## EXHIBIT LIST

Reference No: HOC/00179  
Petitioner: Trevor & Jean Tabernor  
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High Speed Rail (West Midlands – Crewe) Bill  
House of Commons Select Committee  
Wednesday 27 June 2018

Petition No. HS2-P2A-000179 & HS2-AP1-000019:

Trevor Percy Tabernor, Jean Elizabeth Tabernor,  
Alan Christopher Tabernor & Jeffrey Percy Tabernor

Summary Statement of Case

1.0 Introduction and Opening Remarks

1.1 Charles Philip Meynell (CPM) – Fisher German LLP – Agent on behalf of your Petitioners:

- Jean Elizabeth Tabernor (JET) – Joint Owner of Moreton House Farm and Partner, T P, J E and J P Tabernor
- Jeffrey Percy Tabernor (JPT) – Partner, T P, J E and J P Tabernor

1.2 CPM will outline your Petitioners’ case which is set out in detail in the Petitions referenced above and submitted on 26 February and 27 April 2018.

1.3 Moreton House Farm extends in all to about 136 hectares (336 acres), 8% of this property is required for the construction and operation of the proposed scheme.

1.4 The route of the proposed scheme passes immediately to the south of the farmstead at Moreton House Farm in a cutting 115 metres in width and up to 19 metres in depth. At the closest point land take for the proposed scheme is within 10 metres of our farmhouse and during the construction phase temporary land take will abut the garden immediately to the south of the house and be within approximately 8 metres of the conservatory in which we sit to enjoy the fine views over open countryside.

1.5 In respect of route alignment at Moreton House seven options were evaluated in the Environmental Statement, five were discounted and two, being Option A4.0 and A4.3b progressed to detailed appraisal.

1.6 Option A4.3b is the Promoter’s preferred option and forms the basis of the proposed scheme. It involves the construction of a retaining wall on the north side of the cutting, approximately 210 metres in length and up to 10 metres in height. It is said the wall is to reduce the width of the cutting, but the dimensions stated in the ES do not show this. The ES acknowledges the retaining wall introduces construction risk and complexities.
1.7 Option A4.0 would require the demolition of our house, which we support. We believe the adverse effects of noise, vibration, dust, fumes and other impacts during construction of the huge cutting just metres from our house would make living in our existing home intolerable and would have negative effects upon our health and wellbeing. Option A4.0 does not need the retaining wall, it does not introduce any technical or construction complexities, risk of safety hazards or lengthening of the construction period.

1.8 On 13 January 2017 we provided HS2 with a plan showing how we believe Option A4.0 could be amended to retain the auto-transformer to the north of the railway, provide a dedicated separate access to Morton House, improve the existing farm track to provide a new access to the farmstead from the north and give access to a site which would accommodate a replacement dwelling in a position agreed with the LPA. All of the above has been set out in our detailed Representations to both the Draft EIS and the ES and restated in the SES and AP ES.

2.0 Why are we Petitioning?

2.1 Both during the limited engagement with HS2 and in the Petitioner’s Response Document (PRD) HS2 has failed to address our particular concerns, preferring to provide general responses to the routing of the proposed scheme.

2.2 HS2 has failed to respond to our questions of them as to the following:

2.2.1 What is the specific purpose of the retaining wall?

2.2.2 What is the cost of the retaining wall both during construction and an extended maintenance period during the life of the scheme?

2.2.3 What is the extent of additional land saved and what is the value of that land?

2.2.4 What are the construction risks and complexities associated with the retaining wall and what are the costs of same?

2.2.5 Why in Option A4.0 has HS2 decided to position the auto transformer to the south of the line in a position where it is bound to have a greater environmental impact upon Moreton Grange, rather than retaining the auto transformer on the north side of the line but with amended access provisions?

2.3 HS2 has failed to respond to or comment upon the plan we provided showing how we believe Option A4.0 could be amended as outlined above.

2.4 In outlining Option A4.0 on page 63 the ES refers to the demolition of one building associated with Moreton House Farm. That building is our farmhouse.
2.5 Whilst we appreciate HS2 has sought to minimise the demolition of residential properties in this case, we as the owner and occupier of that property, would welcome its demolition in order for the house to be relocated to the north of the farmstead away from the railway. Our support for the demolition is not to achieve betterment (the construction of a railway in this position can hardly be described as “betterment”) but rather to provide us with a property in which we can live during both construction and operation of the railway.

2.6 HS2 acknowledges the effect during construction. By email dated 17 March 2017 HS2 states “the construction of the railway will not require demolition, the proximity of the dwelling to a significant construction area would be likely to be unacceptable during the construction period”. We take this to mean that throughout a period of over three years your Petitioners will be unable to live in their house. It has been explained to HS2 that residence on site is essential on the grounds of animal welfare and security.

3.0 The Solution

3.1 We request the Select Committee support our proposal for the proposed scheme to be constructed in the form of an amended Option A4.0 which we believe will be cheaper, have no less environmental disbenefit, will provide better access to Moreton House and properties to the east but most importantly will provide your Petitioners with a place in which to live during construction and with significantly less impact upon their lives during the operation of the proposed scheme.

4.0 Summary

4.1 Your Petitioners wish to continue to work with HS2 to find practical, workable solutions but require assurances that HS2 will now properly engage with and provide regular updates on the solution outlined above.
1 - Moreton House Farm August 2016
2 - House & Garden
3 - View from Conservatory
4 - Drive towards Moreton House
5 - Adjoining Garden
6 - Silaging

A228 (6)
From: Rebecca Lewis <Rebecca.Lewis@hs2.org.uk>
Sent: 17 March 2017 17:37
To: Liz Farrall <liz.farrall@fishergerman.co.uk>
Subject: Moreton House Farm

Hi Liz,

Mrs Tabernor at Moreton House Farm contacted Alex Lawrence from Reading Agriculture to advise us of the conversations the family have had with Stafford BC, who consider a replacement dwelling would be acceptable under the circumstances, however they would not accept two dwellings at the farm.

There were discussions when we met at the farm regarding the possibility of demolishing the house and building a replacement the other side of the farm. Although construction of the railway will not require demolition, the proximity of the dwelling to a significant construction area would be likely to be unacceptable during the construction period.

I spoke to Mrs Tabernor today to let her know that Alex had contacted us, and that our engineers are now reviewing the proposal for Moreton House Farm.

I am hopeful that we should be in a position to report back in the Summer on this, if not before, and I promised to call Mrs Tabernor with updates, as and when I receive them. Of course I will notify you of any changes immediately Liz.

I hope this is welcome news.

With best wishes,

Beckie

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