

ASHLEY PARISH COUNCIL

1. Introduction

1.1 Ashley Parish Council

1.1.1 Ashley is a village and a civil parish in Cheshire which is mentioned in the Domesday Book. It covers approximately 2,200 acres (900 hectares) and its estimated population in 2020 was 309. Apart from a housing settlement at its heart and a few scattered houses, the village has a rural setting with farming at the core of its economic activity.

1.1.2 There are 16 Grade II listed buildings in Ashley parish, and these include the 16th century Ashley Hall and its stable block, together with other outbuildings and walls. Other listed buildings include St. Elizabeth's Church that dates from 1880; 17th century farmhouses and cottages, as well as a 16th century barn.

1.1.3 In addition, the parish has two Grade II listed road bridges. These are the 18th century Castle Mill Road Bridge (which carries Mill Lane over the River Bollin and acts as the border between Cheshire and Greater Manchester), and the mid 19th century Ashley Bridge which carries Ashley Road over the River Bollin and which also acts as the border between Cheshire and Hale, in Greater Manchester.

1.1.4 Ashley village comprises several important community facilities, including St. Elizabeth's Church at the western end of the village; Ashley railway station on the Mid-Cheshire Line (MCL) in the centre of the village, which opened in 1862; Ashley Cricket Club founded in 1888, and the Greyhound public house at the junction of Ashley Road and Cow Lane at the eastern end of the village.

1.1.5 Although the village no longer has a village store, a furniture shop and a garage business are located at the junction between Ashley Road and Mobberley Road. Otherwise, the nearest shops, together with dental services are located in Hale village, approximately 2 miles to the north, whilst the nearest doctors' surgeries are a little further away in Altrincham.

1.1.6 Knutsford is located approximately 5 miles to the south of Ashley village and road access to the town involves the use of either Ashley Road or Mobberley Roads both of which are narrow country lanes. When Greater Manchester introduces its Clean Air Zone policy, Knutsford is likely to replace Hale and Altrincham as the main destination for community services.

1.1.7 Ashley Parish Council exists to serve the residents of Ashley village in Cheshire. It has eight Councillors, plus a Clerk and meets every two months.

1.1.8 With regard to HS2 Ltd's proposals for the Phase 2b: Crewe to Manchester section of the HS2 project, Ashley PC's key objectives are to protect the well-being, safety and interests of its parishioners by minimising the environmental impacts of the project. We consider that this would be best achieved by:

- Constructing the HS2 mainline in a cutting rather than on an embankment. This would lower the elevation of the railway by up to 20m, thereby taking the railway under the MCL via an underbridge, rather than over the MCL on a viaduct.
- Removing the unnecessary Ashley Railhead and Ashley IMB-R from its Proposed Scheme. This could be readily achieved by utilising the proposed alternative Railhead/IMB-R at Aldersey's Rough in Staffordshire to supply construction materials, rail systems and maintenance materials during the construction and subsequent operation of Phase 2b (West).
- Avoiding the permanent closure of a section of Ashley Road, near Stock Farm to the west of the village, by reinstating it on its original alignment, and the realignment of

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Mobberley Road, both of which would be unnecessary if Ashley PC's aforementioned proposals are adopted.

1.2 Purpose of this report

- 1.2.1 The purpose of this report is to set out Ashley PC's concerns about the Phase 2b proposals, insofar as they will impact this parish and its population.
- 1.2.2 Ashley PC has based its consultation response on the various Phase 2b Environmental Statement (ES) reports, together with supporting information, that it has time to review and assess. In so doing, Ashley PC has focussed on the elevation and alignment of the HS2 mainline, together with the proposed Ashley Railhead and Ashley IMB-R and specifically the proposals for their construction starting in 2027.

1.3 Structure of this report

- 1.3.1 Section 2 of this report deals with the elevation of the HS2 mainline and Ashley PC's desire to see it lowered and constructed into a cutting on the section that passes Ashley village from the proposed Blackburn's Brook Viaduct to the Thorns Green Cutting.
- 1.3.2 The main impediment to the construction of the HS2 mainline in a cutting near Ashley is the Ashley Railhead, the key impacts from which are discussed in Section 3.
- 1.3.3 Section 4 provides the parish council's views in respect of the Ashley Satellite IMB-R and Section 5 our conclusions about the Phase 2b project proposals, insofar that they impact Ashley parish and our recommendations for changes to the proposals that will significantly improve the engineering design of the project, whilst at the same time reducing its environmental effects and saving hundreds of millions of pounds for taxpayers from the HS2 budgets.

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2. Concerns about the HS2 mainline railway

2.1 Elevation of the railway relative to Ashley village

HS2 design

- 2.1.1 It is noted that the elevation of the HS2 mainline railway, as it passes approximately 350m to the south of the village of Ashley, has not changed from the situation presented at the October 2020 Design Refinement Consultation (DRC).
- 2.1.2 It is stated, in paragraph 2.2.19 of the ES, that Ashley Embankment is 829m long and up to 9m high, where it abuts the MCL. HS2 Ltd's proposals to mitigate the visual impact of the railway is to screen it by placing a landscaped mound between the embankment and Ashley village.
- 2.1.3 HS2 Ltd has produced a series of long-sections to profile Phase 2b. Sheets 3 and 4 (of 10), for the M3 Hulseheath to Manchester Piccadilly Station zone, show the elevations of the mainline railway in relation to the existing topography between Chainage 283 and 289, i.e. the section of route as it passes the Ashley IMB-R and Ashley Railhead.
- 2.1.4 These profiles show that at the point at which the mainline railway reaches the eastern side of the Blackburn's Brook North Viaduct it has an elevation of 31.6mAOD. It then follows the existing topography as it passes the Ashley IMB-R before rising sharply at its eastern end (at Ch. 284+530) where the Ashley Embankment Retaining Wall will start to be constructed.
- 2.1.5 The mainline railway then rises at a gradient of 1.325% (1 in 75) over 815m on the Ashley Embankment before crossing the MCL and the realigned Mobberley Road on the viaduct that crosses these features.
- 2.1.6 The mainline railway continues to be elevated above the existing topography on the Thorns Green Embankment until Ch. 286+600, where it transitions into the Thorns Green Cutting at an elevation of approximately 49mAOD.
- 2.1.7 Thorns Green Cutting becomes progressively deeper as the mainline travels eastwards towards the valley of the River Bollin, which it crosses on a 12.3m high viaduct at a mainline railway elevation of 46.4mAOD.
- 2.1.8 Beyond the River Bollin, the HS2 mainline continues in cutting or tunnel through to and beyond the proposed Manchester Airport High Speed Station. The lowest elevation of the HS2 mainline occurs between the River Bollin and the M56 Tunnels at Ch. 287+700.

Ashley PC's response and alternative proposal

- 2.1.9 Based on the profiles that have been provided, it appears that the HS2 mainline would cross the MCL on a viaduct that reaches approximately 45.8mAOD. This would place the tracks approximately 8.7m above the existing railway, which is approximately 6m higher than existing ground level within Ashley village itself.
- 2.1.10 It is evident from the brief contents of Table 7 of the ES, that HS2 Ltd is aware that Ashley PC has recommended that the HS2 mainline be lowered and placed in a cutting as it passes the village of Ashley. However, this recommendation has been ignored and Table 7 of the ES does not explain why. Instead, it is simply stated that:
- "...consideration was given for a cutting to the south-west of Ashley to form part of the Proposed Scheme."*
- 2.1.11 Furthermore, and disappointingly, Table 7 does not include any reference to where the alternative cutting option is discussed in the Hybrid Bill documentation.

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- 2.1.12 Despite this omission, Ashley PC has discovered that the 'Alternatives Report' does include a reference to the cutting option. This is part of an assessment of alternative options for a section of the HS2 mainline starting immediately east of the Birkin Brook (i.e. from approximately 1.5km west of Ashley) and covering a 19km section of the route into central Manchester.
- 2.1.13 The option that includes a cutting to pass under the MCL to the south of Ashley village is referred to Option 03. Option 03 follows the same route as the preferred baseline Option 00.
- 2.1.14 In comparison with Option 00, Option 03 would mean that the mainline route pass Thorns Green in a deeper cutting than Option 00. However, beyond this point, the description of the option is the same as Option 00 as it states that
- "The Manchester Airport High Speed station would be located in a cutting, west of the M56 in green belt, close to Hale Barns. North of the Manchester Airport High Speed station and to the east of Davenport Green, the route would run under the outskirts of south Manchester into an approximately 12.8km bored tunnel."*
- 2.1.15 In paragraph 5.2.151 HS2 Ltd provides a commentary to explain the differences between Option 00 and Option 03. It states that:
- "Option 03 would have fewer visual impacts on residents at Ashley when compared with the preferred option as a result of the lower route south of the village, which would be in cutting. However, further east and north, the deeper cutting would have a greater impact on the landscape character. Similar to the preferred option, this route would require the demolition of the Grade II listed Buckhall and three clusters of residential demolition approaching the station, each with approximately five properties, including at Hale Barns, Halebank and Thorns Green. North of the Manchester Airport High Speed station, the route would cross Davenport Green development site. Further work would similarly be required to understand how this route would impact the Timperley Brook watercourse and to ensure any flood risk is mitigated."*
- 2.1.16 Based on this text, it would appear that HS2 Ltd is claiming that it is rejecting Option 03 because of the perceived increased impact on landscape character. However, it is evident to Ashley PC that the real reason for not pursuing Option 03 is that it would be incompatible with HS2 proposals for the Ashley Railhead and potentially the Ashley IMB-R.
- 2.1.17 Ashley PC has reviewed the relevant plan and profile sheets and considers HS2 Ltd's claims to be spurious and disingenuous, since the HS2 mainline could easily be constructed in a cutting between the Blackburn's Brook Viaduct and the Thorns Green Cutting. This cutting could include a short underbridge to enable the HS2 mainline to pass beneath the MCL, which appears to be at an elevation of approximately 37mAOD where the HS2 mainline crosses.
- 2.1.18 The cutting that would replace the Birkin Brook and Ashley embankments would reach a depth of approximately 8m. On the east side of the MCL, the Thorns Green cutting would be extended westwards to replace the Thorns Green Embankment.
- 2.1.19 Ashley PC understands that the depth of the Thorns Green Cutting would be deeper and could reach depths of approximately 12m, compared to the current maximum depth of 8.3m, but any increase in excavation quantities would be offset by significant reductions in the environmental impacts on the community of Ashley parish.
- 2.1.20 Ashley PC requests that HS2 Ltd carry out a detailed impartial and independent assessment of the cutting alternative and that such an assessment should include an alternative profile of the HS2 mainline and what this means in terms of excavation quantities.

