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9 January 2014

HS2 Phase 2 Route Consultation Submission

Dear Madam/Sir,

We attach our submission to the HS2 Phase 2 Route Consultation.

This consists of our answers to Questions (i), (iii) and (vii) and a supporting document 'Review of HS2 Economic Case and Regional Impact Study' by A A Debenham.

Please would you confirm receipt.

Yours sincerely

A A Debenham
J M Debenham

Response to HS2 Phase 2 Route Consultation.

(i) Do you agree or disagree with the Government's proposed route between the West Midlands and Manchester as described in Chapter 7? This includes the proposed route alignment, the location of tunnels, ventilation shafts, cuttings, viaducts and depots as well as how the high speed line will connect to the West Coast Main Line.

(i) 1) We disagree with the route in respect of the link to the WCML between Hoo Green in Cheshire and Golborne in Wigan Metropolitan Borough. We believe that an alternative – that of upgrading to 4 track the currently 2 track parts of the WCML between Crewe and Golborne - should be the preferred choice. (See also answer to Question iii)

The consultation document states ('Route Selection', p54) that 'the Government's preference for the section of route between Crewe and Golborne was based on the assumption that the benefits of serving the North West should be delivered by a connection at Crewe and serving people further North and Scotland should be included in Phase Two.' Annex B of the Consultation document states that HS2 Ltd's remit included providing options for connecting to the existing West and East Coast Main lines for services further north. In selecting a connection to the WCML there were two wider issues which would influence the connection points, namely:

- how to serve Scotland from Phase Two; and
- where to connect to the existing network to provide the best balance between costs and benefits.

The arguments in Annex B relate to selecting the WCML route as opposed to the ECML route for serving Scotland. Reference is made to Part II of the Consultation document for an explanation of the reasons why the Government has selected a connection at Golborne as its proposed connection to the WCML. However, Part II (the p54 above) only explains why the proposed connection is *not* at Preston and not why it *is* at Golborne. An option of taking HS2 further north with a connection to the WCML at Preston was considered and rejected because 'the journey time savings benefit would not outweigh the additional cost and sustainability impacts.' It is stated that 'for these reasons, at this stage in the scheme design, and with future collaborative studies with Transport Scotland being considered and developed, the Government selected the connection at Bamfurlong near Golborne as the best performing option.' Consequently, contrary to Annex B, there is no cost-benefit analysis in the Consultation document, or referenced by it, which justifies the connection at Golborne.

We fundamentally disagree with the above basis of the preference, which simply associates the North-West and the North/Scotland, separately with the connections at Crewe and Golborne. In fact, we believe it runs counter to the main priorities of the Government in respect of HS2. The remits given to HS2 Ltd, from the then Secretaries of State for Transport in March 2010, January 2012 and June 2013 all in fact specify 'a connection (or link)' to the WCML - which would be satisfied by the connection at Crewe. In fact, services to the North/Scotland on that route would be more in-line with following the rail corridor, unlike the HS2 route going north from between Middlewich and Winsford.

The basis for HS2 connection to the WCML should be to maximise the benefit at minimum cost, to minimise environmental impact and to give priority to capacity relief of the WCML. None of these three criteria is met by the route to Golborne. All three are met by the alternative proposal below of upgrading the WCML. Thus the Golborne route is not the best performing option, even though this is the stated reason for it being selected.

The 'Review of Economic Case for HS2 and Regional Impact Study' attached to this submission, shows that this is the case, as summarised below:

The BCR estimates for an alternative to the Golborne route of upgrading the WCML (by four tracking that part between Crewe and Golborne which is currently two track -ie about half- 27km) are about 3 times and 9 times that of the Golborne route, without and with Wider Economic Impact respectively. These differences are due to lower capital cost and associated operating cost of the WCML upgrade compared to the Golborne route and the substantial Wider Economic Benefit to Warrington which the Golborne route cannot provide.

The Golborne route offers no benefit to the large Mersey Valley conurbation since it is not proposed to stop there and it bypasses Warrington, a potential major beneficiary. Planned reductions in direct connections between Warrington and London and Glasgow/Edinburgh are estimated to cause loss of about £0.3B of existing Wider Economic Benefit to the Warrington area.

