

Agenda Item No. 6(e)

DERBYSHIRE COUNTY COUNCIL

CABINET

20 December 2018

Report of the Strategic Director – Economy, Transport and Environment

**RESPONSE TO THE HIGH SPEED 2 LTD WORKING DRAFT
ENVIRONMENT STATEMENT AND WORKING DRAFT EQUALITIES
IMPACT ASSESSMENT CONSULTATIONS (HIGHWAYS, TRANSPORT
AND INFRASTRUCTURE)**

(1) **Purpose of Report** To set out the County Council's response to the recently published Working Draft Environmental Statement (WDES) and Working Draft Equalities Impact Assessment (WDEIA) for High Speed Rail 2 (HS2) and seek approval to submit the response to Government before the closing date on 21 December 2018.

(2) **Information and Analysis**

Background

HS2 is a new high speed rail network proposed by Government to connect the major cities in England. New stations in London, Birmingham, Toton, Leeds and Manchester will be served by high speed trains running at speeds of up to 225 miles per hour. HS2 trains will also run onto the existing rail network to serve destinations including Chesterfield and Sheffield. The project is seen by Government as a catalyst for helping equalise growth between the north and south. The route is being designed, built and operated by HS2 Ltd, an executive non-departmental public body sponsored by the Department for Transport (DfT).

Cabinet has previously considered reports on the Government's proposals for HS2 at its meetings on 16 July 2013, 21 January 2014 and the 21 February 2017 (Minute Nos 116/13, 13/14, 63/17 refer). These described the proposed route and established the County Council's early response to the plans.

On 11 October 2018, HS2 Ltd released the WDES for Phase 2b of the project, (the proposed eastern arm of the route), from Birmingham to Leeds. Construction of Phase 2 routes is expected to start in 2023, with rail services planned from 2033. This is a non statutory engagement process and the document describes HS2 Ltd's initial thinking around the potential environmental effects of building and operating this section of the line, as well

as the way they are proposing to avoid, reduce, mitigate and monitor the impacts of the project. At the same time, HS2 Ltd also opened consultation on the WDEIA for Phase 2b. The two documents collectively comprise over 11,000 pages of technical information, maps, proposals and alternative options of which, over 4,000 related directly to Derbyshire; local authorities and other interested bodies have had only 10 weeks to consider the information, develop and share views, prepare and approve a response. The consultation on both these documents closes on 21 December 2018 and the Council has advised HS2 Ltd of the inadequacy of the consultation period for such a significant project.

Information gathered through this engagement process will be used by HS2 Ltd and Government to inform the final design and formal environmental statement which accompanies the Hybrid Bill for this phase of the scheme; this is due to be deposited in Parliament in 2020.

The report which follows summarises the documents which form the WDES and WDEIA and provides an outline of the considered response of Derbyshire County Council. More detailed comments are attached at Appendix A to this report and this will form the Council's substantive response to Government.

The Council has co-ordinated its response in liaison with other district/borough authorities and stakeholder organisations across the East Midlands. The Council is also an active member of the East Midlands HS2 Mitigation Board which is chaired by the Cabinet Member for Highways, Transport and Infrastructure. The Mitigation Board has produced a strategic response to the WDES on behalf of all constituent members and this was agreed in draft at the Board meeting on 28 November 2018 and is to be reported to the HS2 Executive Board on 21 December 2018 for endorsement. The Board's response, together with those individual responses being provided by local authorities across the region, forms part of a 'suite' of consultation responses being returned to Government by organisations across the East Midlands and Derbyshire. The County Council's response also forms part of this suite of representations.

1) Working Draft Environmental Statement

The WDES consists of a series of very detailed documents including:

- Volume 1 - which provides an introduction to the project; general examples of the types of permanent features, such as embankments and viaducts which will be required; descriptions of the construction methods to be used; the environmental impact assessment; a methodology summary for the various environmental topics; and the approach to mitigation and monitoring of the project.
- Volume 3 - deals with route-wide effects of the scheme.
- Volume 4 - cover the off-route effects.

These volumes deal with all the areas covered in Phase 2b of the project between Birmingham and Leeds.

In addition, in Derbyshire, there are eight separate community area reports that form Volume 2. These cover all areas in the County which will be directly impacted by the construction and operation of the line. This includes the areas adjacent to the existing Midland Main Line railway which will be electrified as part of the project. The community area reports consist of:

- An overview of the specific area.
- A description of the construction and operation of the line in that area.
- A summary of any local alternatives to the proposed line design in that area.
- A description of the environmental baseline.
- A description of the likely significant effects of the project on 12 specific environmental topics. These are Agriculture, Forestry and Soils, Air Quality, Community, Ecology and Biodiversity, Health, Historic Environment, Land Quality, Landscape and Visual, Socio-economics, Sound Noise and Vibration, Traffic and Transport and Water Resources and Flood Risk.
- The proposed means of avoiding, reducing or managing the likely effects of the project on these topics.

The breadth of topics covered in the WDES is vast (ecology, environment, economic, landscape, health, heritage, highways etc) and preparation of the Council's response has therefore required input from a number of Council officers/services. These have been co-ordinated via the internal working group and have involved liaison with officers in district authorities to ensure a joined up approach to the consideration and understanding of impacts on local communities and businesses.

Prior to the engagement process being launched by HS2 Ltd, the County Council sought advice from other local authorities who had been involved on earlier phases of the HS2 project. They recommended that a detailed response to the WDES was required to ensure County Council comments (including concerns on impacts and potential opportunities) were raised as fully as possible, notwithstanding the limited consultation period. As a result, the proposed consultation response is a large document - a copy of which is provided in Appendix 1. In summary, however, there are a number of strategic, general and cross-cutting issues which are worthy of drawing out.

Summary of Response

This period of public engagement is a key milestone in the development of Phase 2b and represents the first real opportunity for local stakeholders and communities to have meaningful input into the detailed development of the project. The County Council is keen to work with HS2 Ltd to maximise the

opportunities and address the concerns set out in this response to ensure the Hybrid Bill scheme meets the needs of local people, our growth aspirations and the Government's objectives. In acknowledging that the consultation scheme published by HS2 Ltd is very much 'work in progress' and given the limited time available to consider the multiple documents, the Council reserves its right to identify and present additional issues that may emerge through the forward engagement and project development process over the coming months and years.

Derbyshire County Council is keen to ensure the potential benefits of HS2 for Derbyshire residents and businesses are maximised and that the region is not 'left behind' by failing to grasp the opportunities or negotiate improvements to the current proposals through the appropriate channels. The Council is particularly pleased to note the planned implementation of Midland Mainline electrification in addition to the HS2 East proposals as this presents significant advantages for local businesses, for the two Derbyshire growth zones identified in the HS2 Growth Strategy and for the East Midlands generally. However, the full suite of HS2 proposals also present significant challenges and on that basis, the Council has undertaken a pragmatic but thorough exercise in examining the information contained in the WDES.

Whilst it is appreciated that at the moment, discussions with HS2 Ltd are on-going and proposals are continuing to develop, the Council has real concerns regarding the lack of detail in relation to critical matters such as traffic assessments and transport modelling for the strategic highway network (e.g. the M1) and the impact of significant volumes of construction traffic in the local economy and highway network. Potential road closures and diversions to facilitate construction of the line will have significant impact on the movement of goods, people and services in, around and through Derbyshire. The limited information available in the consultation documents means it has been difficult to fully understand and assess the potential economic and social impacts of this aspect of the proposal and the Council is keen to maintain active dialogue with HS2 Ltd on these issues.

There are also concerns regarding the number of factual errors in the documents and the systematic downplaying of the likely social, economic and environmental impacts does not help in developing a fuller understanding and appreciation of the project.

In some cases, the information being presented in the WDES is six months out of date and it appears that no meaningful consideration has been given to previous comments or the cumulative effects of the project and impact it will create. This means that any response to the consultation draft of the WDES is based on limited, inaccurate and poorly evidenced information and this significant lack of detail means it is difficult for the Council to reach any meaningful conclusions. The Council is also concerned as to the apparent

preference given to choosing the lowest cost options at certain locations along the route, rather than those which may have a greater effect in mitigating the impact on the surrounding area. The Council believes there are significant opportunities for more detailed and positive engagement with HS2 on these matters to try and identify more appropriate solutions.

The complexity and format of the numerous documents is likely to make it extremely difficult for the general public to understand or make meaningful representation on the proposals and the Council considers there is a clear opportunity to undertake more meaningful, genuine dialogue with local authorities, communities, business and interest groups going forward. Shared discussion/ transparent feedback from other key stakeholders such as Highways England, Natural England and English Heritage would also be very welcome in revising and progressing the proposals for sensitive localities in the County.

Whilst it is understood the WDES focuses on environmental considerations the proposed Phase 2 route has wide-ranging impacts for the economy and for local communities. There is a clear need for more detailed attention to be given to potential/ improved mitigation at key locations along the route, particularly given the significant wealth of world class heritage, cultural and environmental assets in the County which could be adversely affected by the proposals.

Other specific concerns include:

- The possible detrimental impact in key locations such as the Northern Growth Zone (around Chesterfield) and Hub Station Growth Zone (around Toton) if appropriate consideration isn't given to the impacts of large scale growth on the highway network and wider connectivity, public realm, air quality etc.
- The level of disruption to the strategic highway network e.g. the M1, M42, A38, A52 during construction. A number of realignments of the existing strategic road network as well as new bridges are proposed to carry the new railway over or under it. Concerns at the impact this could have on the operation of these roads during the construction phase and the wider effect of this on the economy of the region due to congestion and delays.
- Impact on local highway network during and after construction - the closure of numerous local roads during construction (some of which will remain permanently closed or diverted following completion of the railway). Concerns about the impact this will have on the operation of these roads and the wider economy due to congestion. Serious consideration needs to be given to how alternative modes of transport such as rail or bus can be used to mitigate some of this impact.

- The size and scale of the grade separated junction north of the A38 where the spur line to Sheffield begins and the impact this line will have on the surrounding communities.
- The lack of technical information against which detailed assessments can be made on the size, scale and suitability of earthworks.
- The likely cost implications (maintenance, indemnities) of the transfer of new infrastructure (drains, highway, structures etc) to the Council over the medium and long term.
- The scale and size of the Long Eaton and Sandiacre viaducts and their long term impact on the residential and business communities in these areas.
- The scale and size of other viaducts and deep cuttings eg around the Staveley spur.
- The impact of construction areas on local communities – particularly residential properties close to the affected areas where ‘temporary’ road closures and diversions could last for several years and attract significant amounts of noise and air pollution from heavy plant.
- Impact on local businesses - In the 11 community areas in the East Midlands it is anticipated that a total of 145 commercial properties will be demolished to make way for the project (e.g. 52 properties from Radcliffe on Soar to Long Eaton) – although the real number is likely to be higher once wider implications of construction access etc have been fully considered. Potential impact of business closures or moving to other areas, which will have an impact on local employment opportunities and the amount of business rates collected.
- Impact of residential demolition - anticipated that a total of 342 residential properties will be demolished to make way for the project (183 from Radcliffe on Soar to Long Eaton). Post construction the ongoing operation of the line will continue to have a visual and environmental impact on a large number of residential properties which remain in close proximity.
- Severance and visual impact on communities – e.g. areas such as Newton and Old Blackwell will experience severance and significant visual impact as they become effectively sandwiched between the new line and the M1.
- The disruption to the public rights of way network and the lack of suitable replacement routes proposed – both during construction and afterwards.
- The impact on the proposed Chesterfield Canal reinstatement project, particularly in the Staveley area.
- The impact on key historic features, such as Hardwick Hall and Bolsover Castle and the lack of meaningful mitigation to minimise the harmful visual effects and appropriate access for tourists.
- The visual and environmental impacts on the wider landscape and ecology of the area and the lack of meaningful mitigation measures to resolve this.
- The impact on the air quality, particularly during the construction phase and the lack of meaningful mitigation measures to deal with it.

- A lack of meaningful engagement by HS2 with relevant stakeholders prior to the WDES being published and the extent to which comments already provided by the Council and others have been considered and addressed by HS2 in this document.

The above summary comments are supported and supplemented by the Council's more detailed response contained in the attached appendices 1 and 2 of this report. Specifically, these appendices reference the implications and opportunities for the East Midlands Hub Station at Toton, the expanded rail station at Chesterfield and the 'line of route issues'. They draw out key issues affecting each of the HS2 community areas across Derbyshire and outline concerns regarding cross cutting issues such as the impact of construction traffic on the strategic and local highway network, visual and residential amenity. The Council believes it is possible to mitigate some of these impacts through constructive and timely dialogue and it is important that such opportunities are maximised.

In conclusion, given the limited, out of date and poorly evidenced information presented in the consultation documents, it has been difficult for the Council to reach any meaningful conclusions on the proposals and it is therefore seeking to reserve its position in the response it makes to Government until such time as more detailed, accurate information is available.

Working Draft Equality Impact Assessment

The Equality Impact Assessment considers the effects of the construction and operation of HS2 Phase 2b on people from the nine protected characteristics. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. Unlike the WDES, the WDEIA is not broken down into community area reports and instead is presented in a single volume.

The proposed response to the consultation is provided in Appendix 2 but a summary of the specific and general areas of concern with the WDEIA are set out below:

- The baseline data sources used and the lack of analysis on certain of the protected characteristics.
- The lack of description on the potential or actual impacts of the project on people with the protected characteristics.
- The lack of information on how HS2 will ensure the opportunities arising from the development are made available to people from the local area first.
- Concern that the adverse impacts of the project on certain disadvantaged areas has not been fully appreciated.

- Concern that no account is taken of how people coming from such disadvantaged communities can engage and have their views recorded properly.

Implications for Derbyshire

The County Council has previously welcomed the economic opportunities that could result from HS2. These include the proposed East Midlands hub station at Toton, the proposed Infrastructure Maintenance Depot at Staveley and the high speed service to the existing station at Chesterfield. HS2 provides a very clear opportunity for the 'destination and dispersal' of visitors and businesses to Derbyshire which would be a significant benefit to Derbyshire's visitor economy and to wider economic factors such as land values. There are also potential opportunities for the construction and rail supply industries in the area throughout the construction and delivery phases; all of which will provide an economic boost across Derbyshire.

The scheme, however, will have a significant impact on large areas of Derbyshire and, as the WDES and WDEIA have shown, this could have particularly adverse effects on certain communities. It is therefore important that the County Council's response to the consultation sets out to HS2 in detail where it needs to do more work to mitigate the impacts of the project and also where a more fundamental review of certain elements of the scheme are required. The proposed response does not seek to provide the detailed views of all the individuals or organisations affected by the proposal as they are better placed to make their own representations direct to HS2 Ltd. However, where possible, the Council's response has sought to reflect similar views to those expressed by the borough and district councils on relevant issues. Some of these views are still emerging and, therefore, the draft response attached to this report may need to be amended prior to final submission on 21 December 2018.

The amount of time which HS2 Ltd has made available for this consultation has limited the opportunity to fully assess the detailed impacts; this has also been hampered by the limited information provided by HS2 and that some of the information is already six months out of date. However, the consultation response does represent a considered view of the various specialists within the County Council and seeks to cover all the issues raised, rather than just those of a broad or strategic nature.

It is important to note that the Council's comments on the WDES and WDEIA are in addition to previous submissions and, in responding to the latest consultation, HS2 Ltd will be reminded of the need to take into account earlier representations, such as the Route Mitigation Study report. The Council's response also forms part of a suite of documents being returned to Government by other local authorities and the East Midlands HS2 Mitigation Board.

(3) **Financial Considerations** The Government will be responsible for meeting the capital costs of the scheme and any mitigation measures undertaken. Whilst the County Council will be reimbursed to a certain extent for undertaking any work specifically requested by HS2 Ltd under the terms of the Service Level Agreement between the organisations, the Council will need to meet the cost of other activities associated with HS2. These include responding to consultations, developing complementary plans and strategies, supporting local communities or dealing with enquires. The potential costs for the County Council in dealing with HS2 are significant, particularly in terms of preparing for more detailed assets and Parliamentary petitions. A budget of £500,000 has been agreed previously and includes funding to pay for the above work and to employ additional staff resources.

(4) **Economic, Social and Environmental Considerations** These are dealt with in the substantive comments set out in Appendix 1. The improved connectivity which will be provided by Phase 2b of HS2 can be expected to contribute to increased job opportunities and increased GVA in the region. This will be most apparent in the growth zone areas and localities adjacent to the proposed Hub Station at Toton, Chesterfield station and the proposed infrastructure maintenance depot at Staveley. However the East Midlands Growth Strategy will seek to ensure that the benefits of the project are more widely spread across Derbyshire.

(5) **Equality and Diversity, Environmental, Property and Transport Considerations** These are dealt with fully in the substantive responses set out in Appendix 2.

Other Considerations

In preparing this report the relevance of the following factors has been considered: legal, prevention of crime and disorder, human resources, and health considerations.

(6) **Key Decision** Yes.

(7) **Call-In** Is it required that call-in be waived in respect of the decisions proposed in the report? Yes.

Cabinet is invited to treat this report as urgent and is, therefore, not subject to call-in in view of the need to meet the deadline of 21 December 2018 for consultation responses to Working Draft Environmental Statement and Working Draft Equalities Impact Assessment for High Speed Rail 2.

Councillor Steve Bull, Chairman of the Improvement and Scrutiny Committee - Places, has been consulted and he has agreed that the decision proposed is

reasonable in all the circumstances and to it being treated as a matter of urgency.

(8) **Background Papers** A copy of the WDES and WDEIA consultation materials can be found on the HS2 website:

<https://www.gov.uk/government/consultations/hs2-phase-2b-working-draft-equality-impact-assessment-report>. Officer contact details – Chris Hegarty, extension 36721.

(9) **OFFICER'S RECOMMENDATIONS** That Cabinet agrees the Council's draft response to the Working Draft Environment Statement and Working Draft Equalities Impact Assessment for Phase 2b and delegates authority to the Strategic Director – Economy, Transport and Environment, in consultation with the Cabinet Member for Highways, Transport and Infrastructure, to approve the final response for submission by 21 December 2018.

