High Speed Rail – Phase 2b
(Crewe to Manchester and West Midlands to Leeds)

Design Refinement Consultation

Response of Manchester City Council

11th of December 2020

MANCHESTER CITY COUNCIL

Contents

1. Introduction

1.1. This paper sets out the response of Manchester City Council (MCC) to HS2 Ltd.'s High Speed 2: Phase 2b Design Refinement Consultation (DRC). This response fully supports, and is aligned with, the responses made by the Greater Manchester combined authority GMCA, Trafford Council, and Manchester Airport Group (MAG). It should also take into consideration our response to the previous consultations made in 2014, 2016, 2018 and 2019, along with the NIC response.

1.2. The response reprovides HS2 Ltd. with a summary of the main issues to which the city continues to seek resolution, as set out in previous consultation responses, and which the Council and its partners expect further engagement on. The previous responses are attached as appendices to this document and should be considered alongside this response.

1.3. Issues relating to Manchester Piccadilly high speed station and Manchester Airport high speed station are outlined in this document, along with the need for appropriate mitigation by HS2 Ltd. The response also provides comment on the line of route, as covered in the route update and first DRC response, in particular, the vent shaft located at Birchfields Rd included as part of the previous DRC in 2019.

1.4. MCC welcomes the opportunity to comment on the design refinement proposals to both Manchester Piccadilly high speed station and Manchester Airport high speed station, and the associated infrastructure to support the design, specifically the inclusion of Northern Powerhouse Rail (NPR) integration into the design. The proposals to integrate NPR into the HS2 scheme are welcome. However, there are issues associated with the proposed designs, which HS2 Ltd. needs to address.

1.5. We welcome the opportunity to work with HS2 in a collaborative way on key issues. One of our major areas of concern is the current surface station proposal at Manchester Piccadilly, which we do not believe to be the right solution for the station. This is set out in more detail below. We are currently working with HS2 Ltd. and partners on an underground station design, to try and reach the right solution for Piccadilly.

1.6. MCC also expects appropriate mitigation measures related to the infrastructure to be developed by HS2 Ltd., in collaboration with stakeholders, and to be fully set out within the Environmental Statement which will accompany the Phase 2b hybrid Bill.

2. The opportunity from HS2 and Northern powerhouse rail

2.1. HS2 and NPR offer considerable opportunities for economic growth in Greater Manchester (GM) and the North. The schemes have significant potential to benefit the wider agenda for rebalancing the economy in the UK. The delivery of this new infrastructure, and the economic growth that they can bring, are crucial part of the economic recovery following Covid-19. It is essential, therefore, that the growth opportunities and benefits afforded by HS2 and NPR are maximised. Levelling up the north demands that railway development recognises the strategic importance of Manchester and other cities, as key growth drivers, highly connected and attractive destinations, and for sufficient funding to be made available to deliver the right infrastructure.

2.2. MCC welcomes and fully supports the Government's intention to progress with the proposed HS2 Phase 2b extension from Crewe to Manchester. MCC also welcome the Government's consideration of the case for Northern Powerhouse Rail (NPR) to improve capacity, reliability and frequency of services.

2.3. MCC and our GM partners also strongly support the commitment to an Integrated Rail Plan for the North and Midlands, with HS2 and NPR as component parts of an integrated short, medium and long term infrastructure investment programme. We are encouraged by the principle set out in the NIC's Interim Rail Needs Assessment report of looking at dynamic interactions between transport and economic growth beyond the conventional appraisal approach. It is more critical than ever to factor in these wider benefits, especially in the context of the Government's levelling up agenda and the shared aim of economic stabilisation and growth.

2.4. The Council has retained a clear position on the need to ensure that HS2 and NPR are delivered in a manner that fully complements the connectivity, place-making, local employment and sustainable growth objectives in the Greater Manchester (GM) Growth Strategy. This position is set out in our responses to the Government's consultation on the HS2 Phase 2b Design Refinement Consultation (2019), Working Draft Environmental Statement (2018), and line of route consultations 2014 and 2017, as well as to the NIC's call for evidence and interim report consultation for the Rail Needs Assessment earlier this year.

2.5. MCC endorses the identified station locations at Manchester Piccadilly and Manchester Airport High speed stations, and welcomes the opportunity to work collaboratively with HS2 Ltd. and partners to develop these plans to ensure they are integrated with our aspirations for the City and to capitalise on the economic stimulus of the airport and its growth, and support the objectives of the Growth Strategy. However, there are a number of areas where proposals do not currently achieve this, and these are highlighted within this response. We are also concerned that the work currently being done to develop alternative options on a number of these areas still will not meet the aspirations of partners and still do not have a formal status within the Bill.

3. Response context

3.1. This response should be considered in the context of other MCC and GM strategies, in particular the GM HS2 & NPR Growth Strategy; 'The Stops Are Just The Start' (2018). Our MCC, along with the GMCA and Trafford Council, with input from Manchester Airport Group (MAG), published the comprehensive Growth Strategy for the stations at Manchester Airport and Manchester Piccadilly. The Growth Strategy sets out how HS2 can have maximum impact through station planning; wider connectivity; full support for committed and new economic and residential growth and regeneration; and local skills and supply chain benefits.

3.2. The key strategies that relate to HS2 are set out within our response to the Working Draft Environmental Statement in 2018. As well as the Growth Strategy they include (but are not limited to) the Our Manchester Strategy, Greater Manchester Strategy and Local Industrial Strategy, GM Transport Strategy 2040, draft GM Spatial Framework, GM HS2 & NPR Growth Strategy, Piccadilly Strategic Regeneration Framework, City Centre Strategic Plan, and the GM Enterprise Zone.

3.3. A summary of new/refreshed strategies since the WDES response is also set out below:

- **City Centre Transport Strategy to 2040** (currently out to consultation) - setting out an integrated package of measures to support more sustainable transport options when travelling to and from and within the city centre, taking account of the city centre's continuing economic and population growth, and Manchester's ambition to become a zero-carbon city, by 2038. The draft strategy sets an ambitious goal for 90% of all trips to the city centre to be non-car modes by 2040 in the morning peak.
- **Climate Change Framework 2020-25 -** The five year Manchester Climate Change Framework was published in February 2020 to meet the ambitious target for a zero-carbon city by 2038, ahead of the UK's target of 2050. HS2

must consider ambitions to reduce car travel, and fully integrate green travel modes.

- **GM Clean Air Plan -** In order to meet national targets for clean air, Manchester is working in partnership with other GM local authorities to develop and implement proposals to reduce air pollution (with a focus on nitrogen dioxide emissions) in the shortest time period possible. Consultation on the draft Clean Air Plan ran between 8 October and 3 December.

- **The Our Manchester Strategy –** The strategy is currently being refreshed, collaboratively with the city's communities and stakeholders. The document will update the ambitions for Manchester; a thriving city, filled with talent, fair, well-connected and a great place to live – in the topflight of world-class cities. **The Our Manchester Industrial Strategy** sets out how a more inclusive economy can be developed for the city's residents and workers. Both policies are important in considering how the benefits that HS2 and NPR brings can be fully maximised, and accessible to, Manchester residents.

- **City Centre Strategic Plan** (CCSP) – The Council's CCSP is currently being updated to cover the period up to 2025. This provides the regeneration and strategic development priorities for the city centre outlining, the ambitions and planned development for the different city centre neighbourhoods and key development areas.

- **Strategic Regeneration Frameworks (SRFs)** There are several SRFs which set out the development context for the localities surrounding, and linked to, the Stations. These include:

  - Piccadilly SRF 2018
  - Mayfield SRF
  - Portugal Street East SRF
  - ID Manchester (North Campus) SRF
  - Wythenshawe Hospital Campus SRF
  - Airport City

  The SRFs take a holistic approach to transforming the overall places. The railway, station and local transport interventions need to be a part of this place-based approach. The railway, station and local transport interventions need to be a part of a holistic, place-based approach, so that development and growth are not blighted.

