Manchester Piccadilly station) Community Area to be determined. MCC will require HS2 Ltd. to address all concerns raised in respect to the ES..

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement

Chapter 3

MCC Comments on Volume 2: MA07 (Davenport Green to Ardwick) community area report and map books

4. MCC comments on Volume 2 – MA07 (Davenport Green to Ardwick) community area report and map books

4.1. Introduction

4.1.1. This section is 13.4km long, of which 12.8km is in tunnel under the wards of Ardwick, Longsight, Rusholme, Withington, Didsbury West, Didsbury East, Northenden and Baguley. 573m of the route is in cutting at Ardwick.

4.1.2. There are several permanent physical features associated with the tunnelled section of the route. These includes four ventilation (vent) shafts/headhouses proposed at: Altrincham Road/M56 junction 3a (Northenden Ward) (vent shaft 1); Withington Golf Course, Palatine Road (Didsbury West) (vent shaft 2); The Christie Car Park D, Wilmslow Road (Didsbury East/boundary with Didsbury West) (vent shaft 3); and Fallowfield Retail Park, Birchfield Road (Rusholme) (vent shaft 4).

4.1.3. The vent shafts and headhouses would be approximately 25m x 43-54 wide and 6m high. Each vent shaft will have a construction compound and there will be additional auto transformer stations at Palatine Road and Birchfields Road.

4.1.4. At the Ardwick end there would be a ‘porous portal’ (a perforated structure at the tunnel entrance, designed to allow the passage of air from the tunnel) with a head house substation and a tunnel portal building.

4.2. Agriculture, Forestry and Soils

4.2.1. This area is urban/suburban in nature and has been scoped out of the ES.

4.3. Air Quality

4.3.1. MCC are concerned that HS2’s model verification tables are underpredicting results of carbon monoxide and nitric oxide (NOX/NO2) concentrations, due to the failure to apply required adjustment factors, and we will require further justification to fully understand the predictions caused by the implementation of the Proposed Scheme.

4.3.2. The permanent loss of part of the car parks for The Christie Hospital and Fallowfield Retail Park (including the ‘Park & Stride’ spaces for nearby schools) has not been considered within the assessment. MCC consider that a further assessment should include the effects of potential vehicle displacement to nearby residential streets and/or alternative car parks and, if necessary, resources should be provided for the creation/promotion of alternative modes of travel and additional mitigation may be required to offset any adverse impacts on air quality and safety.

4.3.3. MCC require HS2 to undertake further review and assessment prior to any works, to inform an Air Quality Action Plan outlining all mitigation measures as required.

4.4. Community

4.4.1. It is acknowledged that several residential properties (4), commercial properties (31) and other buildings/structures, are identified by HS2 Ltd. as being required to be demolished in MA07. As with other community areas, MCC expect the detailed design to avoid or limit the loss of property, as far as possible, and to ensure that adequate and timely engagement and support is provided to the affected residents, businesses and organisations, including any mitigation or alternative.

4.4.2. The proposed vent shaft, headhouse and auto-transformer station at Palatine Road will have a significant impact upon Withington Golf Club, including its future viability. MCC expect that further engagement and specialist support will be provided by HS2 Ltd. to the golf club to ensure that a viable solution is found which will preserve the future viability of the club facility. Further work and engagement with MCC by HS2 Ltd. to establish suitable design proposals is required.

4.4.3. The Wilmslow Road vent shaft will result in the loss of 135 parking spaces at the Christie Hospital, as well as of 3 properties which provide ground floor commercial units with residential accommodation above. MCC require the layout for the headhouse design to be designed to retain as much car parking as possible; to avoid the need to demolish homes/businesses in this area; and to avoid the need for the removal of mature trees on Wilmslow Road. The design should also be in keeping with the character of the area. Further engagement with the hospital and MCC is required to establish suitable mitigation and a re-provision strategy for the loss of parking spaces (including accessible parking provision) and to establish suitable design proposals for the above surface landscaping and headhouse. MCC will also require HS2 Ltd. to work closely with businesses regarding relocation and seek to mitigate the loss of jobs

4.4.4. MCC consider that the Birchfields Road vent shaft will have significant implications for businesses at the Fallowfield Retail Park and the local community and require a less sensitive alternative location for the Birchfields Road vent shaft. The loss of land at the retail park will result in business closures, job losses and the loss of valued community retail services. The use of this location would also cause significant amenity, noise disruption and traffic impacts for both local residents and the directly neighbouring Birchfields Primary School. The car park is used by parents to drop off children at the primary school and Manchester Enterprise Academy (MEA Central).

4.4.5. If, ultimately, land at the retail park is to be required, the construction period and plans for the vent headhouse must be managed to limit impact upon the

operations of the retained businesses as well as the neighbouring schools and residents, including provision of appropriate noise mitigation measures. Replacement arrangements should be identified to allow for the continuation of the 'park and stride' school drop off scheme.

4.5. Construction Management

4.5.1. Moderate contamination risks have been identified by HS2 in Ardwick (although these may be high if significant contamination is found, due to the former gas works on site). Lower risks are identified in relation to the vent shafts, but contamination could still be present. Site Investigations are required prior to construction, to determine if any remediation is required, and then for detailed remediation at all construction areas.

4.5.2. Regarding noise impacts assessed by HS2, daytime construction hours are proposed for the Birchfields vent shaft, but night-time construction hours are proposed for the Withington vent shaft. There is an inconsistent approach to construction in these high-density residential areas. HS2 Ltd. should review working hours in areas of high population density to ensure a consistent approach is taken and agree a bespoke approach in consultation with MCC.

4.5.3. There are expected to be vibration impacts during construction at the Christie Hospital. The Tunnelling Boring Machine (TBM) is expected to have significant effect on the use of the proposed MRI scanner at the Christie for 25-30 days. A specific Vibration Risk Assessment has been undertaken after liaison with the Christie but concludes that HS2 Ltd. will liaise with the Christie further. MCC request information on whether any further assessment is proposed and exactly what equipment will be affected.

4.5.4. There is a major 24/7 haul route between the tunnel portal and Ashley Railhead for removal of tunnel spoil – the route of this has not yet been ascertained so concerns exist around suitability, hours of operation, impact on residents and alternative routes in the event of incidents. HS2 Ltd. should identify the route and provide proper construction management, traffic modelling and mitigation, all of which should be correctly identified and assessed in the ES.

4.6. Ecology and Biodiversity

4.6.1. MCC consider that insufficient information has been provided regarding the impacts that an increase in nitrogen deposition will have on the Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Sites of Biological Importance (SBI) located within MA07. Changes in traffic movements on roads near to the Rochdale Canal SAC will increase nitrogen deposition, which could result in adverse effects on floating water-plantation. Due to the lack of information, it is concluded that there may be an adverse effect on the SAC that is significant at the international level. This missing

information should have been presented within the ES and it is therefore requested that HS2 complete necessary assessments to provide this data.