Mike Ashworth
Strategic Director – Economy, Transport and Environment

Consultation Response to Volume 1 Introduction and Methodology

Version Number	Last updated	
1.0	14/11/18	
1.1	22/11/18	Historic environment SB + GB corrections

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1 INTRODUCTION

1.1 Derbyshire County Council

- 1.1.1 This report is Derbyshire County Council's response to the Government's HS2 Working Draft Environmental Statement (WDES). The Council has been consistent in its approach to HS2. While welcoming the economic benefits of the scheme, the Council has pressed HS2 to minimise the adverse effects on people's homes and local communities, both during construction and after the line has opened. Any harmful effects should be reduced, mitigated or removed completely.
- 1.1.2 HS2 will affect communities in Derbyshire in many different ways and the County Council is concerned that the WDES and Equality Impact Assessment (EQIA) are carried in a way that effectively engages with the local communities. The Council asks that the Government and HS2 Ltd take full account of all the representations that they receive.
- 1.1.3 This report should be read in conjunction with the County Council's response to the original consultation on the HS2 proposals submitted in January 2014 and the response to the Route Refinement and Property consultation March 2017. **The full Health Impact Assessment is included again in Appendix A of this response.**
- 1.1.4 The comments on the HS2 Phase 2b WDES are in addition to the County Council's previous submissions and in responding to the latest consultation HS2 Ltd is reminded of the need to take into account earlier representations.
- 1.1.5 Derbyshire County Council are concerned that the rights and obligations under European Union (EU) lawafter the UK withdraw from the EU. **DO WE NEED THIS JOE?**

1.2 Background

- 1.2.1 In January 2014 Derbyshire County Council published a response to the 2013/14 Government consultation on High Speed Two Phase 2b Crewe to Manchester and West Midlands to Leeds scheme. Since then there have been some substantial changes to the route through Derbyshire.
- 1.2.2 On 7 July 2016, HS2 Ltd published revised proposals to serve Sheffield and a new alignment for the route through north Derbyshire and South Yorkshire. Revised layouts for the Infrastructure Maintenance Depot (IMD) at Staveley and its access route were published at the same time. The revised proposals include a new spur to provide a classic compatible link to Chesterfield and Sheffield.
- 1.2.3 On 15 November 2016 the Secretary of State for Transport announced the preferred route for Phase 2b and published the safeguarded zone, (from Crewe to Manchester in the west, and from West Midlands to Leeds in the east). Two public

consultations were started on the same date: "Route Refinement Consultation 2016 and "Property Consultation 2016".

- 1.2.4 In July 2017 the Government announced the Phase 2b route decision. High Speed Two: From Crewe to Manchester, West Midlands to Leeds and beyond Phase 2b Route Decision.
- 1.2.5 On 18 July 2017 HS2 Ltd opened 2 consultations on the draft Environmental Impact Assessment (EIA) and the draft EQIA.
- 1.2.6 The County Council has welcomed the economic benefits that will result from the proposed East Midlands hub station at Toton, the proposed Infrastructure Maintenance Depot at Staveley and the potential opportunities for the construction and rail supply industries. The more recent proposals to serve Chesterfield by high speed rail services could also provide an economic boost both locally and in wider areas of north and central Derbyshire.
- 1.2.7 The scheme, however, will have a significant impact on large areas of Derbyshire and the County Council is concerned to ensure that the adverse impacts of the scheme are effectively mitigated, especially where the route passes close to or through residential and other sensitive areas.

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2 GENERAL OBSERVATIONS ON THE DOCUMENTS THAT FORM THE WDES

2.1 Introduction.

2.1.1 In this section the council's comments refer to the overall structure of the documents that form the WDES and a number of general observations on the papers as a whole. To aid the reader we have where possible followed the sequence and order of issues raised and the methodology used by HS2 Ltd, namely:

- Agriculture, forestry and soils
- Air Quality
- Climate Change
- Community – incorporating health related issues outside of the HIA.
- Ecology and biodiversity
- Health
- Historic environment
- Land quality
- Landscape and visual
- Major accidents and disasters
- Socio-economics
- Sound, noise and vibration
- Traffic and transport, incorporating PROW, highway design and Traffic Safety
- Waste and material resources
- Water Resources & Flood Risk

2.1.2 Where a comment by the council refers to a specific issue or map, a corresponding reference is included in the left hand column. Where a reference is not given, the comment applies to the document or subject area as a whole. The council does not have the capacity or the technical experience to comment in every area of the environmental statement. There are a number of areas within the documents where the council has not offered a comment, this should not be taken as agreement or consent for the text.

2.1.3 There are also a number of generic comments on issues not contained within the WDES itself namely:

- Future transport projects including Key Cycle Network
- Limestone supplies and haulage
- Opportunities for sustainable travel
- X
- Y
- Z
- Expand as necessary

2.1.4 These comments are included in section 4 of this document.

2.2 General concerns with the documents

- 2.2.1 The Council continue to be disappointed with HS2's failure to address key concerns. These include the failure to accommodate a route for the proposed Chesterfield and Staveley Regeneration Route and for the proposed Chesterfield Canal.
- 2.2.2 The documents do not fully consider the impact of the scheme. Significant utility diversions are not quantified; maintenance access routes and watercourse diversions are not shown with any earthwork provision.
- 2.2.3 The Council are unable to comment on the full implications of road closures and diversions without associated traffic modelling.
- 2.2.4 The suggestion that the documents are simple to understand for the average person is completely false.
- 2.2.5 The Council remain disappointed that there is very limited time to respond to this consultation, particularly as the Hybrid Bill process has been put back 1 year. The current timetable makes it extremely difficult for Local Authorities to get democratic sign off for their responses.

2.3 Mitigation

- 2.3.1 Derbyshire County Council is concerned to ensure that the adverse impacts of the scheme are effectively mitigated, especially where the route passes close to or through residential and other sensitive areas.
- 2.3.2 An independent consultant SNC-Lavalin has carried out an independent review to examine the potential to reduce or remove adverse impacts. Commissioned by the consortium of 3 East Midlands councils (Leicestershire, Nottinghamshire and Derbyshire), the report "East Midlands Consortium - HS2 Route Mitigation Study RTUKR-T40125-001" identified several sites within Derbyshire where mitigation should be developed further including:
 - Trent Valley Vision- Visual impact of viaduct across River Trent and floodplain determined by design of viaduct and intermediate supports.
 - Long Eaton- Visual and noise impact of viaduct through East side of Long Eaton determined by design of viaduct and intermediate supports and use of space below.
 - Sandiacre and Trowell -Impact of viaduct determined by design of viaduct and intermediate supports and construction impacts.
 - Hardwick Hall -Visual impact and access arrangements determined by quality of mitigation and practicality of realignment of local roads.

- Chesterfield Canal – Staveley - Severance of existing canal route with no clear proposals for viable alternative.
- Business Impacts – McArthurGlen Designer Outlet.
- Rights of Way and Access Routes -Severance and deviations / realignments of existing and proposed rights of way.
- The report also looked at impact on another 15 site specific issues the 3 counties where mitigation could be developed further.

2.3.3 The report is included in Appendix B of this response.

2.3.4 There is ongoing concern regarding the severance of roads & footpaths, especially those without formal recognition/designation. In particular what protection can be given to concessionary paths and 'community walks' that have been developed? The statutory designation of PROWS and other paths does not necessarily reflect their importance in the way they are used and their local significance. Some routes, for example, may have been created by volunteers, but their importance to the local community may not be recognised. This may suggest a need for local investigation.

2.3.5 The Environmental Minimum Requirements should take full account of the disruption during construction, visual and noise impacts in its Code of Construction Practice.

2.3.6 It should be noted that when dealing with ecological mitigation and compensation measures required, it should be demonstrated that the measures follow the ecological mitigation hierarchy; that the proposals are acceptable across the various ecological receptors and across the considerations as a whole; and that where impacts cannot be avoided, mitigated or compensated for in turn, it should be clearly explained why this is not possible. Given the nature, significance and long timescales involved in this project, neither cost nor delay should be seen as reasonable barriers to the delivery of adequate mitigation and compensation.

3 VOLUME 1 RESPONSE.

3.1 General Comments & Background to High Speed Two, Section 1

- 3.1.1 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text.
- 3.1.2 Other comments on issues not contained within the WDES itself are raised in separate sections of the response to Volume 2. This includes a Long Eaton Low Level Line Study carried out by Jacobs on behalf of Midlands Connect and Erewash Borough Council.

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
1.4	Meeting environmental commitments after consent 10 - this section introduces various terms for proposals which will be implemented to reduce environmental impacts, including Environmental Minimum Requirements (EMRs), Code of Construction Practice (CoCP), Environmental Memorandum etc. principally, these approaches appear to be separate from mitigation proposals to be set out in the ES although no details are provided.
1.4.2	As the Environmental Minimum Requirements (EMR) for phase 1 of the project has already been published could not a draft for this phase have already been published at the same time as the draft ES?
1.4.4	The EMR imposes a requirement to use "reasonable endeavors" to adapt measures to reduce the adverse environmental effects reported in the formal ES provided that this does not add unreasonable cost or delay the construction or operation of the proposed scheme. There is however no definition of what reasonable endeavors means in this case nor is it explained in the glossary and the same is true of unreasonable cost. More clarity is required in both cases of what is meant by the terms used as they are repeated used throughout the document and other volumes.

3.2 Background to High Speed Two, Section 2

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment

2.3.5	No mention of potential impact on local and other rail services from Sheffield to Clay Cross because of existing track capacity will be required by new HS2 services. Whilst there are some free paths at present the 4 HS trains an hour on this corridor proposed in the document will mean some existing services will need to stop
2.5	<p>Climate Change is comprehensively addressed for HS2 itself and DCC look forward to reading the results and conclusions once these are presented in the formal ES in order to understand what is proposed.</p> <p>However, DCC would like to see those climate change issues, particularly climate change mitigation, which are an indirect opportunity of HS2 addressed. This would mean widening out the scope of the ES and thinking about other opportunities which are not directly linked to HS2 but which are provided through such a large infrastructure project. For instance, the track itself will be a physical barrier dividing an area. Therefore any opportunities to promote active travel across this barrier or to stations and facilities on either side of the track which will inevitably develop along the length of HS2 should be promoted in order to reduce GHG emissions as well as promoting health and well-being. This means that any crossing and any path parallel to the track should have the potential to be a cycle path as well as a walking route as these structures will not be added later.</p> <p>Furthermore, little information is provided about other mitigating potential, such as renewable energy generation particularly at hubs and depots. DCC trust these will be present in the formal ES.</p>

3.3 Stakeholder engagement and consultation, Section 3

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
3.2.5	There have been many meetings between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings is also a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.

3.3.5	DCC did ask for more time to respond to the draft ES because of the large number of areas covered in Derbyshire and the difficulties of getting democratic sign off of any consultation response. It was disappointing that despite raising this issue on a number of occasions with the HS2 consultation team it was not until just prior to the start of the consultation process that DCC were advised that they would only have the standard 10 week period to respond.
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3.4 The Proposed Scheme, Section 4

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
4.2.4	Whilst DCC appreciate that the work on the proposed electrification of the MML from Clay Cross is at an early stage the lack of any real detail on what the works will involve and the impacts on the surrounding area in Volume 2 MML01 and MML02 makes it virtually impossible for the authority to make any meaningful response on this section of the proposed project.
Figure 7+8	The figure shows 4 trains an hour using the spur off the main line to Chesterfield and Sheffield. Previously it was proposed that there would be 2 trains an hour on this route one of which would serve Chesterfield and the other running non stop to Sheffield. Does this mean that frequency has now doubled or does this depend on proposed link north of Sheffield back onto the main line being built? If the service is doubled will this mean more trains will now serve Chesterfield or will the extra 2 an hour also non stop?

3.5 Permanent Features of the Proposed Scheme, Section 5

3.5.1

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
5.1.3	No mention is made of Chesterfield where the existing station will be served by HS2. There is also virtually no detail on this in volume 2 MML01. More information is required on what work would be required at Chesterfield to accommodate the new service.
5.1.4	The viaduct design shown would be unsuitable in particularly sensitive locations such as Long Eaton town centre. Any design needs to take of the local area rather than being a 1 size fits all approach.

5.1.5	The role of the design panel needs to be explained in more detail. To date it has proved to be difficult to understand what impact they will have in relation to the design of permanent features such as viaducts in particularly sensitive locations such as Long Eaton town centre.
5.3.4	Typical cutting and embankment slopes are advised at 1 in 2.5 side slope however HS2 designers would be well advised to consider the natural dip of geological strata when excavating cuttings in Derbyshire geology where historic evidence suggests slopes of this gradient are likely in some instances to be unstable at 1 in 2.5 and side slopes may need to be slackened.
5.10.1	Road bridge widths should be considered carefully to ensure that their design does not lead to the severance of communities where users of the highway are not in motorised vehicles. For both over and under road bridges, at least one surfaced verge should be provided at 4m width alongside the motorised carriageway to facilitate future shared footway/cycleway provision and to future proof the rail crossing to allow for installation of additional statutory utility apparatus (principally cabling and pipework to meet future demands).

3.6 Construction of the Proposed Scheme, Section 6

3.6.1

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
6.4.3	Acknowledges that further survey work will be required, including on land where access has not been possible to date, but does not quantify this.
6.4.10	It is proposed that landscape measures would be implemented as early as reasonably practicable where there is no conflict with construction activities - this is supported but could expressly require the nominated undertaker to design & organise construction activities in order that landscaping can be implemented at the earliest opportunity.
6.8.3	Specific environmental protection measures related to site clearance and the protection of nesting birds and other species, is appropriate. The caveat that this will only be undertaken where reasonably practicable seems a little pessimistic, given that this is likely the minimum that is legally required.

6.10.1	It is unclear the extent borrow pits have been assessed as part of the Landscape and Visual Impact Assessment (GLVIA) but these in themselves could introduce adverse landscape and visual effects that would need to be mitigated. The excavation of borrow pits could adversely impact on existing landscape features such as hedgerows and trees adding to the cumulative effects of the scheme.
6.26.1	Earth bunds used for noise mitigation should be fully integrated with their landscape setting and should not be designed as engineered features with steep sides and flat tops.
6.27.1	Positive steps should be employed to encourage the nominated undertaker to design the construction so as to allow for early landscape and visual mitigation.
6.27.2	All restoration proposals should accord with the established character of the surrounding landscape as defined and described in local landscape assessments such as the 'Landscape Character of Derbyshire' publication produced by DCC (www.derbyshire.gov.uk/landscape).

3.7 Environmental Impact assessment, Section 7

- 3.7.1 At this time the council has no general comments to make, detailed comments are included in Volume 2 CFA responses.

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
7.4.1	The Proposed Scheme will bisect existing transport links, some of which carry significant volumes of traffic. Whilst it is acknowledged that vehicular trafficked roads will not be severed completely, ie permanently, some links however will be subject to permanent realignment. Inevitably though, the potential for disruption during the lengthy construction work will, particularly, in case of the M1 motorway and its junctions be considerable. During times when incidents occur on the existing Motorway, routes parallel to the M1 in Derbyshire can become congested particularly at peak times. It is not clear however how the cumulative effects will be addressed, particularly when works on both the Motorway and local roads simultaneously occur. It is important that the Motorway remain open to traffic at all times.

3.8 Scope and methodology summary for environmental topics, Section 8

3.8.1 Please also refer to detailed comments included in Volume 2 CFA responses.

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment
8.6.1	The scope and approach to ecological impact assessment set out in this section generally seems reasonable and appropriate although only a very brief summary is presented.
8.6.9	This section – assumptions and limitations – does not discuss what proportion of ecological surveys have been completed or will be complete at ES publication, and where surveys are missing. It is understood that a lack of access and permission etc has meant that survey coverage is short of 100% - perhaps significantly so. Despite this, there is no discussion of how this will limit the validity of specific ecological studies, or the extent to which this might undermine confidence in the overall assessment of environmental acceptability.
8.7.4	Social differences in health status (e.g. disability-free life expectancy) or in access to the determinants of health e.g. education need to be added. Because many inequalities are also unjust, they are sometimes referred to interchangeably as health inequality. Up-date of the 2013 Rapid Health Impact Assessment of the 2 HS2 initial preferred route in Eastern Derbyshire gives a summary of the health issues with a positive or negative impact of the upper and lower alignment proposals.
8.7.6	At this time any additional comments will be added under the Volume 2, community area reports.
8.7.7	Agree with health effects resulting from impacts listed. However perhaps should include potential effects on Mental Health and wellbeing, community connectivity, food and farming. These could be included here or in volume 3 Route -wide effects.
8.7.8	Derbyshire County Council has no additional comments to make on this point as it is covered elsewhere in the document.
8.7.10	Derbyshire County Council has health profiles of each locality along HS2 route effecting Derbyshire.
8.7.11	tba
8.7.12	tba

8.7.13	<p>In pre-defining the scope of this report, our ability to capture health impacts outside of our chosen framework for assessing impact are restrained. We recognise that other localities within Derbyshire may be impacted by the second arm of the 'Y' network to Manchester. Although it was necessary to limit the geographic scope of this report.</p> <p>Significant uncertainty is introduced when estimating health impacts almost 20 years into the future, when HS2 Phase 2 would become operational (e.g. demographic shift or changes in disease prevalence). These factors, combined with the early stage of the HS2 proposal and consequent lack of design details, mean that it is difficult to be sure of the potential impacts on health or indeed their amenability to mitigation or enhancement</p>
8.8.3	<p>It is suggested that the 2km study area for gathering data, "either side of the land required in rural areas and urban areas", should be appropriately broadened in areas where there is the potential for more far reaching impacts on the setting of heritage assets. This is because the extent of the setting of a heritage asset is not fixed¹, or in other words it has no definable limit. Therefore the potential impacts and so the study area should be considered more organically in response to this.</p>
8.8.6	<p>In addition to the baseline information listed here, good quality data on opencast coal extraction will be key to understanding and identifying archaeological 'risk' over a large part of the route. This is not mentioned here.</p>
8.8.8	<p>"Survey work is being discussed ... with local authority archaeologists". No consultation at all has taken place on survey work to date.</p>
8.8.16	<p>"Field surveys are ongoing"; "desk-based assessment is ongoing". In the absence of a complete information base for either the desk-based work or field surveys, the reliability of the conclusions in the WDES are therefore open to question.</p> <p>"Common features of the historic landscape such as ridge and furrow are not individually considered": ridge and furrow can be of higher importance dependent on preservation, extent and relationships with other historic environment features, and a more nuanced and site-specific approach may be needed to understand significance.</p>
8.10.3	<p>Plans showing the ZTV analysis have not been included in the WDES so it is not possible to comment on the findings of this work at this stage and the extent to which the visual impact assessment is a fair reflection of the theoretical visibility of the scheme</p>

¹ According to: Historic England, *Setting of Historic Assets*, URL available at: <https://historicengland.org.uk/advice/hpg/has/setting/>, accessed on 20/11/2018.