- **Greater Manchester Spatial Framework** – This is Greater Manchester's Plan for Homes, Jobs and the Environment prepared on behalf of the city-region's 10 local authorities, covering the period 2020-2037. This strategic framework a plan to manage growth so that Greater Manchester is a better place to live, work and visit;

- providing the right homes, in the right places, for people across our city-region.
- Creating jobs and improving infrastructure to ensure the future prosperity of Greater Manchester.

3.4. Previous responses have requested HS2 Ltd. develop schemes in line with Manchester and GM strategies and policies, to realise regeneration opportunities, and provide the right scheme for users and the future. This will help HS2 to maximise the impact of the Phase 2b route to Manchester and contribute to HS2's objective to be an "Engine for Growth", as well as helping to meet future growth demand.

3.5. The MCC response to the Design Refinement Consultation also fully supports, and should be read alongside, the GMCA consultation response, and those of other GM partners; Trafford Borough Council and Manchester Airport Group (MAG). The issues outlined in these responses align with Manchester City Council's views.

3.6. In addition to the DRC for Phase 2b, HS2 Ltd are also currently consulting on Class Approvals for Phase 2A matters ancillary to development. This consultation is due to end on 8th December and relates to specific construction issues such as: soil handling, storage sites, construction camps, and works screening. Given this relates specifically to Phase 2a, the Council have not responded to this consultation. However, for all matters relating to construction management for Phase 2b, the Council and its partners would expect to be engaged at the earliest possible opportunity to develop an approach that is bespoke to the local areas affected as a result of the construction of this phase. It is our expectation that separate consultation on matters ancillary to development for Phase 2b will be undertaken by HS2 at the appropriate time.

4. Overarching comments on key issues

4.1. Manchester City Council, alongside the Greater Manchester Partners, continue to facilitate ongoing dialogue with HS2 Ltd. on the issues raised through previous consultations and ongoing design discussions. We welcome opportunities to work collaboratively with HS2 Ltd. on key issues and progress is being made in some areas. However, a range of aspects of the HS2 Phase 2b scheme remain a cause of significant concern for the City Council and GM partners.

4.2. MCC has previously responded to the three HS2 Phase 2b route consultations, submitted in 2014, 2017 and 2019, and to the WDES, submitted in 2018, as well as to the NIC call for evidence and interim report for the Rail Needs Assessment.

4.3. These responses raised a number of specific, which need to be fully addressed in the final scheme designs. There are several areas where it is crucial HS2 Ltd. fully engages with MCC to inform the design, minimise impacts ahead of hybrid bill submission. An overview of the key issues are provided below, some of which are covered in more detail in answer to the specific consultation questions.

4.4. The Council notes the importance of DfT Ltd having an identified funding strategy which ensures the delivery of the HS2 and NPR schemes in their entirety, and as an integral part of the Integrated Rail Plan, which will also include local rail improvements. This, coupled with proposals that are aligned with the range of planned regeneration initiatives adjacent to HS2/NPR Infrastructure and our citywide policies, will be fundamental in ensuring that the economic benefits of HS2 are maximised.

4.5. **Station design and Urban Integration**

4.5.1. The design for the scheme, including the stations and key infrastructure such as viaducts, headhouses and vent shafts and other major structures, needs to be of high quality and appropriate for its setting. MCC supports HS2 in its Design Vision document and expects to see the principles of ‘people, place and time’ embraced within the HS2 design within MCC.

4.5.2. There are aspects of the current operational and functional design of the Manchester Piccadilly surface station that MCC disagree with. The rationale for this decision is stated within the Bechtel report, which promotes a HS2 & NPR integrated underground station design vision for Manchester Piccadilly, which has capacity for future train service evolution. It is critical to the levelling up agenda that the right station is constructed in Manchester.

4.5.3. The HS2 Stations need to act as key gateways to the wider master planned areas around them, including the Piccadilly SRF and Timperley Wedge and Davenport Green areas around the Airport station, enabling the maximum growth to be achieved. As part of this, it will be necessary for timescales to be sequenced to avoid extended blight and to make efficient use of resources. To enable this, the design and construction methodology must be prepared and delivered in conjunction with MCC and its partners.

4.5.4. MCC believe that Gateway House should be removed in order to provide an entrance to the station that has the capacity to accommodate the growth in numbers, provides an appropriate gateway to the City and supports effective connectivity between the station, the SRF and the city centre. It is fundamental that the station is designed in a way that provides a gateway to the city, properly connected into the surrounding area, and fully integrates all transport modes. The removal of Gateway House can enable the delivery of the SRF vision for a new large public plaza, to anchor the SRF proposals, and provide an excellent arrival space and first impression of Manchester.

4.5.5. The proposed locations for car parks at Manchester Piccadilly are not considered appropriate. The size, location and access of the proposed multi-storey car parks are not in accordance with the approved Piccadilly SRF and are not aligned with local policy including GMSF and the GM Transport Strategy 2040.

4.5.6. It is imperative the Manchester Airport high speed station is a fully integrated station solution, with full public transport connectivity via Metrolink provided from its opening. The impact on surrounding communities and the environment, including those arising from the higher station design, is minimised and fully mitigated.

4.6. **Highways**

4.6.1. Highway proposals should be developed in line with Local Plans and Strategies, including the draft Clean Air Plan, to ensure they are appropriate and fit for purpose. MCC considers that the current highway solutions need considerable further design/development to make them acceptable. This must consider provision for non-motorised and public transport users and should:

- Be adequate at both the Airport and Piccadilly stations, consider the wider strategic road network, and involve both local stakeholders and Highways England.
- Avoid adverse impacts on the M56 and local highway network and protect the operation and future growth of Manchester Airport in relation to traffic and access.
- An assessment of the impact effects in relation to traffic and transport during construction of the proposed scheme, including the effects on air quality, should be reported in the formal Environmental Statement. Appropriate mitigation measures should be agreed in advance of the hybrid Bill submission.
- Seek to limit carbon emissions.
- Optimise the Pin Mill Brow junction whilst avoiding adverse impact on the adjacent SRF proposals. Circulation of traffic around Piccadilly Station needs to be developed and agreed with TfGM and MCC.

4.6.2. It is essential that HS2 Ltd ensures there is ongoing engagement with GM Partners and Highways England (HE) to agree appropriate highways solution that are in line with MCC and GM policy.

4.6.3. It is expected that the assessment of the impact effects in relation to traffic and transport during construction of the proposed scheme, including the effects on air quality, will be reported in the formal ES. Appropriate mitigation measures should be agreed in advance of the hybrid Bill submission.

4.7. **Metrolink**

4.7.1. HS2 Ltd will also need to address the impact of the Hybrid Bill on the existing Powers for Metrolink at Manchester Piccadilly & Manchester Airport, including the powers in relation to Metrolink lines that have been authorised but not yet constructed, ensuring that appropriate Powers are included and safeguarded through the Bill process. MCC expects HS2 Ltd and DfT to continue to engage on this matter.

4.8. **Construction, Traffic and Transport**

4.8.1. Further comprehensive details on both the construction programme, methodology, impact assessment and mitigation are required. It is essential that the construction programme and methodology aims to minimise the impact on communities, businesses and transport modes across the region. It is anticipated that, in accordance with the growth strategy, the principles of 'build it once, build it right' and minimising blight are adopted. This includes enabling adjacent development opportunities to be realised prior to HS2 becoming operational.

4.8.2. MCC anticipates that the programme, methodology and mitigation measures will be developed in full consultation with partners, appropriate statutory bodies and key stakeholders along the route. The programme and methodology must consider other development projects, highway work and infrastructure projects within Manchester and adjacent local authorities, to allow timescales of work to be sequenced to avoid extended blight and to make efficient use of resources.

4.8.3. We are requesting that HS2 Ltd. look at options to move as much of the materials as possible by rail, in order to reduce the level of lorry movements, and the impact on the highways and local communities.