The Golborne route carves through green belt land which is precious in this populated area. It will require a viaduct proposed to be 100 feet (30m) high over the Manchester Ship Canal. This will need to be about 1.3 miles long to limit the gradient to 1 in 40. It will tower 75 feet above the A57 before reaching ground level just outside the village of Glazebrook. In Culcheth, it will blight houses and destroy farm buildings, an industrial estate with about 38 businesses and 497 employees, and the local park (apparently not even recognised in HS2 documentation), before going on to Lowton where it will destroy residential housing.

The time-saving between Crewe and Preston, given by the Golborne route, is estimated by HS2 Ltd as just 10 minutes to Preston, achievable only because this assumes trains on the route do not stop anywhere in the region before Preston. The Transport User Benefit of this time saving (see attached review) is small compared to the very much larger costs and loss of Wider Economic Benefit as compared to the WCML upgrade.

The Golborne route does not give priority to capacity relief. The WCML upgrade provides greater capacity relief through acceptance of more non-HS2 trains and freight, which the HS2 Hoo Green to Golborne route cannot.

If the main demand for capacity relief were south of Weaver Junction to Liverpool, then the length of four tracking required would be about 13.5km and the upgrade cost about £390m . This compares with about £2B for the Golborne route (see the attached review). Consequently, the price paid for an inflated value of about 10min time saving, and going a further 15 miles further north at high speed, is (see attached review) about £1.6B in extra capital cost, £2B in lost Wider Economic Benefit to Warrington over 60 years, and poorer capacity relief of the WCML.

It should be remembered that the basis on which a route through Warrington was not taken forward was given in Para 4.3.11 of the Options for phase 2 of the high speed rail network (29 March 2012) as follows:

‘The westernmost route sections around Warrington and Wigan were originally designed to follow the WCML corridor, however these were not taken forward. Three of the four route variations would only serve Manchester from a spur diverging from the main route south of Northwich. This resulted in an increased total route length and hence a high overall cost’.

This decision was therefore driven by the objective of providing a high speed route to the North which, if going through Warrington, meant that the *resulting* spur into Manchester represented an *additional* cost. Paradoxically, this was tantamount to giving priority to a small time saving to the North/Scotland over cost and capacity relief, which is not in accordance with stakeholder requirements for HS2. This is because the HS2 Ltd proposed route into Manchester *is* this spur, and the resulting Hoo Green to Golborne route offers poor value for money, in these respects, compared to the upgrading of the WCML proposed here, albeit not giving the small time savings.

Given the above, the case for the Golborne connection appears to rest solely on ultimately taking high speed to Scotland which it should not, since the above case against it is too strong to justify the cost and loss of benefits to, and adverse environmental impact on, the Mersey Valley area. This is particularly so since any plans for providing higher speeds to the North/Scotland are way short of showing whether there would actually be any significant benefit to the North/Scotland by constructing the Golborne link rather than upgrading the WCML.

(i) 2) We question the route of HS2 into Manchester since a viable alternative shorter route has not been considered:

We believe from a) examining the reported process in which the proposed route into Manchester was determined from the various route options considered, b) HS2 Ltd’s reply referred to below, and c) discussion with HS2 Ltd staff at the Consultation Roadshow, that the route is not influenced by the proposed route from Hoo Green to Golborne.

A review of the routes considered by HS2 Ltd, identified a possible alternative route into Manchester to the one proposed by HS2 Ltd, with two variations. These were not included in the initial long list of routes considered by HS2 Ltd. This route is a more direct one into Manchester than the one proposed by HS2 Ltd, passing Middlewich and the south and east of Knutsford, and then to the west and north of Manchester airport, joining the route currently proposed. The variation addressed in an e:mailed HS2 Ltd reply (5th June 2013 from Colin Adrian) was one from the *east* of Middlewich, with most of it already contained within the preferred option and another of the final options (ie Sandbach to Manchester airport) of the Engineering Options Report for Phase 2 . The remainder of the route (from the north of Crewe to the vicinity of Holmes Chapel) would be only 6 miles long.

The above HS2 reply refers to HS2 as being ‘designed to follow existing transport corridors where possible’ but that it is often ‘necessary to move away from transport corridors to avoid impacts on major conurbations and other key features.’