8.10.9	Overhead line equipment is excluded from the ZTV model on the basis that this rarely gives rise to significant effects if it is the only element visible - however this may not be the case in many situations within Derbyshire where this equipment might be viewed alongside other incongruous features - in many respects the occasionally passing trains are potentially less significant than permanent fixed equipment
8.10.13	It is stated that published LCAs have been adapted for this assessment to provide a more appropriate and consistent scale. Whilst I have no objection to this approach overall, it is not evident how these locally defined areas then nest within the local, regional and national studies and utilise the guidance contained within the published literature
8.15	Generic review on the management of waste, discussing the potential disposal routes for mainly Commercial and Inert waste, taking into consideration the Waste Hierarchy and Circular economy. The document refers to national and regional information published by the Environment Agency, which will be reviewed by them independently. Waste Management have no further comment to make regards to Volume 1.
8.10.16	It is stated that engagement with the competent authorities is being undertaken and will continue as the design of the proposed scheme progresses. This is welcomed but there has been no engagement to date on the design of the scheme only on the assessment methodology
8.14.6	The assessment will need to take account of best practice guidance published by the DfT and Local guidance where relevant and appropriate. DCC note that guidance includes the Institution of Highways and Transportation (IHT, 1994). Guidelines for Traffic Impact Assessment, Institution of Highways and Transportation. The IHT Guidelines suggest that the scoping of the Transport Assessment should include all links and associated junctions where traffic will exceed 10% of existing tow-way traffic (or 5% in congested or other sensitive locations) or such other thresholds as may have been established by the Highway Authority. These considerations will only however be addresses in the formal ES. Early engagement with the Highway Authority to agree the detail and scope of the formal ES will therefore be required.

3.9 Approach to mitigation and monitoring, Section 9

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment

9.1.4	It is not possible to fully comment on the scale of landscape and visual effects if there are further judgements to be made on submission of the formal ES - the suggestion is that significant residual effects after mitigation will form part of the formal ES.
9.1.6	Without a design rationale it is not possible to make a judgement on the mitigation that has been developed through the planning and design of the Proposed Scheme. DCC should reserve its right to comment on the detailed design mitigation rationale until such point it is clearly explained and understood as part of future submissions.
9.1.9	The use of planting is not the only way that the proposed scheme should be assimilated into the landscape particularly in areas where tree cover and woodland is not a characteristic feature. Other attributes such as traditional boundaries and land-use should also be considered as part of a suite of mitigation proposals.
9.5.2	Concern that areas of public realm / replacement community facilities area to be created may already exist and be available to the public. For example Plan CT-06-632 shows three such sites at Staveley all of which already fall within the public realm, 2 as grassland and 1 as recently restored canal. Proposal for development and public benefit is already in process and no advance approach has been made to the County Council to suggest that HS2 would either facilitate improvement of accessibility or provision of community facilities.
9.6.1	Whilst it is suggested that the scheme is "being designed to avoid or reduce impacts on habitats, species and other features of ecological value where reasonably practicable", it should be acknowledged that given the design and operational factors which constrain horizontal and vertical alignment changes, it generally isn't possible to alter the route to avoid or reduce ecological impacts, except in the initial route selection.
9.6.4	It is proposed that a "route-wide, integrated strategic approach has been developed to compensate for loss of widely distributed habitats, especially woodland and grassland." Whilst this may be desirable to maximise the ecological gains delivered through compensation, or perhaps to achieve the necessary 'no net loss' of biodiversity in the smallest area possible, it should be acknowledged this may have the effect of directing ecological compensation away from those areas and communities that have experienced the loss and harm.
9.7.1	Where the introduction of viaducts is in significantly populated areas like Long Eaton (higher alignment route) HS2 Ltd need to consider the provision of aesthetically pleasing barriers as a prevention measure to mitigate against potential suicide. The WDES needs to provide detail on proposed strategies for mitigating potential mental health and well-being adverse impacts within Derbyshire with reference to the evidence base for intervention effectiveness and proposals for monitoring and evaluation during the construction and operational stages as appropriate.

9.7.2	<p>The WDES needs to provide detail on proposed strategies for mitigating potential employment-related adverse impacts within Derbyshire with reference to the evidence base for intervention effectiveness and proposals for monitoring and evaluation during the construction and operational stages as appropriate.</p> <p>The WDES needs to provide detail on proposed strategies for mitigating lifestyle and leisure-related adverse impacts within Derbyshire. These details should reference the evidence base for intervention effectiveness and proposals for monitoring and evaluation during the construction and operational stages as appropriate.</p>
9.8.8	<p>There are a number of heritage assets which will be rendered unviable as a result of the line through their total destruction. If this is the case then this paragraph should be updated. Alternatively, this paragraph may also be discussing the heritage assets which will be impacted on, either directly or indirectly, that will remain. It is therefore considered that greater clarification may be required on this paragraph.</p>
9.10.3	<p>There is merit in many of the specific mitigation proposals but the Local Area plans show many details that seem to be at odds with the intent of the concepts identified in this section. For example around Hardwick Park there are engineered features (cuttings and screen mounds) that strongly contrast with the local topography and landscape character, and there is a distinct lack of connectivity between the park and its wider estate landscape, which seems contrary to the statements in this section.</p>
9.10.4	<p>It states that the "design or external appearance of new structures would be subject to the approval of the relevant local authority", this is welcomed although there has been no engagement or discussion with respect to the proposed structures along the route.</p>
9.10.5	<p>This section refers to the use of advanced planting to assist in the mitigation of the construction works although the supporting plans in Volume 2 don't appear to identify advanced planting. DCC would have to reserve judgement on how effective advanced planting might be until it has been identified on drawings.</p>
9.10.6	<p>There is reference to the maintenance of landscape areas (woodland, grass and wetland) but no suggestion as to how long these areas would be maintained and by who adding to the uncertainty as to how successful any landscape treatment might be.</p>
9.10.7	<p>Again when maintenance and establishment works are transferred to third parties there is no suggestion as to how long these areas would be maintained for.</p>
9.10.12	<p>It is welcomed that the nominated undertaker will be required to monitor all new landscape areas but who will be independently judging these assessments? - will this fall on the local planning authorities to administer?</p>

9.14.11	The potential of travel plans to reduce the impacts needs to be assessed realistically. They are unlikely to have a major impact unless funding is provided to ensure facilities such as bus services to construction compounds are introduced when work commences. It is unlikely that the existing commercial or council supported bus services will be able to accommodate the numbers of people working on the sites requiring a bus services so special works buses will be needed.
General	Information regarding new footpath and greenway routes which are newly constructed with recent planning consent but that are not yet included in the adopted DCC RoW network mapping at Markham Vale was provided to HS2 engagement leaders in January 2018. It is very disappointing to see that this information has not been included or considered in the plans published in October 2018 which the council understands are based on a design freeze in March 2018 when the information was already available to HS2. New routes at Markham Vale provide continuity to routes in the countryside and along the Doe Lea River corridor. These should be considered for continuity and safeguarded against severance impacts in the same way as for definitive RoW routes at other locations. Path diversions exceeding well over a 1km or the suggested closure of what HS2 see as 'fragmented' paths suggests a poor design methodology and lack of concern in respect of the impact their scheme will have on the existing and additionally advised path network.
General 2	A number of new maintenance access routes are indicated by red outline on plans throughout the publication series. No thought has been given to how these will sit into the landscape where generally tracks in the countryside follow closely alongside hedgerows or walls and do not simply sit within unbounded field spaces. This could possibly be the result of poor landscape detailing by HS2.
General 3	HS2 in many instances appear to suggest that low use of footpaths and other rights of way in a rural setting gives them the right to close or to impose often significant diversion routes for users simply to avoid the cost of crossing provision be that by underpass or overbridge. Rural footpaths may be used by varying numbers of people at varying times of day, month or year and cannot be considered in the same way as footways in an urban setting. The number of users is of no consequence in terms of the protection that need be afforded to each definitive right of way and the network as a whole should be protected. There are instances throughout the published documents which suggest that greenfield RoW are diverted onto the public road network often for distances of 1km or more and this is quite unacceptable in respect of the present and future users of the existing RoW network. It is recommended that a community consultation and a health impact assessment are both completed in order to assess the true impact on health, including mental health and wellbeing and the impact on the local /wider community due to the proposed loss of routes in the rural areas

3.10 10.0 Strategic, route-wide and route corridor alternatives, Section 10

3.10.1 The council does not wish to make comments at this time.

3.11 Local alternatives, Section 11

3.11.1

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Volume, page and paragraph reference	Full ES comment

11.3.1	<p>Table 6: 'Main reasonable local alternatives considered post 2013/2014 consultation prior to July 2017 preferred route announcement'. The 'project response' to the 'vertical alignment of the railway and visual impacts on Hardwick Hall' (p207) is that the 2013 proposed scheme is to be retained. The apparent justification for this being that "the alternatives considered would be more complex and substantially more costly and would result in increased environmental impacts, including on heritage, landscape and surrounding views".</p> <p>The current proposals for this area, including that past Sutton Scarsdale and the Bolsover Castle escarpment, essentially comprises of a series of cuttings and embankments as it passes along the associated M1 corridor. These appear to have been arranged simply to minimise the need to transport materials during construction. Although laudable in areas with lesser sensitivities, it is difficult to accept that this is considered to be the best possible design response to this highly sensitive historic landscape. This has been picked up on in comments by DCC's Landscape Architect ². A clear and high-quality design rationale is required and should be developed in response to this stretch.</p> <p>Alternatives should be explored which might include either a world-class viaduct structure³, and/or use of tunnels within the locality. Discounting this approach on the grounds of cost and environmental impacts is questionable. A study by the National Trust claim that Hardwick Hall alone contributes £8m to the local economy each year. Therefore, I would advise that all three heritage assets are considered holistically, and, in doing so, questioning what all three heritage assets contribute currently and extending this could be enhanced through a good design.</p>
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3.11.2

² See also comments by DCC's Landscape Architect on; Volume 1: Introduction and Methodology', para 9.10.3, p2.

³ See also comments by DCC's Landscape Architect on similar suggested alternatives; Volume 2: Community Area Reports; General Issues, p3.

4 COMMENTS ON ISSUES NOT CONTAINED WITHIN THE WDES

4.1 Future transport projects including Key Cycle Network

Major Transport Projects

- 4.2 The County council has a number of potential highway and transport projects with existing policy status which it expects HS2 Ltd to take into account in its design and formal Environmental Statement. These are:

A61 Chesterfield Inner Relief Road Junctions (Grade Separation)

- 4.3 Although not designed or programmed, grade-separation of the A61/A617 'Horns Bridge' roundabout is listed as a potential project in the Derbyshire Local Transport Plan. This scheme would be adjacent to the Midland Main Line crossing of the A617 south of Chesterfield Station and could, therefore, be constrained by any land required for electrification.

Clay Cross Rail Station

- 4.4 Although not designed or programmed, provision of a local station at Clay Cross would be on the section of the Erewash Valley line to be electrified by HS2 Ltd and could, therefore, be constrained by any land required for this.

A61-A617 Avenue Link Road

- 4.5 Although not designed or programmed, a highway link between the A61 and A617 principal roads would cross the Midland Main Line south of Chesterfield and could, therefore, be constrained by any land required for electrification.

Hollis Lane Link Road

- 4.6 This link between the A632 and Chesterfield Station is identified on a specific alignment within the adopted Chesterfield Borough Local Plan. It falls within the scope of masterplanning work now underway on Chesterfield Station, and has a provisional offer of grant funding from the D2N2 Local Enterprise Partnership. The Link Road, though, follows an alignment close to the Midland Main Line, and it is a matter of concern that the safeguarding requirements of HS2 Ltd for electrification are, at present, unknown.

Chesterfield-Staveley Regeneration Route

- 4.7 This scheme has status in the adopted Chesterfield Borough Local Plan and the Derbyshire Local Transport Plan and has a provisional offer of funding from the Housing Infrastructure Fund. This is a major intervention, facilitating significant housing and employment development, and is receiving substantial current investment towards design and business case preparation. The major landowners along this corridor are fully engaged in this work. The HS2 Infrastructure Maintenance Depot, though, places significant constraints on both the quantum of development achievable and on the alignment of the CSRR. These are issues acknowledged by HS2 Ltd, which is welcome, but much remains to be done through further engagement to ensure that the needs of all parties can be met in full.

Key Cycle Network

- 4.8 The County Council has an identified Key Cycle Network comprising its most important cycling routes, some complete and some proposed and which comprise a combination of highways and multi-user trails. The published HS2 route severs a number of these, and the Council will seek to ensure that suitable measures are provided as mitigation to ensure that the KCN can still be developed in full.

4.9 Limestone supplies and haulage

4.10 xxx

4.11 xxx

4.12 Opportunities for sustainable travel

- 4.13 The areas of land identified as 'potentially' required for HS2 construction are substantial and will, in due course, offer opportunities to be re-used for other purposes. Some of the identified sections of landscape mitigation planting and HS2 access roads could potentially supplement the network of existing or diverted rights of way and minor roads suitable for sustainable travel modes. Some integration is clearly planned between HS2 access roads and rights of way diversions, but there appear to be other locations where statutory or concessionary routes could allow additional links and circuits to be developed.

Consultation Response to Volume 2 General Responses to WDES Volume 2 CAR's

Version Number	Last updated	By
1.0	17/10/18	Morna Dudeney
1.1	26/10/18	Andrew Marsh
1.2	31/10/18	MD – add RR comments
1.3	5/11/18	TF comments
1.4	14/11/18	SB & GE & JB comments Plus review – Move sections to Vol 3, 4...
2.0	20/11/18	Air Quality added
2.1	22/11/18	JB historic environment GB corrections

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1 INTRODUCTION

1.1 General response to WDES Volume 2

1.1.1 This report contains our generic comments for the various Community Area reports of the WDES Volume 2 within Derbyshire.

- LA05: Ratcliffe-on-Soar to Long Eaton LA06
- LA06: Stapleford to Nuthall
- LA07: Hucknall to Selston
- LA08: Pinxton to Newton and Huthwaite
- LA09: Stonebroom to Clay Cross
- LA10: Tibshelf to Shuttlewood
- LA11: Staveley to Aston
- MML01: Danesmoor to Brierley Bridge
- MML02: Unstone Green to Sheffield Station

1.1.2 The more detailed comments on these are contained in separate local area volumes which also form part of this consultation response.

1.1.3 DCC are concerned regarding the complexity of the information contained in the Community Area Reports. Examples of overlapping between the different areas makes it difficult to follow. This is particularly confusing between LA10 and LA11 where several major structures such as the 40m viaduct over the M1 is shown in LA10 but described in LA11. The suggestion that the documents are simple to understand and that the average person only needs to read the chapter related to their locality to be assured that the assessment is sound is completely false. It is the Council's view that to make reasonable sense of the papers a person needs to have opened at least a number of volumes at the same time.

1.2 Introduction.

1.2.1 In this section the council's comments refer to the overall structure of the documents that form the WDES and a number of general observations on the papers as a whole. To aid the reader we have where possible followed the sequence and order of issues raised and the methodology used by HS2 Ltd, namely:

- Agriculture, forestry and soils
- Air Quality
- Community – incorporating health related issues outside of the HIA.
- Ecology and biodiversity
- Health
- Historic environment

- Land quality
- Landscape and visual
- Socio-economics
- Sound, noise and vibration
- Traffic and transport, incorporating PROW, highway design and Traffic Safety
- Water Resources & Flood Risk

1.2.2 Where a comment by the council refers to a specific issue or map, a corresponding reference is included in the left hand column. Where a reference is not give, the comment applies to the document or subject area as a whole. The council does not have the capacity or the technical experience to comment in every area of the environmental statement. There are a number of areas within the documents where the council has not offered a comment, this should not be taken as agreement or consent for the text.

1.2.3 There are also a number of generic comments on issues not contained within the WDES itself namely:

- Future transport projects including Key Cycle Network
- Limestone supplies and haulage
- Opportunities for sustainable travel
- X
- Y
- Z

2 GENERIC COMMENTS ON WDES SECTIONS

2.1 Agriculture, forestry and soils, Section 4

2.1.1 At this time the council has no general or specific comments to make.

2.2 Air Quality, Section 5

2.2.1 Please also refer to individual responses to each Community Area Reports (CAR).

2.2.2 Long Eaton; DCC welcome the inclusion of review of the impacts of viaduct design on urban airflow with specific reference to Long Eaton and the potential impact on environmental pollutant exposure.

2.2.3 DCC welcome the inclusion of green walls and associated greening infrastructure to support mitigation of air pollution and improve visual appearance of man-made structures. Such measures will also support irrigation and reduce flooding.

2.2.4 DCC welcome engagement with Borough and District Environmental Health teams throughout the process in order to ensure consideration of local impacts, suitable monitoring and appropriate mitigation measures.

