

## The Chilterns Conservation Board

Chilterns AONB Office  
The Lodge  
90 Station Road  
Chinnor  
Oxfordshire  
OX39 4HA



Contact: Colin White  
Tel: 01844 355507  
Fax: 01844 355501  
E Mail: cwhite@chilternsaonb.org  
www.chilternsaonb.org

Chairman: Mike Fox  
Vice Chairman: Cllr Bill Storey  
Chief Officer: Steve Rodrick

7<sup>th</sup> February 2012

Ciaran Scanlon  
Programme Sponsor  
Network Rail  
Western House  
1 Holbrook Way  
Swindon  
SN1 1BD

My Ref.: Railways/GWML electrification Jan 2012/CCB Scoping response 070212  
Your Ref:

Dear Ciaran,

### **Network Rail: Proposed Great Western Main Line overhead line electrification EIA request for scoping opinion**

Thank you for consulting the Chilterns Conservation Board in connection with the above. The details that you sent have been read with interest and I write to tell you that the Chilterns Conservation Board has the following comments to make in connection with the Scoping Report.

- Section 2.2 (p18) gives a description of the route. The Chilterns and the AONB are mentioned though the North Wessex Downs and the AONB are not (paragraph 2.2.2).
- Paragraph 2.2.5 mentions the North Wessex Downs but not the AONB.
- Section 2.3 lists the relevant local planning authorities that the route passes through. The Board considers that it would have been useful to include the three AONBs.
- The Board considers that paragraph 3.2.1 should also mention the future impacts of the use of the route with the arcing that occurs with the use of electrified trains.
- Section 5 deals with the scoping of the planning policy context. The Board considers that this should also include the three AONB Management Plans, relevant other advice such as the Chilterns Buildings Design Guide and supplementary technical notes on local building materials (Flint and Brick in particular), The Environmental Guidelines for the Management of Highways in the Chilterns and relevant landscape character studies (in particular the Countryside Commission work from 1992 for the Chilterns, the Chilterns Historic Landscape Characterisation work and any other landscape characterisation work). This should also be reflected in Appendix B.

- Paragraph 7.1.4 details that any visual assessment should include an analysis of views from various receptors. The Board considers that all relevant major types of receptor appear to be included though there will need to be an agreed schedule of specific locations. The Board would like to be involved in the preparation of such a schedule.
- Paragraph 7.2.1 mentions consultation with relevant landscape officers in connection with the selection of representative viewpoints. The Board considers that this consultation should also involve representatives of the AONBs, National Trails, National Trust and others. The list should include the Ridgeway, the Thames Path, the Swan's Way and various specified locations.
- Paragraph 7.3.6 states that a 1km study area has been defined. The Board considers that this is not wide enough as there may be other areas within zones of theoretical visibility that would need to be assessed. The study area should not be restrictively applied.
- Paragraph 7.3.9 refers to Appendix C and a summary of published landscape character assessments. Consideration should also be given to the AONB character assessments undertaken by the Countryside Commission (1992 for the Chilterns) and Historic Landscape Characterisation work as well as other landscape character work if not already mentioned and scoped.
- Table 7.1 (p48) specifically excludes or generally excludes from the scope parapet, OLE bridge attachments and other structural clearance operations as part of bridge works. This is considered to be a significant omission as bridge works can often be seen from a significant distance, particularly if the works involve a fundamental change to the appearance of the relevant bridge. These should therefore be included in the scope.
- Paragraph 8.4.1 mentions Bath and its World Heritage Site and the fact that this could be a potentially significant issue. It should also be noted that the GWR is on the tentative list for World Heritage Site status. This is supported by English Heritage. This status should be fully investigated as part of the EIA scoping and report production.
- Paragraph 10.3.22 states that no SACs have been identified within 2km of the route. This is incorrect because Hartslock Wood is less than 1km from the route (this is also partly within a SSSI [Hartslock] which is identified in 10.3.24). An appropriate assessment will also be required and close liaison with Natural England should be undertaken.
- Paragraph 11.3.6 mentions three of the five SACs that are within 1km of the route. The other two should also be mentioned and should clearly include Hartslock Wood, virtually all of which is within 1km. This may mean that the number of SACs affected is actually six rather than five.
- Table 13.1 details potential mitigation for various issues. For diversion routes (associated with bridge and other works) the report states that diversions should be prepared that avoid heritage areas, narrow roads and low bridges. The Board considers that any mitigation should also mean that diversion routes are as direct as possible and lengthy diversions are avoided wherever possible.