The HS2 Ltd reply states that ‘ Route options which follow the WCML in this area require an approach to Manchester from the west of Knutsford, particularly since the corridors which allow a route from Crewe to the east of Knutsford are constrained by large settlements and a number of environmental features.’ The reply then goes on to refer to the difficulties of following the Crewe -Manchester railway from Crewe, before addressing a move away from this rail corridor to the north, as considered in the query. The difficulties with this, identified in the reply, are the ‘potential impacts at a group of sites of special scientific interest (SSSI’s) including Sandbach Flashes SSSI south of Middlewich, potential impacts on the community of Moston and an industrial area to the south-east of Holmes Chapel.’. ‘There would also be a potentially complex engineering interface with the Crewe-Manchester railway and Jodrell Bank Observatory’. ‘The resulting grade separated junction for the spur into Manchester means the route would also pass through the middle of Mobberley (also a conservation area) with resulting cluster of demolitions. To minimise impacts on the community at Mobberley it would be necessary to provide a tunnel at significant additional cost. (Reference page 95 of the Engineering Options for West Midlands report, Section 2.8.1 Options for Tunnels at Mobberley)

Another variation of a more direct route to Manchester from Crewe is from just to the north of Winsford and Middlewich as detailed below. This appears to avoid the problems, identified by HS2 Ltd of the above variation, except the passage through Mobberley:

This possible route leaves the currently proposed HS2 route as the latter crosses the Trent and Mersey Canal and River Dane (Grid reference; SJ 685 686), and goes across the A530 (SJ 692 709), to the north of Lach Dennis (SJ 703 725), across Crow Brook (SJ 710 733), across the M6 to the north of Lower Peover (SJ 735 748), across the A50 (SJ 758 760), across the A537 (SJ 769 771), across the B5085 at Mobberley (SJ 786 796), past the west end of Manchester airport (SJ 792 820), and across the M56 to the interchange station at SJ 805 858.

Both the above route and the HS2 Ltd proposed route, from the above starting point, diverge from the main rail corridor.

The length of the route considered here is estimated to be about 4km less than the proposed route. The cost saving on track would be about £300m to HS2 as a whole, pro rata. The route appears favourable in terms of minimising impact on buildings with a bored tunnel possibly being required at Mobberley. The bored tunnel option identified for a route through Mobberley in the Engineering Options West Midlands to Manchester report (Section 2.18.1) is about 2km long. Given 28 km of tunnels on HS2 at a cost of £3.8B (see Strategy Report October 2013), the tunnel at Mobberley would cost about £270m. So, given that the cost of the tunnel is offset by the reduced track length, this route appears to offer an advantage over the proposed route in terms of the reduced environmental impact due to the lower distance and the number of affected properties.

HS2 Ltd should examine this route and compare its cost and environmental impact with that of the proposed route.

(i) 3) We consider that the HS2 Y network, as currently proposed, has not yet been justified by an adequate economic case (See attached review). This includes the routing, which is the subject of this Consultation.

We consider that HS2 as a whole should not proceed until this has been done and all branches of the chosen route shown to be the most cost-effective.

(iii) Do you think that there should be any additional stations on the western leg between the West Midlands and Manchester?

The attached review indicates that, taking into account diminishing returns, Wider Economic Benefit would be increased by additional stations, and that this additional benefit would be substantially more than the value of time lost in stopping. Therefore, we support additional stations where it can be shown that additional ‘catchment’ of economic benefit through increased connectivity can be demonstrated.

However, we also think that this should not be at the expense of more cost-effective development of existing stations where the above is also true. This applies to Warrington Bank Quay station which, as the attached review shows, gives the above benefit, in association with the proposal in this submission to upgrade the WCML, instead of constructing the proposed section of HS2 from Hoo Green to Golborne. Consequently, we propose an upgraded Warrington Bank Quay as the station serving the Mersey Valley on the main line between London and Scotland, based on HS2 to the Crewe connection and an upgraded WCML as discussed below.

It is stated, in Section 7.3.3 ‘Serving, Crewe , Liverpool and the Wider North-West’, that:

‘HS2 Ltd also developed an option which converted Crewe into a high speed station. This could bring significant benefits to passengers wanting to use Crewe station whilst still providing a connection to the existing railway to allow services still able to run on to Liverpool and the North West. Some local stakeholders also believe that it would lead to significant regeneration of the surrounding area. Building a dedicated high speed facility in Crewe would require significant remodelling of the existing station and railway lines; and an additional station on the Y network would need to demonstrate value for money for the investment that is required.’