2.2.5 DCC welcome the use of Euro VI vehicles within the fleet however support the use of ULEVs where possible as viable options become available.

2.2.6 DCC support assessment and mitigation in line with recently developed East Midlands Air Quality Network; Air Quality and Emissions Mitigation Guidance for Developers using the DfT Threshold Criteria for Transport Assessments [1] to assess impact and mitigations. However it is noted that guidance includes the Institution of Highways and Transportation (IHT, 1994). Guidelines for Traffic Impact Assessment, Institution of Highways and Transportation. The IHT Guidelines suggest that the scoping of the Transport Assessment should include all links and associated junctions where traffic will exceed 10% of existing tow-way traffic (or 5% in congested or other sensitive locations) or such other thresholds as may have been established by the Highway Authority. These considerations will only however be addresses in the formal ES. Early engagement with the Highway Authority to agree the detail and scope of the formal ES will therefore be required.

2.2.7 DCC note the assessment of construction traffic impacts will use traffic data based on estimates of the average daily flows and assume vehicle emission rates and background pollution concentrations from the year 2023. Such modelling is based on assumptions regarding decreasing trends in air pollution levels. DCC recommend monitoring and assessment during the pre-construction, construction and operational phases to ensure accurate assessment of baseline and impacts.

- 2.2.8 DCC note the use of the DEFRA baseline data which utilises 1km grid squares, however would wish to ensure monitoring at source where sensitive receptors are known in order to monitor actual impacts.
- 2.2.9 It is not evident from the report if local monitoring data has been utilised during initial assessment or will be utilised during further assessment. DCC advocate the use of actual monitored data above modelled data where this is available.
- 2.2.10 DCC note the reports seek to identify AQMAs within respective areas. It must be noted that AQMAs will be subject to change and whilst areas may not currently have AQMAs in operation currently the increase in traffic created by construction may result in increases in air quality at local levels, therefore requiring the declaration of AQMAs.
- 2.2.11 The report does not include the area of A38 near junction 28 of the M1 identified within the Clean Air Strategy.
- 2.2.12 DCC advise close consultation with Borough and Districts to ensure accurate identification of sensitive receptors.
- 2.2.13 DCC welcome the publication of evidence to support the assumption that CoCP measures will be effective in ensuring effective mitigation in order to support that statement “no significant effects from dust generating activities”.

2.3 Community, Section 6.

- 2.3.1 Please refer to individual responses to each CAR.

2.4 Ecology and biodiversity, Section 7.

- 2.4.1 Generally, the approach taken is as expected, and can be supported. However;
- Survey methods will “follow recognised methodologies (deviating only where considered appropriate)” it is not currently possible to comment on the detailed approaches taken in respect of survey methodologies.
 - The suggestion that the scheme will only **seek to deliver** no net loss of biodiversity causes some concern at this stage. A firm commitment that the scheme will deliver no net loss of biodiversity would be warmly welcomed, and would better fit with government policy and aspirations, and accord better with other regimes such as planning policy and the National Planning Policy Framework. Early agreement should be sought with stakeholders about how ‘**no net loss**’ is measured and demonstrated, including clarity in how irreplaceable habitats such as Ancient Woodland will be considered and addressed.

- DCC very strongly encourage early, meaningful and sustained dialogue with ecological consultees and stakeholders throughout the process, from data acquisition and survey planning, through scheme detail design and on to mitigation/compensation development and to the delivery phase. Such consultees should naturally include statutory nature conservation bodies, local authorities, and wildlife and environmental charities. Engagement and consultation with forums such as the Ecology Technical Group, (voluntarily formed by wildlife charities), Local Authority ecologists and others, would be particularly useful.

Volume 2: Community Area reports

2.4.2 LA05: Ratcliffe-on-Soar to Long Eaton

2.4.3 The ecology sections of Volume 2 of the Environmental Statement have been written taking account of a mixture of ecological survey and assessment work, including desktop studies, consultations and field surveys. However, it is quite apparent that whilst the desktop study work is largely complete, much of the field survey work has yet to be finished - and in some areas may not yet have even been started due to access restrictions. The result is that whilst the Ecology Sections of the ES appear to have a reasonable understanding of the potential impacts of the Proposed Scheme upon designated sites (both statutorily designated and non-statutorily designated sites), and to a lesser extent the potential for impacts on habitats along the route, the potential for impacts on species and other receptors is currently poorly understood, and firm proposals for mitigation and compensation are lacking especially in relation to these impacts.

2.4.4 Taking the Volume 2 report for area LA05 as an example of the above approach is exemplified in paragraphs 7.2.2 and 7.2.3 -

- 7.2.2 In the absence of field surveys and fully developed mitigation, the assessment has been undertaken on a realistic precautionary approach.
- 7.2.3 Field surveys are ongoing, but are limited to locations where landowner permission has been obtained and to areas accessible to the public...The findings from these ongoing surveys will be taken into account in the formal ES.

2.4.5 Section 7.3 adequately describes the designated sites found along the route. The baseline identification of habitats however frequently awaits clarification or verification through further survey, the results of which are awaited. With regards to protected and notable species however, the baseline has been established only through desktop study identifying the presence of species within the wider area. Habitat suitability assessment for those species, the results of field surveys, are generally absent. Similarly, section 7.3 includes reference to areas of land which will be used for ecological enhancement, including for example The River Erewash Floodplain Local Wildlife Site, a site already of county-level ecological importance. However, in the absence of ecological surveys to establish the existing ecological value of this area, and detailed ecological mitigation and enhancement proposals, it

is impossible to undertake any kind of ecological loss/gain calculation or ascribe any ecological value to the enhancement proposals.

- 2.4.6 Section 7.4 Effects arising during construction. The initial avoidance and mitigation measures proposed, (i.e. those measures implemented to minimise or avoid ecological impacts before assessing the residual impacts arising from the proposals), seem reasonable. With regards to the assessment of impacts and effects (7.4.4), these seem reasonable where the attribute of concern is a designated site or other feature which is mapped, and where direct construction-related impacts are easily foreseen. The assessment of impacts on habitats however has slightly less certainty, pending the results of further survey.
- 2.4.7 The assessment of impacts on species is however rather disappointing. In each respect, whilst the potential presence of these species is acknowledged and the likely sources of impacts are identified, impacts on specific receptors, (bat roosts, otter holts, great crested newt ponds etc), cannot be discussed as surveys are not sufficiently complete. On that basis, the approach is simply to conclude that impacts are possible but of unknown significance, and to accordingly assume that impacts could be of up to county or regional level importance. At this stage, this is a less than ideal situation, but DCC would suggest that if this persists to the formal ES, the lack of robust data to inform an impact assessment would be deeply troubling.
- 2.4.8 In the section '*Other mitigation measures*' which could be implemented, although there is no firm commitment to do so at this stage, pending the results of the ongoing ecological surveys. Again, whilst many of the ideas suggested could be appropriate, the lack of detail and the lack of a firm commitment to deliver these measures makes their worth difficult to assess, and again, it would be troubling if this were to persist into the final version of the ES.
- 2.4.9 The next section summarises the likely residual significant effects, taking account of the mitigation already proposed. It is troubling to see that for a great number of receptors, impacts are still foreseen that could be significant at the county (sometimes district/borough) level, even taking into account the mitigation measures already proposed. Whilst operational impacts (section 7.5) are less widespread and affect a much narrower suite of receptors, it is troubling that here too, significant impacts of up to regional-level significance are foreseen, even following the implementation of mitigation measures.
- 2.4.10 The ecology section of the report ends seemingly without resolving whether more can, or should be done to address these residual impacts.
- 2.4.11 Overall then, whilst the assessment of impacts on designated sites is reasonably robust, the lack of data in relation to other receptors, and the lack of proposals for the mitigation of impacts, means that the scheme would appear at this stage to deliver significant ecological impacts on a number of receptors, but the scale and significance of these impacts are currently unknown.

2.5 Health, Section 8

2.5.1 Please refer to individual responses to each CAR.

2.6 Historic environment, Section 9

2.6.1 The comments below are without prejudice and combine both archaeological and built historic environment comments under the general heading of the 'historic environment'. The comments have been compiled by DCC's Archaeologist and Historic Building Architect.

2.6.2 The comments made by other consultants have been reviewed as part of this process and are supported in principal. These include:

2.6.3 Historic England; with reference to their current comments dated 8th March 2017.

2.6.4 The National Trust; with reference to their response (6th September 2017) to mitigate the effects of HS2 between Tibshelf and M1 Junction 29, with reference to Hardwick Hall and Estate.

2.6.5 Further, as the historic environment is inextricably linked to Derbyshire's rich landscape character the comments provided by our landscape architect are also supported. It is advised that these are taken into consideration to help mitigate any adverse visual impacts as so far as is practicable.

2.6.6 For Historic Environment, the intention is to consider impact on features within a 500m rural or 250m urban span outside the land to be taken for the rail corridor itself. In the case of linear features such as canals, the impact of severance is far greater in extent than could be envisaged within 500m of the rail corridor in that severance at any location for current navigations is critical to the operation of that entire navigation into the future. Severance or impact on a 1km reach could jeopardise operation of many more km of existing or proposed navigation / waterway.

2.6.7 As an example, severance of Chesterfield Canal at Norwood (west of Wales) would deny all chance of restoration and re-opening of the canal as a viable navigation right back to Chesterfield itself, so 14 miles (22km or more) and would similarly deny opportunity for the Rother Valley Link circuit creation. Severance even at Staveley would, deny use of the 5 miles of existing restored canal right back to Chesterfield. Severance at either location could thus put the whole of the partially restored historic feature at risk. There needs be a higher priority impact set for severance of a linear water feature which requires continuity and maintenance of a fixed water level.

2.6.8 For landscape and visual assessment it is standard practice to look at a 2km study area. This is particularly relevant for sections with a rail corridor on elevated embankments or new structures.

- 2.6.9 The historic environment study is at a very early stage and it is consequently difficult to make specific and detailed comments, in particular with regard to archaeological impacts. The WDES contains an incomplete desk-based assessment of heritage assets, mapping of only designated heritage assets. There is no archaeological field evaluation (even non-intrusive work), no details of the risk-modelling approach for prioritising archaeological surveys beyond a proposed methodology, no assessment of historic landscape character, and no historic environment viewpoints or visualisations. NPPF policy embodies a process of understanding heritage significance at the point of determination and then making a planning balance determination. The lack of progress, and consultation, thus far on heritage assessment risks leaving the final ES with weak historic environment baseline.
- 2.6.10 This problem is exacerbated by an almost complete lack of engagement and consultation thus far on historic environment matters. It is regrettable that there has been no consultation to date from the consultants carrying out the ES with either Derbyshire HER (beyond the supply of shapefile data) or with the County Council's archaeological officers. DCC have not been invited to meetings with Historic England (e.g.) to discuss the settings of some of the county's principal archaeological assets. This approach risks the omission of important additional data layers within the HER (for example the 'grey literature' library) and the local expertise of the relevant officers. More critically it is endangering a consensus approach to achieving the best possible design and mitigation outcomes in relation to the county's heritage assets and the associated tourism economy.
- 2.6.11 DCC's greatest concern in relation to the historic environment work to date is the general under-assessment of setting impacts to designated heritage assets within the WDES volumes, particularly where there is no direct impact (i.e. because the scheme passes close to the asset). This is particularly noticeable with some of the higher value assets such as the groups at Hardwick Halls/Park, Bolsover Castle, and Sutton Scarsdale Hall, but also applies to other assets such as the Grade II Listed Brookhill Hall at Pinxton (Vol 2 LA08 9.4.5). This under-assessment partly arises from an overly coarse-grained approach to heritage weighting e.g. weighting the Hardwick assets the same as some Grade II Listed Buildings. However there also seems to be a reluctance on the part of the consultants to assess at the higher levels of impact where there are no direct impacts or where there are existing detractors. In some cases these assessments clash directly with the results of the Landscape and Visual Impact Assessment (LVIA) study (for example at Hardwick), and the conclusions reached lack credibility. Where the contribution of setting to significance for internationally important heritage assets hinges critically on designed views over the Vale of Scarsdale this should be properly acknowledged in the relevant setting studies and reflected in the levels of change and effect assessed.
- 2.6.12 Due to its scale and length the HS2 line will impact on areas of the historic environment with multiple overlapping sensitivities. Nowhere is this more demonstrable than the M1 Corridor alignment which cuts through the

aforementioned trio of Grade I Listed Buildings of international significance. It is these assets in particular, and their encompassing historic landscapes, which have the potential to be impacted on greatest by the route and so it is vital that impacts and mitigation strategies are considered more holistically. Unfortunately, the current WDES considers the measure of any impact on these heritage assets individually.

- 2.6.13 'Historic Environment Overview' sections at each LA volume are drawn from known data alone, principally sites on National Heritage List for England (NHLE) and Derbyshire Historic Environment Record (HER). Although this is inevitable given the stage the project is at, it is important to acknowledge that known data provides a partial overview. Large parts of the route through eastern Derbyshire are historically under-researched and imperfectly understood, and have few known sites. This is sometimes achieved, but not always (e.g. Vol2b LA08 9.3.9 "Romano-British activity within the 500m study area is limited to two areas where pottery has been recovered").

2.7 Land quality, Section 10

- 2.7.1 The report does not mention the potential contamination arising from previous land use as railway or rail sidings which applies across the whole HS2 route.
- 2.7.2 At this time the council has no further comment to make but does have individual responses in some CARs.

2.8 Landscape and visual assessment, Section 11

General Issues

- 2.8.1 The whole consultation exercise could have been eminently easier if plans in the various Map Books had been orientated with the north point to the top of the plan or certainly no worse than a 90 degree turn clockwise. For example drawing reference CT-06-602a has a north point orientated at about 170 degrees making it exceedingly difficult to orientate the plans with other maps and plans used to reference other data.
- 2.8.2 Throughout Volume 2 there is repeated reference to the commencement of consultation with Local Authorities along the route of HS2. With regard to Landscape and Visual issues this has largely been in the form of presentations by HS2 on the overarching approach with more specific consultation on the definition of landscape character areas (LCA) and the location of representative viewpoints along the route. Overall the engagement has been very limited and it remains unclear as to the extent that comments provided by the Local Authorities have been considered and addressed in the submission of the WDES.

2.8.3 The approach to use local Landscape Character Areas is welcomed and supported in principle but some concern has already been expressed to the various consultants engaged by HS2 with regard to the definition of these areas. These are described throughout Volume 2 as 'adaptions' of existing published landscape character assessments such as the 'Landscape Character of Derbyshire' document. With regard to this point see below the response made to Arup+ in relation to the definition of local LCAs:

"Without the detailed descriptions of the proposed landscape character areas defined within the study, it is not clear what distinguishes one LCA from another. For example, it is not clear what distinguishes Sutton Estate Farmlands to the north of Sutton Scarsdale from the Wooded Farmlands to the south. Both of these areas fall within the Estate Farmlands LCT as defined in the Derbyshire LCA and there seems very little justification for the separation of these two areas based on either their 'estate' or 'wooded' characteristics. If Wooded Farmlands was to be defined as a separate LCA I would expect it to form the area to the east of the HS2 corridor with a boundary formed by the District boundary and consistent with the Wooded Farmlands in the Derbyshire LCA.

I am a little concerned about the negative connotations attached to some LCA names... [which] give the impression (from their names) of poor quality areas and as a result are likely to be judged as landscapes of low sensitivity and quality. However, these are areas where there has been (and still is) significant investment in their regeneration and are still in the early stages of recovering from past industrial activities associated with coal mining. It is important to distinguish landscape character from landscape impacts and not conflate the two. I would not wish to see the current baseline be a justification for sub-standard design particularly when the local authorities in the area are striving to improve the environmental quality of these areas. The loss of a contiguous river corridor within the assessment is also worrying because river floodplains are linear landscapes and it is important visually and functionally that this linearity and connectivity is maintained as part of any development and this could have ramifications for the detailed design of the route.

A potential weakness of the LVIA process is that it often under-assesses the adverse effects of existing development on landscape character and visual amenity and where existing adverse effects are recognised they are then applied as a mitigating factor for new development – in other words poor quality development leading to more poor quality development. The local authorities in the area do not support that approach and are keen to secure not only mitigation of potential adverse effects associated with HS2 but environmental enhancement to redress long standing harm to the landscape. In this section that might include enhancements as the route passes close to Hardwick Park such as the consideration of a land bridge that might be used to reconnect the landscape and reinstate an original historic access route to the Hall. At Coalite, where the route directly impacts on the site, consideration might be given to the role HS2 could play in remediating the contamination associated with this site, which could open the

door to less intensive redevelopment of the remaining site to create greater opportunity for landscape and green infrastructure enhancements.”

- 2.8.4 DCC are concerned in the way the landscape and visual impact assessments have been constructed. Within each Community Area Report forming Volume 2 of the WDES. The LVIA outlines the number of LCAs defined within each area and then compares this number with the number of LCAs where there would be significant adverse effects on landscape character. Invariably those areas that receive the most significant adverse effects are those that are directly impacted by the line of the route. Other LCAs within the study area may not experience any direct landscape effects or only short-term effects associated with the construction and are unlikely to experience significant long-term landscape effects. DCC do not accept that counting up the number of significantly affected areas and comparing those against those areas that won't be significantly affected is a basis for overall acceptability. By taking all the Community Areas together for Derbyshire there are at least 15 LCAs that will still experience significant adverse effects in year 15 of operation. This constitutes what would be perceived as a near continuous landscape corridor running through the County and the fact that other areas within the wider study area remain less affected doesn't justify a less than optimal environmental design for the scheme in these areas.
- 2.8.5 Furthermore it is difficult to appreciate how the particular characteristics of the landscape, whether locally defined in the WDES or at a county scale, have informed the overall design of the scheme. As such the scheme proposes landscape mitigation that is very much at odds with the established character of the landscape such as that shown on drawing number CT-06-457-L1 near Sutton Scarsdale and rather than mitigating the adverse effects of the scheme the landscaping is likely to add to them. Overall the general approach to landscape mitigation has been to uniformly plant trees along both sides of the route to screen the route. There are locations along the route such as the section of the route north of the M1 near Deepdale Farm, Sutton Scarsdale (drawing no LV-04-394 (Volume 2: Tibshelf to Shuttlewood)) where the planting of trees to screen views seems to be at odds with the description of the established landscape character and would be inappropriate. In this area defined as Sutton Estate Farmland LCA (page 182, Volume 2: Tibshelf to Shuttlewood), the landscape is described as having an “open character combined with the rising topography contributes to a larger sense of landscape scale” with “the perception of the valley landscape and its relationship with the historic features”; an observation supported by the Derbyshire landscape character area which describes the area as being “an open landscape with long distance views” with “a paucity of tree cover”. It is difficult to appreciate how this description of landscape character has informed the landscape mitigation proposals in this section of the route.
- 2.8.6 It is not clear why embankments haven't been graded out into the surrounding farmland to allow for farming to continue up to the boundary of the route and allow for better integration with the established landscape character. I note that the grading out of embankments is shown in other sections of the route such as to the

north of Wales/Kiveton Park as shown on drawing number CT-06-641 (LA11: Staveley to Aston) even though in this case the entire slope would be planted, which seems to render the grading out of the embankment as pointless.