4.8.4. Proposals must protect the operation and future growth of Manchester Airport in relation to traffic and access during both the construction and operational phases. It is also essential the city centre continues to function through construction works and that any blight is minimised.

5. Technical comments on Manchester Piccadilly high speed station

5.1. MCC welcome the fact that Manchester Piccadilly high speed station has now incorporated Northern Powerhouse Rail into the station design. However, there are a number of concerns that surround the new station design. These are set out in answer to the questions below.

5.2. **Question 3a: What are your comments on the inclusion of two additional platforms into the design of Manchester Piccadilly High Speed station?**

5.2.1. MCC fully supports the inclusion of NPR at Piccadilly. Piccadilly is central to the HS2 / NPR network in the north. Therefore, it is essential to get the right solution to ensure there is capacity to meet long term demand, provide connectivity across the north and support economic growth. 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.

5.2.2. However, MCC does not believe that the current surface terminus station proposed within the DRC will provide the right solution to offer the level of reliability and resilience needed to effectively support the wider High Speed network. Furthermore, it undermines delivery of the place-making and economic growth agenda set out in the Piccadilly SRF and the GM HS2 NPR Growth Strategy. The DRC proposals plan for 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 (North / South and East / West). In short, we do not believe that the proposals fully takes account of the points set out at 2.62 of the design refinement consultation document.

5.2.3. This is demonstrated by the recent work commissioned by MCC and TfGM and carried out by Bechtel to review Piccadilly Station. This work notes that whilst the HS2 alignment could be considered to be appropriate for a HS2-only solution, it is not the optimal alignment in properly considering NPR and the need to provide both East-West and North- South connectivity. The report concludes that a fully underground and re-orientated through-station could address the constraints of the existing proposal and offer much more flexibility and long term capacity for future train service provision.

5.2.4. The Bechtel report was also considered by the Richard George Independent Review of Piccadilly, agreed by the Transport for the North (TfN) Board. Richard George notes that whilst the surface turnback solution may be the most cost effective way to deliver HS2's current remit, the solution in terms of the best way forward for the long-term development of land use and resilient transport infrastructure would be most likely to be an underground solution.

5.2.5. Specific issues at Piccadilly highlighted in the Bechtel report, and previous correspondence with HS2 Ltd. and DfT, include:

- **Capacity, Resilience & Future Proofing**: Modelling work carried out as part of the Bechtel study has shown that the proposed HS2/NPR turnback station does not have any spare capacity or the ability to accommodate the future evolution of train services (i.e. it would be at capacity at Day 1). This is a significant disadvantage given existing and predicted growth trends for rail passenger volumes, and the potential need to run further NPR services into Piccadilly as the route options are developed. We have significant concerns that the station will not be able to accommodate the combined HS2 & NPR service specification and to take into service disruption and capacity for future expansion.

- **Customer Experience – Need for a Whole Station Approach**: MCC believes that it is important that Piccadilly Station is a fully integrated and connected multi-modal transport hub, which is able to accommodate predicted future user numbers; allows easy interchange between modes; a properly sequenced arrival point for the city; and proper connections to the rest of the city centre and surrounding communities. We do not feel any of these matters are appropriately accommodated for by the current design, while the pedestrian modelling used to inform the design fails to fully take into account growth in classic rail use, and growth in the surrounding areas and from non-rail users. Specific areas of concern include pedestrian flows, the adequacy of station entrances; and lack of legible connections into the surrounding areas. In addition, there are impacts on journey times across the north, as well as questions of customer perceptions, resilience and service reliability, of passengers having to wait for NPR services to turn back, rather than carrying on through the station. MCC believes this is not the right solution for a station at the heart of the HS2 NPR network.

- **Place making & Supporting Economic Growth:** The loss of development land, and therefore economic and regeneration benefits as a result of the combined HS2 and NPR wider surface station. The surface station has a significant impact on the ability to deliver the most

valuable commercial development in the SRF area, reducing the development land available and the ability to deliver the Boulevard alongside the station, which will be the prime commercial route and a key piece of public realm connecting the area. This land take would be difficult to navigate at a human scale and is an essentially asset. There is a need for a more integrated approach to Rail Infrastructure Planning at Piccadilly, which combines infrastructure solutions with place-making and economic growth.

- **The need for proper sequencing of investment -** a "build it once, build it right approach" - which can minimise blight and support timely future development. We emphasize the need for jointly developed, integrated programmes.

- **The application of onerous standards:** The Bechtel review found that determination of an optimum solution for Piccadilly station may have been impeded by design parameters developed by HS2 Limited for its high-speed line. This could lead to a potential missed strategic opportunity to deliver best value in terms of more effective regeneration of central Manchester, reduced land-take, flexibility to develop train services beyond those initially envisaged, and even in terms of more direct, and therefore less expensive, approaches to the new station.

5.2.6. The Council requests that HS2 Ltd. and DfT continues to work collaboratively with MCC, TfGM and TfN, at each step of the process and before decisions are made, to consider an alternative, underground solution for the Manchester Piccadilly High Speed station, which takes a holistic view of the station, considers the long term future of rail for a leading regional city that serves the north of England, minimises disruption and blight on city centre development, and reduces significant valuable land take. This work needs to conclude as quickly as possible, ideally to enable it to be included as an Additional Provision within the hybrid Bill, or, if this is not possible, for an alternative route to be approved ASAP for taking it forward.

5.3. **Question 3b: What are your comments on the proposed changes to Metrolink around Manchester Piccadilly High Speed station?**

5.3.1. MCC are in full support of the relocation and enhancement of the Metrolink stop at Manchester Piccadilly Station, and the opportunity for an additional tram stop at Piccadilly Central. The relocation and improvement of the Piccadilly Metrolink Station is essential to both the future capacity of the Metrolink system and the experience of passengers. MCC want to see Metrolink as active provision, to avoid delay in reconnecting the Metrolink network as hastily as possible to minimise disruption to patrons. 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.'

5.3.2. The existing Metrolink stop at Manchester Piccadilly offers a poor passenger environment. It will not be able to accommodate the predicted growth in Metrolink traffic on the current network due to HS2 & NPR, or provide any capacity for further network expansion, for example, through the implementation of Tram-Train proposals or increased frequency on existing lines. Given the imperative of creating a well-integrated, passenger-focused station, Metrolink needs to have a stop at the current Piccadilly Station that provides the capacity for its future growth, as well enabling easy interchange with HS2, NPR and classic rail passengers. The additional stop at Piccadilly Central will support the Piccadilly and Mayfield SRFs, and provide enhanced access to the regeneration areas.

5.3.3. The consultation document notes that GM partners have confirmed that they support the prioritisation of future local transport funding to the enhanced Metrolink facilities at Piccadilly, and that this will form part of the shared programme between DfT and GM. It is imperative that Government make sufficient funding available within devolution settlements to enable local infrastructure schemes such as Metrolink to be delivered as part of meeting the challenge of levelling up Northern cities.

5.3.4. It will be important to ensure that the construction of the Metrolink and High Speed stations at Piccadilly are properly sequenced. In particular, HS2 Ltd. need to demonstrate how they will ensure the operation of the existing Metrolink service during construction.

5.3.5. The proposals within the DRC assume that Metrolink will be routed underneath Gateway House. It is currently not clear if this solution will be technically possible to construct the Metrolink line through the basement of Gateway House, whilst the Gateway house structure remains standing. We have consistently repeated our position that Gateway House should be removed to enable a proper entrance for Piccadilly Station, to allow the station to properly connect into the city centre, to accommodate the anticipated increase in people using the station, and maximise the user experience and surrounding development opportunities.

5.3.6. MCC believe that Gateway House limits pedestrian movements in and out of the proposed new station, funnels passengers through inadequate station entrance/exits, will require passengers accessing HS2 and the relocated Metrolink stop to make level changes, and prevents the development of a gateway public realm. We have major concerns that the existing entrance hall has already reached the limit of its capacity. Removing Gateway House facilitates development of an arrival Plaza, as proposed within the SRF, a wider, better-connected and city centre-facing station entrance that can provide capacity and space to cater for the anticipated levels of pedestrian traffic; facilitates the development of a 'world class gateway'; and delivers the full scope and benefits of the Boulevard. The removal of Gateway House is also needed to reduce the risk and simplify the construction of Metrolink.