4.6.2. MCC consider that the scheme does not take in to account the importance of individual street and highway trees of note that are not veteran trees but are important landscape features. MCC expects there to be a full Capital Asset Value for Amenity Trees (CAVAT) assessment conducted on all trees of note to ensure that a full understanding of the ecosystem is captured and an appreciation of their value and function is considered when determining mitigation. Mitigation planting should be proposed by HS2 Ltd. in consultation and agreement with MCC at the appropriate stage.

4.6.3. Four mature street trees are located on Wilmslow Road. HS2 must ensure that these trees are protected during the construction phase of the development with root protection areas put in place.

4.6.4. MCC consider that landscaping and habitat improvement plans around the South Portal should include improvements to Fairywell Brook, Open Space and Woodland in the MCC District.

4.6.5. MCC consider that there has been missed opportunities for habitat enhancements and improvements at vent shaft locations. HS2 Ltd. should explore habitat enhancement opportunities further in consultation with MCC.

4.6.6. MC expect that vent shaft landscaping will consider climate resilient and wildlife friendly nature-based solutions within their developments, for example, the use of rain gardens and permeable surfacing. MCC expect that suitable screening and green wall / green roof opportunities will be considered on all headhouse and vent shaft locations. It is expected that the final detailed design on these matters would be consulted upon by HS2 Ltd. and agreed with MCC.

4.6.7. In the Palatine Road area, MCC request that HS2 Ltd. ensure that all areas of woodland creation also benefit from suitable planting of woodland wildflower assemblages that will be integrated fully into the wider Mersey Valley.

4.6.8. Within the MA07 area, there are several properties, structures and trees which require demolition or removal. However, only 22 properties have been subject to initial inspection for bat roosts or bat roost potential, and this needs to be addressed and agreed in consultation with GMEU and MCC and implemented prior to demolition or removal of said properties, structures, and trees.

4.6.9. HS2 Ltd. should make appropriate provision to compensate for the loss of habitats for the assemblages of bats of regional importance identified within MA07, including an additional exploration of hedgerow creation opportunities.

4.6.10. A potential area of Open Mosaic Habitat has been identified in the Ardwick area. No survey has been undertaken but it is described as being up to “district

/ borough value". Given that this habitat is one of principal importance MCC would consider its value to be higher than district/ borough level. It is recommended that a habitat survey is completed on this area to identify the habitat type present and categorise its value so that appropriate mitigation and/or compensation can be proposed and implemented by HS2 in consultation with MCC.

4.6.11. The loss of hedgerows in MA07 is described as being significant at a local/parish level. Since this includes the loss of native species-rich hedgerows, this is an underestimation of the value of the hedgerows. Mitigation planned should relate to this level of significance and appropriate mitigation and/or compensation should be proposed and implemented by HS2 Ltd. in consultation with MCC.

4.7. Health

4.7.1. MCC are concerned about the increase in HGV traffic and changes to the noise and visual environment caused during construction in various locations in this community area (MA07), which will lead to reduced levels of satisfaction with the local environment, including at Wilmslow Road, Moseley Road, Old Hall Lane, Kingsway and Birchfields Road.

4.7.2. Little detail is provided on mitigation measures other than compliance with the CoCP and HS2 Ltd. engaging with local authorities and community representatives to identify measures aimed at fostering and maintaining good relationships between the workforce and local communities. Such measures should be further developed by HS2 Ltd., in consultation with MCC, and included within the community engagement framework, as appropriate.

4.7.3. MCC are concerned that the presence of a significant construction workforce on worksites and at satellite compounds (i.e., Altrincham Road vent shaft, Palatine Road vent shaft, Wilmslow Road vent shaft, Birchfield Road vent shaft, Manchester Tunnel north portal, Manchester tunnel north portal main compound) leading to the presence of workers in local community facilities. Little detail is provided on mitigation measures other than compliance with the CoCP. Again, measures should be further developed by HS2 Ltd., in consultation with MCC, and included within the community engagement framework.

4.7.4. Construction of the Proposed Scheme intersecting public rights of way (PRoW) leading to changes in the amenity value of PRoW, increased distance due to diversions, and introduction of features such as footbridges and underpasses, deterring the use of PRoW for active travel and recreation. The statements suggest that the adverse effects on health are small and temporary and does not identify other mitigations. MCC are concerned that the lack of mitigation proposed and suggest HS2 reconsider mitigation at local levels in consultation with MCC.

4.7.5. The presence of construction traffic, including HGVs on local roads will result in amenity impacts and safety concerns, deterring the use of local roads by non-motorised users. Further mitigation measures need to developed by HS2 Ltd, in consultation with MCC.

4.8. Historic Environment

4.8.1. Further research should be undertaken by HS2 Ltd. to understand which Conservation Areas in this community area (MA07) qualify as being of 'high significance', as this may change the overall significance of effect rating. HS2 Ltd. have currently assessed Conservation Areas as 'medium significance'. Equally, many non-designated heritage assets have been identified as being of 'low' significance (with some exceptions). MCC disagree with the conclusions regarding the Withington Conservation Area and the Northenden Conservation Area, where disturbance would have a considerable impact. This is not reflected in the 'neutral' impact given. HS2 Ltd. should reconsider their findings and potential mitigation in consultation with MCC.

4.8.2. In instances where there is some unknown potential for archaeological interest, the degree of significance is yet to be identified. This requires further investigation by HS2 Ltd. and consultation with MCC & GMAAS.

4.8.3. There is no justification for the removal of the Grade II listed Milestone adjacent to Withington Fire Station for temporary works / land required for construction. The repositioning of the asset to a different location would completely erode the integrity of the asset and absolutely undermine its purpose and, thus, significance. Options for retention should be further explored by HS2 Ltd. in consultation with MCC.

4.8.4. No justification is offered by HS2, nor alternatives explored, to avoid the total loss of numerous non designated heritage Assets (principally located in the Ardwick area). Recording can provide mitigation to some extent but should not be the first point of call.

4.8.5. There is concern around the potential for movement around the collection of Listed Buildings to Ladybarn Road. This should be monitored by HS2 Ltd. during the construction and operational phases to identify and record threats to integrity of the structures and their setting.

4.8.6. The installation of the overground station and associated viaducts will result in considerable, irrevocable loss of a great deal of non-designated heritage assets in the Ardwick (as well as Piccadilly) area. All reasonable options which would avoid the permanent loss of these assets should be further explored and consulted on with MCC. Further, MCC have high concerns over potential non-designated heritage assets which are yet to be identified. HS2 Ltd. should robustly demonstrate that measures would be in place to identify and then appropriately consider further mitigation as works commence, in consultation with MCC.

4.8.7. Where loss of heritage assets cannot be demonstrably avoided, building records should be undertaken by a qualified conservation specialist in line with Historic England's Guidance on building recording (Level 3 minimum for non-designated heritage assets - Level 4 for Listed Buildings).

4.9. Land Quality

4.9.1. MCC expects that the analysis of contaminated land data for HS2 Ltd. within Manchester to be provided as soon as it is available in order for it to be reviewed and assessed, which will in turn determine the need for mitigation (if any). MCC require HS2 to provide confirmation on the current mechanisms/agreements in place to ensure appropriate consultation takes place throughout each stage of this process.