2.8.7 There appears to be discrepancies in the extent of the proposed landscape planting between the drawings in the CT-06 series of plans (proposed scheme) of the map books and those shown in the LV-04 series of plans. The CT-06 series show no planting on embankments and cuttings whereas the CT-04 series sometimes show embankments and cuttings as being planted e.g. LV-04-394. This discrepancy needs to be clarified to fully understand the likely impact of the proposed scheme.

2.8.8 With respect to visual impact assessment, comments and concerns on the approach have also been provided to the consultants operating on behalf of HS2 in the preparation of the WDES. The general concern shared with the consultants in earlier correspondence (Arup+, 16 March 2018) is as follows;

“From a general point of view it will be important that the LVIA takes a balanced view to the assessment of landscape and visual effects so that it can be used to inform the design of the route as part of an iterative process. In this context it will be important to have a range of views that assess the proposed corridor in wider views as well as at close quarters where the effects are likely to be greatest and most significant. My understanding from the presentation by HS2 Ltd at their Birmingham office in January is that landscape mitigation will primarily be focused on addressing significant effects so it will be important that adverse effects are accurately assessed in the first instance if the appropriate mitigation is to be applied. The concern is that impacts of a low to moderate nature would not be assessed as significant with respect to the LVIA methodology and would therefore not justify any significant mitigation or enhancement”.

2.8.9 In this regard DCC are concerned that the viewpoints identified in the LV-03 and LV-04 series of plans in the Volume 2 Map Books only identifies the “Significantly Affected Viewpoints” and may well have underestimated the impact from more distant locations particularly where these might be elevated vantage points. The detailed assessment work forms part of Volume 5 which is not available at the present time so DCC would wish to reserve its right to comment on this information when it becomes available.

2.8.10 Although drawings at this stage may still be indicative, DCC are concerned with the way certain landscape details are shown on the plans. All balancing ponds and river realignments such as that shown for the River Doe Lea on drawing number CT-06-633 should be designed and NOT engineered so that they integrate with existing features and maximise their value for ecology. The precise location and design of balancing ponds should be carefully considered so that they also sit comfortably alongside existing landscape features and do not in themselves introduce other incongruous elements into the landscape. This should also include access roads and tracks shown for the maintenance of these features.

2.8.11 It is not clear the extent to which the lighting associated with construction compounds and satellites has been considered as part of the LVIA and the concern is that these impacts have been significantly down played.

2.9 Socio Economic, Section 12

2.9.1 Please refer to individual responses to each CAR and Volume 3 response.

2.10 Sound, Noise & Vibration, Section 13

2.10.1 Please refer to individual responses to each CAR.

2.11 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14

2.11.1 The level of engagement from HS2 with DCC as Highway Authority has been extremely concerning and the fact that an informed Transport Assessment (TA) has yet to be provided makes it impossible for the Highway Authority to provide informed comment. Unfortunately without the TA DCC are unable to truly evaluate the impact the proposals will have on the traffic and transport elements of the WDES. The Highway Authority also have grave concerns in relation to the confidence of information/data provided within the WDES in relation to highway network impacts and feel that the level of engagement to date has been extremely disappointing. DCC request a far more detailed dialogue about the construction proposals and the outputs from the TA with HS2.

2.11.2 There is an alarming lack of detail showing the alterations to the existing highway network. Given the lack of information DCC are unable at this time to undertake a technical assessment to inform this consultation.

2.11.3 The project proposes to alter considerable sections of highway network within Derbyshire and by doing so will realign and sever numerous highway sections. DCC are extremely disappointed at the lack of engagement around these specific elements. Where a highway section is to be severed by the project and the remaining sections of highway will provide no public benefit DCC will stipulate that these sections of highway be stopped up and ownership revert to the subsoil owner/adjacent land owner. In depth consultation will need to be undertaken in relation to the stopping up of any highway section within Derbyshire.

2.11.4 DCC need to be provided with detailed phasing plans for the project and robust travel plans/arrangement to identify the transport activities to and from the proposed site compounds. Also far more detail is required in relation to siting of the access points off highway as to ensure they are safe and suitable.

- 2.11.5 DCC are extremely disappointed and alarmed that throughout the documents there is no mention of where the responsibility lies for ongoing maintenance of new drainage infrastructure, sustainable or otherwise, that is to be constructed by the project. This element must be addressed and clearly identified. Unless the infrastructure purely drains the highway network DCC as Highway Authority will not adopt this infrastructure and the responsibility will remain with the subsoil owner or a responsible body.
- 2.11.6 Within all the supporting plans for the project a large number of 'HS2 Access roads' are proposed. The supporting documentation does not make reference to whether these are to be permanent or temporary elements of infrastructure. As they do not appear to derive any highway related benefit the Highway Authority would like to clearly inform HS2 that there will be no intention for the authority to enter into any form of negotiation in relation to future adoption of this infrastructure.
- 2.11.7 Within all the supporting plans for the project there are an overwhelming number of Main construction compounds, Satellite construction compounds and Construction traffic routes. Unfortunately given the sheer lack of informed information within the WDES, DCC are unable to provide a meaningful assessment at this stage. It is to be noted that all these elements will have a major and strategic impact upon the Highway Network and the Highway Authority require detailed information and adequate engagement before a robust assessment can be made.
- 2.11.8 The project strategically identifies the need for both Temporary and Permanent Traffic Regulation Orders to be produced and implemented. Unfortunately no reference has been made as to how these will be managed and by whom. The Highway Authority would like to inform HS2 that given the volume of Orders that will be needed, DCC do not have the available resource to support this. HS2 will have to identify a specific element of the project to finance and facilitate these orders in close liaison with the Highway Authority.
- 2.11.9 DCC have concerns regarding management and maintenance liabilities of new routes.

2.12 Water Resources & Flood Risk, Section 15

- 2.12.1 DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC were supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the Highway Authority, but with no additional funding to maintain them which is not acceptable.
- 2.12.2 Please also refer to individual responses to each CAR.

2.13 Waste Management

- 2.13.1 The Waste Management Service have reviewed the HS2 route in relationship to the locations of the Councils closed landfills, for which DCC have a responsibility for. The current line of HS2 does not cause any concern, however if the location of HS2 were to change, then further consultation would be required.

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Consultation Response to Volume 2 CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON

Version Number	Last updated	
1.0	16/11/18	
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VOLUME 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 5 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.
- 1.1.4 A recent study by Jacobs for Midlands Connect and Erewash Borough Council looked at options to improve connectivity, "*Midlands Rail Hub - Long Eaton Low Level Line Study*". The County Council request that HS2 Ltd liaise with Network Rail and promoters to support the recommendations. **See Appendix C.**

1.2 Overview and description, Section 2

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
2.1.27	With regard to commitments, allocations and land safeguarded for minerals and waste development, HS2 Ltd should liaise with Derbyshire County Council to ensure that all relevant allocations, commitments and safeguarded sites for minerals and waste are included in the assessment and are up to date as the WDES is progressed.
2.1.33	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.23	The height of the viaduct has increased from that consulted on in 2017 could not efforts have been made to lower instead to reduce the visual impact of the scheme. How can the planting around the auto-transformer station provide visual screening to residents of Long Eaton? DCC encourage HS2 to consider specialist 'exemplar' design for the viaduct.
2.2.36	It is unrealistic to expect all vehicles to access the site from the A52 due to the considerable extra traffic this would place on the road. A vehicular access from Long Eaton town centre to the hub station also needs to be delivered by HS2 as part of the scheme. To make access to the site more sustainable it also important that the extension of NET to the site is delivered by the scheme rather just leaving a corridor for it to be provided at some point in the future.

2.3.1	It is confirmed that HS2 Ltd has engaged with officers at DCC regarding minerals and waste related baseline information. However, as the WDES progresses, further liaison should take place to ensure that the baseline information is up-to-date and robust.
	Trent Lane Satellite No.1
2.3.56(1)	A satisfactory access cannot be achieved to serve the site as drawn on the plan.
	<p>The site is accessed by an adopted highway (Trent Lane) which deteriorates to a public footpath (FP 40) prior to reaching Cranfleet Farm. The footpath extends east from the farm over a 2 metre high drainage dyke to a 2 metre wide 'humpback' canal bridge. The access route then leaves the public footpath and extends across open farm land to the proposed compound.</p> <p>There is space within the existing highway to widen Trent Lane to form passing places and construct a new carriageway from Cranfleet Farm to the canal. A new crossing would be required to accommodate construction traffic.</p> <p>Trent Lane is not designed and laid out to accommodate two way traffic flows without significant mitigation works in the form of widening and provision of passing places which may require third party land. Access by operatives to the compound would have a significant impact on the fronting residential properties.</p> <p>The access route extends across the River Trent flood plain. Any construction would need to accommodate the existing berm flood defenses. The significant works required to gain access particularly the canal crossing would make the location impractical.</p> <p>Trent Lane is accessed from Meadow Lane. A signal controlled level crossing is located on Meadow Lane Immediately adjacent to the junction. Right turning vehicles into Trent Lane can cause queuing over the level crossing. An increase in traffic flow on Trent Lane would exacerbate the problem.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exit.</p>

2.3.56(2)	Trent Lane Satellite No.2
	<p>A satisfactory access cannot be achieved to serve the site as drawn on the plan.</p> <p>The site is accessed by an adopted highway (Trent Lane). The carriageway is approximately 3 metres wide with few opportunities to pass oncoming vehicles. The proposed compound fronts directly onto Trent Lane and access may be achieved into the site.</p> <p>Trent Lane is not designed and laid out to accommodate 2 way traffic flows. Without significant mitigation works in the form of widening / passing places access by operatives to the compound would have a significant impact on the fronting residents and may require third party land. The site is accessed by Trent Lane. The carriageway is 3 metres wide and no footways are provided. There are verges on both sides to enable pedestrians to step out of the carriageway.</p> <p>Trent Lane is accessed from Meadow Lane. A signal controlled level crossing is located on Meadow Lane Immediately adjacent to the junction. Right turning vehicles into Trent Lane can cause queuing over the level crossing. An increase in traffic flow on Trent Lane would exacerbate the problem.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.71	Meadow Lane, Long Eaton
	<p>The nature of Meadow Lane is part light industrial and part residential. The site compound would increase vehicle and pedestrian movements on Meadow Lane.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.73-2.3.78	<p>It is not clear how long the Long Eaton main compound would remain in place. In section 2.3.73 it states this compound would remain in place for 4 year 3 months for construction of the viaduct and then in 2.3.76 there is an additional 2 years and 6 months for track works to the conventional line and then another 2 years and 3 months in section 2.3.77 to manage the railway installations works. So a total of</p>

	<p>9 years. However in figure 5 the compound is shown as being open for 4 years and 3 months for civil engineering and in figure 6, 3 years and 6 months for rail systems work. A total of 7 years 9 months. More clarity is required on what the total time the various work compounds will be open for.</p>
2.3.83	<p>Could materials for the East Midlands hub station main compound and any waste generated be brought and removed from the site by rail using train on the Erewash Valley line rather than road as proposed the compound is immediately next to the rail line.</p>
2.4.7 and 2.4.8	<p>These sections indicate that an assessment will be provided of the amount of waste material that would be generated by the proposed scheme 'as a whole' in Volume 3 of the ES. However, it is important that details are provided of the amounts of waste that would be generated by this specific section of the works and the other sections of the route that pass through Derbyshire so that a more detailed assessment can be made by the County Council of the likely impacts of the scheme.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain.</p> <p>Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.5.5-2.5.10	<p>With the exception of 1 option 3 of rejected proposals have a higher costs than the selected scheme being taken forward for development. It would appear that cost is the determining factor on what option is selected. This should be re-examined to see if the selected scheme does provide the best option overall when considering all of the aspects.</p>

1.3 Stakeholder engagement and consultation, Section 3

3.3.2	<p>There is no mention in the main themes to emerge from the engagement of the design of the viaduct across the Trent Valley and through Long Eaton. This subject has been consistently raised by DCC over the last 2 years. The design of the viaduct is seen as a critical issue and simply using the same generic design proposed across the rest of the HS2 network would not be appropriate. The viaduct will be visible from large part of Long Eaton town and therefore needs to be a high quality design which form a key element of town scape of the area. The treatment of the land below and immediately adjacent to the viaduct also needs to be considered to ensure it has a suitable use in the future.</p>
3.4.6	<p>There have been many meetings between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.</p>


1.4 Agriculture, forestry and soils, Section 4

1.4.1 At this time the council has no comment to make

1.5 Air Quality, Section 5

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
5.3.5	It is noted that the Long Eaton AQMA falls within scope, and also (in 5.4.9) that this may be impacted by construction traffic. The formal ES will need to address this in full.
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA5 area.
5.4.6	It is noted that the risk of dust effects could be "high" in this area and that human health effects could be "medium".
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA, Section 6.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
6.2.4	When reinstating or sourcing alternative public footpaths in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.
6.4 Temporary effects	The report does not provide enough details on how the construction phase will impact on traffic, pedestrians and businesses. Existing traffic along this stretch of the main A and B roads affected can already get hold up, so any disruption is likely to add to traffic congestion and impact on local people, and especially the town centre and route into Sandiacre from Stapleford.
6.4  Permanent effects	<p>HS2 has identified that at two locations residential dwelling will need to be demolished, totaling 173 dwelling. 23 are located on Newbury Avenue/ Trent Cottages, to the south of the town as the line would enter the Erewash Valley, and 150 properties in Bonsall Street, Bonsall Court, New Tythe Street, Main Street. Additionally the Windsurfing Club and Kingdom Hall, Jehovah Witness place of worship would also be impacted, with the latter being demolished.</p> <p>This represents a significant adverse impact on the community and the people who will be displaced. In the case of Bonsall Street/ Court. Much of the housing is social affordable housing, which is in high demand within the Long Eaton area, and some is targeted at older people, a growing community within Derbyshire. Relocation, whether forced or voluntary, may cause stress impacting more on low income families and those with disabilities or poor social support.</p> <p>The development will also have a huge intrusive impact on the town centre and residential areas which are adjacent, and people living nearby are likely to experience additional noise and have their townscape views affected.</p> <p>The loss of a number of community based facilities also represents an adverse impact, with the loss of a local place of worship, specialist recreational facilities, albeit to a lesser degree, and with the loss of the community centre in nearby Toton.</p>

6.4 Permanent effects (2)	<p>Great care needs to be taken to ensure that residents displaced receive the maximum amount of support and have access to rehousing without having to undergo a stay in unsuitable temporary accommodation, and get financial and other help with moving. The landlord is likely to have duties to compensate tenants for the cost of loss of their home and to cover removal expenses. HS2 should ensure that their compensation to the social landlord takes full account of this.</p> <p>The impact of construction, temporary interference with road and other access needs to be carefully managed and well publicised, to minimise the day to day impact on local people, residents and businesses.</p> <p>Sandiacre and Stapleford lie adjacent to each other, with Sandiacre within Derbyshire, but Stapleford within Nottinghamshire.</p> <p>The loss of a small number of dwellings in both towns on Derby Road, Station Road and at Rutland grove, will be of significant impact to the owners or residents of those dwellings and dwellings which will then become adjacent to the development.</p>
6.4.2	Add additional mitigation point of avoiding using important local roads for construction traffic, which will worsen existing congestion and therefore exacerbate commuter stress particularly, but not exclusively, in Long Eaton
6.4.15	Effect of loss of greenspace on mental and physical wellbeing should be taken into account.
6.4.37	It is difficult to understand how no cumulative effects have been identified on the community of Long Eaton during construction. This is despite the fact that 173 residential properties will be removed in the area along with community facilities and business premises. In addition there will be works compounds in the area for many years. The combination of all these factors surely create a significant adverse cumulative effect.
6.5.6	It is difficult to understand how no cumulative effects have been identified on the community of Long Eaton during operation. The introduction of a 15-19m high viaduct through the middle of the town which will carry 9 train an hour in each direction will surely create significant adverse cumulative effects.