5.3.7. MCC and its partner TfGM request that HS2 Ltd., DfT and MHCLG work with MCC and GM partners to identify a solution for Gateway House, in order to facilitate the construction of the enhanced Metrolink facilities at Piccadilly, and an adequate entrance to Piccadilly Station.

5.4. **Question 3c: What are your comments on the proposed inclusion in the design of passive provision for a future Manchester to Leeds junction?**

5.4.1. The additional passive provision for NPR services demonstrates and is welcomed to integrate services. Concern, though, remains which revolves around the minimum specification of the passive provision. There is a need to ensure that the junction design enables the delivery of the optimal solution for both HS2 and NPR.

5.4.2. GM partners have significant concerns around the proposed NPR Piccadilly surface station option (as set out above), and whether this will meet future demand requirements and provide a resilient, reliable operation. We do not believe that the surface station design has the capacity to provide for the additional NPR services required to deliver some of the NPR route options. Alternatively, an underground station at Piccadilly could potentially provide the capacity for extra services, enabling a more resilient operation and the future growth of NPR.

5.4.3. It should be noted that an underground station could result in a different route alignment to Leeds and this should be considered within the final design.

5.4.4. It is noted that the passive provision set out in the DRC only includes the footprint of the design and not the additional infrastructure to support the link required to access the NPR lines. This infrastructure includes the grade separated junction, additional rail track, additional Switches and crossings, overhead line equipment and the overhead viaduct allowing access from the proposed platform 1 to the spur in order avoid conflict with the junction with HS2.

5.4.5. To incorporate these changes after HS2 finishes their construction with the high speed railway into full operation could result in significant delays & disruption to the operational railway and Manchester whilst the above additional infrastructure for NPR is constructed. The design for the station should be right first time.

5.4.6. The approach taken by HS2 for passive provision only contradicts with the “Build it Once, Build it Right” approach as it leaves legacy work to be completed by another party on HS2 infrastructure and doesn’t align with the Oakervee review – conclusion 4 which states “*HS2 can be part of transformational economic change, but only if properly integrated with other transport strategies, especially those seeking to improve inter-city and intra-regional transport, and also with national, regional and local growth strategies. Transport investment alone will not ‘rebalance’ the UK economy*”. The passive provision proposal isn’t the proper integration that MCC would expect.

5.4.7. The passive provision junction for the NPR Leeds connection will bring additional years of blight to the Manchester area which will have just been through years of HS2 construction activity and then subjected to additional years of NPR construction in the heart of the expanding city. This is why MCC ask for **active provision** for the NPR spur in order to minimise additional disruption to Manchester residents and avoid disturbance for patrons of the HS2 service. Once HS2 is operational patrons of the HS2 service will be subjected to closure of the network at Manchester to enable the NPR construction interface to be completed. HS2 can only level up our economy if it can be used reliably.

5.4.8. MCC see that the provision for all infrastructure that curtails the frequency of NPR suspending HS2 services and causing blight to residents for the future construction of the NPR spur, as crucial. These construction activities should be completed before HS2 commences operational services.

5.4.9. As outlined in the GMCA response, the proposed junction is positioned close to the existing Siemens Depot in Ardwick in an area proposed to be shared with a future tram-train extension (that would connect the Metrolink tracks at Piccadilly Central Tram Stop to the heavy rail network at Ashbury’s) and ideally with a modified highway proposal at Pin Mill Brow (as suggested by MCC). The option to modify the design of the NPR and HS2 alignments to enable a modified junction proposal should be explored. It is MCC and GMCA’s view that this should be investigated as part of future design development. There is a need to develop an integrated solution for the HS2, NPR, highway and tram-train proposals.

5.5. **Question 3d: What are your comments on the proposed relocation of the Manchester tunnel portal to avoid the need to demolish the train care facility at Ardwick Depot?**

5.5.1. The changes to track alignments to avoid the Ardwick depot, and the widening of the viaduct conflict with existing and approved plans set out within the Piccadilly SRF, cutting through a core piece of development land, creating an undevelopable plot of land and severance to the Mayfield regeneration area. Mayfield is the MCC flagship regeneration project and needs to have any blight minimised. MCC requests that a 'place based' approach is taken to the Piccadilly and Ardwick areas, rather than a purely engineering approach, to ensure that the right solution is reached and investment and growth maximised. The design of the station and associated infrastructure should fully support the regeneration and growth plans at Piccadilly and Mayfield, set out within the approved SRF's, rather than impede their delivery.

5.5.2. There is also a need to consider the impact of the new alignment on proposed future alignments for NPR, as well future alignments for tram train, and alternative highways layouts that are being considered. All of these issues should be considered together, to enable designs which are work for all of the proposed schemes, as well as the development of the wider area.

5.5.3. The Council notes that the new layout could result in the demolition of the Hooper St depot. MCC would expect appropriate compensation for the loss of this facility, identification and provision of an agreed alternative suitable site if this alignment is taken forward.

5.6. **Question 3e: What are your comments on the proposed changes to the road network around the new Manchester Piccadilly High Speed station?**

5.6.1. The highways proposals at Pin Mill Brow described in the DRC are too expansive and do not take into account local transport and environment policies, which look to reduce car trips into the city centre, or of Piccadilly's location in the city centre, as part of a major public transport hub. The proposals conflict with the city's traffic aspirations (included in City Centre Transport Strategy and 2040 Strategy) and zero carbon strategy. They also take a considerable amount of land in the SRF area, creating a loss of development land, and a poor local environment, especially in combination with the other major transport infrastructure being created in the area.

5.6.2. According to the DRC document, the Pin Mill Brow highway proposals have been designed using "normal design standards for urban roads, based on the current projection of future traffic growth". This projected growth is in part driven by the level of parking and "kiss and ride" provision made at the new HS2 station which promotes private vehicle trips. Adoption of a strategy to reduce vehicle trips would increase opportunities for delivery of a smaller scale highways scheme at Pin Mill Brow.

5.6.3. The currently proposed car park locations and sizes also have adverse impacts, both in terms of the additional traffic generated and the loss of two prime development sites. The size of the proposed car parks will encourage thousands more car trips into the city centre, contradicting local policy and national emissions targets.

5.6.4. The proposed changes to the road network do not provide evidence of prioritising public transport or delivering high quality walking and cycling connections to support sustainable access to the station and the SRF area. Where walking and cycle connections are coming into conflict with high volumes of vehicular traffic adequate segregation should be provided.

5.6.5. The DRC design includes a ramp positioned on North Western Street to provide access to the top of the existing railway viaduct for Network Rail road vehicles. It is currently proposed that vehicles will access the new ramp by travelling along Hoyle Street, Chapelfield Road and Temperence Street. This route passes through an area of the proposed Mayfield Development that will not be suitable for road vehicles.

5.6.6. MCC have significant concerns about the new access ramp. The proposals would have substantial impacts on the Mayfield development, affecting development plots, and routing heavy duty vehicles through the regeneration area. Of particular concern is the fact that the construction of the ramp will coincide with the occupation of the first phase of development at Mayfield, which could detract from the ability to attract and retain tenants to the area, and consequently the ability to deliver the growth and jobs outcomes. MCC requests that more work is done to find an alternative solution, to make sure that one of the city's major regeneration areas is not so severely impacted.

5.6.7. MCC is aware that HS2 Ltd is considering an alternative location for the ramp near the east end of the HS2 station. However, this location conflicts with MCC and TfGM's preferred position for a "multimodal hub", incorporating a bus and coach interchange, taxi/kiss and ride provision and parking. Further work needs to be undertaken by HS2 in collaboration with MCC and GM partners on collaborativly developing an optimal design and position for a multimodal hub.