4.9.2. MCC request a bespoke focussed strategy on how site investigations/land surveys will be undertaken within potentially contaminated areas within the tunnelled section of the Proposed Scheme specifically.

4.9.3. MCC are aware that there is no demolition or decommissioning data available for former fuel stations within the study area. MCC would expect detailed site investigation data to be provided for these areas to determine if decommissioning has taken place and if mitigation is required to address potential risks to human health and controlled waters receptors.

4.10. Landscape and Visual

4.10.1. HS2 Ltd. do not provide any viewpoints in areas defined as ‘land potentially required during construction’ so it is unclear how views might be affected. There is the potential for the effects to be greater in magnitude than predicted and more design information is required from HS2 Ltd. to determine the magnitude, scale of effect, and significance during the operation stage.

4.10.2. HS2 Ltd. have not provided sufficient viewpoint (VP) assessments in several key areas to allow MCC to understand the landscape impacts of the current proposals and consider if sufficient and appropriate mitigation has been detailed in the ES. It is therefore difficult to fully consider the visual impacts at this stage and further assessments should be provided by HS2 Ltd. during the final detailed design stage to inform the design and any additional mitigation which may be required.

4.10.3. Further photomontages are required, alongside detail of the landscape mitigation being relied upon, to ensure a robust justification of how the significant effects arising will be mitigated over time. Without this justification, further significant residual effects could occur which are not considered in this assessment.

4.10.4. The final design of any above ground structures and public areas associated with HS2 in this community area will be key to ensuring that any adverse

landscape or visual impacts of the Proposed Scheme are minimised. HS2 Ltd will be expected to develop the final design details in consultation with MCC.

4.11. Socio-Economics

4.11.1. HS2 Ltd. have made an assessment of the potential effects within individual community areas by the Proposed Scheme which is welcomed. However, the assessment of effects is significantly inconsistent, with the sensitivity of receptors (i.e. those affected) selected without clear justification and often underestimated. On this basis, MCC would request that HS2 Ltd. re-assess the potential effects on the receptors likely to be affected and provide appropriate mitigation to reduce these effects.

4.11.2. MCC are concerned that 640 jobs are expected to be displaced or lost as a direct result of the HS2 development and its impact on businesses identified within MA07. The impact from the relocation or loss of jobs is considered to be minor in the context of the total number of people employed in the area. However, given the dependency of these business on the current location and the likelihood of successful relocation considered to be low, the loss of the business and its employees is considered to be significantly adverse. Additionally, there is a lack of information from HS2 on how businesses will be supported in their search for alternative sites and premises.

4.11.3. As with other community areas, MCC will request HS2 Ltd. to provide additional supportive information which provides confidence to stakeholders that all businesses affected will be supported prior to and throughout the construction works to minimise any potential effects as far as practical.

4.12. Sound, Noise and Vibration

4.12.1. MCC are strongly concerned about the impacts of sound noise and vibration on local communities during construction and operation.

4.12.2. MCC require clarification on the methodology used to determine how appropriate noise levels would be achieved by the vent shafts and headhouses during operation, as this is insufficient.

4.12.3. HS2 Ltd. have not provided sufficient noise baseline data in several locations, which does not allow MCC to consider if the impacts stated by HS2 Ltd. are reasonable assumptions. HS2 Ltd. also rely significantly on mitigations which are not clearly defined in the ES. MCC require full detail on mitigation regarding sound, noise and vibration impacts identified.

4.12.4. HS2 Ltd. indicate that ground-borne ground–borne vibration during the construction phase will be controlled via selection of construction methods to ensure that the Significant Observed Adverse Effect Level (SOAEL) is not exceeded on a monthly basis. MCC considers this statement insufficient at

this time and requires further evidence as to how this will be achieved and mitigated, if necessary.

4.12.5. HS2 Ltd. indicate the provision of 'increased construction screening' at the four vent shaft locations. However, no further details have been provided regarding the effectiveness of the mitigation, and further assurance that this screening will suitably mitigate adverse effects on local communities is required.

4.13. Traffic and Transport

4.13.1. The impact on the strategic and key route network during construction requires further mitigation in order to ensure that traffic delays are minimised and that local communities are not disproportionately impacted. MCC will require HS2 Ltd to work with the Council and TfGM to ensure any adverse effects during construction are minimised on the highway and thereby local communities.

4.13.2. MCC are concerned about the major 24/7 haul route between the tunnel portal and railhead for removal of tunnel spoil, in terms of hours of operation and impact on residents. Further information is required on construction management, traffic modelling and mitigation to ensure no unacceptable effects.

4.13.3. MCC have a number of concerns with construction traffic routes suggested in the ES and require HS2 Ltd to revisit these routes in consultation with MCC.

4.13.4. The Princess Parkway / Palatine Road and Sharston Interchange are existing areas for concern in terms of community severance and poor accessibility for those not using motor vehicles. HS2 Ltd should design proposals to ensure severance of communities is minimised, in consultation with MCC.

4.13.5. MCC are concerned that parking arrangements during operation and construction around vent shaft locations will require additional mitigation to ensure no adverse effects on the highway network and local communities. MCC will require HS2 Ltd to further develop their mitigation for these anticipated effects.

4.14. Waste and Material Resources

4.14.1. HS2 have not assessed waste and material resources on a "community area" basis. Therefore, there are no direct considerations against local policies or plans regarding waste infrastructure capacity.

4.14.2. MCC will require HS2 Ltd. to provide a project plan for waste management which provides sufficient information to allow MCC to consider if there are likely to be any local issues and a strategy to mitigate against any potential issues that may arise.

4.15. Water Resource and Flood Risk

4.15.1. The hydrology assessment which is found in the Mersey Model report uses event data between 1955 and 2012. The model has been further calibrated against Storm Christoph (Jan 2021). MCC note that river levels on Saturday 19th February 2022 marginally exceeded those of Storm Christoph. MCC require HS2 Ltd. to undertake further hydrological assessment to ensure that there are no changes following another high magnitude event in short succession.

4.15.2. The flood report identifies that some properties in the location of the Didsbury Flood Basin will receive an increased risk of flooding. Additional detail is required from HS2 Ltd. to understand how and where compensatory storage will be located to mitigate this risk. MCC will require additional detail for how the scheme will mitigate flood risk during the construction phase, noting that within the Didsbury Flood Basin area, the scheme will be working in the middle of an active flood plain.

4.15.3. MCC have identified several assets (ponds, drains, culverts etc.) which do not seem to have been considered by HS2 Ltd. MCC will require clarification if all these individual assets were considered and if not, further studies to understand potential impacts and any additional mitigations required.

4.16. Conclusion

4.16.1. The information provided to date does not allow for environmental effects or the adequacy of any proposed mitigation in the MA08 (Manchester Piccadilly station) Community Area to be determined. MCC will require HS2 Ltd. to address all concerns raised in respect to the ES.