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2.2 Construction compounds

HS2 proposals

- 2.2.1 HS2 Ltd is proposing multiple construction compounds in the vicinity of Ashley, which will need to be accessed from narrow and inadequate country lanes and roads.
- 2.2.2 Some of these Satellite Construction Compounds are accompanied by 'Temporary Materials Stockpiles', (TMSs). These seem to be the equivalent of the Phase 2a Transfer Nodes, which are used to import and export bulk earthworks materials.
- 2.2.3 The Satellite Construction Compounds¹ located within Ashley parish and likely to directly impact our community are:
1. Birkin Brook (TN) from Ashley Road south of HS2 mainline.
 2. Ashley IMB-R (TN) (RS) from Ashley Road north of HS2 mainline.
 3. Ashley Station Satellite Compound north of HS2 mainline.
 4. Birkinheath Covert Satellite Compound (TN) (RS) from Mobberley Road and potentially the Ashley Road diversion.
 5. Mobberley Road South Satellite Compound (TN) from Mobberley Road.
 6. Mobberley Road Satellite Compound from Mobberley Road north of HS2 mainline.
 7. Mobberley Road North Satellite Compound from Mobberley Road north of HS2 mainline.
 8. Castle Mill Lane Satellite Compound (TN) via Mill Lane and Castle Mill Lane (TN).
- 2.2.4 Ashley Railhead itself will also be supplied by construction materials by road from Q1 2031.
- 2.2.5 With the exception of the Castle Mill Lane Satellite Compound, all of the sites would be accessed from Ashley Road at some time during the construction period.
- 2.2.6 In addition, there are several other Satellite Compounds to the west and east of Ashley PC, which have the potential to impact the wider road network used by the population of the parish.
- 2.2.7 Examples include Rostherne North Cutting Satellite Compound (TN) and the Blackburn's Brook Satellite Compound (TN), which would also initially be accessed from the east via Cherry Tree Lane from Ashley Road.
- 2.2.8 HS2 Ltd is also indicating that the satellite compounds at Rostherne North and Blackburn's Brook would be supplied via a temporary overbridge to be constructed over the M56 near Junction 7. This construction traffic would utilise Yarwoodheath Lane to the north of the M56, Tom Lane to the south of the M56 and either Cherry Tree Lane or, HS2 Ltd claims, internal haul roads to be constructed along the mainline railway corridor. On this basis, HS2 Ltd is also claiming that, the temporary M56 overbridge could be used to access the multiple satellite compounds near Ashley village.

Ashley PC's response

- 2.2.9 Ashley is a small parish that is entirely served by a handful of narrow unclassified roads and lanes. There is no public road access to the M56 within the parish and access to Junctions 7 and 6 of the M56 requires the use of the existing narrow lanes and roads.
- 2.2.10 Ashley PC is also aware that local roads located close to the existing motorway network, and from which the roads into Ashley parish are connected, e.g. A50 in Knutsford, J7 of the M6

¹ The Satellite Compounds accompanied by 'Temporary Materials Stockpiles' have the notation (with TN) added. Those that would be used to import rail systems have the notation (RS).

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and A538 and Mill Lane near J6 of the M56, are regularly severely congested, especially during the morning and evening rush hours and when the motorways are subject to congestion and closure.

2.2.11

Ashley PC has reviewed HS2 Ltd claims that it could access multiple satellite compounds via the use of a temporary overbridge over the M56 and a combination of local lanes and has the following concerns that urgently need to be resolved:

- No details are given in the Figure 24 indicative programme as to how much time this overbridge will take to construct or the duration it would be in operation before it is removed. However, based on the scenarios described in paragraph 14.4.19 of the ES, it is understood that HS2 Ltd has assumed that the temporary overbridge would be operational for 2½ years from 2029 Q2 to 2031 Q3.
- Whilst it is accepted that a temporary overbridge could be used to access the Rostherne Cutting Satellite Compound located immediately south of the M56 near Junction 7 and north of the HS2 mainline, it would be more difficult to access the Birkin's Brook Satellite Compound. This is because it is located on the south side of the HS2 mainline, where the Manchester to Liverpool connection occurs and where both railways would be constructed within the Rostherne Cutting (which would be over 5m deep) and the Rostherne East Box Structure (235m long and 12m above existing ground level).
- Extending an internal haul road further east from the Rostherne East Box Structure is further complicated by the low-lying floodplains of the Blackburn's and Birkin's Brooks, which require a 385m, 11m high mainline viaduct to cross them.
- Constructing an internal haul road capable of being used by HGVs to access the Birkin's Brook Satellite Compound, and potentially beyond, would also be time consuming and expensive. This is because it would need to have a sealed surface (e.g. tarmaced) and provided with wheel-washing facilities near the points of entry onto the public highway.
- Alternatively, and potentially more likely, HS2 Ltd would need to unload bulk earthworks materials at the TMS located at the Rostherne Cutting Satellite Compound and transfer these materials onto off-road site haulage for transportation to the construction sites near Ashley. This would explain why HS2 Ltd believes it can construct the Ashley Embankment from the Rostherne Cutting Satellite Compound and why the number of HGV movements predicted for this satellite compound are much greater (average of 437/day and peak of 486/day) than the other local satellite compounds.
- Although Ashley IMB-R Satellite Compound is located on the northern side of the HS2 mainline, the remaining satellite compounds are either located to the south of the mainline and/or the east of the MCL. This means that even in the unlikely event that a sealed internal haul road could be constructed the distance of more than 3km between the temporary M56 overbridge and the MCL, public roads would still need to be used to access numerous satellite compounds.
- By claiming that so many satellite compounds could at some stage be supplied by internal haul road via the temporary M56 overbridge, Ashley PC is concerned that HS2 Ltd's predicted number of HGV movements are significantly understated and that the actual levels of HGV movements on local roads will be significantly higher.
- With the exception of the small or low activity satellite compounds at Ashley Station and Mobberley Road, together with the Ashley Railhead itself, construction at the other eight satellite compounds will begin from Q2 or Q3 2027. By HS2 Ltd's own admission, these compounds would all be active at the same time and for at least 33

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months. Furthermore, seven would be operating simultaneously for at least four years, four for at least five years and two for six years. It is therefore inevitable that the HGV movements will impact local roads on a cumulative basis, but the Environmental Statement does not assess such impacts.

- 2.2.12 In order for HS2 Ltd's claims about HGV movements on local roads to be verified, Ashley PC requires full details of its assumptions regarding materials quantities and timings to be published. This should take the form of a Transport Logistics Profile (TLP), which would comprise a detailed spreadsheet.
- 2.2.13 The TLP should show the entire construction programme across the page, against the number and type of HGV deliveries HS2 Ltd believes would be required to support each construction activity that needs to be undertaken from each satellite compound, which would be set out down the page.
- 2.2.14 The TLP should also include HS2 Ltd's assumptions about when each supply route to each satellite compound would be used so that the cumulative effects on each road/lane can be determined and appropriately assessed.