1.7 Ecology and biodiversity, Section 7.

1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
General	<p>The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage. It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES. Whilst not wishing to consider potential impacts on individual sites, features and species at this time, with regards only to the section of the route (and potential receptors) within the county of Derbyshire, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <ul style="list-style-type: none"> • The use of a viaduct where the Proposed Scheme enters Derbyshire at the southern end (the Long Eaton and Toton viaduct) should significantly reduce impacts on habitats and habitat connectivity along the Trent Valley corridor in this area, and should allow species to move through this area unimpeded. Care must be taken however to ensure that the viaduct is well designed and executed, in order to support the Trent Valley Vision - the aspirations for an enhanced recreational, leisure and tourism offer in this area, whilst also supporting improved economic activity and environmental functionality. • The demolition of buildings in the Long Eaton area has the potential to affect bats and bat roosts, although the extent of impacts is not known at this stage. Consideration will need to be given to both construction stage and operational impacts. Opportunities for maintaining and enhancing habitat connectivity and providing green infrastructure and multifunctional green space should be thoroughly explored, including under the viaduct section through Long Eaton • East-West habitat connectivity along the River Erewash corridor and floodplain should be maintained and enhanced where crossed by the Proposed Scheme immediately south of Toton Station • Impacts on designated sites - particularly Local Wildlife Sites – will need careful consideration

1.8 Health, Section 8

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
8.2.2	Demonstrates an understanding that the wider determinants of health will be affected as a result of this development.
8.2.3	Identifies that there will be adverse and beneficial health impacts.
8.2.4	DCC agree with health determinants listed. However, has neglected to include: potential affects on mental health and wellbeing, community connectivity, employment, housing, local transport, food and farming and economy.
8.2.6	DCC agree that strength of evidence does not necessarily determine the importance of the outcome. The WDES also needs to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight, for example the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order As there are 173 residential properties and 24 businesses scheduled for demolition in this section this impact could be significant.
8.2.8	DCC encourage HS2 Ltd to use and refer to Derbyshire County Councils "Rapid Health Assessment of HS2" (2013) and "Update on the 2013 Rapid Health Impact Assessment of HS2" (2017) when constructing the formal ES document.
8.4.1	DCC agree with mitigation listed but HS2 also need to consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.5	DCC agree that a community engagement framework and personnel is vitally important.
8.4.8	DCC request that HS2 also include reference to community connectedness in this section.
8.4.18	DCC request that HS2 includes reference to mitigation such as using aesthetic design solutions.
8.4.20	Special attention must be paid to retaining easy access to healthcare services, particularly specialist services in Derby and Nottingham.
8.4.29	Due to impact on PRoW in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.

8.4.30	DCC request that HS2 add additional mitigation of avoiding using important local roads for construction traffic. Increased traffic congestion will make it more difficult for pedestrians and cyclists to utilise active travel options. Increased journey times will also lead to higher stress levels for commuters.
8.4.39	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase. HS2 should ensure that construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme which will include monitoring against 'respecting the community'.
8.4.44	A total of 173 residential properties would be demolished. The erosion of social networks resulting from these demolitions would have the potential to reduce social capital, reducing the beneficial health effects that are gained through social contact and support. Relocation, whether forced or voluntary, may cause stress impacting more on low income families and those with disabilities or poor social support
8.5	DCC request that HS2 work closely with planners in Long Eaton to ensure that preparation for the HS2 station in Toton is integrated with local planning policies.

1.9 Historic environment, Section 9.

1.9.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
9.3.4	<p>The following designated heritage assets, within the 2km study area, are currently not included and so a full assessment towards any impacts on their setting will be required:</p> <ul style="list-style-type: none"> • The Church of St Giles (NHL: 1204475); Grade I Listed Building. The Church has a prominent hill top location within the Sandiacre Cloudside Conservation area and semi-rural location. • Sandiacre Cloudside (Conservation Area) • Sandiacre Canalside (Conservation Area) <p>Long Eaton Town Centre Conservation Area (NHLE 1204249) is identified as being wholly within the 2Km study area. Although its setting is extensively urban the viaduct is of a proximity and height that it will have the potential to have a major adverse impact on its setting; forming a strong visual and/or physical barrier. Careful consideration towards the design of the structure, with particular regards to the treatment of areas at low-level</p>

	around it, will be required. In this regard, the comments made by DCC's Landscape Architect ¹ are fully supported and should be taken into consideration
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1.10 Land quality, Section 10.

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Volume, page and paragraph reference	Full ES comment
10.2.7	Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase. Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should license for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.
Table 20 (10.3.38)	Appropriate reference is made to Attenborough Quarry and that it was a former sand and gravel site that has been reclaimed for agricultural and leisure uses.
10.3.58	Appropriate reference is made to the Derbyshire Minerals Local Plan and that it identifies a Sand and Gravel Minerals Consultation Area to the south of Long Eaton, which contains the former Attenborough Quarry.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 23, there appears to be no plan to clarify or advise the location of these sites.
10.4.15	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 24, there appears to be no plan to clarify or advise the location of these sites.
10.4.16	With regard to potential impacts associated with mine water and mine gas and potential mitigation measures, Derbyshire County Council should be consulted as one of the 'authoritative' consultees.
10.4.22	Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 25, there appears to be no plan to clarify or advise the location of these sites.
10.4.28	This paragraph is confusing as it initially states that there are no MCAs in either Leicestershire, Nottinghamshire or Derbyshire but then

¹ See comments on; *Detailed comments and observations; LA05 Radcliffe-on-Soar to Long Eaton*, para 11.5.4, p6.

	indicates (correctly) that there is a Sand and Gravel MCA in Derbyshire to the South of Long Eaton that is impacted by the route. To prevent the unnecessary sterilisation of the mineral resource impacted by the route, Derbyshire County Council would expect to see an assessment that examines whether prior extraction of the minerals resource in advance of the development is practicable and environmentally feasible in accordance with the requirements of the NPPF. DCC would expect borehole evidence to be used as part of the assessment to provide an indication of quality and depth of deposit, particularly when such may be considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of development in order to prevent the sterilisation of the resource. This approach would accord with the policies of the adopted Derby and Derbyshire Minerals Local Plan.
10.4.31 and 10.4.32	Mention is made of the fact in these two paragraphs that in Long Eaton the site of the main compound and two satellite compounds would be located within an MCA defined in the Adopted Derby and Derbyshire Minerals Local Plan but that, as these construction compounds would be temporary and be removed on completion of the scheme, the resultant impacts would not be significant as the mineral resource would only be temporarily sterilised. This is considered to be an appropriate assessment of the impacts on the mineral resource.
10.4.35	However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, land and resource is scarce and every effort should be made to ensure full extraction of mineral resource in advance of, or at very least during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.
10.5.3	Appropriate reference is made to the Adopted Derby and Derbyshire Minerals Local Plan and that an active minerals site at Attenborough Quarry identified in the Plan has since ceased operation in 2004 and has been restored to agricultural and leisure use.

1.11 Landscape and visual assessment, Section 11.

1.11.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Volume, page and paragraph reference	Full ES comment
11.2.3	At this stage some surveys are incomplete so DCC reserves its right to comment on these findings when they become available.

11.3.10	This section of the route has been subdivided into 15 LCAs although full descriptions of each will be provided in Volume 5 of the ES, which is not available for comment at this stage. DCC reserves its right to make further comment on this information once it has been made available.
11.4.8	Table 28 outlines those LCAs that would be significantly affected during the construction of the proposed scheme. Whilst DCC agree that the 5 identified LCAs would experience significant adverse effects during the construction phase it is DCC's view that the magnitude of change has been under-estimated and would be higher than predicted for the Long Eaton Commercial Heart LCA and Long Eaton/Toton Green Corridor LCA. For example Table 28 states for the Long Eaton/Toton Green Corridor that " <i>Construction works would therefore adversely affect a substantial part of the LCA</i> " but only records the magnitude of change as medium. DCC would record this level of change as high giving rise to a major adverse effect during the construction phase.
11.4.15	The summary of significant landscape and visual impacts in this section is an over simplification of the facts because viewpoints are not receptors; they are merely locations that represent the view of the receptors (people) experiencing the potential impact. There is no assessment of how many people these effects might impact upon although this information should form part of the detailed assessment in Volume 5 of the document. DCC reserves its right to make further comment on this information once it has been made available.
11.5.4	Table 30 reads on from Table 28 at 11.4.8 and confirms that all 5 LCAs identified as experiencing significant adverse effects during the construction phase would all experience significant adverse effects at Year 1 and with the exception of the Sandiacre Industrial Area LCA would continue to have significant adverse effects at Year 15. Again DCC would not necessarily disagree with the assessment in this section but remain unconvinced that the current proposals represent the least harmful possible scheme for dealing with the route and its associated landscaping in this section as it passes through Long Eaton on viaduct. In order to assist in mitigating these clearly identified adverse effects, HS2 should engage an internationally renowned architect with a specialism in bridge design and then create sufficient space in association with this structure to deliver a high quality public open space beneath it that would maintain connections across the town as well as creating an attractive space and setting for the proposed route as part of a wider green infrastructure network.
11.5.7	Table 31 predicts the likely significant visual impact of the proposed scheme at the operational phase in the winter and summer of Year 1 and in the summer of Year 15. DCC do not accept the findings of this assessment, which underestimates the short and long term impacts associated with the proposed scheme. At viewpoints 375-02-003 and 375-02-011, for example, the visual impacts are assessed as not

	<p>significant at Year 15 <i>“Due to the maturing vegetation present in the view” or as a result of “the public open space and tree planting beneath the Long Eaton and Toton viaduct”</i>. At locations such as Bonsall Street (VP 375-02-015) it is even suggested that the long-term effects would be ‘beneficial’. Without any detailed design proposals for the public space below or adjacent to the viaduct or indeed the viaduct itself at this location. DCC find it very difficult to accept that the impacts would not be significant and adverse at these locations so very close to the proposed new structure. The proposed viaduct would be 15m to 19m high at this location with a 4m high noise attenuation fence so it is difficult to envisage any landscape treatment being sufficiently mature after 15 years to deliver the benefits suggested in this assessment particularly given the likely constraints that would be imposed when planting adjacent to an active railway line. As a result DCC do not accept or agree with the summary of residual effects set out in section 11.5.9 of the report.</p>
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1.12 Socio Economic, Section 12.

1.12.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.13 Sound, Noise & Vibration, Section 13.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
13.1.4	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.1	The Council notes the assumptions and limitations and the need for specific assessment of the construction of the Long Eaton and Toton viaduct construction. No assessment is made in regards to noise and

	vibration associated with the station construction. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.5	The Council notes the assumptions made in the assessment and wishes to record the need for consideration in the formal ES of any requirements specific to the LA05 area.
13.4.6	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.9	It is noted that the likely significant effects on Long Eaton Baptist Church and Trinity Methodist Church will be confirmed in the formal ES.
13.4.10	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.4.12	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.5.5	It is noted that details of operational train noise will be provided in the formal ES. The Council wishes to register the need for any noise impacts of track maintenance to be taken into account in this assessment.
13.5.11	The noise maps would appear to show limited noise impacts in Long Eaton compared to those in the area immediately adjacent in the Trent Valley. Whilst we understand that noise fencing will be installed in the Long Eaton section will this really make the difference that the map shows?
13.5.12	It is noted that baseline information will be confirmed in the formal ES.
13.5.14	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.15	It is noted that Further work is being undertaken to confirm the extent, location and type of the noise mitigation to be included within the design of the Proposed Scheme, which will be reported in the formal ES.
13.5.17	The assessment is noted, but the Council will await the formal ES before commenting.
13.5.20	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
14.1.1	
	<p>DCC as the Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.1.2	
14.2.5	Unfortunately at this stage, the level of assessment undertaken does not provide the Highway Authority with an adequate level of information to provide informed comment.
	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>DCC as the Local Highway Authority strongly request for an adequate level of engagement to support and inform local impacts as part of the formal ES.</p>
14.2.6	
14.3.1	The Highway Authority do not feel as though we were provided to opportunity to inform and assist the project with the correct and most relevant baseline data for this subject matter.

14.3.5	This section is based upon sweeping statements and supported by very holistic data. Further more detailed analysis will need to be presented to the Highway Authority as part of a more detailed Transport Assessment.
14.3.6	DCC are disappointed that they were not invited to help inform the base data of accident information at a local level. We ask if this information is based upon KSI or minor accident data sets? How has this data been forecasted given the major alterations this infrastructure will have on Derbyshire's Network? DCC strongly request an informed discussion about the use of accurate and informed accident data. Also although reference has been made to the historic accident data the report makes no reference to how the project will mitigate road safety concerns and improve overall road safety.
14.3.10	The proposals for Long Eaton will have an immense impact upon both local parking provision and on street parking requirements. The statements provided here, are once again very sweeping and far greater information will be required to mitigate the impacts the project will have within the Long Eaton area. The Highway Authority formally request the HS2 Project Team undertake a resident parking area assessment, as vehicle displacement will have a strategic impact within this area.
14.3.12	Long Eaton station doesn't just provide access to local rail destination is it also served by trains which provide direct access to national destinations including London, Birmingham and Cardiff.
14.3.14	This section has limited information to support how sustainable travel planning will be an objective of the project and also the Highway Authority would like greater clarity on the details surrounding the surveys that have been conducted i.e. location, frequency and time of data recording.
14.4.1	Far greater robust information and data will be needed to substantiate the sweeping statements within this section. DCC are extremely disappointed at the level of engagement and information surrounding mitigation measures. DCC strongly request more detailed information to allow officers to make informed comments on the proposal.
14.4.2	The Code of Construction Practice (CoCP) provides a very limited overview of the proposals to reduce the adverse effects on the local communities and the level of information at this stage is not adequate to enable informed comments to be made.
14.4.13 & 14	DCC as the Highway Authority is unable to provide specific technical comment based on the lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.
14.4.15	The Highway Authority is unable to provide specific technical comment based on lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.

14.4.16 – 14.4.18	<p>The Highway Authority is unable to provide specific technical comment based on lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.</p> <p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.19	<p>The Highway Authority is unable to provide specific technical comment based on lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.</p> <p>It is noted that potential effects on public transport will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>The vast majority of these bus services are provided on a commercial basis by operators with no direct support from local or central government. Prolonged diversions and increased journey times will reduce the attractiveness of these services. Mitigation in terms of funding to support these services during the construction period to lessen the impact and ensure their commercial sustainability will be required.</p>
14.4.20	<p>The works will also impact local rail services between Derby and Nottingham which are used by large numbers of commuters. Action must be taken to minimise the impact on these services to ensure passengers do not switch change mode to less sustainable forms of transport during the construction phase.</p>
14.4.24	<p>It is noted that potential effects on PRoW will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.26	<p>The Highway Authority is unable to provide specific technical comment based on lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.</p>
14.4.27 - 14.4.28	<p>The Highway Authority is unable to provide specific technical comment based on lack of suitable information at this stage. More detailed information will need to be provided to the Highway Authority in advance of the formal ES.</p> <p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any</p>

	effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.4.30	DCC as the Highway seek clarity from the HS2 Project team about who the responsible body will be for processing both temporary and permanent TRO's. DCC do not have the available resource to support the scale and complexity of TRO's that will be required as part of this project. DCC request detailed discussion about HS2's proposals as soon as feasibly possible.
14.4.31	This statement is extremely sweeping and requires far greater analysis to inform these comments.
14.4.35	The bridge over Cranfleet Canal is identified on the Highway Authorities Structural Register as No H43162. The Asset owner is identified as the Canal and Rivers Trust and is believed to have a 10 Ton weight limit. Plan CT-05-431 shows this bridge forming part of a proposed haulage route. Greater detail on the intended vehicle types and weights of vehicles will have to be assessed prior to its use for this purpose and in depth discussions will be needed with the asset owner Canal and Rivers Trust.
14.4.36	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.5	This whole section requires far greater detail and clarity as to enable DCC to provide specific technical comment. The statements are again extremely sweeping and do not appear to have adequate analysis to support them. More detailed information needs to be provided to the Highway Authority in advance of the formal ES.
14.5.14	Detailed consideration needs to be given to how the East Midlands Hub station will be served by conventional local trains. To make it attractive for people to access by rail from Derby and Nottingham and other local stations travel times need to be comparable if not better than using a car to the site. However it should not result in existing local rail users having to experience longer journey times as their train from Derby to Nottingham is diverted to serve the hub station as well. The answer would be to introduce bespoke local rail shuttle services which link the hub station with key destinations in the area.
14.5.15	Increased travel distance for bus service can impact on their commercial viability. To reduce the impact specific measures should be put in place to improve bus reliability in the area at the same time as the station opens. HS2 should also be providing a road link from Long Eaton into the hub station to allow through bus services to be introduced such as Long Eaton to Sandiacre via the hub. .
14.5.16 (1	This comment refers specifically to the Cranfleet Canal Towpath Long Eaton Footpath 12. This path forms part of the Trent Valley Greenway which is a strategic route identified on the Derbyshire Key Cycle Network. The route is crossed by the Long Eaton and Toton Viaduct. The vertical alignment should ensure sufficient height clearance of 3m

	above the route and ensure no part of the structure impedes the Greenway or the Waterway.
14.5.16 (2)	This comment refers specifically to Long Eaton Footpath 72. This is a proposed Greenway to join the National Cycle Network route 6 at Station Road. The vertical alignment should ensure sufficient height clearance of 3m above the route and ensure no part of the structure impedes the proposed Greenway and where diverted, a path width of 3m would be beneficial.
14.5.16 (3)	<p>This comment refers specifically to Long Eaton Footpaths 4 and Long Eaton 17. As a mitigation suggestion for the loss of Bridleways 125,126,127 and 128 in the immediate vicinity for the proposed development. DCC ask that consideration be given to ensuring permeability for cyclists and all accessible mobility scooters between the communities east and west of the railway hub, north and south of the River Erewash and shared continuous route to the National Cycle Network Route 67 at the Erewash Canal to the west.</p> <p>It would meet government policy to design for cycle connectivity between public transport hubs and complete gaps in key network routes to reduce journeys by car and to promote activity for improved health. To this end it would be favourable to upgrade footpaths in Long Eaton 4 and Long Eaton 17 to cycle tracks with a 3m wide surface and multi user access infrastructure as required.</p> <p>Route connectivity should link Toton Lane Tram Station and Park and Ride at the B6003 to the River Erewash existing access bridge at start of Bridleway 128, via the main hub entrance. The onward realigned footpath Long Eaton 4 to the west across the lines, requires level un-stepped access designed to gradients lower than 1:20 and a 3m wide track and multi user bridge across the River Erewash by Dockholm Lock on the Erewash Canal towpath/NCN67.</p> <p>Clear and segregated links to both station entrances via suitable cycle lockers/facilities should also be considered to ensure all suitable cycle infrastructure is available.</p>
14.5.28	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
CT-05-431	The bridge over Cranfleet Canal is identified on the Highway Authorities Structural Register as No H43162. The Asset owner is identified as the Canal and Rivers Trust and is believed to have a 10 Ton weight limit. The plan shows this bridge forming part of a proposed haulage route. Greater detail on the intended vehicle types and weights of vehicles will have to be assessed prior to its use for this purpose and in depth discussions will be needed with the asset owner Canal and Rivers Trust.