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement

Chapter 4

MCC Comments on Volume 2: MA08 (Manchester Piccadilly Station) community area report and map books

5. MCC comments on Volume 2 – MA08 (Manchester Piccadilly station) community area report and map books

5.1. Introduction

5.1.1. This chapter specifically details the MCC consultation response comments in respect of issues and requirements which have been identified within MA08, Manchester Piccadilly Station.

5.1.2. Other chapters within this MCC consultation response detail issues and requirements identified in relation to the other sections of the ES. Where those issues apply to all or several of the Community Areas, they have been set out in the Chapter titled “MCC Points raised to ES Consultation which are Common across chapters and Community Areas”. To avoid repetition, those issues and requirements have not been re-stated here but in reading this section it should be noted that those issues and requirements also apply to this Community Area.

5.2. Agriculture, Forestry and Soils

5.2.1. This area is urban/suburban in nature and has been scoped out of this topic.

5.3. Air Quality

5.3.1. The modelling of the reconfigured Pin Mill Brow junction is not accurate. It is understood that this will result in different traffic flows in the operational scenario to those shown in the ES.

5.3.2. MCC require HS2 to undertake further review and assessment prior to any works, to inform an Air Quality Action Plan outlining all mitigation measures as required.

5.4. Community

5.4.1. Substantial areas of land within this community area will be required with significant impacts for the local community and established businesses. 48 commercial properties and 26 other buildings/structures, including a number of important community services, are required to be demolished in MA08.

5.4.2. Adequate engagement, assistance and support is to be provided by HS2 Ltd. to the affected business community. This needs to include resourcing for the Business and Local Economy Fund and Communities and Environmental Fund, universal access to an agency service to assist businesses find alternative premises and provision of access to independent legal advice. This should include a severance package which reflects construction and disturbance impact, as well as the permanent loss to businesses. A detailed programme for the delivery of support services is required.

5.4.3. There will be permanent loss of the community facility premises for SOL Christian Academy, Manchester Action on Street Health (MASH), Manchester Offenders: Diversion Engagement and Liaison Service (MO:DEL), True Jesus Church, Totem Gymnastics, Cloud Aerial Arts, CrossFit Ancoats, Straight Blast Gym and Frontline Fitness Performance Centre. Replacement provision for these community facilities needs to be established in each case as a matter of urgency.

5.4.4. Large numbers of residential properties in Chapeltown Street, Ducie Street, Pollard Street and New Islington will experience a prolonged combination of significant amenity impacts associated with construction activity, alongside adverse visual effects. Appropriate mitigation and engagement need to be provided.

5.4.5. HS2 Ltd. do not identify any permanent construction effects on public open space in Community Area MA08. This assessment does not take account of the multiple impacts upon existing public realm spaces within the city centre, or the impacts upon the cityscape.

5.4.6. MCC is concerned that the proposed HS2 Ltd. station is not appropriately integrated with the facilities of the existing Piccadilly Station and would not deliver suitably strong connectivity links between the proposed station, the city centre and its communities.

5.4.7. The detailed station design needs to be formulated and optimised in co-ordination with MCC, TfGM and relevant stakeholders. The station design should be revised to align with the approach detailed in the Piccadilly Strategic Regeneration Framework (2018) and the Greater Manchester HS2 and NPR Growth Strategy (2018). A new fully integrated underground station for HS2 & NPR is needed to successfully integrate with the existing station and maximise the land's significant economic potential.

5.5. Construction

5.5.1. The HS2 Ltd. Predictions and Assessments for noise are out of date. Committed developments on and around Heyrod Street and Store Street have not been included in the impact assessments. HS2 Ltd. should update their assessments to include all development.

5.5.2. There are contamination risks in the Ardwick/Piccadilly area, and these may be high if signification contamination is found. Site investigation is required to determine if any remediation is required, and the specific controls needed (i.e., dust/odour) during these works.

5.5.3. 304 residential properties are forecast to experience noise above the eligibility criteria for noise insulation. There are no details of any verification once glazing has been fitted. HS2 Ltd. should provide details of Noise

Insulation proposals and any intake/extract points in addition to details of any verification once glazing has been fitted.

5.5.4. MCC has concerns with respect to Manchester Piccadilly High Speed Station sustainable mode analysis. The assessment of impacts to cyclists is not adequate or accurate for the temporary highway works situation. We also require that cycle facilities to current standards are provided as part of any permanent or temporary highway arrangements around Piccadilly and Pin Mill Brow.

5.5.5. The proposed westbound Great Ancoats Street closure at Every Street is not acceptable as it constitutes a closure of the Inner Ring Road without details of wider area mitigation. Southbound closures of the A6 London Road between Fairfield and Store Street and Adair Street in the same stage of construction are also unacceptable without wider area mitigation, as they are key city centre access routes. HS2 Ltd. should provide proper construction management, traffic modelling and mitigation for proposed closures.

5.5.6. No detail is provided on how adequate footway widths will be determined and maintained during construction. Minimum widths will not be adequate on many of the busy footways around Piccadilly Station.

5.6. Ecology and Biodiversity

5.6.1. Changes in traffic movements on roads near to the Rochdale Canal Special Area of Conservation in the Ardwick area will increase nitrogen deposition which could result in adverse effects on floating water.

5.6.2. HS2 Ltd. does not consider the importance of individual street and highway trees of note that are not veteran trees but are important landscape features.

5.6.3. MCC welcome proposals to improve habitat around the Medlock in MA08 but would encourage further opportunity to enhance connectivity South into the Lower Medlock Valley.

5.6.4. MCC note that no bat emergence surveys were undertaken in any building or structures in MA08, or replacement rooting provision made, which would normally be expected as part of an ES.

5.6.5. The ES identifies that the construction in this area will result in the disturbance of black redstart bird nesting habitat. However, no details are given of the location and no mitigation is proposed.

5.7. Health

5.7.1. HS2 Ltd. have not provided adequate mitigation for all health-related impacts. A general mitigation for loss of the community facility identified is indicated to explore options to include:

- improving or altering the remaining portion of the community facility.
- improving other existing community facilities in the area that could reduce the effect;
- improving accessibility to other community facilities; and/or
- identifying land that could be brought into use as a community facility.

5.7.2. Visual intrusion and changes to the noise environment a result of construction work and HGV traffic could lead to reduced levels of satisfaction with the local environment at the following locations: Residential properties on Chapeltown Street, Pollard Street, Ducie Street, and in the vicinity of Old Mill Street in New Islington.

5.7.3. The presence of construction traffic, including HGV, on local roads will lead to amenity impacts and safety concerns. It will deter the use of local roads by pedestrians and cyclists.

5.7.4. The presence of workers in local community facilities could lead to changes in levels of community cohesion and trust at the close to the Manchester Piccadilly High Speed station main compound and Manchester approach satellite compounds B, C and D.