The Board considers that the issues raised above should be considered as part of the production of the EIA and any subsequent report. Subject to inclusion of detailed information about these issues the Board considers that the content of the Environmental Statement would be appropriate.

As stated the Board considers that various additional documents should also be fully scoped. These include the following, which are available from the Board:

- the Chilterns AONB Management Plan 2008-2013 'A Framework for Action' (£20.00 inclusive of postage and packing);
- the Chilterns Buildings Design Guide (£20.00 inclusive of postage and packing);
- the Buildings Design Guide Supplementary Technical Notes dealing with Flint and Brick (£14.00 each inclusive of postage and packing), and
- the Environmental Guidelines for the Management of Highways in the Chilterns (£14.00 each inclusive of postage and packing)
- The Making of the Chilterns Landscape (Chilterns Historic Landscape Characterisation Project Summary, £10.00 each inclusive of postage and packing)
- The Chilterns Historic Landscape Characterisation Project report is available as a download from the Chilterns AONB website at the following address - [http://www.chilternsaonb.org/uploads/files/AboutTheChilterns/HistoricEnvironment/The\\_Changing\\_Landscape\\_of\\_the\\_Chilterns.pdf](http://www.chilternsaonb.org/uploads/files/AboutTheChilterns/HistoricEnvironment/The_Changing_Landscape_of_the_Chilterns.pdf)

In addition, the 1992 Countryside Commission landscape assessment of the Chilterns ('The Chilterns Landscape', ISBN 0 86170 351 0, CCP 392 available from Natural England) and any other landscape character assessment work that has been undertaken are also considered to be relevant. The Board does not hold stocks of these.

The Board is willing to make those documents that it holds copies of available at the costs stipulated.

Whilst not making any detailed comments about the proposal at this stage we would like to take the opportunity to make the following comments.

- The introduction of both gantries and overhead wires will undoubtedly lead to visual and therefore wider landscape impacts. Clearly these will need to be fully assessed as part of any LVIA work.
- In addition there are likely to be detrimental impacts arising from work on some of the bridges mentioned (particularly those that are recognised for their architectural and historic importance). Any changes or replacements should be designed with the local context in mind, particularly if this is within an AONB.
- As a result, the Chilterns Conservation Board would look for agreed mitigation measures to be in place despite the fact that much of the proposed work is deemed to be permitted development.
- Network Rail will clearly need to demonstrate that it has taken full account of the purpose of the AONBs (the need to conserve and enhance the natural beauty of each area) in accordance with its statutory duty in the context of Section 85 of the Countryside and Rights of Way Act 2000.
- Network Rail should therefore take full account of the 'Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads' guidance note. This was published by DEFRA in 2005. It is available from DEFRA using the following link: <http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf> alternatively it can be obtained directly from DEFRA using the following information: Product code PB 10747 REV 1/07.

The Board would like to be consulted on any future reports and statements and will make comments on those at the appropriate time.

Yours sincerely,

A handwritten signature in black ink that reads "Colin White". The signature is written in a cursive style with a long horizontal stroke extending to the right from the end of the name.

**Colin White MRTPI**

**Planning Officer**

**For and on behalf of the Chilterns Conservation Board**

Copy to: Chilterns Conservation Board Planning Committee, Cllr David Nimmo-Smith (Oxon CC and CCB), Cllr Anna Badcock (South Oxfordshire DC and CCB), Cllr Julia Wells (CCB), Cllr John Griffin (CCB), Natural England, North Wessex Downs AONB, Cotswolds AONB, Oxfordshire County Council and South Oxfordshire DC officers (by email)