CT-05-432	Within this plan there are two structural assets identified within the Highway Authorities Structural Register No's H43165 (Network Rail) and P43047 (Highway Authority). Both these structures appear to be impacted by the proposed construction works. HS2 project team will need to undertake in depth discussion with the Highway Authority and Network Rail to provide detailed information about the proposals and impact upon these structural assets.
CT-05-433	Within this plan the Highway Authority is aware of issues with parking congestion on and near to Midland Street for which is identified as part of a haulage route. Also the proposal shows the continuation of the haulage route off highway to access the Midlands Hub. At this location the Highway Authority have a number of street lighting assets that will require relocation. In depth discussions will be required with the Highway Authority before any works are commenced within this location.
CT-05-434a	Within this plan there are two structural assets identified within the Highway Authorities Structural Register No's C43002 and C43001 (Highway Authority). Both these structures appear to be impacted by the proposed construction works. Also the Highway Authority would like inform HS2 that the cross roads at Station Road/Town Street/Derby Road has a congestion problem at both on and off peak. Numerous design studies have been undertaken to try and address this but given the highway boundary constraints at this location no cost beneficial scheme has been achieved to date. This cross roads is identified as a section of the haulage route.
CT-05-435a	Within this plan there is a structural assets identified within the Highway Authorities Structural Register No C43034 (Storton Gate - Highway Authority). This structure appears to be impacted by the proposed construction works. HS2 project team will need to undertake in depth discussion with the Highway Authority to provide detailed information about the proposals and impact upon this structural asset.

1.15 Water Resources & Flood Risk, Section 15.

Document: Volume 2: CFA LA05: RATCLIFFE-ON-SOAR TO LONG EATON	
Volume, page and paragraph reference	Full ES comment
15.4.16	<p>It states that balancing ponds for Highway and Railway drainage will be sized on a precautionary basis. The DCC Flood risk team were informed via consultations with the HS2 design teams that the ponds would be sized to a 1/100yr + 40%CC event.</p> <p>DCC seek clarification with regards to surface water run-off and attenuation, in particular the run-off from the viaducts. Following conversations with the Environment Agency, they have intimated that there has been some miss-understanding with regards to surface</p>

	<p>water run-off and attenuation with different Risk Management Authority (RMA) giving different advice. DCC have been advised that guidance was planned to be issued to all partners, LA's etc to try and provide an acceptable approach across the board.</p> <p>Although this is not directly connected to this section, DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC were supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the Highway Authority, but with no additional funding to maintain them which is not acceptable.</p>
15.4.5	<p>DCC would like to note there concerns in respect of the potential flood risk impact on Long Eaton Fire Station, as it states that the flood risk would be major adverse which is significant, although it also states that this would be addressed in greater detail at the ES stage with further detailed modelling.</p>

Consultation Response to Volume 2 CFA LA06: STAPLEFORD TO NUTHALL

Version Number	Last updated	
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1.1	23/11/18 27/11/18	Md check IL & TF

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VOLUME 2: CFA LA06: STAPLEFORD TO NUTHALL

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 6 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.2 Overview and description, Section 2.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
2.1.27	It should be noted that DCC and Derby City Council are currently preparing reviews of the Derby and Derbyshire Minerals Local Plan and Derby and Derbyshire Waste Local Plan, which have not yet reached the submission stage to the Secretary of State.
2.1.28 - 2.1.30	With regard to committed developments, allocated sites and land safeguarded for minerals development, which will be identified in the baseline information, HS2 Ltd is requested to liaise with DCC to ensure that the baseline information is robust and up-to-date as the WDES is progressed to its final version.
2.1.32	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.17	The height of the viaduct has increased from that consulted on in 2017 could not efforts have been made to lower instead to reduce the visual impact of the scheme. There is no mitigation landscaping shown for a section of M1 motorway bridge that will become redundant as part of the works. CT-06-435a H5. Please ensure that redundant highway and structures are removed as part of the works.
2.3.1	Could materials for the Stanton Gate main compound and any waste generated be brought and removed from the site by rail using trains on the Erewash Valley line rather than road as proposed the compound is adjacent to the rail line.

2.3.34	<p>It is not clear how long the Stanton Gate main compound would remain in place. In section 2.3.43 it states this compound would remain in place for 4 year 6 months for construction of the viaduct and then in 2.3.35 there is an additional 6 years and 6 months for embankment works and in 2.3.37 another 3 years and 6 months for M1 realignment works and 2.3.40 2 years and 6months for rail installations works and 1 year and 3 moths for electrical transformers. However in figure 5 the compound is shown as being open for 4 years and 6 months for civil engineering and in figure 6, 1 years and 3 months for rail systems work. More clarity is required on what the total time the various work compounds will be open for.</p>
2.3.41, 2.3.47, 2.3.53 and 2.3.59	<p>A6007 Stapleford Road Satellite Compound.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p> <p>Construction traffic and worker routes for sites in the neighboring Authority areas may have some transportation impacts on Derbyshire's roads. The predicted volume and nature of trips generated by the operations for this site should be identified within the Environmental Statement and any requisite mitigation identified / implemented as a part of the Construction Management Plan.</p> <p>Canal and rail bridges on Stanton Gate / Moorbridge Lane within the County of Derbyshire may need up to date structural assessments to be undertaken to ensure they are acceptable for the construction traffic envisaged via this route.</p>

2.3.102 and 2.3.103	<p>It is noted from this paragraph that forecasts for the amount of construction, demolition and excavated waste that would be produced during the construction of the scheme will be reported in Volume 3. It is important, however, that details of the amount of construction, demolition and excavated waste that would be specifically generated for this section of the route are set out in the ES so that DCC, as Minerals and Waste Planning Authority, can fully understand the likely environmental impacts of the scheme, particularly if any excess waste has to be exported from the site.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
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1.3 Stakeholder engagement and consultation, Section 3.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
3.4.6	<p>There have been many meetings between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.</p>

1.4 Agriculture, forestry and soils, Section 4.

1.4.1 At this time the council has no comment to make

1.5 Air Quality, Section 5.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
5.2.3	The Council notes, and raises its concern, that there is no reference to the formal ES presenting further assessment of dust effects.
5.2.4	The selection of the year 2023 as "worst case" is noted, but the Council is provided with no information on construction traffic levels over the period 2023-2032 so is not able to comment on whether this is correct.
5.3.5	It is noted that the Sandiacre AQMA falls within scope, and it is noted in 5.4.9 that construction traffic may impact upon this location. The formal ES will need to address this impact in full.
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA06 area.
5.4.6	It is noted that the risk of dust effects and human health effects could be "medium" in this area.
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA, Section 6.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
6	<p>The Council has concerns over the likely impact of the route on the area to the north of Sandiacre/ Stapleford, through Stanton gate and Stanton by Dale. This area is largely rural, although on the edge and surrounding existing and former industrial developments. Much of the area which was formerly industrial has been turned over to recreational use, and this land will be particularly adversely affected, limiting access for local people. The area is currently popular with people living in Sandiacre, Ilkeston and Kirk Hallam, for walking, dog walking and cycling. Engagement by local people in walking and other exercise is seen as important in helping to reduce the incidence of ill-health, and a number of the LSOAs in Ilkeston and Kirk Hallam have high incidence of deprivation and poor health.</p> <p>The proposed development will impact on a number of locations and require the demolition of a small number of rural dwellings. The local Moo- Haven Animal rescue Centre which is privately operated, will also be affected, and may cease to be viable/ operational during construction.</p> <p>The existence of the M1 corridor and motorway already significantly impacts on the area and we are concerned that additional noise during construction and afterwards will adversely affect people living in nearby Stanton by Dale, and residents on the edges of Ilkeston and Kirk Hallam.</p>
6.2.4	<p>When reinstating or sourcing alternative public footpaths in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.</p>

1.7 Ecology and biodiversity, Section 7.

- 1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
General	<p>The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage.</p> <p>It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES. Whilst not wishing to consider potential impacts on individual sites, features and species at this time, with regards only to the section of the route (and potential receptors) within the county of Derbyshire, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <p>Only a short section of the route in this community area lies within Derbyshire. However the section in question runs through the Erewash valley and in close proximity to the Erewash Canal. As well as the various ecological designations found in this area, this section of the route is likely to be environmentally sensitive generally, and perhaps particularly in relation to the movement of protected and notable species. The use of a viaduct in this area should go some way to reducing ecological impacts and ensuring habitat connectivity in the longer term.</p> <p>However, the impacts of realigning a section of the M1 should not be underestimated, and consideration should be given to opportunities to enhance ecological issues through these works. In particular, it would appear a missed opportunity if habitat connectivity is maintained through the use of a viaduct in the Stanton Gate Viaduct section, but severance is maintained, and indeed reinstated, by the realigned section of the M1 further west. Further north, it would appear that an embankment is proposed both for the realigned section of the M1 and the route of HS2, with the HS2 embankment continuing further northwards still. HS2 Ltd should actively seek to demonstrate that opportunities have been sought to enhance long term habitat connectivity east-west in this area, including addressing severance caused by HS2 and the realigned route of the M1.</p>

1.8 Health, Section 8.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
8.2.2	Demonstrates an understanding that the wider determinants of health will be affected as a result of this development.
8.2.3	Identifies that there will be adverse and beneficial health impacts.
8.2.4	Agree with health determinants listed. However, has neglected to include: potential affects on mental health and wellbeing, community connectivity, employment, housing, local transport, food and farming, economy
8.2.6	Agree that strength of evidence does that necessarily determine the importance of the outcome. Also need to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight for example the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order. There are 34 residential properties and 38 businesses scheduled for demolition in this section so this impact could be significant.
8.2.8	DCC encourage HS2 Ltd to use and refer to Derbyshire County Councils "Rapid Health Assessment of HS2" (2013) and "Update on the 2013 Rapid Health Impact Assessment of HS2" (2017) when constructing the formal ES document.
8.4.1	DCC agree with mitigation listed but HS2 also need to consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.5	Community engagement framework and personnel is vitally important.
8.4.8	DCC request a reference to community connectedness in this section.
8.4.18	DCC request a reference to mitigation such as using aesthetic design solutions.
8.4.20	Special attention must be paid to retaining easy access to healthcare services, particularly specialist services in Derby and Nottingham.
8.4.33	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase

8.4.38	<p>A total of 34 residential properties would be demolished. The erosion of social networks resulting from these demolitions would have the potential to reduce social capital, reducing the beneficial health effects that are gained through social contact and support.</p> <p>Relocation, whether forced or voluntary, may cause stress impacting more on low income families and those with disabilities or poor social support</p>
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1.9 Historic environment, Section 9.

1.9.1 At this time the council has no comment to make.

1.10 Land quality, Section 10.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
10.1.2 and 10.1.3	DCC requests HS2 LTD to continue to liaise with its officers on an ongoing basis to discuss the likely potential effects of the scheme and to ensure that all baseline information is up-to-date and robust.
10.2.7	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should a licence for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>
10.3.46	Appropriate reference is made in this paragraph to the policies and proposals for mineral workings in the Derby and Derbyshire Minerals Local Plan and emerging review of the Derby and Derbyshire Mineral Local Plan; and to the fact that the Adopted Plan does not identify any minerals extraction allocated sites, minerals safeguarding areas or Minerals Consultation Areas relevant to the study area.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 23, there appears to be no plan to clarify or advise the location of these sites.

10.4.15	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 24, there appears to be no plan to clarify or advise the location of these sites.
10.4.22	Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 25, there appears to be no plan to clarify or advise the location of these sites.
10.4.26	However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.
10.4.31	<p>Large areas of 'Robbinetts' licenced opencast site have been worked principally to the west of the M1 and it is likely that reserves remain to the east where the HS2 cutting is proposed.</p> <p>Un-anticipated intersect of coal seams within cutting excavations could result in significant delay to construction should licence for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.. Recovery of mineral resource need be planned for within the detailed design process.</p> <p>DCC request that any mitigation measures for mine water and mine gas should be identified in consultation with the County Council's officers.</p>

1.11 Landscape and visual assessment, Section 11.

1.11.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.12 Socio Economic, Section 12.

1.12.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.13 Sound, Noise & Vibration, Section 13.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
13.1.4	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4-13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.1	The Council notes the assumptions and limitations and the need for specific assessment of the construction of viaducts, underbridges and road realignment/diversion at Sandiacre, Stanton Gate and Stapleford.
13.4.5	The Council notes the assumptions made in the assessment and wishes to record the need for consideration in the formal ES of any requirements specific to the LA06 area.
13.4.6	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.9	It is noted that confirmation that no non-residential properties will be significantly impacted by noise and vibration will be confirmed in the formal ES.
13.4.10	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.4.12	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.5.5	It is noted that details of operational train noise will be provided in the formal ES. The Council wishes to register the need for any noise impacts of track maintenance to be taken into account in this assessment.
13.5.13	It is noted that baseline information will be confirmed in the formal ES.
13.5.15	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.17	The assessment is noted, but the Council will await the formal ES before commenting.

15.5.21	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.
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1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

Document: Volume 2: CFA LA06: STAPLEFORD TO NUTHALL	
Volume, page and paragraph reference	Full ES comment
14.1.2	<p>DCC welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. DCC request early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.4.16	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.4.23	It is noted that potential effects on PROW will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.5.23	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).

1.15 Water Resources & Flood Risk, Section 15.

1.15.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

DRAFT

Consultation Response to Volume 2 CFA LA07: HUCKNALL TO SELSTON

Version Number	Last updated	
1.0	16/11/18	
1.1	23/11/18	Md & check

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VOLUME 2: CFA LA07: HUCKNALL TO SELSTON

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 7 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.2 Overview and description, Section 2.

Document: Volume 2: CFA LA07: HUCKNALL TO SELSTON	
Volume, page and paragraph reference	Full ES comment
2.2.33	The replacement flood storage area adjacent to Maghole Brook is not shown on CT-06-447a for LA07 although is shown on both the continuation sheets CT-06-448a and CT-06-448b.
2.3.86	<p>Erewash and Mineral Railway Siding</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There is no information provided about vehicular access route to public highway or off-site haul routes. Possible access onto B6019 Kirkby Lane but frontage is limited making visibility difficult to achieve and may conflict with access to Kirkby Lane satellite compound on opposite side of road.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.88	<p>Kirkby Lane Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. Limited frontage to public highway. Limited frontage to Kirkby Lane making visibility difficult to achieve and may conflict with access to potential Erewash and Mineral siding compound on opposite side of road.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public</p>

	highway, it will be for the promoter to ensure that rights to access a site exist.
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1.3 Stakeholder engagement and consultation, Section 3.

1.3.1 At this time the council has no comment to make.

1.4 Agriculture, forestry and soils, Section 4.

1.4.1 At this time the council has no comment to make

1.5 Air Quality, Section 5.

Document: Volume 2: CFA LA07: HUCKNALL TO SELSTON	
Volume, page and paragraph reference	Full ES comment
5.2.4	The selection of the year 2023 as "worst case" is noted, but the Council is provided with no information on construction traffic levels over the period 2023-2032 so is not able to comment on whether this is correct.
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA07 area.
5.4.6	It is noted that the risk of dust effects could be "high" in this area and that human health effects could be "medium".
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA, Section 6.

1.6.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.7 Ecology and biodiversity, Section 7.

1.7.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.8 Health, Section 8.

1.8.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.9 Historic environment, Section 9.

1.9.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.10 Land quality, Section 10.

Document: Volume 2: CFA LA07: HUCKNALL TO SELSTON	
Volume, page and paragraph reference	Full ES comment
10.1.2	It is noted that the HS2 rail route as advised in LA07 passes through both Derbyshire County and Bolsover District geographic extents to the south of its crossing beneath the A38. Neither authority is listed as an engagement consultee in this document despite the fact that the line passes through the potential 'Winterbank' opencast coal site, identified in the 1990's by the then British Coal and which is located mostly within Derbyshire.
10.2.7	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should licence for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>

10.3.40	Although not recognised by Mineral Safeguarding Areas or Mineral Local Plan historic identification of the 'Winterbank' opencast site to the south of the A38 suggests likely presence of shallow coal seams. HS2 advise intent to excavate up to 20m in depth at their crossing of the A38 in cutting. Investigation for the presence of shallow coal seams should be made to better inform baseline environmental assumptions.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 21, there appears to be no plan to clarify or advise the location of these sites.
10.4.21	Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 22, there appears to be no plan to clarify or advise the location of these sites
10.4.30	However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.

1.11 Landscape and visual assessment, Section 11.

1.11.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.12 Socio Economic, Section 12.

1.12.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.13 Sound, Noise & Vibration, Section 13.

Document: Volume 2: CFA LA07: HUCKNALL TO SELSTON	
Volume, page and paragraph reference	Full ES comment
13.2.4	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.

13.4.1	The Council notes the assumptions and limitations and the need for assessment in the formal ES.
13.4.6	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.9	It is noted that confirmation that no non-residential properties will be significantly impacted by noise and vibration will be confirmed in the formal ES.
13.4.10	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.4.12	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.5.2	The Council notes the lack of reference to the impacts of track maintenance and requests that these be included in the formal ES.
13.5.12	It is noted that baseline information will be confirmed in the formal ES.
13.5.14	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.15	It is noted that Further work is being undertaken to confirm the extent, location and type of the noise mitigation to be included within the design of the Proposed Scheme, which will be reported in the formal ES.
13.5.21	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

Document: Volume 2: CFA LA07: HUCKNALL TO SELSTON	
Volume, page and paragraph reference	Full ES comment
14.1.2	<p>DCC as the Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.5.5	DCC are alarmed that this section has omitted the complex impact upon Brookhill Lane and Pinxton Lane. It is noted however that reference is made in volume 8. When evaluating the EIA it should be identified that a large amount of cross referencing of documents is required to ensure that all relevant information has been evaluated.
CT-05-448a	This plan shows significant realignment and stopping up of existing highway network one/Brookhill Lane and Pinxton Lane. DCC as the Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner.