5.7.5. MCC have concerns about the isolation of recreational facility, affecting ability to participate in physical activity at the following locations:

- Permanent closure of Sheffield Street means that Straight Blast Gym (SBG) will become physically isolated.
- The Fairfield Street diversion and the permanent closure of North Western Street will mean that Frontline Fitness Performance Centre will become physically isolated.
- Change of vehicular access to Mancunian Boxing Club (current access from Chancellors Lane and the A635 Mancunian Way will be permanently closed and new access routes established from Union Street.).

5.7.6. HS2 Ltd. advised it is continuing to engage with the owners and operators of, Frontline Fit and SBG Manchester to identify reasonably practicable measures to help mitigate the likely effects.

5.7.7. Demolition of community facility will reduce the beneficial health effects gained through educational attainment at SOL Christian Academy on Fairfield Street. HS2 Ltd. has advised that it will engage with SOL Christian Academy, to identify reasonably practicable measures to help mitigate the likely significant effects but no mitigations are identified for the specific premises.

5.8. Historic Environment

5.8.1. The extent of removal of significant historic fabric to Piccadilly Station is unclear, and options for maximum retention are not illustrated or investigated. MCC notes that there is clear harm to the listed columned bridges and blocked-arch wall along Sheffield Street.

5.8.2. Visual impact on the setting of heritage assets around Piccadilly Station is likely to result in a change. As such, MCC require a detailed plan for consultation at an early stage in order to avoid any unnecessary adverse impact.

5.8.3. The proposed extent of removal of significant historic fabric to Piccadilly Station is unclear, and options for maximum retention are not clearly illustrated or investigated. The overall impact is therefore impossible to determine at this stage. This is a major concern for MCC which should be re-assessed by HS2 through final detailed design, in close consultation with MCC and Historic England.

5.8.4. It is considered that the installation of the overground HS2 station will result in considerable, irrevocable loss of a number of non-designated heritage assets in the Ardwick / Piccadilly area. Where loss of heritage assets cannot be demonstrably avoided, MCC require that building records should be undertaken by a qualified conservation specialist.

5.8.5. MCC maintains significant concerns over potential non-designated heritage assets which are yet to be identified. For instance, prominent late-19th century buildings at 163 Ashton Old Rd and 223 Ashton Old Road do not feature on the map, but are clearly of some architectural and historic merit, and have the potential to be impacted by the construction compounds.

5.9. Land Quality

5.9.1. MCC understand that potentially contaminated spoil from the tunnelling process is likely to be stored and processed at the North Manchester Portal Tunnelling Compound. HS2 Ltd. need to make clear how these soils will be managed.

5.9.2. MCC are aware that there is no demolition or decommissioning data available for a former petrol filling station within MA08. Mitigation is required to address potential risks to human health and controlled waters receptors.

5.10. Landscape and Visual

Townscape Assessment – Scope and Methodology Report

5.10.1. The Piccadilly, Ardwick and West Gorton industrial and infrastructure character area baseline requires further detail to form a robust townscape assessment.

5.10.2. The methodology for assigning value does not reflect the urban environment of the two-character areas identified as being significantly affected within the MA08 area. The assessment of value has the potential to be lower in urban areas due to the methodology HS2 Ltd. has used.

5.10.3. Similarly, the criteria for determining landscape sensitivity are focussed on non-urban environments and the components that constitute a high or medium-high sensitivity landscape largely do not apply in an urban context. This is disproportionately under-estimating the impact in Manchester, with the weighing leaning towards rural settings.

5.10.4. The photomontages have only been prepared for views which meet specific, limited criteria. In a city-centre location which is highly complex, and taking into consideration the size, scale and importance of the proposals, and the high numbers of visual receptors, a photomontage of each key viewpoint would be appropriate. MCC require block model or wireline photomontages for each identified view.

Townscape Assessment – MA08 Community Area Report

5.10.5. The assessment of the landscape baseline and sensitivity (which measures assessed value and susceptibility to change) of the Piccadilly, Ardwick and West Gorton Local Conservation Areas (LCA) lack detail and are not robust.

5.10.6. The assessment states that substantial parts of the character area will be returned to suitable development use, but in year 1 are likely to constitute empty sites surrounded by hoarding, which is a 'high' magnitude of change. However, it goes on to state that the changes will largely be in keeping with the existing character and the overall assessment is one of “minor adverse impact”. The substantial areas of land surrounded by hoardings are likely to impact on the townscape character and this is not reflected in the assessment. MCC require a re-assessment of change against the key characteristics of the baseline in order to establish the degree of change, the nature of that change, and the significance.

5.10.7. For the year 30 operational phase, the assessment states that there is insufficient information to understand the changes that the character area will experience in this period. It is unclear how an assessment of minor adverse and not significant impacts can justifiably be determined from this. The urban nature of the character area, city along with the substantial areas available for new development, means that the area is likely to undergo transformative change over the next 30 years, and an assessment of minor adverse impact is likely to be misleading.

5.10.8. Clarity is required on the selection of committed developments. No committed developments of relevance for landscape and visual have been identified, and there is no mention of key schemes in the area such as Mayfield. The townscape around the station is dynamic and fast changing,

with a high number of consented schemes, along with the proposals in the Piccadilly SRF and other surrounding SRF's (Portugal Street East, Mayfield, North Campus (ID Manchester), and Kampus (Aytoun Street)) coming to fruition. A more robust approach to methodology to identify and assess cumulative effects and future baseline is required in order to demonstrate the likely effects (currently assessed as not significant).

5.10.9. The visual assessment has not identified any locations within this study area where additional lighting during continuous night working and/or overnight working during construction will result in significant visual effects at night.

5.10.10. The ES states construction works are likely to require lighting early morning and evening, when residential properties are likely to have blinds drawn. Therefore, lighting during typical hours is not considered as part of night assessment for residential properties. MCC request further consideration to ensure a robust approach to assessing night-time visual effects.

5.10.11. No mention is made of advance planting to screen and potentially reduce visual effects during construction.

5.10.12. No significant temporary landscape effects during construction are anticipated but nearby developments which are likely to influence the character of the townscape, such as Mayfield, need to be considered. MCC require a more robust approach to identifying and assessing cumulative schemes which will impact on townscape character.

5.10.13. Mitigation integrated into the design includes tree planting. After 15 years it is assumed that trees planted for mitigation and screening are expected to have grown to 7.5m based on the assumption of 0.5m per year. This does not account for tree planting in urban areas, which would require substantially larger specimens. MCC require more detail on tree planting in an urban environment in order to include it as mitigation.

5.10.14. There will be no significant landscape effects during the operational phase according to the ES. MCC require a more robust methodology, approaches to townscape assessment to demonstrate no significant effects.

5.10.15. The study area has been limited to 750m within MA08 due to the urban character. However, both the construction phase and operational phase indicate potential for views beyond 750m within urban areas, resulting in the potential for 'missed' longer range views. MCC require additional mid and long-range views to reflect the potential extent of visibility considering that buildings in this area will be multistorey.

5.10.16. The City Centre Core, Historic and Commercial Grain townscape character area is poorly defined and out of date. The assessment states that there is a relatively consistent mass and height of 4-7 storeys. The city centre is increasingly characterised by taller buildings as individual landmarks or clusters which have changed the city skyline.