2.3 Road and footpath diversions and closures

HS2 proposals

- 2.3.1 Since the HS2 mainline cuts through the centre of Ashley parish from west to east, it effectively divides the parish into two halves.
- 2.3.2 Ashley Road, which runs between Hale to the north of the parish towards Mere to the southwest, will be permanently severed between Birkin's Farm and Stock Farm to facilitate the HS2 development, which includes the mainline, together with the eastern end of the permanent Ashley IMB-R and the temporary Ashley Railhead.
- 2.3.3 It is proposed to construct an 880m long replacement road, which would run south and parallel to the Ashley Railhead to connect to a new section of realigned Mobberley Road 250m north of Arden Lodge.
- 2.3.4 It is also proposed to close Lamb Lane, with users travelling from the west expected to use a 2.2km diversion via the diverted Ashley Road and realigned Mobberley Road. For users from the north, it will require them to travel through the village before turning south onto Mobberley Road.
- 2.3.5 Mobberley Road itself will be realigned onto a more circuitous route to the east of the existing road over a distance of 824m to accommodate the temporary Ashley Railhead, where the southern sidings link to the northern sidings and the HS2 mainline.
- 2.3.6 The realigned Mobberley Road will be raised onto embankments on either side of an 110m long overbridge, which will rise over 7m above existing ground level and the connection tracks of the temporary Ashley Railhead before immediately passing below a 260m long HS2 mainline viaduct.
- 2.3.7 In addition to the closure and diversion of local roads, the HS2 proposals will severely impact numerous local footpaths, most of which will be subject to temporary closure for five years and two months (Ashley 6/4, 6/5, 8/1 and 8/2) or the full construction period (Ashley 3/1), following which they will be permanently diverted.
- 2.3.8 Footpaths Ashley 3 and 6 are two footpaths that connect the two halves of Ashley parish located on either side of the M56 motorway and both are facilitated by bridges over the M56.
- 2.3.9 FP3 runs from Bowdon and Hale in a broadly southeasterly direction towards Ashley via Ashley Road. It also connects via Lamb Lane and FP8 to Mobberley Road. HS2 Ltd's proposals mean that FP3 will be impacted by the HS2 mainline and the Ashley IMB-R and

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FP8 by Ashley Railhead. Following its closure for over five years, FP3 it will be diverted 365m south-east of its current alignment for 1.1km to pass under the Blackburn's Brook North viaduct. This will increase the journey length by 624m, which HS2 Ltd considers to be a 'moderate adverse effect'.

- 2.3.10 Footpath Ashley 6/5 is part of several sections of the north to south aligned FP6, which provides an alternative, shorter and more direct pedestrian route between Ashley village and Hale via to points on Ashley Road. FP6 continues south from the western end of Ashley towards Mobberley Road via Arden House. HS2 Ltd's proposals for the HS2 mainline and the Ashley Railhead mean that, following its closure during the construction period, this southern section of FP6 will be diverted along Ashley Road and the realigned Mobberley Road, increasing journey length by 1.7km.

Ashley PC's response

- 2.3.11 Ashley PC considers that the effects of the closure and/or diversion/realignment of Ashley Road, Lamb Lane, Mobberley Road, FP3, FP6 and FP8 should be considered cumulatively and not individually, as HS2 Ltd has done.
- 2.3.12 Ashley PC opposes the proposals to permanently close a section of Ashley Road and permanently close Lamb Lane, which it considers unnecessary and could be avoided if the Ashley IMB-R and Ashley Railhead were abandoned and the elevation of the HS2 mainline was lowered to pass Ashley village in a cutting and routed under the MCL.
- 2.3.13 Furthermore, Mobberley Road realignment is only required to accommodate the temporary and unnecessary Ashley Railhead. This expensive feature should be abandoned along with proposals for the Ashley IMB-R, the functions of which could be more effectively carried out from Aldersey's Rough in Staffordshire at much reduced cost to the public purse.

2.4 HGV use of local roads

HS2 proposals

- 2.4.1 As outlined in Section 2.1 above, despite its unsubstantiated claims that it would be able to supply multiple satellite compounds by an internal haul road from the proposed temporary M56 overbridge near Junction 7, HS2 Ltd will need to mostly supply multiple Satellite Construction Compounds within Ashley parish via an inadequate local road network comprising a series of narrow lanes and country roads.
- 2.4.2 Based on the construction route drawings (TR-08-306, 307 and 308 from the Volume 5 Traffic and Transport mapbook), it is evident that the primary supply route to most of the compounds in Ashley parish would be Ashley Road from Mere to the southwest.
- 2.4.3 It also appears that HS2 Ltd is proposing to access Ashley Road from the A50 from Clamhunger Lane, together with a very short section of Mereside Road (A5044).
- 2.4.4 Drawing TR-08-311 also suggests that the Mobberley Road North and Mobberley Road Satellite Compounds will also be supplied from the east via Mill Lane, Castle Mill Lane, Tanyard Lane and Back Lane to the crossroads in Ashley village before HGVs turn south onto Mobberley Road itself.
- 2.4.5 Drawing TR-08-311 also summarises details of the construction start date; predicted duration of construction use; the duration of the busy period and the average and peak number of HGVs, as well as cars and LGVs during the busy periods. This information is also presented

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in tabular form in Table 38 of the ES and Table 18-5 of 'Volume 5: Appendix TR-003-00006', which is Part 3 - Report 1 of 4 of Transport Assessment appendices (Report M290)².

Ashley PC's response

Suitability of local roads

- 2.4.6 The local roads that HS2 Ltd is proposing to use for its construction traffic within Ashley and the neighbouring parishes are very narrow country lanes and unsuitable for use by large numbers of HGVs.
- 2.4.7 It is understood that paragraph C.6.2 in Appendix C of HS2 Ltd's own technical standard (Ref: HS2-HS2-HW-STD-000-000001) advises the following:
- "Realigned or diverted rural roads should generally match the existing, subject to a minimum of 5.5 metres (the minimum for two cars to pass in safety at low speed). This minimum width shall be increased to 6.0 metres for lengths with occasional use by buses or heavy goods vehicles and 6.8 metres for roads where buses or heavy goods vehicles are likely to pass each other on a regular basis."*
- 2.4.8 Clamhunger Lane at the start of the proposed route from the A50 is a narrow residential access road that is subject to a 7.5 tonne weight restriction (other than for access).
- 2.4.9 The western end of Ashley Road is approximately 6m wide and is relatively straight. It is an attractive country road which, for much of its length, is bordered by woodland and the estate boundary wall of Tatton Park on its southeastern side and farmland to the northwest.
- 2.4.10 The main entrance to Tatton Park, a popular tourist destination, is located at Rostherne Lodge, at the crossroads with Rostherne Lane, which is located approximately 1.8km from the A5034 junction at Mere and represents approximately the first third of the proposed route to Ashley village.
- 2.4.11 The point at which Ashley Road enters Ashley parish (3.8km from Mere) is characterised by a narrow bridge over Birkin Brook, beyond which the nature of the road changes to incorporate multiple blind bends.
- 2.4.12 The approach into the village from the western end becomes increasingly twisting in nature and incorporates several blind bends, most notably where the 90-degree bend into the village occurs at the drive entrance to Ashley Hall.
- 2.4.13 Although Ashley Road is reasonably straight as it passes through the village, it is less than 5m wide at certain points. It is therefore not suitable for use by large numbers of HGVs.
- 2.4.14 At the eastern end of the village, Ashley Road meets Mobberley Road and Back Lane at a crossroads with Cow Lane. Although a ghost-island junction is located at this point to enable vehicles to turn right into Ashley village on the approach from the north and into Back Lane on the approach from the south, this junction is not designed to enable large numbers of HGVs to turn right onto Mobberley Road from Ashley village.
- 2.4.15 To the south of this junction, Mobberley Road is only approximately 5.6m wide and the existing road, beyond the point where HS2 Ltd proposes to start the realignment, is characterised by twists and turns and blind spots. It is therefore unsuitable for large-scale HGV usage.
- 2.4.16 The route from Junction 6 of the M56 via the A538 from the east also comprises narrow country roads, including Mill Lane, Castle Mill Lane, Tanyard Lane and the final 400m of Back Lane. With the exception of the first 350m from the A538, none of these lanes are suitable to be used by HGV traffic, despite HS2 Ltd proposing to supply the Castle Mill Lane Satellite

² It is assumed that the HGV movements provided relate to those using the local road network and exclude any assumptions by HS2 Ltd regarding movements via its proposed internal haul road from the temporary M56 overbridge from Junction 7.

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Compounds and potentially two satellite compounds near Ashley via this route. Indeed, for much of this route these lanes are barely wide enough for two-way passage by cars and LGVs.

Construction traffic

- 2.4.17 Ashley PC has raised many concerns above about how HS2 Ltd proposes to access its satellite compounds located within the parish and in this sub-section we comment on the construction traffic routes that are shown on Drawing TR-08-111.
- 2.4.18 It is noted that separate numbers of HGV movements are not presented for the import and export of bulk earthworks materials via the TMSs, located next to some Satellite Compounds. This is a departure from the approach taken with respect to Phase One and Phase 2a, where separate HGV numbers were presented in respect of the Transfer Nodes (TN), which perform the same function as many TMSs. Ashley PC is therefore concerned that the absence of such information represents a lack of transparency and an attempt by HS2 Ltd's to conceal the actual impacts of its construction traffic on the local road network.
- 2.4.19 As mentioned above, Ashley PC is very concerned that the numbers of HGVs predicted in respect of each satellite compound are unsubstantiated and that actual HGV numbers will be significantly greater than HS2 Ltd is acknowledging.
- 2.4.20 However, it is clear that HS2 Ltd's construction traffic proposals would significantly impact Ashley residents because they frequently use Ashley Road and Mereside Road as the most direct route to travel to Knutsford and the M6 motorway.
- 2.4.21 Furthermore, once the Greater Manchester Clean Air Policy is implemented and road charging is introduced within the associated Clean Air Zone, Mereside Road, will become an increasingly important route to the M56 to enable drivers to remain within the boundaries of Cheshire East and beyond the charging zone.
- 2.4.22 With respect to HS2 Ltd's obvious reliance to supply many of its sites primarily from the southwest via Ashley Road, it is unclear how HGVs would be able to continue to use this route throughout the construction period, since Ashley Road will be severed at Birkin Farm on the southside of the HS2 mainline during an early stage of the construction period.
- 2.4.23 Unfortunately, no phasing information has been provided in relation to the Ashley Road diversion. Instead, all we know is that it will take two years to implement starting Q4 2027. However, we assume that it is HS2 Ltd's intention to keep Ashley Road open to enable the Ashley IMB-R Satellite Compound to be supplied from the southwest until the diversion is completed at the end of Q3 2029.
- 2.4.24 Beyond that date, it is assumed that Ashley IMB-R Satellite Compound will have to be supplied from the east and this will mean all HS2 HGV and other construction traffic accessing and leaving the site would need to travel through the centre of the village.
- 2.4.25 Prior to the diversion of Ashley Road, all of the HS2 construction traffic proposed to serve the Birkenheath Covert Satellite Compound and the Mobberley Road South Satellite Compound, would also need to pass through Ashley village.
- 2.4.26 HS2 construction traffic bound for the Mobberley Road North Satellite Compound and the smaller Mobberley Road Satellite Compound is also likely to pass through Ashley village at this time, although HS2 Ltd has also made provision to access Mobberley Road from Castle Mill Lane from the east.
- 2.4.27 The above questions can only be addressed by the provision of more robust and transparent information to confirm HS2 Ltd's assumptions and this should take the form of a Transport Logistics Profile based on a monthly construction programme for the entire construction period.