5.6.8. We welcome the fact that HS2 Ltd. are working with the Council and other GM partners to develop more appropriate proposals for highways, parking and Network Rail ramp access. However, we are significantly concerned that the alternative options are still a way removed from the aspirations and policies of the Council and our partners. We request that this work is further developed, in full collaboration with MCC and GM partners, and is taken forward into revised proposals within the hybrid Bill.

5.6.9. To ensure an efficient construction programme, traffic routes and mitigation measures (for local residents, communities and road users) need to be developed in conjunction with the Council and its partners.

6. Technical comments on Manchester Airport high speed station

6.0. MCC welcome the fact that Manchester Airport high speed station has now incorporated Northern Powerhouse Rail into the station design, however, there are a number of concerns that surround the new station design which are outlined below the following questions.

6.1. **Question 2a: What are your comments on the proposed changes to the design of Manchester Airport High Speed station?**

6.1.1. MCC fully support the inclusion of provision for NPR at the Airport. The additional two platforms are a welcomed alteration to accommodate the additional forecast NPR services. HS2 and NPR are core transformational infrastructure components in Greater Manchester's HS2 Growth Strategy and the wider agenda for economic rebalancing in the UK.

6.1.2. MCC believe the design of the HS2 Airport Station needs to be fully integrated with local development plans within the area and existing planning policies, including the Greater Manchester Spatial Framework.

6.1.3. As the UK's third busiest airport after Heathrow and Gatwick, Manchester Airport serves over 29 million passengers annually. The Airport functions as the key international travel hub for the North and Midlands. HS2, NPR and Metrolink connectivity at Manchester Airport will require fully integrated station solutions, delivered by a funding strategy that it is in line with other HS2 airport stations (the station is currently unfunded within the HS2 and NPR budgets) and agreed by an integrated senior level review by government and local partners.. Manchester Airport plays a pivotal role in providing access to international markets from Greater Manchester and across the North of England and is central to delivering a Northern Powerhouse economy, as a key part of the levelling up agenda and post COVID-19 economic recovery.

6.1.4. MCC have concerns relating to the raising of the railway alignment, and reduction in the depth of the cutting at the Airport station. Raising the level of the station has caused a visual impact to the surrounding environment. The impact of the latest design of the station and associated infrastructure, particularly on Metrolink, is covered in more detail in the GMCA response.

6.1.5. The published DRC states that design at Manchester Airport High Speed Station are subject to the agreement of local funding contributions. This is a key issue which we have challenged consistently, and our previous consultation responses have requested that Manchester Airport Station is treated consistently with other high speed airport station. The current funding context for local partners makes this issue even more critical. The business case for HS2 is

considerably strengthened by the inclusion of a station at Manchester Airport and this needs to be recognised in the funding approach.

6.1.6. The environmental impacts of the shallower cutting station need to be fully understood and appropriate mitigation provided. At present the impacts of the shallower cutting won't be shared until the hybrid bill is published. This prevents MCC and partners commenting on the additional noise pollution that this will bring. The visual impact of the elevated station, and the retaining wall, are also areas of concern. Trafford Council have highlighted the impact on the surrounding developments at Davenport Green and Timperley Wedge, and on Timperley Brook and Davenport Green Ancient Woodland. The design should also ensure proper connections to the surrounding development areas. We support the requirement in the GMCA's response for HS2 Ltd. to carry out further engagement with GM partners on design optimisation, environmental impact mitigation and additional cost implication of the shallow cut design of the high speed station.

6.1.7. The inclusion of Metrolink at the Airport station is crucial to connectivity, both to the Airport terminals and to surrounding communities, and needs to be provided from the opening of the HS2 station. However, as the GMCA response notes, the DRC Consultation Document refers to the 'future extension of the Metrolink Airport Line.' It is MCC's and GM partners' view that the Metrolink connection to and from the Manchester Airport high speed station should be constructed by HS2 Ltd and should be operational from the day of opening alongside HS2 services. This is needed to provide appropriate public transport links to the HS2 station, and to help minimise the construction disruption, and reduce blight.

6.1.8. The construction sequencing and integration of Metrolink needs to be aligned with the construction of the HS2 station in order to minimise future construction costs and minimise additional disruption in the area. The DRC states that currently HS2 are only providing passive provision for Metrolink. In order to deliver the Metrolink extension at the Airport, there is a need for new and modified powers to be obtained to enable construction and operation of the proposed works. MCC supports the position in the GMCA response that the powers needed to construct and operate the modified Metrolink proposal should be obtained as part of the HS2 hybrid Bill. In line with the GM response, the Council will oppose the design for a Manchester Airport high speed station with no sustainable / public transport mode of access from its day of opening.

6.1.9. It is MCC's understanding that the HS2 tracks were raised to reduce the HS2 excavation works, thereby reducing the HS2 infrastructure costs and amount of spoil to be disposed offsite. These proposed changes have however had the result of raising the Metrolink stop, which is proposed on a viaduct structure positioned above the HS2 concourse, to a higher level (around 75m AOD) which is approximately 6m higher than that previously proposed. The increased height of the Metrolink stop requires its approaches to be on viaducts, leading to an increase in its construction cost.

6.1.10. MCC require further engagement with HS2/DfT on design optimisation and environmental impact mitigation of the shallow cut design of the high speed station, and to ensure full integration with local transport networks.

6.2. **Question 2b: What are your comments on the proposed changes to the road network around the new Manchester Airport High Speed station?**

6.2.1. MCC welcome HS2's identification of the additional challenges that will be experienced on the Strategic Road Network (SRN), and expect HS2 to work with council and partners to reach a satisfactory conclusion for all parties around the vicinity of the Manchester Airport HS2 station.

6.2.2. There will be a significant highways impact on the Strategic Road Network notably the M56 - Junction 6, Hale Road, Hasty Lane and Runger lane and a second access into the station at its western side including additional car parks. Any highways design should account for HS2 and NPR demand, as well as ensuring committed schemes are also factored in including Airport growth and surrounding development sites identified in the GMSF (Timperley Wedge and Global Logistics). Wider connectivity, including active modes (cycling and walking), must also be properly addressed into the hybrid Bill scheme.

6.2.3. MCC, Manchester Airport Group, Trafford Council and TfGM share a number of concerns about HS2 highway proposals for the Airport station. These have been raised formally with HS2 Ltd. on a number of occasions.

6.2.4. Key issues include:

- Adequate station access and impact on the surrounding environment.
- Car park locations, numbers and design and level of mitigation.
- Absence of traffic modelling.
- Lack of accurate demand forecasting and transport mode-share, including the exclusion of trips by Airport staff and passengers.
- Limited resilience on the road network proposed.
- Impact on strategic routes (Motorways, motorway junctions and local roads).
- Construction access impacts and mitigation.
- Opposition to the use of Runger Lane/Thorley Lane as a construction route because of its critical role in terms of Airport access.
- Adequacy of walking and cycling routes.

6.2.5. MCC and our partners are of the view that inadequate evidence has been provided on how the proposed station can be accessed by various modes; what the implications are for Junction 6 of the M56; the wider highways access; impact on airport operations and accessibility. The project needs to be designed and constructed with NPR, and surrounding development, considered holistically, from the outset, not as a solution for only HS2 that would be inappropriate if NPR is only considered passively. There is concern that the works proposed to Junction 6 will mean that the junction is operating at full capacity from the outset and will be unable to accommodate any future demand. We are also concerned about the scale and environmental impact of the large gyratory design and the adequacy of pedestrian and cycling connectivity.

6.2.6. The DRC document states that changes to the road network have the objective of "accommodating the predicted increase in vehicle numbers generated by HS2" and to "integrate NPR... and HS2, thereby reducing the amount of infrastructure required to deliver the NPR network and avoiding disruption to HS2 operation in the future". However, the approach adopted to develop these changes to the road network is likely to result in sub-optimal highway arrangements for a number of reasons.

