To Maddelyn Sutton, by email 4-Mar-2025

Head of Community & Stakeholder Engagement

cc Greg Smith MP, Peter Martin, Martin Tett (Bucks), Freda Jesudason (HS2), Dr J Conboy (Chiltern Society)

RESTORATION OF THE AONB

Dear Maddelyn,

We write to express our concerns regarding the restoration of the Chilterns AONB, on completion of the HS2 construction works. Despite our continued participation at drop ins and engagement meetings since construction commenced, the strategy and direction of the reconstruction project remains unclear. We would draw your attention to the following factors – developed in consultation with the HS2 team at Chiltern National Landscapes, who share our misgivings.

Aims of the project

Is it your intention to restore the pre-existing Landscape Character areas (as identified by Bucks council)[1] where possible or is it "(to) set new standards of landscape design that will … provide an exemplar for future infrastructure projects."[2] In the latter case, how will this differ from the existing LCAs?

Unless the aims of the project are declared, it is not possible to offer constructive criticism or judge the eventual success of the operation.

Biodiversity

The report 'No Net Loss in Biodiversity calculation'[3] stated that "*HS2 Ltd is seeking to achieve the goal of Phase One of the proposed railway ('the Scheme') resulting in no net loss in biodiversity at a route-wide level*". However, the landscaping sections of the current schedule 17 applications contain few if any references to biodiversity – either the reductions caused by construction or increases resulting from the planned works.

While the 2015 document expressed an aspiration to avoid loss of biodiversity, section 85 of the CROW act (as amended in Dec 2023) requires 'relevant authorities' to 'further the purpose of conserving and enhancing the natural beauty of the Area of Natural Beauty'. Is HS2 Ltd considered to be a relevant authority in this context, and if so, how are the biodiversity changes being

[1] https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/landscape-policy-and-assessments/landscape-character-assessments/

[2] "Landscape Design Approach", July 2015, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/456502/Exhibit_C_Landscape_Design.pdf

[3] Dec 2015 https://assets.publishing.service.gov.uk/media/5a7f1791e5274a2e8ab4a107/No_net_loss_in_biodiversity_calculation_-_methodology_and_results_v2.pdf

assessed and recorded? Is the same metric (discredited by the wildlife trust's report[4]) still to be employed?

Strategy

The last published design overview that we are aware of was contained in the 'Detailed Design Principles', published by the AONB review group in November 2017. This covered 'Vegetation Outside Operational Limits' in two pages (88-89)[5] even though (3.12.3) "*This component offers possibly the greatest means of accelerating the integration of the line with the Chilterns landscape"* This document provides no more than a brief introduction to the problem and was written before the full scale of the devastation caused by construction became apparent. We have approached the AONB review group, to see if they might play a continuing role in restoration, but they declined to do so as it was outside their remit.

Clearly this topic is in urgent need of revisiting, to inform and coordinate the plans currently under development. These should be presented to stakeholders and local experts, to profit from their experience and secure the best outcomes for the AONB, also to win the support of local communities and make best use of the available funds.

Community Engagement

To date this has been a lamentable failure. The only available information is contained in the (20 or so) schedule 17 applications, many containing landscaping documents, but without cross referencing. We are aware that Align have engaged one landscaping director, responsible for their sites in the AONB, and so it is likely that the planting schemes for woodland edge, for example, are the same – but this is not readily apparent from the way they are presented.

We believe that the plans for restoration should be presented to the conservation bodies and all interested parties in a clear manner, so that local experts can examine and comment on the proposals. The cost of an adequate restoration is unlikely to be much higher than a poor one, but a poor restoration will perpetuate the harm already inflicted on the Chilterns National Landscape.

Regards,



Peter Phippen
Chair at the Chiltern Society

[4] https://www.wildlifetrusts.org/news/new-report-hs2-got-it-wrong

[5] http://www.hs2amersham.org.uk/Resources/Construction/Reconstruction/HS2%20DDP%203-12%20Vegetation.pdf