It is not clear to us that an HS2 station at Crewe would be the best option since two trains per hour each way are due to connect Crewe with London via the connection between HS2 and the WCML, according to the network service pattern in Fig 28 of the October 2013 Economic Case. A third train, between London and Liverpool, without stopping at Crewe, could do so. According to the same service pattern, Warrington, with a population of about 200,000 compared to Crewe with about 80,000, will have only one train per hour each way

As explained in answer (i) 1) we *do* think that upgrading the WCML, so as to be the main route to the North/Scotland, is the best option in terms of both cost and benefit. The priority should be to provide capacity relief of the WCML up to the turn off to Liverpool by upgrading, to 4 track, the sections of track between Winsford and Hartford, and Acton Bridge and Weaver junction, which are currently 2 track. With 4 tracking at Warrington, the WCML through Warrington should be able to take the 3 trains per hour in each direction due to go on the Hoo Green to Golborne route.

We have visited by road parts of the track referred to above to get some idea of the implications of this proposal for people living or working near the track. The view from the track was observed on a return train journey from Runcorn to Crewe. The main impacts observed appear to be in respect of the parts of an industrial estate at Winsford which are nearer the line, and residential housing near the line at Hartford. Most of the buildings nearest to the line on the industrial estate at Winsford are set back from the line thus giving the opportunity to avoid encroachment towards houses on the other side. At Hartford the existing line is in a cutting which would appear to allow space on either side, for the two extra tracks, possibly by reshaping/re-engineering the cutting. The section of 2 track between Acton Bridge and Weaver Junctions runs through open countryside with no observed building close to the track.

Consequently, the adverse impact seems to be substantially less than that of the Hoo Green to Golborne route.

To give further capacity, if/when this is needed (eg if/when the track north of Golborne is upgraded), and indeed more capacity than could be provided by the Golborne HS2 route (see attached review), 4 tracking of the remaining 2 track sections between Weaver Junction and Warrington, and Winwick Quay to Golborne (about 13km total), could be carried out.

Consequently, we think the priority and the best option is to upgrade Warrington Bank Quay station further, with improved parking, and retain the station as the main station in the Mersey Valley on the main route to the North/Scotland.

(vii) Please let us know your comments on the Appraisal of Sustainability (as reported in the Sustainability Statement) of the Government's proposed Phase Two route, including the alternatives to the proposed route as described in Chapter 9?

Hoo Green to Golborne route

For reasons described in answer (i) 1) above, the Hoo Green to Golborne route performs badly, in comparison with the proposed WCML upgrade, in respect of the themes of the HS2 Sustainability Policy (Para 1.3.1 of the Sustainability Statement Volume 1):

- ***Growth and regeneration*** - Support sustainable economic development and the localism agenda for regeneration.

- ***Environmental change*** - Seek to avoid significant adverse effects on communities, business and the natural, historic and built environment. Minimise impacts where they occur and deliver enhancements as far as practicable to ensure there is no net loss to the natural environment.

Skills and employment - Improve skills, jobs, education and the economy through our investment along the length of the route. Act as a driver for improvements in the sustainability of the engineering and construction sector. Promote diversity, openness and fairness

Integrated transport - Engage with stakeholders to create seamless transport links with other modes and ensure accessibility for all.

In particular it can be seen, from a consideration of Table B:1 of Appendix B of the Sustainability Statement –The AoS Framework, that the proposed route from Hoo Green to Golborne is likely to be worse in most aspects of sustainability than the upgrade of the WCML proposed in the above answer (i) 1). These aspects are listed below together (in brackets) with *examples* of sources of this detriment incurred by the Golborne route:

- maintaining or where possible enhancing existing landscape character and qualities, including listed buildings. (The Grade II Listed Old Rectory, Newchurch, on the Warrington Rd, would be demolished-Para xii p3, Vol 1)

Appendix E1 states: 'This landscape (ie through which the Hoo Green to Golborne route passes) comprises flat or gently undulating farmland, with relatively large mainly arable fields and limited hedgerow or hedgerow tree cover, lending an open, exposed character, especially to the mosslands. Wide, expansive views are a key characteristic.