6.2.7. The design rationale has been confined to designing a road network suitable for HS2 demand, and then separately identify additional measures that could be feasible to address NPR access and capacity requirements. The approach should seek to identify the optimal solution for HS2 and NPR demand combined and then value engineer this design to understand which elements are needed to support HS2 in the interim. The current approach is likely to lead to additional highway infrastructure, prolonged disruption, and sub-optimal arrangements that do not integrate the public transport connections needed to reduce private vehicle mode share. It is,therefore, not in line with GM's 2040 Transport Strategy, Right Mix Target, the GM Clean Air Plan and MCC's aspiration to be carbon neutral by 2038.

6.2.8. There is a concern that the highways and traffic modelling undertaken fails to provide robust enough evidence to support the design. The modelling assessment presented to stakeholders used dated assumptions for development and background traffic growth, in particular it does not account for Timperley Wedge or Global Logistics and therefore will underestimate local traffic demand (and also not include new infrastructure such as the Spine Road associated with Timperley Wedge). Traffic modelling has not been made available to enable MCC to undertake due diligence and assurance checks. It is noted, however, that HS2 are working with stakeholders in the area to establish future demand and infrastructure needs through the South Manchester Highways & Transportation working group and study. However, how this fits into the wider HS2 programme is yet to be fully clarified, and needs to be resolved as a matter of urgency.

6.2.9. A review of the existing traffic level on the local road network shows that there are significant congestion issues around the Manchester Airport. On workday an estimated 57% of the classified road network (Motorways, A and B roads) within 7km of the Airport are operating close to or at capacity at some point in the day.

% of network	Level of delay
23%	Up to 50%
19%	> 50% <= 100%
24%	> 100% <= 200%
12%	> 300% <= 300%
22%	More than 300%
57%	**Total > 100%**

Table 1: Capacity of Local Road Network within 5km of Manchester Airport

[Please note that "Close to or at capacity" has been defined as a peak delays of more than 100% compared to free flow (i.e. a journey time of more than double free flow); free flow speeds have been defined as the average from 22:00 to 05:00 and the data in Table 1 is for term time during February 2020.]

6.2.10. On the Strategic Road Network (SRN) 70% of the M56 and 71% of the M60 are operating at or over capacity at some time of the day, with the issues most severe during the PM.

6.2.11. The completion of the A555 has relieved some of the congestion issues on the south eastern section of the M60. However, the scheme has increased the amount of traffic using Junction 5 of the M56, pushing the junction which serves the Airport to capacity. Any additional traffic associated with construction, or following completion, of HS2 will further increase the pressure on this junction increasing delays.

6.2.12. The capacity issues between Junctions 5 and 6 of the M56 are demonstrated by the obligations for MAG to provide additional lane capacity on the M56 once passenger numbers reached a certain threshold, known as the “Rainbow Works”.

6.2.13. There needs to be a collaborative approach between HS2, MCC, GM partners (Trafford Council, TfGM and MAG) and Highways England to deliver a holistic set of improvements across Junctions 5 & 6 to incorporate both HS2 and NPR demand. This should include work to consider an appropriate access from Junction 5 to the Manchester Airport station, that is environmentally acceptable, and could accommodate future demand as part of a ‘Right Mix’ solution. For example, intercepting traffic bound for the HS2 station from the north and east via Junction 5 could relieve this section of M56 and movement on A538 between eastern & western parts of Junction 6. The current scheme allows access only for bus and taxi from the North side. There needs to be more detailed work by HS2 to ensure that sufficient road connections are provided to the surrounding development areas, with connections from both sides of the station. Public transport and active travel access needs to be part of the access strategy from the outset.

6.2.14. More detail will be required for the proposed closure and realignment of Sunbank Lane, and all proposed closures/realignments to Ringway footpaths. The routes will need to be kept under review due to local development aspirations for the area. Careful consideration is required for access and parking works for construction in this area to avoid unacceptable impact to the residents of Ringway and the operation of the Global Logistics Hub, (GLH) for several years. Sustainable travel options for residents and employees and visitors to the GLH will need to be provided.

6.2.15. Providing a connection to Junction 5 as part of the enabling works would balance the pressure and provide resilience on the local and strategic highway network during the construction phase and into the operation of the station, on a 'build it once, build it right' basis.

6.2.16. Shuttle buses are being proposed until Metrolink is constructed. This will have a further impact on the road network both at the HS2 station and on the local highway network around the airport. The Metrolink station needs to be provided from the opening of the HS2 station to avoid these additional road trips and eliminate the area suffering from extended construction impacts.

6.2.17. HS2 designs assume the Rainbow works will be delivered prior to HS2 construction commencing. There is a significant possibility that COVID-19 impacts on the airport will mean that this may not be the case and the infrastructure may be delayed. As a result, assurance of the suitability of the HS2 road network under the existing highway configuration is required. There are significant concerns about the suitability of Runger Lane (post yellow Works) for use as a construction route without unacceptable delays to airport traffic, hence the investigations into alternative haul routes / railhead, Using Runger Lane in an unimproved condition will not be acceptable.

6.2.18. More evidence is required to assess whether the level of proposed car parking is appropriate for both HS2 and NPR. However, the number of car parking should not promote private vehicle use and contribute to unsustainable traffic volumes on the local road network. A greater focus is needed on providing access via sustainable modes and ensuring NMU connections are attractive and direct.

6.2.19. Significant construction impact is expected from the construction of the Airport station and the associated tunnel portal, much of which will be in close proximity to Manchester Airport.

6.2.20. Further detail of construction activities and access and routing needs to be shared with MCC and partners as the design develops to minimise stress to the highways network. This is especially important around the numerous compound sites, including at vent shafts and where local neighbourhood life could otherwise be blighted. More work is needed to minimise the impact of disruption and to provide robust mitigation measures.

6.2.21. There is traffic severance for walkers and cyclists during construction. These vulnerable modes should be protected. Appropriate mitigation measures will be required to ensure that walkers and cyclists are not disadvantaged and that sustainable journeys do not decline.

6.2.22. GM partners do not support the usage of Runger Lane for construction traffic and believe further analysis is required to ensure the capacity for traffic is maintained without adding adverse impacts on access to Manchester Airport and its surrounding areas.

6.2.23. MCC and GM partners have previously requested that HS2 consider options to use rail to move a proportion of materials required to construct the Airport station and tunnel portal, in order to reduce the level of road-based construction traffic. We would request that HS2 undertake further work to review potential options for removal of spoil by rail. This work should take into account the impact on local residents and maximises the legacy opportunities from the temporary rail links needed for the construction material. The consideration of rail based transportation is critical for HS2 to meet its sustainability objectives, as well as local environmental policy.

7. Technical comments on Crewe Northern Connection & Route Wide Update

7.1. The DRC provides an update for the whole of the Western Leg of HS2 Phase 2b. This update is based on the final designs and construction boundaries which are expected to be submitted within the bill, and which supersede the designs that have previously been shared.

7.2. The connections on and off HS2/ WCML at Crewe are a good thing, giving flexibility to adapt service patterns and enabling diversionary routes. The opportunity to deliver additional trains at Crewe should be considered against the impact this could have on journey times to other destinations with a bigger catchment, north of Crewe, such as Manchester. We are supportive of the infrastructure required on HS2 that will enable NPR to be delivered in its entirety. Also, we are supportive "build it once, build it right" approach and so would want to see this work delivered with HS2, rather than a disruptive add on at a later date.

7.3. The Golbourne link provides direct connectivity on a purpose-built high-speed railway almost all of the way into Wigan Town Centre from the Midlands and the south. The link therefore maximises the time that services can travel at high-speed on journeys between London/Birmingham and Scotland, thereby minimising end-to-end journey times

7.4. Whilst HS2's DRC proposal includes the Golborne Link, it does not include the HS2 Northern Chord (see below). This chord, which is located at High Legh, was included in earlier HS2 proposals with the aim of enabling HS2 trains to travel from a depot proposed at Golborne (which has subsequently been relocated to Crewe) to Manchester. Whilst the depot has been relocated, MCC's position is that the Northern Chord should be reintroduced to provide faster and greater capacity links from Scotland, Cumbria and Lancashire to Manchester and to reduce pressure on the existing Euston Junction to Manchester; Manchester to Preston; and Castlefield rail corridors. It is acknowledged that HS2 are providing passive provision for this, but in the ethos of build it once, build it right, this is removing a key piece fo the puzzle to transform the North and allow services for not only NPR, but for HS2 services from Scotland to access the Manchester HS2 terminus.