5.10.17. The assessment of future City Centre Core, Historic and Commercial Grainis incomplete and 'no affects' on landscape susceptibility because of future development is not robust. It references only two schemes, and e.g. there is no consideration on the impact of the wider North Campus (ID Manchester) area.

5.10.18. The scale of the proposed development in this area will have a substantial effect on the townscape around the station during construction and operation. However, due to the high-level division of the city into large townscape areas and character areas which cover a substantial part of the city, the full magnitude of the construction phase effects are not assessed and are given an assessment of 'low'. The full magnitude of the construction phase impacts is not assessed. MCC require an assessment which includes the operation phase impacts on the station area as a whole, and at a detailed level to reflect the character around the station.

5.10.19. MCC require design consideration for the station and city which includes:

- Consideration of the potential gateway and arrival point to the station, which is proposed as located to the rear of the existing Gateway House. The rear of Gateway House is unlikely to provide a positive arrival experience and legibility on approach to the station is likely to be poor with Gateway House forming a physical barrier to views towards the station.
- Consideration of the impacts on townscape character and urban grain as a result of the station, associated infrastructure and overhead viaduct structures.
- Consideration of the impacts on movement and linkages of the overhead viaducts and station and resultant road closures, including consideration of the aspirations for movement and linkages as set out in the SRFs covering the area.
- Consideration of land use impacts, with substantial areas of land returned to suitable development use but likely to be undeveloped sites surrounded by hoarding.
- Consideration of the impacts on the public realm and public open space network.
- Consideration of proposed new planting and the potential effectiveness of what is proposed to create high quality public realm and mitigate against any adverse effects.

Visual Assessment

5.10.20. The photographs and descriptions are outdated, and in some cases inappropriate (e.g. not facing towards the likely direction of travel). The foreground of the view will substantially change during construction and operation. An update of the photography, description and future baseline to reflect the Great Jackson Street proposals should be carried out. Additional mitigation should be provided to the viaduct along its length on the approach

to the rear of the new station to provide the mitigation that is relied on in the description of impact - otherwise the assessed impact and effects will need to be revisited.

5.10.21. Stemming largely from the lack of photos and limited description of likely impacts, it is considered that the visuals described in the MA08 Community Area report do not provide adequate detail in order to fully understand whether the design is acceptable in visual terms. Additional operational photomontages and descriptions of impact should be provided to support the assessment, and assessed effects should be revisited in light of the new photomontages. MCC require a much more robust consideration of future and cumulative effects.

5.11. Socio-economics

5.11.1. Approximately 470 FTE will be required within MA08 during the construction phase. MCC require that HS2 Ltd. work with local partners on a recruitment strategy to ensure as many as possible are locally employed. MCC further request that HS2 Ltd. identify the potential impacts on the current supply chain.

5.11.2. 2,630 jobs are expected to be displaced or lost as a direct result of the HS2 Ltd. development and its impact on businesses identified within Community Area MA08. The impact from the relocation or loss of jobs is considered to be minor in the context of the total number of people employed in the area. However, given the dependency of these business on the current location and the likelihood of successful relocation considered to be low, the loss of the business and its employees is considered to be significantly adverse. Additionally, there is a lack of information from HS2 on how businesses will be supported in their search for alternative sites and premises.

5.11.3. MCC would request HS2 Ltd. provide additional supportive information which provides confidence to stakeholders that all businesses affected will be supported prior to and throughout the construction works to minimise any effects as far as practical.

5.12. Sound, Noise and Vibration

5.12.1. Design details for internal and external plant and fixed equipment at Piccadilly Station have not been provided, so emissions cannot be assessed at this point.

5.12.2. As for other topics, a number of predictions and assessments regarding committed developments are out of date, and developments have not been included within the impact assessments. MCC does not consider existing assessments adequate to fully demonstrate suitability of the proposals.

5.12.3. MCC notes the provision of increased construction screening at numerous sites across MA08, however, no further details have been provided regarding the effectiveness of the mitigation. MCC requires further assurance that this screening will suitably mitigate adverse effects.

5.12.4. It is understood that current modelling of the reconfigured Pin Mill Brow junction is not accurate and as a result under-estimate the amount of traffic reassignment likely to occur off roads that approach the junction. MCC requires that the existing noise modelling is updated and resubmitted to reflect any necessary amendments to the transport assessment.

5.12.5. Construction and operational noise levels at a number of locations exceed the noise limits during daytime and night-time hours respectively. However, impacts are not listed as significant. While it is noted that mitigation is proposed in the form of noise insulation, clarification is required on the impact categorisation.

5.13. Traffic and Transport

5.13.1. MCC consider the facilitation of access and integration of bus facilities at the station to be insufficient. This mode is vital for onward connections from the station if national and regional policy objectives on sustainability are to be met. HS2 Ltd. should improve the integration of bus facilities in line with the City Centre Transport Strategy.

5.13.2. MCC consider that the quantum of car parking proposed at Piccadilly Station to be excessive (2,029 spaces) and will encourage greater use of private vehicles. The parking strategy should be reconsidered to encourage greater use of sustainable travel modes over private vehicles in line with guidance set out in the GM 2040 vision and City Centre Transport Strategy documents.

5.13.3. MCC are concerned that the access to HS2 and associated car parks for Piccadilly are not appropriate and require HS2 Ltd to revisit these highway works and parking proposals to ensure that associated vehicular movements are acceptable to local partners.

5.13.4. There is no mention of accessible parking provision (should be approximately 5% of total parking), electric vehicle parking, car club bays or motorcycle parking provision.

5.13.5. MCC consider that the pedestrian assessment in the Manchester Piccadilly High Speed Station Sustainable Mode Analysis as not adequate or accurate and fails to pick up existing crowding issues during peak times.

5.13.6. The Pin Mill Brow gyratory proposal is not appropriate in scale or function. It occupies a wide area, limiting development potential and creates a hostile environment for cyclists and pedestrians. It is understood that the design was developed in this way so as to achieve no major adverse effects from a traffic capacity basis. However, the proposed Pin Mill Brow gyratory does not cater

for the forecast future demand in either 2038 or 2046 or MCC plans to reduce general traffic in the city centre.

5.13.7. MCC require that highway improvements and mitigations are supported by robust highway modelling, and this is currently not the case. The unacceptability of road closures is covered in the construction section.

5.13.8. Pin Mill Brow should facilitate high quality pedestrian routes to connect to the proposed development sites created by HS2 Ltd. At present the design appears to assume footways alongside very busy multi-lane roads with no separation, green infrastructure or public realm considerations. Full consideration should be given to the need for space in line with the city location and active travel policy. HS2 Ltd. should provide detail of the pedestrian facilities and measures to enhance the environment for active travel users.