Almost inevitably, given the height and scale of the engineered structures that would be introduced to these landscapes, and the fact that landscape sensitivity to high structures is explicitly identified in the Warrington landscape character assessment, the impact of the new viaducts and embankments would be **major**, affecting landscape character over a wide area. However they would not represent wholly new landscape elements, as there are already several high level road and rail crossings over the Manchester Ship Canal between Warrington and Irlam.

The long, high embankment from Hollins Green to Culcheth would be out of keeping with the flat mossland landscape, although this has already been affected by railway, motorway and landfill development.'

(Even more reason not to remove the green spaces and put more traffic through there)

Section 4.1 of Appendix E, Overview and Summary, states: 'The Leeds and Liverpool Canal corridor near Pennington Flash Country Park, where the cumulative impacts of the proposed route alignment, rolling stock depot (and possible new road connections) would fragment and intrude upon a valued area of open countryside between Golborne and Abram.'

Thus two out of the four major category impacts on landscapes, on the Western Leg of the Y network (see Section 4.1 of Appendix E), are on the Hoo Green to Golborne route.

Section 9, Sustainability Summary, Para 9.1.6 recognises the viaduct as the 'chief' amongst locations on the western leg of HS2 Phase 2 where, 'due to the sensitivity of the landscape, the proximity of people and the prominence of HS2 structures, large visual impacts would occur.' However, the strategy for mitigating landscape and visual impact outlined in Para 9.2.1 clearly cannot possibly mitigate, to any significant degree, the adverse impact of this viaduct. **This was confirmed in discussions at an HS2 Consultation Roadshow.**

- maintaining land resources, including agricultural and green belt, and encouraging the use of brown field sites. (substantial loss of green belt and agricultural land along the route)
- supporting economic prosperity, including transport benefits and wider economic growth and enhancing employment opportunities. (loss of an estimated £0.3B of

existing Wider Economic Benefit to Warrington over 60 years due to decreased rail connectivity, plus an estimated £1.7B loss of future benefit –see attached review) (less capacity relief of the WCML – see attached review)

- supporting economic welfare, including supporting welfare growth, support of the local economy, enhancing regeneration and supporting regional and local growth.(as above)
- maintaining health and well-being, including consideration of disturbance during construction and impact on areas of high tranquillity.(considerable disruption of communities along the line, including driving through the scarce green belt areas of the Mersey Valley) (huge adverse visual impact of the viaduct over the Manchester Ship Canal)
- maintaining security and safety, including communities at risk of isolation, loss of community and amenity, including loss of country parks and greens and cumulative impacts of demolitions, severance and access. (destruction of the Culcheth Linear Park, a well used and depended upon walking and recreational space for the community)
- maintaining accessibility, including pedestrian and recreational access and interruption/disruption of footpaths. (many footpaths disrupted and eliminated along the route)
- avoidance of noise and vibration (increased noise all along the route, particularly in exposed places eg the viaduct over the Manchester Ship Canal, mitigated in that case only by worsened visual impact.)
- maintaining community integrity, including consideration of the dwellings and commercial properties to be demolished (destruction of the Taylor industrial park at Culcheth) (splitting up farmland and demolishing farmbuildings) (demolishing of residential housing in Lowton) (many residential properties blighted)

Consideration should also be given to consequences of important detriments which are not represented in the above scheme. Examples are the loss of physical and mental wellbeing and reliance on the Culcheth Linear Park for exercise and pleasure (rather than a safety and security issue), visual impact effect of a towering viaduct over the community in Hollins Green (in additional to it being a noise issue) and widening the landscape issues to include physical and mental wellbeing of access to, and maintenance of, the general countryside, as well as the nationally designated landscape resources and listed buildings which dominate the AoS.