Source: Annotated extract of Figure 1 of the 'Design Refinement Consultation' document.

7.5. It should be noted that previous responses have highlighted that Trafford Council have raised concerns about the impact of the route alignment and the Northern Chord, and also identified the need for HS2 Ltd. to work closely with GM partners to consider options to mitigate local impacts, including the visual and heritage impact on local communities. Trafford Council have also submitted a response to this DRC.

7.6. MCC understand the need for a stabling facility at Annandale, between Glasgow, Edinburgh and Carlisle to reduce the distance of empty coaching stock workings and allow for early service provision from Carlisle. Although the proposed location is some distance from Glasgow and Edinburgh which are deemed to be the core markets for HS2 services north of Manchester, we appreciate detailed commercial and operational analysis on alternative sites and the expansion of existing stabling facilities has been undertaken. MCC seek reassurance from HS2 Ltd that sufficient capacity is available on the WCML for the level of empty coaching stock movements (and other supporting train movements) required.

8. Comments on DRC Government response to Birchfield Road Ventshafts

8.1. MCC were opposed to the original location of the vent shaft in the WDES at Lytham Road, situated on the site of the Manchester Enterprise Academy; (MEA) Central. In the first DRC, an alternative location at Fallowfield Retail Park was proposed.

8.2. The Council were also opposed to HS2 Ltd. locating the vent shaft on Fallowfield Retail Park, with the details being highlighted in the 2019 DRC response.

8.3. We are extremely disappointed and concerned, to see within the response to the first DRC, published alongside this consultation, that despite the objections raised, the ventilation shaft is still proposed to be located on Fallowfield retail park. It is acknowledged that the position has changed slightly, however, this location remains unacceptable to the council and the local community.

8.4. In the Council's previous response, and subsequent discussions with Council and community representatives, alternative locations considered as acceptable by both the Council and local community were provided, including:

a. The site of Pronorm Kitchens and Kwik-Fit (Mosley Road, M14 6PB)

b. The site of Car Centre (Mosley Road, M14 6PA)

c. University of Manchester Armitage Sports Centre

8.5. The first DRC response only provides reasons for the rejection of the University of Manchester Armitage sports centre. This location was dismissed based on resulting in less attractive landscape and visual impact. The Council do not believe these reasons represent a sufficient rationale to discount this location. The response made no specific reference to the impact on Birchfields Primary School which is located in close proximity, or on the facilities at the retail park which many local residents depend on.

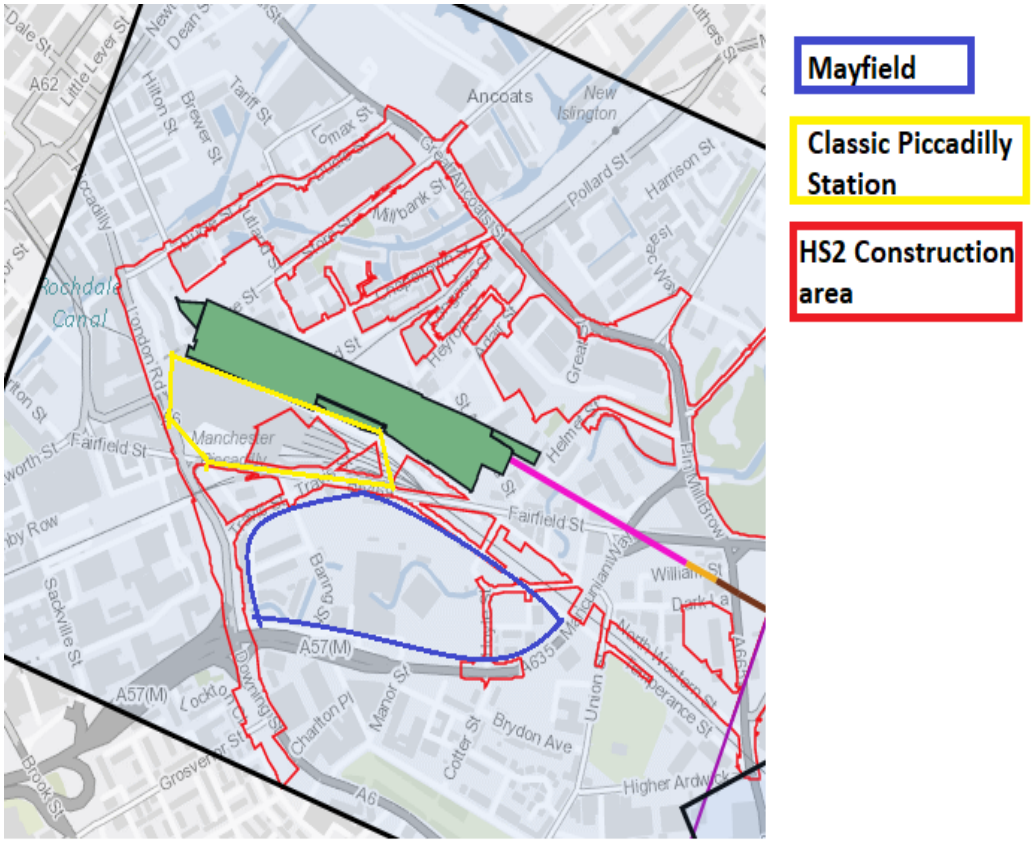
8.6. As a result of previous discussions last year, HS2 Ltd, undertook to carry out further work on alternative locations, including the potential for a 5th ventshaft. However, despite assurances that the work was being commissioned, it has either not taken place or not been shared with the Council. Our previous DRC response requested that HS2 Ltd. consult appropriately with the local residents, Councillors, schools and businesses, take on board their views, and respond to them appropriately. Again, we do not feel that this has taken place. HS2 Ltd. need to undertake further investigations on alternative sites, collaboratively with the Council, as a matter of urgency, in order to identify an alternative solution. The Council also expects mitigation measures to be taken by HS2 Ltd. in relation to the construction and placement of these ventilation shafts in proposed alternative locations.

9. Safeguarding

9.1. The DRC Safeguarding Maps exclude some properties located on Pittbrook Street and Chancellor Lane from the safeguarded area (Ref. Map Number SG-02-123). These areas are crossed by some of the Pin Mill Brow Junction options that are currently being developed and may need to be included as an Additional Provision.

9.2. Hoyle Street, Chapelfield Road and Temperence Street are included in the safeguarded area (Ref. Map Number SG-02-123). It is understood that these roads have been included in relation to an access route to a ramp proposed on North Western Street to provide access to the top of the existing railway viaduct for Network Rail road vehicles. This access route would pass through an area of the proposed Mayfield Development that will not be suitable for road vehicles. There is a need for HS2 Ltd to develop alternative arrangements for the ramp access.

9.3. Land that is identified in the safeguarding maps that are potentially required for construction envelopes the classic Piccadilly station and the Mayfield SRF site. MCC expect HS2 to provide a construction staging process to ensure that access to patrons of the classic Piccadilly station is maintained, along with construction and patron access to the Mayfield SRF site throughout the HS2 project lifecycle.



9.4. It should be noted that the Mayfield Partnership are also submitting a response to the updated safeguarding information, which sets out the significant impact on this major regeneration scheme for the city. Full consideration to this response also needs to be taken by HS2 Ltd.