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2.5 Hours of working

HS2 proposals

2.5.1 HS2 Ltd's proposals for the hours of working are set out in paragraphs 6.3.21 to 24 of the Volume 1 Introduction (M14) document. In paragraph 6.3.22 it states:

“Core working hours will be from 08:00-18:00 on weekdays (excluding bank holidays) and from 08:00-13:00 on Saturdays.”

2.5.2 Unfortunately, HS2 Ltd's commitment to limiting working hours to these times is undermined by the following sentence of paragraph 6.3.23, which states:

*“The nominated undertaker will require its contractors to adhere to these core working hours for each site **insofar as reasonably practicable, unless otherwise permitted by the relevant local authority**³ under Section 61 of the Control of Pollution Act.”*

2.5.3 Paragraph 6.2.23 then includes another caveat as it states:

*“Guidance on site-specific variations to core hours and/or additional hours likely to be required will be included within the **LEMP following consultation with the relevant local authority.**”*

2.5.4 Further caveats are then set out in paragraph 6.2.24 which states:

*“The Section 61 process will also be used to agree, in advance, any work required to be undertaken outside core hours, **except in the case of emergency and not including repairs or maintenance.**”*

Ashley PC's response

2.5.5 HS2 Ltd's proposals for core hours are worthless and completely undermined by the four caveats highlighted above.

2.5.6 Ashley PC understands that the term '*insofar as reasonably practicable*', or variations thereof, permeate through all HS2 Ltd documentation on all phases of HS2 and this effectively provides HS2 Ltd and its contractors with the ability to circumvent the workings hours restrictions at any time of their choosing for a raft of reasons, however inappropriate or unjustified.

2.5.7 All determining local authorities at borough, county or unitary level are required by HS2 Ltd to sign Non-Disclosure Agreements (NDAs) in order to be given access to relevant information about its proposals and this requirement, together with the very limited powers afforded to local authorities in the Hybrid Bill and subsequent Hybrid Act following Royal Assent, constrain their abilities to refuse requests for changes to the scheme proposals, including working hours.

2.5.8 Local Environmental Management Plans (LEMPs) have not yet been drafted for Phase 2b. However, it is understood that the apparent commitments made in draft and/or final versions of these documents on Phase One have proved toothless and offer little or no protection to the environment or local people from the construction operations of the HS2 project.

2.5.9 Even if local authorities were to require conditions, including relating to working hours, under Section 61 powers, the exceptions provided under the cover of what HS2 Ltd, and its contractors, might consider an emergency or termed '*repairs and maintenance*'.

2.5.10 In summary, Ashley PC considers the limitations on working hours to be far too lax and open-ended in favour of HS2 Ltd and its contractors and requires the rules regarding working hours to be significantly tightened.

³ Boldened for emphasis by Ashley PC.

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3. Concerns about Ashley Railhead and HS2 mainline railway construction

3.1 Purpose of the railhead

HS2 proposals

3.1.1 In paragraph 2.3.112 it is stated that:

“Ashley railhead will be used to receive and stockpile materials, by rail, required for the construction of the railway tracks, signals and electrification systems for the Proposed Scheme.”

Ashley PC's response

3.1.2 Ashley PC understands that the function of the Ashley Railhead could be more effectively carried out from the proposed alternative Railhead at Aldersey's Rough near Madeley in Staffordshire. There is therefore no requirement for HS2 Ltd to construct, operate and remove Ashley Railhead at huge cost to the public purse and we require the Ashley Railhead to be removed from the Proposed Scheme.

3.1.3 Further details regarding Aldersey's Rough's ability to replace the Ashley Railhead are given in Section 3.6.

3.2 Railhead design and layout

HS2 proposals

3.2.1 Brief details regarding the design of the Ashley Railhead are given in paragraph 2.3.113 of the ES and are shown in parts on a total of ten separate plans in the accompanying mapbook. These include five construction plans (CT-05-353, 354, 354R1, 355R1 and 355R2) and the equivalent plans for the operational phase (CT-06-353, 354, 354R1, 355R1 and 355R2), when the facility has been removed and the land reinstated.

Ashley PC's response

3.2.2 The design information provided in the ES is minimal and does not provide Ashley parish and the people it represents with sufficient information to understand how the Ashley Railhead will be constructed, operated and removed prior to the reinstatement of the affected land.

3.2.3 The piecemeal presentation of the Ashley Railhead in the mapbook makes it very difficult for parishioners to understand what is proposed. We cannot understand why HS2 Ltd has not accompanied the mapbook plans with a single plan that shows the entire Ashley Railhead, and its location relative to the proposed HS2 mainline railway and Ashley IMB-R.

3.2.4 Ashley PC requests that single plans of the construction and operational phases are produced and issued in hard copy form at the appropriate scale, i.e. 1:5000 at A2.

3.3 Construction phasing, operation and removal

HS2 proposals

3.3.1 It is understood from the contents of paragraph 2.3.113 of the ES that the construction of the Ashley Railhead will be managed from the Birkinheath Covert Satellite Compound over a period of 2 years and 3 months. It will then be utilised for 2 years 9 months and the land occupied reinstated over a period of one year.

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3.3.2 In paragraph 2.3.91, the phasing of the construction, operation and decommissioning of the Ashley Railhead is described and illustrated on six unscaled phasing plans, which are embedded into the text document.

3.3.3 Figure 24 provides an indicative programme of works within the MA06 Community Area.

Ashley PC's response

3.3.4 Ashley PC has compared the text description of the six stages of the construction, use and decommissioning of the Ashley Railhead in the bullet points with the six plans and the indicative construction programme in Figure 24 and has found them to be inconsistent and confusing.

3.3.5 The situation has not been assisted by the absence of an indicative timeframe for each of the plans and this is a considerable concern to Ashley Parish Council:

- Figure 13 (Stage 1) shows the location of local satellite compounds; temporary stockpiles, two road diversions and the '*Mid-Cheshire (Railway) and Mobberley Road viaduct*'. Since the Mobberley and Ashley Road diversions are predicted to take 2 years each and commence in Q3 and Q4 of 2027 respectively, and the viaduct 2½ years respectively, it is assumed that this plan shows the layout in Q4 2027.
- Figure 14 (Stage 2) shows the addition of site preparation at the southern end of the Ashley Railhead, but the area does not extend to the north of the Mobberley Lane diversion. It is therefore assumed that this plan represents the 9-month long period that starts in Q3 2029.
- Figure 15 (Stage 3) shows that the road diversion works and viaduct construction have been completed; site preparation is being undertaken on the northern part of the Ashley Railhead site adjacent to the HS2 mainline, and the southern end of the railhead is subject to earthworks, including the construction of sidings and other infrastructure. It therefore appears that this plan represents the 15-month period starting at the beginning of Q3 2030.
- Figure 16 (Stage 4) shows the installation of rail systems at the southern end of the Ashley Railhead and the earthworks being undertaken on the northern part of the railhead, which commence in Q3 2030, which is the same timeframe as apparently shown in Figure 15 (Stage 3). However, Figure 16 also suggests that the nearby HS2 mainline railway embankments are under construction, even though these works commence between Q2 and Q4 2029 but are not shown in Figure 15.
- Figure 17 (Stage 5) shows rail systems covering the entire footprint of the Ashley Railhead and Ashley IMB-R and the HS2 mainline in place. It also still shows the various Satellite Compounds and TMSs. This would suggest that it represents the situation when the Ashley Railhead is being used to install rail systems along the HS2 mainline. Rail systems installation are shown on Figure 24 to start in Q3 2031 and continue for four years, although it is assumed that the first year of such works relate to laying tracks within the Ashley Railhead, since these works are not shown to be completed until the end of Q2 2032.
- Figure 18 (Stage 6) shows the Ashley Railhead as being reinstated. Figure 24 suggests that tracks are being removed over 15 months from Q1 2034 with railhead civils works and site reinstatement taking place simultaneously to be completed by the end of Q1 2035. However, this is inconsistent with the mainline track installation works which are not showing as being completed unto end of Q2 2035. In practice, the decommissioning and reinstatement of the Ashley Railhead will not occur until after the track laying, testing and decommissioning is completed.