Further elaboration of sustainability issues for the Golborne route is given in the Sustainability Statement in Volune 1, Western Leg: Lymm to Golborne and the WCML Paras xi to xiv p3:

‘xi.The alignment northwards was carefully selected to avoid impacts on the historic parkland and setting of Dunham Massey. The route would be within cutting as it enters the Bollin Valley, and it would continue in cutting for some way northwards. It would then rise onto a viaduct around 30m above the Manchester Ship Canal in order to maintain its

navigability. *The viaduct and embankments either side would greatly affect the landscape character of the area, as well as the views of residents in villages such as Hollins Green and Glazebrook. Noise impacts are predicted around Hollins Green.*

xii. Passing south of Holcroft Moss SSSI (part of Manchester Mosses SAC), the route has been designed to avoid impacts on this European protected habitat. The route would then cross the edge of Risley landfill site, again necessitating careful design and construction to ensure contamination and other risks are addressed.

xiii. The route would enter cutting for much of its remaining passage south of Culcheth and on to Lowton, helping to minimise risks of noise and visual impacts. *The route would pass through the Taylor Industrial Estate south of Culcheth, demolishing an estimated 17 properties. The Grade II Listed Old Rectory, Newchurch, on the Warrington Rd would be demolished. Continuing through a gap between Lowton and Lowton Common, east of Golborne, the route would result in five residential demolitions as well as visual impacts.*

xiv. *The route would pass west of Pennington Flash Country Park and, with the proposed train depot at Golborne, would result in visual impacts for users of the park and the Leeds and Liverpool Canal, as well as local residents. The open countryside between Golborne and Abram would become fragmented.* Early design work within this environmentally sensitive location has ensured that direct impacts on Abrams Flashes SSSI would be avoided, although the risk of disturbance or pollution at the site would need to be carefully monitored and mitigated. *The Grade II* Listed Lightshaw Hall would sit within the depot footprint and although direct impacts would be avoided, the building's setting would be greatly changed, as would that of the nearby Grade II Listed Byrom Hall.'*

The Sustainability Statement does not recognise the existence of Culcheth Linear Park and the destruction of it that would be caused by the route from Hoo Green to Golborne as seen below. (Para 2.2.11. of the Sustainability Statement refers to it as a 'disused rail corridor' which it most certainly is not).

Crewe to Manchester route

The examination of an alternative route identified in answer (i) 2) should include a comparison of its sustainability with that of the HS2 proposed route. The Sustainability Statement identifies the sustainability issues of the latter as follows:

Western Leg: Crewe to Lymm

vii. A cutting immediately north of this (ie after the River Dane and Trent and Mersey Canal crossing) would pass through the Bostock landfill, necessitating careful design and construction to ensure contamination and other risks are addressed.

viii. The route would remain on embankment as it passes east of Northwich. However, the area is quite sparsely settled and noise and visual impacts would be limited to small settlements such as Lostock Green and Lostock Gralam. Winnington Wood and Leonard's and Smoker Wood are both Ancient Woodlands in the valleys east of these villages that would be directly affected, as would Wincham Brook, potentially requiring some diversions to the river channel.

ix. Passing west of the Mere SSSI (part of the Midland Meres and Mosses Ramsar site), the design has been devised to ensure impacts are avoided on this internationally significant habitat.

x. A spur to Manchester (see below) would diverge from the main route at this point. The delta junction and routes northwards would result in impacts on the landscape in this area, and would affect views for residents in Hoo Green and Hulseheath. The setting of the Grade II Listed Ovenback Cottage near High Legh would be affected.

Western Leg: The Manchester Spur

xv. Having diverged from the main route, the Manchester spur would cross over the A556 and then pass close to the north of Rostherne Mere National Nature Reserve and Ramsar site. Careful design would ensure that impacts on this internationally significant habitat are avoided; further measures to minimise the risk of bird disturbance could be integrated through landscaping in the area. The southern edge of Hancocks Bank Ancient Woodland would be crossed by the scheme.

xvi. The route would remain just south of the M56, avoiding impacts on the historic Tatton Park. It would then turn northwards under the M56 to pass west of Manchester Airport. The route and a new HS2 station would result in an estimated 15 residential demolitions, as well as visual impacts.

Wider Economic Issues

The section on Wider Economic Issues p11 states:

‘lvii. The potential benefits from HS2 would result from:

- Improved access to markets, with businesses having better access to a wider range of potential customers, suppliers, and labour.
- Increased trade and competition, with new opportunities for increased trade and competition between local and regional markets, as well as for wider export.
- Change in business behaviour leading to potential efficiency gains.
- Improved employment opportunities, by giving more people access to a wider range of jobs’

In respect of the Warrington area, both existing and opportunity benefit from all these means of achieving wider economic benefit are reduced by the route from Hoo Green to Golborne and would be increased by the WCML upgrade referred to in answer to answer (i) 1) above.

AA and J M Debenham

December 2013