10. Further engagement

10.1. MCC expects HS2 Ltd to engage and work with us and our partners throughout the ongoing design development and ES process, to pay due regard to the requirements detailed in the local strategies listed above, and in this, and previous, consultation responses. These include:

- 'Build it once, build it right' principle;
- Fully integrated, fit for purpose stations;
- Integration of HS2 with wider local transport and active travel ambitions;
- Minimising blight to ensure the arrival of HS2 complements the development of adjacent areas rather than negatively impacting the regeneration of land around stations and the route. To ensure this, timescales must be sequenced, and the design and construction methodology be prepared and delivered in conjunction with MCC and its partners, including Manchester Airport Group;
- Station and rail infrastructure of a design quality appropriate for the setting and acceptable to the Local Planning Authority;
- A fully integrated one-station solution with seamless integration between national, regional and local transport modes; and
- Maximising the opportunity to upskill the GM population.
- Accommodate Metrolink
- Deliver appropriate highway capacity

10.2. A significant number of issues were raised by MCC and GM Partners through the first DRC, WDES and previous consultation responses. The majority of these remain unresolved. Whilst HS2 Ltd. have published high level summary responses on previous consultations, disappointingly formal feedback is not provided on individual responses, and it remains unclear how our comments will be reflected in the final scheme design and in the final ES.

10.3. MCC wishes to continue to work with HS2 Ltd. through the current design phase leading to the Bill deposit, with the aim of achieving the full vision set out in the GM Growth Strategy, and to ensure that all of the issues that we have raised are properly addressed before the hybrid Bill is submitted.

10.4. We are disappointed that HS2 Ltd. only plan to share the detailed environmental information at the time when the hybrid Bill is submitted, and the full Environmental Statement is published.

10.5. GM partners have requested specific technical discussions with HS2 Ltd to engage with, and respond to, issues under the specific WDES topics for and on wider topic areas, including route-wide construction. This engagement is now urgent regarding the Birchfield Road Vent shaft, which is of deep concern.

10.6. MCC expect HS2 Ltd to thoroughly engage in more detailed discussions with GM Partners to provide detailed information on the scheme impacts and agree proposed mitigation measures in advance of the hybrid Bill deposit. MCC request early and meaningful engagement with HS2 Ltd. on the final construction, operational and safeguarding boundaries before hybrid Bill submission, and for engagement on the programme for construction, including the impacts associated with traffic, and the mitigation measures to be taken. We also ask for early consultation on the impacts included in the ES, before deposit of the hybrid Bill.

11. Summary & Conclusion

11.1. In all responses over the past six years, MCC and partners have reiterated our support for HS2, and the significant benefits that will arise from having HS2 stations at Manchester Airport and Manchester Piccadilly. It is essential that the right solutions for Manchester Piccadilly and Manchester Airport Stations are delivered to support the long-term growth set out in the Piccadilly SRF and GM Growth Strategy.

11.2. The Council welcomes the opportunity to comment on the second DRC. We fully support the proposal to integrate both NPR and Metrolink with HS2 at Manchester Piccadilly and Manchester Airport High Speed Stations. However, there remain major concerns around the design of the stations and associated infrastructure which we request HS2 take into account in the final designs included within the hybrid Bill. Our response sets out the key scheme issues raised during previous consultations not yet responded to by HS2, in addition to those arising directly from the information provided within the DRC. Although not formally part of the consultation, our response also highlights specific areas of concern included within the route wide update.

11.3. Key Issues covered in our response, which need to be resolved within the hybrid Bill, include:

11.3.1. Significant concerns about the capacity, resilience, future proofing, and regeneration impact of the current surface station design at Manchester Piccadilly, and the need for full integration of NPR and HS2, to enable the optimum station solution, for both Piccadilly and the full high speed network. We believe that this would be provided by an underground station solution, and request that HS2 Ltd. and DfT continue to work collaboratively with the Council and other partners to develop an underground station design for Manchester Piccadilly's high speed station.

11.3.2. The need for the design of Piccadilly station and surrounding infrastructure to integrate with, and not detract from, the Piccadilly and Mayfield SRF's. The current highways and car parking solutions, Network Rail ramp access, track and viaduct alignment all fail to do this, and alternative solutions need to be developed in collaboration with the Council and partners and included within the Bill.

11.3.3. The need for full integration of Metrolink at both stations, and the inclusion of powers in the hybrid bill for both Manchester Airport & Piccadilly stations, and to make enough funding available within devolution settlements to enable local infrastructure schemes such as Metrolink to be delivered

11.3.4. The impact of the shallower cutting station at Manchester Airport, including on the construction of Metrolink, need to be fully considered and appropriate mitigation provided.

11.3.5. The funding of Manchester Airport Station must be consistent than at other high speed airport stations, and recognition given to the fact that the business case for HS2 is considerably strengthened by the inclusion of a station at Manchester Airport.

11.3.6. The highways design at both Manchester Airport Station need to be holistically designed to not only includes HS2 and NPR predicted traffic, but traffic generated by the Airport and surrounding developments. The highways solutions at both stations need to consider local transport and environmental policy, which look to encourage modal shift to non-car modes.

11.3.7. MCC are opposed to the proposed location of the ventilation shaft on Fallowfield Retail Park, due to the impact on Birchfield Road Primary School and on local retail and community facilities. HS2 Ltd. need to undertake further investigations on alternative sites, collaboratively with the Council, as a matter of urgency, in order to identify an alternative solution.

11.3.8. The construction programme and methodology must aim to minimise the impact on communities, businesses (including Manchester Airport) and transport modes, including the full consideration of options to use rail to move materials, in order to reduce the level of road-based construction traffic.

11.4. The Council are committed to continuing to work with HS2, DfT, TfN and other partners on the design development of the proposed schemes in advance of hybrid Bill submission, and request that HS2 Ltd. and DfT engage collaboratively in this. It is important that MCC and partners are engaged in detailed discussions over the designs of the new stations and associated infrastructure (including vents shafts) to minimise their impact on local communities and ensure seamless integration with their surroundings, and will respond to the contents of the hybrid Bill once they are published.

11.5. We will provide a response to the formal Environmental Statement, published at hybrid Bill deposit to parliament in June 2020 and our expectation is that the ES will provide sufficient detail to respond to issues raised previously.

12. Appendix 1 – Links to Bibliography

1. City Centre Transport Strategy (Consultation Draft)
https://www.manchester.gov.uk/downloads/download/7277/draft_city_centre_transport_strategy_2020

2. Manchester Climate Change Framework 2020 - 2025
https://www.manchesterclimate.com/framework-2020-25

3. Our Manchester Strategy
https://www.manchester.gov.uk/downloads/download/6426/the_manchester_strategy

4. The Our Manchester Industrial Strategy
https://www.manchester.gov.uk/downloads/download/7156/our_manchester_industrial_strategy

5. City Centre Strategic Plan
https://secure.manchester.gov.uk/downloads/file/24745/city_centre_strategic_plan

6. Greater Manchester Clean Air Plan
https://images.ctfassets.net/tlpgbvy1k6h2/38mpTrGAw7qtuneFVln93c/c919fd3e08d54ec1f17e114a3b014093/20-0565_CAP_Consultation_Summary_WEB.pdf#page=8

7. Greater Manchester Spatial Framework
https://www.greatermanchester-ca.gov.uk/media/3663/221020-agma-issue-opt.pdf

8. Manchester Piccadilly Strategic Regeneration Framework (2018)
https://www.manchester.gov.uk/downloads/download/6868/manchester_piccadilly_srf_march_2018

9. Mayfield Strategic Regeneration Framework
https://secure.manchester.gov.uk/downloads/download/6851/mayfield_srf_february_2018

10. Portugal Street East Strategic Regeneration Framework
https://www.manchester.gov.uk/downloads/file/24866/portugal_street_east_srf_april_2017

11. ID Manchester Strategic Regeneration Framework
https://secure.manchester.gov.uk/downloads/download/6619/north_campus_srf_january_2017

12. Wythenshawe Campus Hospital Strategic Regeneration Framework
https://democracy.manchester.gov.uk/documents/s16521/Appendix%20-%20Wythenshawe%20Hospital%20Campus%20SRF.pdf