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- 3.3.6 With respect to the latter point, the situation is compounded by the contents of the final two rows of the indicative programme (Figure 24) on page 100 of the ES. These show that, not only is it assumed that the track laying for the mainline will be completed by the end of Q2 2035, but that track testing and commissioning will take place simultaneously over the final 1¾ years. This is totally unrealistic and completely inconsistent with the approach outlined on Phase One and Phase 2a, where the testing and commissioning followed the track laying.
- 3.3.7 Ashley PC therefore believes that not only will the testing and commissioning extend the life of the Ashley Railhead by up to 1¾ years to potentially the end of Q1 2037, but that this will delay the decommissioning and reinstatement of the site until Q1 2038. This means that the construction period will last for at least 10½ years and not the 8 years claimed by HS2 Ltd.
- 3.3.8 This appears to represent a clear and obvious example of a lack of candour by HS2 Ltd, which is of extreme concern to Ashley PC. Notwithstanding this point, it is noted in paragraph 14.2.2 that the opening year of Phase 2b is referred to as 2038.
- 3.3.9 Ashley PC therefore urges HS2 Ltd to correct the misleading information presented in its Figure 24 Indicative programme.

3.4 Railhead operating hours

HS2 proposals

- 3.4.1 In paragraph 2.3.114 of the ES, it is stated that:

“Ashley railhead will be capable of receiving and dispatching up to 18 trains per day, to and from the existing railway network, via purpose-built sidings adjacent to the Mid-Cheshire Line. Rail deliveries into the railhead will be undertaken during day and night-time hours and at weekends, though unloading will be undertaken during a standard 10-hour (08:00-18:00) working day (Monday to midday Saturday), where reasonably practicable.”

Ashley PC's response

Basis for 18 trains/day

- 3.4.2 HS2 Ltd's proposed hours of working for the operational railhead, which effectively enable deliveries to take place on a 24/7 basis, are completely unacceptable to Ashley PC.
- 3.4.3 Ashley PC also wants to know why HS2 Ltd is claiming that it needs 18 trains/day to enter and then leave the Ashley Railhead. Although equivalent details were not provided in the ES for the Stone Railhead on Phase 2a, it is understood that HS2 Ltd's expert witness gave evidence on this subject under questioning from HS2 Ltd's QC at the afternoon session of the House of Commons proceedings that took place on 25th April 2018.
- 3.4.4 The Hansard transcript of the proceedings from the afternoon of 25th April 2018 provides the relevant information.
- 3.4.5 Although HS2 Ltd's expert witness (Tim Smart⁴) and Tim Mould QC managed to conflate several issues and confuse themselves and the Select Committee over whether they were referring to the operation of the Stone Railhead during the period of rail systems installation for Phase 2a, or the Stone IMB-R once Phase 2a and then the entire western leg of HS2 became operational, it was stated that the maximum number of supply trains required would be just seven.

⁴ Tim Smart was HS2 Chief Engineer at the time of the proceedings, but now is Managing Director for HS2 Phase 2a.

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- 3.4.6 Indeed, in response to Mr Mould, who wrongly suggested that supply trains would be delivering to the Stone Railhead for five years when it is actually a maximum of 2¾ years, in paragraph 666 of Hansard Mr Smart actually replied:

“Per day – in order for us to build the Phase 2A, we are talking about one to two a week – sorry – to build it, we’re talking potentially for up to seven. But what I should say is seven trains a day does not occur every day because you’ve only got so much capacity in the railhead. So, to build it we would come in at a maximum of seven. If we do have more – if we have a slab on Phase 2A, but for Phase 2B, there’s a possibility of ballast for a certain section. And that’s where we would derive the seven per day from. It’s unlikely we would need that number. It’s the worst case, but you don’t need that every day because you’ve only got so much capacity in the railhead. And there’s easily capacity to feed that.”

- 3.4.7 It is evident from Mr Smart’s response that he did not understand that it was HS2 Ltd’s intention to use the Stone Railhead to install rail systems on Phase 2a only and not Phase 2b. Furthermore, Mr Smart suggests that the seven per day is due to Phase 2b utilising ballast track on certain sections and not slab track, which would be the main method of track construction used on Phase 2a.

- 3.4.8 From these exchanges it is clear that HS2 Ltd did not have full grasp of its needs for the delivery of rail systems into the Stone Railhead and therefore it is appropriate for HS2 Ltd to provide details of its calculations to support the need for 18 trains/day into the Ashley Railhead.

Train delivery window

- 3.4.9 Given the proximity of Ashley village to the proposed Railhead, Ashley PC considers that it is unreasonable for trains to be permitted to enter and leave the Ashley Railhead at any time of day or night and wishes to see appropriate restrictions in this respect.
- 3.4.10 Since it is intended for trains to be unloaded during the standard working hours (0800-1800), Ashley PC considers that trains entering and leaving the site should operate within a slightly extended window only. It is therefore proposed that trains should not be able to enter or leave the Ashley Railhead via the MCL within the evening/night-time period of 1900-0700 from Monday evening to Saturday morning.
- 3.4.11 Similarly, weekend restrictions should apply that prevent any trains from entering or leaving the Ashley Railhead via the MCL within the period commencing at 1300 hours on Saturdays and ending at 0700 on Monday mornings.
- 3.4.12 In addition, bank holidays should be subject to the same Sunday restrictions, with no trains permitted to enter or leave the site via the MCL from 1900 hours on the evening preceding the bank holiday and 0700 on the morning following it.
- 3.4.13 Ashley PC also considers that it is unacceptable to include the caveat “*where reasonably practicable*” to the standard working hours (0800-1800) and that this wording should be withdrawn.

3.5 Environmental Impacts

Traffic

- 3.5.1 Chapter 14 of the Environmental Statement provides HS2 Ltd’s assessment of the traffic impacts.

Avoidance and mitigation

- 3.5.2 Further to the points Ashley PC has already made with respect to HS2 Ltd’s use of caveats to undermine its commitments to local people, it is noted that the term ‘*insofar (or where)*

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reasonably practicable is used seven times in the first nine bullet points relating to avoidance and mitigation measures in paragraph 14.4.1.

- 3.5.3 Notwithstanding the caveat issue, Ashley PC does not consider that the *'so-called'* mitigation measures set out in the bullet points of paragraph 14.4.1 actually represent genuine mitigation that will avoid, reduce or compensate for the effects of the HS2 development on local people. Instead, they mostly represent the minimum management requirements required to enable HS2 Ltd's contractors to access the satellite compounds and manage the works.
- 3.5.4 It is also claimed that the Ashley Railhead, with its connection to the MCL, would be used *"...for the movement of excavated materials to reduce the volume of construction vehicles using the public road system"*. However, since the Ashley Railhead would not be completed until the end of Q3 2031, which is 4½ years after the start of construction of Phase 2b in the MA06, it would not be possible to reduce HGV movements when the civil engineering works to construct Phase 2b are being undertaken.
- 3.5.5 In summary, Ashley PC considers HS2 Ltd's claims to be able to avoid or mitigate the adverse effects of its construction traffic on local roads to be worthless and calls upon the company to propose mitigation proposals that will genuinely and unambiguously reduce the impacts on the parish and local people.
- 3.5.6 Examples of such measures would be an embargo on the routing of HGVs through Ashley village throughout the construction period by the construction of the Ashley Road diversion in advance of the Main Civils Contract Works on the HS2 mainline.
- 3.5.7 Ashley PC also requires the unnecessary Ashley IMB-R proposals to be abandoned and the HS2 mainline to be lowered into a cutting, which would enable affected section of Ashley Road to be reinstated over the HS2 mainline and reopened within a minimum timescale.
- 3.5.8 In addition, Ashley PC requires the unnecessary Ashley Railhead and the associated permanent closure of a section of Mobberley Road to be abandoned, to minimise disruption on parishioners.

Construction traffic scenarios

- 3.5.9 HS2 Ltd's assessment of the impact on local roads near Ashley also depends on the particular scenario being considered. Four scenarios have been assessed by HS2 Ltd as follows:
- Scenario 1 - 2025 Q1 and 2027 Q2: Set up stage.
 - Scenario 2 - 2027 Q3 and 2029 Q1: This corresponds with the peak in construction traffic movements prior to the installation of M56 temporary overbridge.
 - Scenario 3 - 2029 Q2 and 2031 Q3: This corresponds with the peak in construction traffic following the opening of M56 temporary overbridge.
 - Scenario 4 - after 2031 Q3: This corresponds with the peak in construction traffic movements following the removal of M56 temporary overbridge and the decommissioning of construction compounds following the completion of all construction works. This scenario also includes opening of the Ashley Road diversion and Mobberley Road realignment.
- 3.5.10 From the above it is noted that the indicative programme in Figure 24 of the ES shows no construction activity taking place during the timeframe outlined in Scenario 1. It is therefore unclear what the traffic impacts would be on the parish during this 2½ year period ending Q2 2027.
- 3.5.11 From the information provided in respect of Scenario 2, it is evident that the proposed M56 overbridge will not be available for the first 21 months of the construction period. Scenario 2 also coincides with when the Ashley Road diversion and Mobberley Road realignment is

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taking place. With the Castle Mill overbridge also under construction for over 3¼ years and the eastern route effectively closed, all construction traffic to the parish will be routed from the west via Ashley Road, with most coming through the village.