5.13.9. The assessment of impacts to cyclists in the Manchester Piccadilly High Speed Station Sustainable Mode Analysis is not adequate or accurate. There have been no surveys of cycle volume in the area around the existing Piccadilly station to enable an assessment on impacts to be made. Future growth in cycling and investment in infrastructure in and around the regional centre are also not accounted for. Cycle facilities at key locations such as Pin Mill Brow gyratory are not provided to the latest LTN1/20 standards.

5.13.10. MCC consider there is insufficient information to determine the quality of the cycle parking provision at the proposed HS2 Ltd. Piccadilly station. The cycle parking facilities need to be of a high quality to support greater cycle mode share. MCC consider the proposed quantum of cycle parking (523 spaces) at Manchester Piccadilly is insufficient.

5.13.11. The ES does not assess the impacts of closures to the Metrolink network on the Ashton Line during construction and does not assess the impacts of the additional traffic associated with this or highway improvements.

5.13.12. Not all of the bus routes listed for Ashton Old Road use Ashton Old Road to access the city centre. This raises the question of whether the predicted journey time increases have been properly assessed. The 31% increase in journey time is considered to be significant but no explanation is offered for the cause of this delay to be able to be determined if mitigation measures are necessary. HS2 Ltd. should correct this assessment and provide details of mitigation against the indicated bus delays.

5.13.13. Committed developments are only within 1km of the centreline of the HS2 route. Within Manchester City Centre the geographical scope needs to be widened for committed developments as it is likely to generate far-reaching transport impacts. HS2 Ltd should agree the list of committed developments with MCC.

5.14. Waste and Material Resources

5.14.1. The submitted Waste and Material Resources chapter does not include an assessment of individual community areas. There has been no consideration of the proposals against waste policies included in local plan's or of local waste infrastructure capacity.

5.15. Water Resource and Flood Risk

5.15.1. The report indicates that flooding from March 2019 has not yet been assessed with respect to this location. It is recommended that detailed analysis of previous flooding is assessed and taken into account to ensure any additional mitigations are proposed at the next stage.

5.16. Conclusion

5.16.1. The information provided to date does not allow for environmental effects or the adequacy of any proposed mitigation in the MA08 (Manchester Piccadilly station) Community Area to be determined. MCC will require HS2 Ltd. to address all concerns raised in respect to the ES.

High Speed Rail (Crewe to Manchester) – Phase 2b

Environmental Statement

Chapter 5

- MCC Comments on Volume 3: Route-wide effects
- MCC Comments on Volume 5: Wider-effects report
- MCC Comments on Draft Code of Construction Practice (CoCP)

6. MCC comments on Volume 3 – Route-wide effects

6.1. Traffic and Transport

6.1.1. Over 60 weekend possessions / blockades on different parts of the existing West Coast Main Line (WCML) during the construction of the HS2 Crewe-Manchester line are proposed. We believe that this will cause unacceptable disruption to passengers travelling to Manchester (over approximately 9 years), especially given the trend for increased leisure rail travel following the Covid-19 pandemic. MCC's petition will seek further information on this and request that alternative options are looked at to minimise the disruption on rail passengers.

6.1.2. The Ardwick railhead construction will further result in disruption over 4 weekends between 2026 – 2030.

7. MCC comments on Volume 5 – Wider Effects Report

7.1.1. The Wider Effects Chapter seeks to describe whether deviating the alignment or level of the route (the "limits of deviation" (LOD)) within these statutory limits would alter the significant predicted effects reported elsewhere in the ES, or create new or different significant effects. HS2 state that sensitivy analysis has been undertaken to identify where such spatial changes are feasible and assess the environmental implications. MCC have not been provided with the sensitivity analysis and therefore cannot be certain of HS2 Ltd's assumptions and judgements. It is reported by HS2 Ltd. that significant effects of changes with the LOD would only be assessed for significant effects at a later stage.

7.1.2. MCC are concerned as to how exactly the Environmental Minimum Requirements (EMRs), which HS2 Ltd. and its contractors would be subject to during construction, would be accorded with in reality and the process of how HS2 Ltd. would assess and decide the need for potential additional mitigations of effects. Should HS2 Ltd. need to change the Proposed Scheme within the LOD, significant environmental effects, which are currently not assessed or identified in the current ES, could be missed or insufficiently mitigated against. MCC will require HS2 Ltd to demonstrate its sensitivity testing and work with relevant local partners to continually review the environmental impacts of any significant design changes.

8. MCC comments on supporting documents – Code of Construction Practice (CoCP)

8.1. General issues

8.1.1. MCC note that this document is high level and lacking in detail in many areas which need specific measures/strategies. The CoCP discusses mitigation, monitoring and management of environmental issues but does not address

the key area of avoidance or protection from effects. MCC are concerned that this document is reactive in nature, only seeking to mitigate, rectify or report on issues once they have already occurred. MCC would require a more proactive approach to ensure all issues/risks are identified and then applying a hierarchy of avoid, protect, mitigate.

8.1.2. MCC are concerned that the high level nature of the CoCP will mean that contractors will approach delivery in different ways. The CoCP should provide specific direction and strategy to contractors to ensure consistency between different HS2 contractor submissions to public and local authorities, including a detailed minimum standard.

8.1.3. The CoCP seeks to establish the high-level principles of how various environmental issues would be managed by HS2 and its contractors during construction. MCC understand that this document is a very important mechanism in the implementation of the Proposed Scheme which will dictate how any given construction issue is managed to a large degree. MCC will require HS2 Ltd. to further develop the document in consultation with relevant local partners and provide much more clarity on how HS2 Ltd. intend the principles, processes, and procedures to function in reality during the implementation. MCC will be seeking HS2 Ltd. to commit to robust information sharing, project management, and oversight /approval processes, with relevant local partners, on a multitude of environmental issues, i.e. relating to Air Quality, Historic Environment, Ecology, Land Quality, Landscape and Visual, Noise and Vibration, Traffic and Transport, Waste and Materials, Water Resources and Flood Risk.

8.1.4. MCC are concerned that the current draft CoCP highlights that specific exemptions, for example regarding construction plant equipment, would be sought by HS2 Ltd. to Greater Manchester's Clean Air Plan (CAP) and proposed Clean Air Zone (CAZ). However, MCC do not support the principle of HS2 Ltd or its contractors being exempt from Greater Manchester's Clean Air Plan (CAP) and proposed Clean Air Zone (CAZ). MCC will seek to require HS2 Ltd. to comply and not prejudice Manchester meeting it's clean air targets.

8.2. Specific issues

8.2.1. MCC would welcome more information on to how the stockpiles containing contaminated soils will be managed to prevent contamination from leaving the compounds to ensure that the lands beneath the compounds does not become contaminated as a result of the temporary storage. Specific controls will need to be given in the Remediation Strategies, Construction Management Plan and/or CoCP.

8.2.2. MCC would expect that any soil embankments for noise control or landscape reinstatement will need to be suitability constructed with capping soils validated as suitable for use. It is noted that this will be covered as part of the

remediation strategy, however, soil sampling frequencies and validation procedures will need to be agreed.

8.2.3. In terms of site investigations, MCC would expect detailed site investigation data, detailed risk assessments and any remediation/validation requirements to be submitted to the Local Planning Authority. Additional resources shall be provided to Local Authorities during the process to assist with the review and assessment of site investigation data and subsequent remediation/validation information if required.

8.2.4. It is proposed that a temporary railhead will be used to receive (by rail) and stockpile material required for the construction of the Proposed Scheme. MCC would request clarification as to whether an analysis of the existing capacity on the railway line has been undertaken and what the findings and implications are.

8.2.5. MCC welcomes the requirement for contactors to produce and submit monthly reports on noise, dust and air quality data. In the event of complaints or exceedances, details must be shared with MCC within 48 hours.

8.2.6. Detail on plant assumptions for the construction assessment are not provided. The relevant details should be provided, and the potential impacts defined. MCC should be consulted when details are available to ensure that forecast impacts are accurately identified, and that appropriate mitigation is secured.

8.2.7. The timings for baseline sound levels used for the construction sound assessment are unclear and inconsistent, and need to be clarified

High Speed Rail (Crewe to Manchester) – Phase 2b

Equality Impact Assessment

Chapter 6

- MCC Comments on Equality Impact Assessment (EqIA)

9. Equalities Impact Assessment (EqIA)

9.1. Introduction

9.1.1. MCC welcomes the commitment of HS2 Ltd. to consider equality as part of the assessment for the Crewe to Manchester scheme. However, we feel there are still a number of issues that could be improved and resolved and as a result below we outline a number of points MCC would wish to be considered as the design of the scheme evolves.

9.2. Scope and Methodology

9.2.1. MCC welcomes the commitment from HS2 Ltd. to preparing a comprehensive Scope and Methodology Report for the EqIA assessment, which is separate to the Environmental Impact Assessment (EIA).

9.2.2. It is noted that the scope of the EQIA takes account of the requirements of the Public Sector Equality Duty (PSED): to eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. MCC would request that HS2 Ltd. consider the potential impact on other equality groups which are not protected under the Equality Act duty.

9.2.3. MCC would also request that HS2 Ltd. EqIA consider the potential impacts (or provide justification why such an impact is not likely) on those groups that Local Authorities have due regard duties to or who are considered in Local Authority EqIA frameworks and additional vulnerable groups to be assessed. MCC would request that HS2 Ltd. identify measures considered to understand the differential and disproportionate impact on adults and children in the disability groups identified, in order to identify sufficient mitigations, in consultation with stakeholders.

9.2.4. The EqIA Scope & Methodology Report and EqIA Main report also includes limited information on the mechanisms to be secured for ongoing equalities analysis, equality stakeholder engagement and the need to refresh the data based on Census 2021 release and revisit the disproportionate data analysis model. MCC would therefore request that HS2 Ltd. consult with stakeholders to address the ongoing changes to equality baseline information and agree mechanism for delivery of the mitigation measures proposed.

9.2.5. MCC notes that the level of effects considering a combination of factors – noise, pollution, possible congestion, access as well as the impact on mental health - should be considered and addressed within the EqIA where practical, as different groups might have different positive/negative impacts. MCC would request that HS2 Ltd. consider the cumulative effect on the protected groups identified within the EqIA and those suggested above when considering and developing mitigations.

9.2.6. MCC request that HS2 Ltd. provide a justification for the approach to selecting Local Super Output areas and that appropriate mitigation is provided should the potential effects be different to those identified in this EqIA.

9.3. Stakeholder Engagement

9.3.1. HS2 Ltd. must set out in more detail their engagement approach and support to be provided to affected businesses and organisations, including the strategy for providing alternative facilities where applicable, access to advice and timescales for engagement.

9.3.2. It is acknowledged that a significant number of facilities, businesses and properties are identified as being required to be demolished at a route-wide level. As highlighted in other sections, MCC would expect the detailed design to limit the loss of property as far as possible. It also needs to be ensured that adequate and timely engagement and support is provided, including details of compensation and mitigation, to the affected residents, businesses and other organisation as a matter of urgency.

9.3.3. Details of the programme and approach to engagement and mitigation for the education settings and the community they serve i.e. education awareness, health and safety etc.

9.3.4. In addition, MCC would request that Local Planning Authorities affected by the scheme are informed on the support requirements for all parties affected, specifically those identified as PCGs under the Equality Act 2010.

9.4. Accessibility

9.4.1. MCC are concerned that the proposed HS2 station is not appropriately integrated with the facilities of the existing Piccadilly station. A more integrated design would provide a common and more legible approach for all passengers, reducing unnecessary changes of level and therefore allowing better accessibility for all. MCC would request that HS2 Ltd. ensure that designs/modification reflect a similar or higher level of accessibility considerations in accordance with the Piccadilly Strategic Regeneration Framework (2018), GM HS2 and NPR Growth Strategy (2018).

9.5. Socio-Economic

9.5.1. Where building and structures are required to be demolished, further support and information are required for impacted local businesses and community facilities and homes on the mechanisms being considered, alongside the support that can be provided with the financial compensation. MCC request that appropriate resources be provided through the Communities and Environmental Fund and Business and Local Economy Fund and be informed by a quantified assessment of the impact upon community assets and business

9.5.2. Construction works have the potential to impact on disabled residents who use the area (for example barriers, increased traffic, temporary lights, signs etc may impact on wheelchair users, partially sighted or blind residents) and also parents or carers with pushchairs. MCC would request that the EqIA considers, and where practical, addresses the impacts associated with travel disruption, with particular attention given to disabled residents and visitors of the area.

9.5.3. MCC request clarification on whether the mitigation measures outlined in the Code of Construction Practice (CoCP) and Local Environmental Management Plans are considered sufficient to mitigate the potential effects on the Protected Characteristic Groups (PCGs) identified and whether additional mitigation will be considered following detailed design.

9.5.4. Further consultation is required to underpin the assessment within the CoCP of arrangements in the case of evacuation. Further details are required about how the Emergency Response teams will be engaged and feed into the future community emergency plans and how the CoCP will be used by the appointed undertaker to protect the PCGs identified within the EqIA. On this basis, relevant Local Planning Authorities would request approval of the final form of the CoCP.

9.5.5. MCC require further details on the programme and approach to engagement and mitigation of the effects on the PCGs identified which provides confidence to stakeholders that all premises and associated PCGs affected will be supported prior to and throughout the construction works to minimise any potential effects as far as practical.

9.6. Conclusion

9.6.1. It is noted that many of the environmental impacts identified in the ES, including the specific impacts within the community areas, will be intrinsically linked to equality issues. Therefore, the EqIA and ES should be complementary documents which support each other. However, and as noted above, MCC will require significantly more information from HS2 Ltd. to ensure the Proposed Scheme avoids, reduced or mitigates any adverse impacts on all parties affected, specifically those identified as PCGs under the Equality Act 2010. It is understood that HS2's Ltd will seek to continually assess and review the impacts and implications of the Proposed Scheme on PCGs throughout the construction and operation of HS2, and this should be done in consultation with MCC and other stakeholders.