- 3.5.12 It is therefore imperative that HS2 Ltd provide an accurate cumulative assessment of the traffic impacts through the village during Scenario 2.
- 3.5.13 Since HS2 Ltd is assuming that it can supply its construction sites near Ashley via the M56 overbridge and the Rostherne Cutting Satellite Compound and TMS during Scenario 3, it is critical that the difference it can make to local HGV movements is fully explained. However, this is not apparent from the information provided in Drawing TR-08-311, nor Table 38 of the ES or Table 18-5 of the M290 document.
- 3.5.14 It is noted that the M56 overbridge will be removed by the end of Q3 2031 and that thereafter all construction traffic would access local construction sites via the local road network, as altered by HS2 Ltd.
- 3.5.15 In order for Ashley PC to be able to determine the impacts on its local road network, as requested in Section 2.4 above, we require Transport Logistic Profiles to be provided in respect of all HS2 construction sites. In addition, Ashley PC also requires accurate histograms, which can be accurately cross-referenced to the TLPs, to be provided for the entire construction period at the following road locations:
- Ashley Road (between A5034 at Mere and junction with Birkinheath Lane, which leads to Cherry Tree Lane).
 - Ashley Road (between Birkinheath Lane and junction with Mobberley Road and Back Lane via Ashley village)
 - Diverted Ashley Road between existing Ashley Road and Birkinheath Covert Satellite Compound.
 - Mobberley Road:
 - Between junction with existing Ashley Road and Back Lane and the Mobberley Road North Satellite Compound.
 - Between Mobberley Road North Satellite Compound and the Birkinheath Covert Satellite Compound.
 - Just north of the entrance to the Mobberley Road South Satellite Compound.
 - Back Lane/Tanyard Lane/Castle Mill Lane west of Castle Mill Lane Satellite Compound.
 - Castle Mill Lane/Mill Lane east of Castle Mill Lane Satellite Compound.

Environmental Impact Assessment

HS2 assessment methodology

- 3.5.16 Ashley PC has reviewed HS2 Ltd's approach and considers it to be both incoherent and untransparent.
- 3.5.17 The assessment seems entirely based on predicted changes to HGV traffic levels on certain sections of road and at junctions but includes no detailed calculations as to how the conclusions have been made in respect of each road.
- 3.5.18 There has also been no consideration of different road sensitivities resulting from important factors such as how the character of a road that is proposed to be used as a construction route changes along its length.

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- 3.5.19 For example, Ashley Road varies in carriageway width and forward visibility along its length and the section through Ashley village is not only narrow but passes residential properties and community facilities that are accessed on foot by pedestrians, many of which would have to cross the road to access fixtures such as the post box and village notice board.
- 3.5.20 There has also been no consideration of environmental factors including community severance and yet HS2 Ltd is proposing to sever Ashley Road to the west of the village and divert parishioners over a distance of 2.7km.
- 3.5.21 Notwithstanding this concern, it is noted from the contents of paragraph 14.4.29 that HS2 Ltd has concluded that changes in traffic flow will lead to changes in delays to vehicle occupants and congestion, which would be significant. The significant effects with the highest magnitude at each junction are predicted to occur at the following junction location within Ashley parish:
- “Ashley Road/Back Lane/Mobberley Road/Cow Lane - major adverse effect during scenarios 1 and 2.”*
- 3.5.22 In addition, Tables 42 and 43 of the ES identify numerous sections of road where significant adverse effects are predicted to occur. These include the following sections of road within Ashley parish:
- Ashley Road (between Rostherne Lane and A5034 Mereside Road), where major adverse effects are predicted during all four timescale scenarios, i.e. 1, 2, 3 and 4.
 - Ashley Road (between Birkinheath Lane and Rostherne Lane), where major adverse effects are predicted during all four timescale scenarios, i.e. 1, 2, 3 and 4.
 - Mobberley Road (between Back Lane and Breach House Lane), where major adverse effects are predicted during Scenarios 3 and 4.
- 3.5.23 Interestingly, the roads listed above do not include the existing Ashley Road between Birkinheath Lane and the junction with Mobberley Lane, Back Lane and Cow Lane even though that junction has been predicted by HS2 Ltd to be subject to significant (major adverse) effects during Scenarios 1 and 2.
- 3.5.24 Also missing from the assessment is the diverted Ashley Road, which will be used by construction traffic during Scenarios 3 and 4.

Accidents and safety

- 3.5.25 In paragraph 14.4.32, HS2 Ltd considers the Accident and Safety risks for the entire MA06 area by concluding:
- “There will be no significant effects on accidents and safety as there are no locations where there are both accident clusters and substantial changes in traffic during construction.”*
- 3.5.26 This does not represent a robust assessment of the accident and safety risk. By adding thousands of HGV journeys to narrow country roads and lanes that are infrequently used by HGVs at present and that comprise multiple blind corners and minor junctions, new accident risks will be created.
- 3.5.27 Ashley PC therefore requires for HS2 Ltd to undertake comprehensive assessments of the accident risks and propose appropriate mitigation measures to minimise such risks.

Cumulative effects

- 3.5.28 HS2 Ltd's cumulative effects section amounts to two sentences, which demonstrate that the company does not understand how to undertake a cumulative effects assessment. Furthermore, HS2 Ltd has presented no evidence that confirms that it has considered the cumulative effects of its own traffic on specific sections of road or that its assessment includes

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predictions of HGV construction traffic from committed development. Ashley PC is also aware that this flawed approach has been used on other phases of the HS2 Ltd project.

Noise

Baseline monitoring data

- 3.5.29 Ashley PC is concerned about the lack of transparency regarding baseline monitoring data and the conclusions that have been made in respect of the baseline noise conditions in and around Ashley.
- 3.5.30 HS2 Ltd has stated in paragraph 3.3.5 of Volume 5: Appendix SV-002-0MA06 (Document Ref M264) that it has only characterised the baseline noise environment using seven baseline measurement locations.
- 3.5.31 The measurement locations near Ashley are shown on maps SV-02-230 and SV-03-230 in the M275 mapbook document and confirm that three monitoring locations have been used at the following approximate locations:
- 712703: Junction of Mobberley and Lowerhouse Lane, close to the Mid-Cheshire Line
 - 712704: Junction of Cow Lane and Hough Green
 - 712705: On the northern side of Back Lane east of the last residential properties.
- 3.5.32 Unfortunately, HS2 Ltd has not provided any further details regarding the precise locations of the monitoring locations, i.e. the height of the instruments or proximity to buildings and nearby noise sources, such as the respective roads and the MCL.
- 3.5.33 There is also no reference to where the actual noise data from the monitoring is provided or key information that should include:
- The type of noise meter used and whether it was attended or not.
 - The date and duration of monitoring and whether the monitoring was continuous.
 - The weather conditions during the monitoring, including wind speed and wind direction and whether it was cold or raining.
 - What noise sources were potentially affecting the noise climate during the monitoring and whether some of these were exceptional events.
- 3.5.34 Instead, all that we are told about the baseline monitoring in the MA06 Community Area is that it comprised:
- five long-term measurements – unattended measurements of several days' duration; and
 - two short-term measurements – unattended measurements typically of 24 hours'
- 3.5.35 Ashley PC considers that the baseline noise monitoring locations used by HS2 Ltd are not representative of the noise climate experienced by Ashley residents. Instead, baseline noise monitoring should have been carried out at the following locations to reflect the true noise characteristics of properties within Ashley village and those located closest to the proposed Ashley Railhead and the satellite compounds that will be used to construct it:
- St. Elizabeth's Church on neighbouring property at western end of Ashley village.
 - Residential property at the heart of the Hough Green area.
 - Arden House, Arden Lodge or Sugar Brook Farmhouse.

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- 3.5.36 The monitoring should be carried out for a minimum of seven days with noise data (LA_{eq} and LA₉₀) recorded at 15-minute intervals throughout the entire monitoring for comparison with weather data recorded for the same period at a nearby representative weather station or on-site unit.
- 3.5.37 HS2 Ltd has claimed in paragraph 3.1.5 of the M364 document that:
- “The community of Ashley is characterised by sound from the M56 to the north, Ashley Road, local roads, and the Mid-Cheshire Line that passes through Ashley from south to north. Properties in the centre of Ashley typically experience daytime sound levels of 55dB – 65dB and 45dB – 60dB during the night-time.”*
- 3.5.38 Given the local baseline noise locations used by HS2 Ltd, and the lack of transparency over the timing of the monitoring and the weather conditions, it is not surprising that the results have been unduly influenced by the M56, local roads and the MCL. However, Ashley PC considers that HS2 Ltd has painted a false picture and that if robust and representative baseline noise monitoring was undertaken it would show the background noise levels would be considerably lower than indicated by HS2 Ltd.
- 3.5.39 Ashley PC therefore requires the original raw baseline noise monitoring data to be made available for public scrutiny and that new baseline noise monitoring is undertaken on the basis of the approach set out in the paragraphs above.

Avoidance and mitigation

- 3.5.40 The proposals for avoiding or mitigating construction noise in the MA06 Community Area are set out in paragraphs 13.4.5 to 13.4.8 of the Environmental Statement. However, these are mostly high-level, generic and/or vague.
- 3.5.41 The only measure that is specific to Ashley is the suggestion in paragraph 13.3.6 that some noise screening may be provided “...around works associated with the Ashley railhead”. However, in addition to the unnecessary works to construct and operate the Ashley Railhead, HS2 Ltd proposes to construct large above ground structures close to the village, such as the Ashley Embankment and the Mid-Cheshire (Railway) and Mobberley Road Viaduct.
- 3.5.42 All of the aforementioned works will involve the use of heavy plant that would be supplied and maintained via several road satellite compounds located close to Ashley village or other residential property located in its vicinity. Ashley PC therefore requires HS2 Ltd to explain what bespoke mitigation is proposed to minimise the noise impacts on residential receptors during the various proposed working hours and how effective it is predicted to be at reducing noise pollution.

Construction noise assessment

- 3.5.43 Ashley PC notes that none of noise related documentation includes details of how noise predictions for specific construction operations have been carried out, nor what levels of noise were predicted and how these may or may not have been reduced by noise mitigation measures. In addition to the use of construction plant and HGV traffic, such predictions should also include the proposed daytime, night-time and weekend operations of the Ashley Railhead.
- 3.5.44 Instead, all HS2 Ltd has provided are very brief details that eight properties within the MA06 area are forecast to experience noise above the eligibility criteria for noise insulation, but below the eligibility criteria for temporary rehousing.
- 3.5.45 These properties include one on Ashley Road and two on Lamb Lane. However, there is no explanation as to why these properties have been assessed in this way and why other properties in and near Ashley have not.
- 3.5.46 Without the presentation of the basis of the noise predictions and how they are being related to the baseline noise environment, it is not possible for Ashley PC to gain a clear

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understanding of what is going to happen when HS2 Ltd is being constructed and what this means in terms of HS2 Ltd noise pollution, which has the potential to blight the lives of the people we represent.

Operational noise assessment

3.5.47 Many of the concerns that Ashley PC has outlined in respect of the construction noise assessment are applicable to the operational noise assessment. However, HS2 Ltd has a golden opportunity to avoid and/or mitigate the worst of the operational noise effects by lowering the elevation of the HS2 mainline as it passes Ashley village and replacing the Ashley Embankment and Mid-Cheshire (Railway) and Mobberley Road Viaduct with a cutting and underbridge.

3.5.48 The only realistic impediment to achieving this goal is the Ashley Railhead, the role of which could be carried out from Aldersey's Rough in North Staffordshire.

3.6 Alternative Railhead at Aldersey's Rough on Phase 2a

3.6.1 Petitioners from Stone Town Council, Yarnfield & Cold Meece Parish Council and Chebsey Parish Council, supported by technical experts from the Stone Railhead Crisis Group (SRCG), have been campaigning since late 2016 for the proposed Stone Railhead/IMB-R on Phase 2a to be abandoned and relocated to Aldersey's Rough, near Madeley.

3.6.2 There are multiple engineering, environmental and economic reasons for doing so, which would initially benefit the construction and operation of Phase 2a of HS2, and subsequently Phase 2b (West).

3.6.3 Compelling evidence has been presented that shows that the Stone Railhead/IMB-R is technically unfeasible because:

- It would be located in a saturated floodplain where the very poor ground conditions would significantly impact its practical and timely construction.
- It is criss-crossed by active local roads and an important inter-regional railway (Norton Bridge to Stone Railway) that would impair internal heavy plant movement and efficient construction.
- The site has a cramped internal layout requiring multiple construction components to be completed sequentially to enable the construction programme to be fulfilled. Inevitable delays to one or more construction element, given the constraints outlined above, would have damaging knock-on impacts and have the potential to cause considerable programme delays and consequential budget overruns.
- Despite being located close to the M6, the site requires the construction of a complex and costly new motorway junction and unsafe access arrangements to connect to the northbound carriageway.
- HS2 Ltd's construction programme for the Stone Railhead/IMB-R and the adjacent mainline railway are reliant on completely unrealistic HGV transportation logistics that are both unachievable and likely to delay its completion by years beyond the 4½ years already predicted as being required by the company.

3.6.4 Aldersey's Rough is located 13km to the north of the Stone Railhead and just 13km to the south of the southern end of Phase 2b, which starts at the southern portal of the Crewe Tunnel.

3.6.5 A Railhead/IMB-R constructed at Aldersey's Rough would be able to overcome all of the constraints that apply to the facility at Stone. Briefly, this is because Aldersey's Rough:

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- Would be located on solid geology out of the floodplain where ground conditions would make excavated materials management simple and cost efficient.
- Is an open unconstrained site with easy access from/to the M6 via the existing motorway slip roads and local road connections of Keele Services.
- Could be linked efficiently to the two slow lines of the four-track West Coast Mainline (WCML) via the currently unused former Stoke to Market Drayton line without adversely impacting existing rail services.
- Would be engineeringly straightforward to construct and could be opened to receive rail traffic for the supply of multiple HS2 construction sites within 18 months of the start of Phase 2a.
- Its construction would save at least £171.3 million from the Phase 2a budget and potentially much more given the high programme and financial risks of pursuing the Stone Railhead/IMB-R.

3.6.6 In addition to supplying multiple HS2 construction sites with bulk excavation and other construction materials together with rail systems during the Phase 2a construction period, Aldersey's Rough would have plenty of spare capacity to supply the needs of multiple Phase 2b (West) construction sites on both sides of Crewe by using the slow lines of the WCML from the start of construction.

3.6.7 Once the Phase 2b civil engineering works have been completed, these direct rail routes between Aldersey's Rough and the Phase 2b mainline on both sides of Crewe could then be used for rail systems installation, testing and commissioning. This would negate any need for the temporary Ashley Railhead, thereby saving an estimated £385 million from the Phase 2b budget from avoiding its construction, subsequent removal and land restoration.

3.6.8 Once Phase 2b (West) is completed, Aldersey's Rough would also be able to maintain the entire length of Phase 2b, as well as Phase 2a in perpetuity. This is discussed in more detail in Section 4.

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4. Concerns about Ashley Satellite IMB-R

4.1 HS2 proposals

Purpose of the Ashley IMB-R

4.1.1 Ashley Satellite IMB-R is one of two such facilities that HS2 Ltd proposes to construct on Phase 2b and is described as a facility that would support infrastructure maintenance, that would in work in conjunction with the proposed main IMB-R at Stone.

4.1.2 Paragraph 5.9 of HS2 Ltd's F4 Information paper for Phase 2b states that the Satellite IMB-R's "...would consist of a small number of rail sidings to stable maintenance trains at strategic points across the route."

4.1.3 Paragraph 7.1 of the F4 information paper then states:

"The satellite IMB-Rs proposed at Crewe North RSD and Ashley would be used as and when needed by the maintenance schedule and would not be in constant use. When in use, maintenance units would normally be prepared and dispatched from satellite IMB-Rs at around midnight and return before the closure of the maintenance window, at 04:59 Monday to Saturday and at 07:59 on Sunday. In an emergency, maintenance unit may be dispatched and return outside of these hours."

4.1.4 Paragraphs 7.2 and 7.3 then add that:

"Once passenger services draw to a close in the evening, maintenance trains would then leave the satellite IMB-Rs and travel to wherever maintenance is required."

and

"during the operational phase of the Proposed Scheme supplies would be delivered to each satellite IMB-R via rail and road, although the majority of heavy materials would arrive by rail."

4.1.5 Paragraphs 2.4.8 to 2.4.16 of the Environmental Statement describe the work that could be undertaken at the Ashley Satellite IMB-R. It is clear from this information that HS2 Ltd is providing itself with the flexibility to do much more than just stable maintenance trains.

4.1.6 For example, in paragraph 2.4.9 of the Environmental Statement, HS2 Ltd states that:

"Railway maintenance vehicles will usually be loaded or unloaded at Stone IMB-R, before the vehicles travel to Ashley IMB-R. However, unplanned events might result in the need to occasionally load or unload vehicles directly at Ashley IMB-R, which will generally occur during the day, if required."

4.1.7 In order to undertake such work, HS2 Ltd is also making provision for delivery of materials by road, as well as by rail. HS2 Ltd claims in paragraph 2.4.15 that "Only light supplies will be delivered to Ashley IMB-R by road" but offers no explanation as to what is meant by this description.

4.1.8 In paragraph 2.4.16 it is stated that "Lighting will be required for all external working areas of Ashley IMB-R during the maintenance periods. This includes the access road, general circulation areas, walkways, and storage and loading areas." Whilst HS2 Ltd suggests that it will mitigate the effects of this lighting, its statements include the usual caveats.

Site design and layout

4.1.9 The design and layout of the Ashley IMB-R is provided in paragraph 2.2.47 to 52 of the ES, where it is stated that the facility would be constructed on the 2m high Birkin Brook

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Embankment over a distance of 1km, cover an area of approximately 4ha and be up to 36m wide.

4.1.10 Ashley IMB-R is also to be provided with the following facilities:

- two sidings, 360m and 180m in length.
- an open storage area, 100m by 10m.
- office and welfare facilities, which will be used during periods of maintenance works.
- 10 parking spaces for cars and long-wheelbase maintenance vehicles.
- a 360m long headshunt to allowing trains to change tracks and direction.

4.1.11 It is also stated in paragraph 2.4.49 that:

“The Ashley IMB-R will be located at the same level above ground as the route of the Proposed Scheme.”

4.1.12 However, HS2 Ltd does not confirm the proposed elevation of the IMB-R.

4.1.13 Furthermore, it is clear from the ‘Plan and Profile’ drawing for Chainage 283 to 286 that the elevation of the HS2 mainline is increasing as it passes the Ashley IMB-R. Over the initial 700m from its western end, the elevation of the HS2 mainline changes rising from 31.8mAOD to 33.2mAOD, representing ab gradient of 1 in 500 or 0.2%, before steepening and reaching an elevation of over 37mAOD at its eastern end.

4.1.14 The presence of the 189m long, 6m high Ashley Embankment Retaining wall at the eastern end of the Ashley IMB-R would also suggest that the Ashley IMB-R is not at the same level as the HS2 mainline but would be several metres below it.

4.2 Ashley PC response

4.2.1 Ashley PC considers that there is no justification for locating a large incongruous permanent industrial facility in the heart of a rural community, especially when its function could be more appropriately be carried out from Aldersey’s Rough, further details in relation to which are given in Section 4.3 below.

4.2.2 Ashley PC also considers the design of the Ashley Satellite IMB-R to be ill-conceived since it would be located on an embankment and result in the permanent closure of Ashley Road as a through road to the west of Ashley village.

4.2.3 In the unlikely scenario that the need for the Ashley IMB-R could be justified, there seems no reason why it could not be constructed at a lower elevation to accompany an HS2 mainline that should be constructed in a cutting at this location.

4.2.4 Ashley PC estimates that in such a situation the Ashley IMB-R could be lowered by several metres and be provided with a level elevation of approximately 30mAOD.

4.3 Alternative IMB-R at Aldersey’s Rough on Phase 2a

4.3.1 In addition to Aldersey’s Rough’s ability to supply bulk materials and rail systems to facilitate the construction of Phase 2b, as outlined in Section 3.6 above, unlike the Stone IMB-R, Aldersey’s Rough could maintain the entire western leg of HS2 in perpetuity without any need for Satellite IMB-Rs at either Ashley or the Crewe North RSD.

4.3.2 This reason for this is that Aldersey’s Rough, which would access the HS2 mainline at Chainage 234km, is located exactly equidistant (71km) from both the Delta Junction on

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Phase One at Birmingham and the Phase 2b terminus at Manchester Piccadilly. This means that it can achieve at least 3 hours 20 minutes of maintenance time at both ends of the western leg of HS2 without the need for overnight stabling of maintenance trains at in-between locations, such as the Ashley Satellite IMB-R.

- 4.3.3 This evidence was accepted by HS2 Ltd's barrister during the House of Commons Select Committee proceedings of 25th April 2018, when he effectively withdrew the company's evidence regarding the relative locations of Aldersey's Rough and Stone to the southern end of the western leg, including HS2 Ltd's incorrect claim that Aldersey's Rough could only achieve the required overnight maintenance period if its maintenance trains were stabled at Pipe Ridware in South Staffordshire.
- 4.3.4 The Pipe Ridware Maintenance loops, which are no longer proposed, were designed to perform the same stabling function as the Ashley Satellite IMB-R.
- 4.3.5 HS2 Ltd also originally claimed that Stone IMB-R, which is located 13km further south than Aldersey's Rough at Chainage 221km, could achieve sufficient overnight maintenance time at Manchester Piccadilly without any need to stable trains inbetween. However, the Staffordshire parish councils that gave evidence on 25th April 2018 demonstrated that only a maximum of three hours maintenance time at Manchester Piccadilly was achievable using the Stone IMB-R.
- 4.3.6 Since three hours duration is insufficient to achieve HS2 Ltd's stated minimum overnight maintenance window, the company subsequently decided it needed the Ashley Satellite IMB-R to support the operations of its Stone IMB-R. However, Ashley Satellite IMB-R would clearly not be required if the IMB-R was relocated to Aldersey's Rough.
- 4.3.7 To make matters worse, Ashley Satellite IMB-R has not been provided with sidings capable of stabling the 800m long ballast trains that are required to maintain the ballasted track sections of Phase 2b. Furthermore, the Stone IMB-R cannot accommodate 800m ballast trains either, but instead can only receive 400m long trains from Network Rail tracks, which then need to be shunted into sidings located next to the HS2 mainline at Stone where they would be coupled together before travelling to their maintenance destination.
- 4.3.8 Conversely, Aldersey's Rough has been designed to incorporate four very long sidings that could accommodate the 800m long ballast trains required to deliver ballast to Phase 2b.
- 4.3.9 It is therefore clear that neither the inefficient Stone IMB-R shunting operations, nor the Phase 2b Satellite IMB-Rs proposed by HS2 Ltd, would be necessary if Aldersey's Rough were adopted as the IMB-R for the entire western leg of HS2 instead.
- 4.3.10 With the two proposed Satellite IMB-R's estimated to cost £90 million to construct, significant additional savings could therefore be achieved from the Phase 2b budget.

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5. Closing comments

5.1 Summary and conclusions

- 5.1.1 Ashley PC has carried out a comprehensive review of some of the elements of HS2 Ltd's Phase 2b proposals with specific focus on the elevation of the HS2 mainline, as it traverses the parish, together with the Ashley Railhead and separate Ashley Satellite IMB-R.
- 5.1.2 In addition to providing comment on our key concerns on the design of the elements, we have assessed what this means in terms of construction activity and specifically the impacts that HS2 Ltd's proposals will have on our community during the construction period, especially in terms of construction traffic and noise, but also from the proposed road and footpath closures, the impacts of which will be permanent.
- 5.1.3 Ashley PC has concluded that the number of construction compounds and associated HGV movements to/from them is excessive and that our road network, which comprises narrow country lanes, is not only unsuitable for the proposed usage by HGVs but HS2 Ltd's plans will put our residents at under unacceptable safety risk and environmental harm.
- 5.1.4 Ashley PC also considers the design of the HS2 mainline to be unacceptable and that there is no logical reason why its elevation could not be substantially lowered by constructing the railway in a cutting and routing it beneath the Mid-Cheshire Line.
- 5.1.5 Ashley PC does not accept HS2 Ltd's lame reasoning of impact on landscape character as a justification for placing the mainline railway tracks on an embankment and viaduct that would be over 6m above the height of the village. Instead, it is obvious that the real reason for the proposed design of the HS2 mainline within Ashley parish is HS2 Ltd's desire to construct the unnecessary Ashley Railhead.
- 5.1.6 There is no justification for the construction, operation and removal of the Ashley Railhead over a period of 10½ years, given that its function could be more effectively carried out by Aldersey's Rough in Staffordshire. It is also clear that its removal from the project would not only substantially reduce the environmental impacts on Ashley parish but would save approximately £385 million from the Phase 2b budget.
- 5.1.7 Although we consider that it would be possible for the Ashley IMB-R to be constructed at an elevation of approximately 30mAOD adjacent to a lowered HS2 mainline in a cutting, it is also clear to Ashley PC that its function could also be more effectively carried out from Aldersey's Rough, saving an additional estimated £90 million from the Phase 2b budget.
- 5.1.8 By removing the Ashley Railhead and separate Ashley Satellite IMB-R from the proposals and lowering the HS2 mainline into a cutting, it would clearly be possible to avoid the permanent severing of Ashley Road to the west of the village and the unnecessary realignment of Mobberley Road. It would also be possible to reinstate footpaths 6 and 3 to the existing or similar alignments by constructing footbridges over the HS2 mainline.
- 5.1.9 Ashley PC is unimpressed by the excessive use of caveats that undermine the apparent commitments on working hours for the construction of the railway, including the operation of the proposed railhead should it be built. Similar ambiguity also undermines the apparent offers to reduce the environmental effects from the implementation of generic mitigation measures.
- 5.1.10 We also found that the elements of the Environmental Statement, which we have had time to review in detail, to be limited in content. There was also no substance to the findings of the environmental assessment due to the absence of a coherent and transparent assessment methodology.

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5.1.11 The assessment of the impacts of HGV construction traffic on local roads was particularly poorly conceived and there is no assessment of the cumulative effects on specific sections of roads or junctions, which form the key transport arteries for our community, even though they will be clearly impacted by the simultaneous use by HGVs serving multiple satellite compounds.

5.1.12 Ashley PC considers that the locations used for baseline noise surveys to be unrepresentative and do not accurately characterise the background noise environment of residential properties in the parish that are likely to be significantly impacted by the development. This situation has not been assisted by the lack of factual information regarding the monitoring that has been undertaken and the absence of the actual monitoring and accompanying weather data.

5.2 Recommendations

5.2.1 Ashley PC recommends that the design of the Phase 2b project be urgently reconsidered and the following changes are implemented:

- The elevation of the HS2 mainline is lowered by constructing it in a cutting and routing it under the MCL through Ashley parish.
- Proposals for Ashley Railhead and Ashley IMB-R are abandoned in favours of their respective roles being carried out by the proposed Railhead/IMB-R at Aldersey's Rough.
- Ashley Road to the west of Ashley village is subject to temporary closure for a minimum period only and reinstated on its original or similar alignment on a bridge over the HS2 mainline constructed in a cutting.
- Mobberley Road realignment is abandoned.
- Footpaths 6 and 3 are subject to temporary closure for a minimum period only and reinstated on its original or similar alignment on a bridge over the HS2 mainline constructed in a cutting.

5.2.2 Ashley PC also requests that Transport Logistics Profiles are provided in respect of all satellite compounds that are located within, or have the potential to impact, Ashley parish and that HS2 Ltd undertakes a detailed, robust and transparent cumulative effects assessment of the impacts on Ashley Road, Mobberley Road, Back Lane and junction of these roads with Cow Lane as Ashley village.

5.2.3 Ashley PC requests that its comments regarding baseline noise surveys in this consultation response are addressed and that additional baseline noise monitoring is undertaken in consultation with Ashley PC and the Environmental Health Department of Cheshire East Council.

Ashley Parish Council
March 2022