1.15 Water Resources & Flood Risk, Section 15.

- 1.15.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Consultation Response to Volume 2 CFA LA08: PINXTON TO NEWTON AND HUTHWAITE

Version Number	Last updated	
1.0	16/11/18	
1.1	23/11/18	
1.2	27/11/18	IL & md check, TF

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VOLUME 2: CFA LA08: PINXTON TO NEWTON AND HUTHWAITE

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 9 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.2 Overview and description, Section 2.

Document: Volume 2: CFA LA08: PINXTON TO NEWTON AND HUTHWAITE	
Volume, page and paragraph reference	Full ES comment
2.1.25	Appropriate reference is made to the Derby and Derbyshire Adopted Minerals Local Plan; Derby and Derbyshire Adopted Waste Local Plan; Derbyshire Local Transport Plan; and (emerging) Bolsover District Local Plan (2018). However, reference should also be made to the Saved Policies of the Adopted Bolsover District Local Plan 2000, which will still be relevant in the assessment process.
2.1.26	It should be also be noted in this section that the Replacement Bolsover District Local was submitted to the Secretary of State on 31st August 2018 and so will be relevant in the assessment process. Reference should also be made to the fact that Derbyshire County Council and Derby City Council are currently preparing reviews of the Derby and Derbyshire Mineral Local Plan and Derby and Derbyshire Waste Local Plan but neither Plan has yet reached the submission stage to the Secretary of State.
2.1.27; 2.1.28; and 2.1.29	In terms of the identification of committed development, site allocations and safeguarded sites for minerals, DCC request that HS2 Ltd continues to liaise with the County Council's officers to ensure that the baseline information, particularly on committed developments, is robust and up-to-date as the WDES progresses to its final version.
2.1.31	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.5 and 2.2.12	It is not clear why the Map Books for LA08 start at CT-06-447b but this community area report does not include/describe it. Why is there 3 sheet of overlap between LA08 and LA09?

2.2.13	<p>DCC ask that diverted PRow will not have excessive gradients, (ie will follow industry best practice). Where diverted across existing and new bridges, these should be upgraded for the required use, (eg equestrian fences). DCC will be looking for improvement of provision on affected routes.</p> <p>Pinxton Footpath B8/1/1, is diverted some way along the top of a very large retaining wall. Please consider adding an alternative route with steps down the embankment to Farmwell Lane. Refer CT-06-448b.</p>
2.2.18	<p>DCC ask that diverted PRow will not have excessive gradients, (ie will follow industry best practice). Where diverted across existing and new bridges, these should be upgraded for the required use, (eg equestrian fences). DCC will be looking for improvement of provision on affected routes.</p>
2.2.19	<p>There is no acknowledgement that a high voltage pylon will need relocation as part of the works, it is still shown in the middle of the HS2 line south of B6026 Blackwell Road (CT-05-449 J6 & 450). Associated works could have a major impact in the area which has not been assessed.</p>
2.2.26	<p>Map is not clear that the southbound spur dives under the mainline, (the retaining walls make it look like it crosses over). CT-06-449.</p>
2.2.21 -2.2.36	<p>The scale of the proposed elements e,g viaducts (up to 16m high), cuttings (up to 12m deep) and embankments (up to 12m high) in the area from the start of the spur through Hilcote, Netwton and Blackwell are totally out of proportion with the surrounding environment. More use should be made of cut and cover tunnels in this area to shield it from the worst of the impact. For example the residential area adjacent to Alfreton Road is badly effected. The mitigation study carried out on behalf of DCC and other east midlands councils by SNC Lavalin, which representatives from HS2 have been party to, made specific proposals to create a cut and cover tunnel in this area to shield it from the worst impact. A copy of the mitigation study forms part of the councils response to this draft environmental statement.</p>

2.3.32	<p>Maghole Brook Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan.</p> <p>In view of existing highway being severed by HS2 route and compound being located on a cul-de-sac. 85th percentile speed survey required to establish visibility splay requirements post stopping up</p> <p>Satisfactory use of compound relies upon severance of Brookhill Lane by Stopping Up Order. Truncated ends of former route will require provision of turning heads. New junctions to diverted line of Brookhill Lane will require provision of adequate exit and forward visibility. Details of line and level of diverted route required in order to comment further.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.41	<p>Farmwell Lane Main Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. In view of the unknown status and indicated land ownership / control. HS2 Ltd therefore needs to establish status of Farmwell Lane and traffic impacts where this meets the publicly maintainable highway network.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>

2.3.52	<p>Castlewood Transformer Station Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan, unless existing classified highway is Stopped Up and Diverted. The severed ends of former Huthwaite Lane require provision of adequate turning facilities and junctions and line and level of diverted highway will all have to be designed to appropriate design standards.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.56	<p>B6026 Huthwaite Lane Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan as the existing margin reduces to nothing. Given the width of frontage available third party land is required to deliver exit visibility for access onto B6026.</p> <p>Topography may present an additional highway constraint due to the undulating nature of Huthwaite Lane. The exact point of access will need to demonstrate exit and forward visibility appropriate for speeds. Footways have minimal margins and are unlit. The nearest bus stop is over 1 km distant from site in Old Blackwell. The nearest shop is 1.3 km distant in Hilcote. There is no PRow near the site and the closest footpath at County Boundary to east of site is accessed via a B road with no footways and no lighting.</p> <p>Huthwaite Lane is shown as diverting at this location. The compound will ultimately be served via the bypassed route. The introduction of a 90 degree bend to the east of the site will reduce the achievable sightline by may be acceptable based on reduced speeds.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.57	<p>There is no mention of the demolition of an electricity pylon from B6026 Huthwaite Lane satellite compound, presumably as it will be advanced works but is not mentioned anywhere else.</p>

2.3.63	<p>Newtonwood Lane Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. Although Newtonwood Lane at this location is generally straight with wide margins, raises as it forms a crest possibly obscured by the Motorway overbridge. The visibility to south will require safeguarding as part of future realignment of Newtonwood Lane.</p> <p>The site is lower than adjacent highway so any access is likely to require regrading within the site to achieve appropriate gradient onto highway and exit visibility from required eye height.</p> <p>There are no footways in vicinity of site, grassed margins only. Short length of footway leads to weak bridge, but there is no margin at all over bridge. Footway commences on far side of bridge and there is no lighting. The nearest shop is just under 1 km distant in Newton (unless pedestrian access to rear of motorway services is permitted). The nearest bus stop is on Main Street, Newton; over 1 km from site. Public footpath no. 13 runs alongside the site and links to Huthwaite, Newton and onto the Silverhill Trail.</p> <p>The Bridge over Silverhill Trail to North West of site is weak and there is a maximum 13 Tonne (mgw) and is also subject to signal controlled shuttle working. All construction traffic will approach from south east. Newtonwood Lane reduces in width beyond motorway service access and varies down to less than 5 metres. Horizontal alignment limits passing opportunities.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.70	<p>It is not clear how long the Sheffield spur main compound would remain in place. In section 2.3.73 it states it would remain in place for 2 year 12 months for construction of Cartwright Lane cutting, 2 years and 9months for the Cartwright Lane dive under, 2 years and 12 months for the Normaton Brook embankment, 3 years and 6 months for the Hilcote west embankment and 2 years and 9months for the Alfreton Road box structure. However in figure 5 the compound is shown as being open for 5 years and 3 months for civil engineering and in figure 6, 5 years and 3 months for rail systems work. More clarity is required on what the total time the various work compounds will be open for.</p>

2.3.79	<p>M1 South Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There appears to be insufficient frontage on New Road to achieve sightlines in line with speed limit. Access via Huthwaite Lane dependent upon 'HS2 Access' being constructed at this stage.</p> <p>Topography may present a highway problem, there is a crest on New Lane halfway along site frontage. The access location will need to ensure forward visibility is not prejudiced.</p> <p>There are no footways on New Lane. The footway on Huthwaite Lane starts opposite site and leads to Old Blackwell has minimal margins and is unlit. The nearest bus stop is over 1 km distant from site in Old Blackwell. The nearest shop is in Hilcote and the PRow at the southern corner of site provides a link to Hilcote.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.86	<p>Alfreton Road Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. Formal on-street parking bays to the southern end of the site may require relocation.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.94	<p>DCC fully support the approach set out in this paragraph whereby excavated material across the whole scheme would be used as engineering fill material or in environmental mitigation works where suitable or reasonable practicable. See also comments on Section 2.3.95.</p>

2.3.95	<p>It is noted from this section that forecasts of the amount of construction, demolition and excavated waste that would be produced during construction of the proposed scheme is to be reported in Volume 3 of the ES. However, DCC considers it to be important that full details of the likely amounts of construction, demolition and excavation waste should be set out for this specific section of the route in the ES so that DCC can make a more detailed assessment of the potential environmental impacts of the generation of waste material, particularly if it is proposed that any excess waste material will need to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.3.96	<p>DCC fully supports the proposed approach in 2.3.96 whereby local excess or shortfalls in excavated material in the area would be managed through the mitigation earthworks design approach with the aim of contributing to an overall balance of excavated material on a route-wide basis.</p>
2.4.2	<p>Previously it was proposed that there would be 2 trains an hour on the spur route to Sheffield one of which would serve Chesterfield and then Sheffield and the other running nonstop to Sheffield. However it is now proposed that there will be 4 trains an hour. Does this mean that frequency has now doubled or does this depend on proposed link north of Sheffield back onto the main line being built? If the service is doubled will this mean more trains will now serve Chesterfield or will the extra 2 an hour also nonstop?</p>

2.4.7	<p>With regard to operational waste and material resources, Derbyshire County Council considers it important that full details of the likely amounts of operational waste that would be generated by this specific study area of the scheme should be set out in the ES so that Derbyshire County Council can make a more detailed assessment of the likely environmental impacts of the scheme, particularly is there is likely to be a need for significant amounts of excess waste material to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.5.1	<p>The Sheffield spur dive under option which has been selected should be re-examined. Option 0 using the cut and cover tunnel would seem to offer better alternative in terms of the reduction in long term visual impacts on the area than option A which is the preferred scheme. It would appear option A has been chosen because it is easier and cheaper to construct rather than it necessarily provides the right response to the local conditions.</p>
2.5.6	<p>DCC have asked on a number of occasion that HS2 look at the option of putting the Sheffield services onto the existing Erewash Valley rail line at the East Midlands Hub station in Toton doing away with the need to construct any type of spur line at all. DCC have never received a formal response to this suggestion and would therefore ask that this option should be considered as well.</p>
CT-05-447b CT-06-447b	<p>These drawings are wholly within LA07 and repeated as CT-06-447a, it is not clear why included as the overlap is due to construction management and are not referenced in the document.</p>

1.3 Stakeholder engagement and consultation, Section 3.

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Volume, page and paragraph reference	Full ES comment
3.3.2	DCC have asked on a number of occasion that HS2 look at the option of putting the Sheffield services onto the existing Erewash Valley rail line at the East Midlands Hub station in Toton doing away with the need to construct any type of spur line at all. We have never received a formal response to this suggestion and we would therefore ask that this option should be considered as well.
3.4.6	There have been many meeting between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.
3.4.6 /3.4.9	Derbyshire County Council would request that HS2 Ltd ensures that it engages with the County Council on an ongoing basis to ensure that the baseline information in the ES is robust and up-to-date as the WDES progresses to its final version.

1.4 Agriculture, forestry and soils, Section 4

1.4.1 At this time the council has no comment to make

1.5 Air Quality, Section 5.

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5.2.3	The Council notes, and raises its concern, that there is no reference to the formal ES presenting further assessment of dust effects.
5.2.4	The selection of the year 2023 as "worst case" is noted, but the Council is provided with no information on construction traffic levels over the period 2023-2032 so is not able to comment on whether this is correct.

5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA08 area.
5.4.6	It is noted that the risk of dust effects from trackout could be "high" and human health effects arising could be "medium" in this area.
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA.

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6	<p>The route will run very close to a number of villages and dwellings on the edge of villages within this area. We are concerned that HS2 hugely underestimates the impact this change will have on the lives of those affected. Pinxton is already affected by the M1 and A38, and HS2 will add to this impact. Parts of South Normanton are also going to be adversely affected with the route only around 35m to the west of some dwellings. Similarly at Hilcote the line will come within 45m of dwellings. DCC believe that this is far too close. The residents of these dwellings will require additional support or assistance, where they believe it is unfeasible to go on occupying their homes. Significant work may be required to place to shield them from noise, visual disruption and other aspects both during construction and afterwards.</p> <p>This area also contains a number of locations where residential properties will need to be demolished, affecting the residents, their families and any landlords. At Pinxton 2 dwellings will be demolished, at South Normanton, a similar number, Hilcote 1 dwelling. However in the village of Newton more than 20 dwellings will need to be demolished, impacting significantly on this former mining community/ small village, which has already lost services in recent years.</p>

6(cont)	<p>In the case of Newton the village will become sandwiched between lines and this will have a very significant isolating effect on the village and its residents. This will in the future limit the ability of the village to attract new development. A number of the dwellings have already suffered from blight. Residents have complained that properties are not being maintained and protected from vandalism pending future demolition. House prices in the rest of the village have crashed as residents make choices about the likely impact on their lives and homes.</p> <p>Additionally, a number of community facilities and recreational facilities will also be impacted upon, either during construction, or permanently. This includes the Normanton Brook and the Blackwell Trail, used by local people for exercise, leisure and activities such as dog walking and cycling. The Silverhill Trail at Tibshelf is also affected by the proposals.</p> <p>During construction local access is likely to be significantly restricted due to temporary or permanent re-routing/ diversions and this could have a further isolating effect on the village and its remaining services, as well as causing frustration to residents seeking to travel to Alfreton or Tibshelf, the two nearest larger towns or villages.</p> <p>It is not clear how the places listed above will benefit from the development as communities. DCC ask HS2 to take steps to ensure that employment and related business opportunities are targeted at local people, by way of bringing economic benefits to people who are unlikely to utilise the line for business related trips to the capital. This could include apprenticeships, offering local businesses the opportunity to provide supplies, using local sub-contractors, and providing additional community facilities during and post construction.</p> <p>DCC are also concerned that during the construction period and once the line is built and operating that whole communities will experience the additional impacts of noise and pollution. This could cause additional health problems over time. DCC believe that HS2 should consider making a contribution to services that will support people both during construction and afterwards; such as health, social and mental health related facilities.</p>
6.4.1	<p>Add additional mitigation point of avoiding using important local roads for construction traffic, which will worsen existing congestion and therefore exacerbate commuter stress.</p>

1.7 Ecology and biodiversity, Section 7.

- 1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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General	<p>The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage. It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES.</p> <p>Whilst not wishing to consider potential impacts on individual sites, features and species at this time, with regards only to the section of the route (and potential receptors) within the county of Derbyshire, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <p>East-west connectivity along the Normanton Brook corridor should be maintained and ideally be enhanced. The use of the Normanton Brook Viaducts together with wetland habitats beneath should go some way towards achieving this, but it should be demonstrated that this is sufficient to allow the passage of amphibians, reptiles, and mammals.</p> <p>The inclusion of 31 mitigation and compensation ponds north of the A38 is an interesting prospect. Whilst the accompanying text suggests that these will "be within a wider area of grassland habitat creation to provide replacement habitat and ecological connectivity" this connectivity isn't immediately obvious given that these ponds are more or less surrounded by industrial land to the east, HS2 to the west, the A38 to the south and a functional balancing pond to the north. It should again be demonstrated that the retained connectivity is sufficient and appropriate.</p>

1.8 Health, Section 8.

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8.2.2	Demonstrates an understanding that the wider determinants of health will be affected as a result of this development.
8.2.3	Identifies that there will be adverse and beneficial health impacts.
8.2.4	DCC agree with health determinants listed. However, HS2 has neglected to include: potential affects on mental health and wellbeing, community connectivity, employment, housing, local transport, food and farming and economy.
8.2.6	DCC agree that the strength of evidence does that necessarily determine the importance of the outcome. HS2 also need to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight for example the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order. There are 29 residential properties and 4 businesses are scheduled for demolition in this section so this impact could be significant.
8.2.8	DCC encourage HS2 Ltd to use and refer to Derbyshire County Councils "Rapid Health Assessment of HS2" (2013) and "Update on the 2013 Rapid Health Impact Assessment of HS2" (2017) when constructing the formal ES document.
8.3.14	Pinxton and South Normanton both lie in Bolsover District. Bolsover is a deprived area with associated poorer health status than other areas in Derbyshire. Overall residents in this district are poor in health and life expectancy is worse than the Derbyshire average.
8.4.1	DCC agree with mitigation listed but HS2 also need to consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.5	DCC agree that community engagement framework and personnel are vitally important.
8.4.8	DCC ask that HS2 also include reference to community connectedness in this section.
8.4.18	DCC ask that HS2 include reference to mitigation such as using aesthetic design solutions
8.4.24	Due to impact on PRoW in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are altered for as part of the planning for temporary diversions or permanent rout/footpath changes.

8.4.32	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase. HS2 should ensure that construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme which will include monitoring against 'respecting the community'.
8.4.35 and 8.4.36	DCC request that HS2 ensure that residents affected by demolition are given adequate counselling and support.
8.4.40	A total of 29 residential properties would be demolished. The erosion of social networks resulting from these demolitions would have the potential to reduce social capital, reducing the beneficial health effects that are gained through social contact and support. Relocation, whether forced or voluntary, may cause stress impacting more on low income families and those with disabilities or poor social support

1.9 Historic environment, Section 9.

- 1.9.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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9.4.5, also 9.4.9 and 9.4.20	Brookhill Hall and stable block are separately Grade II Listed. The proposed setting impact to this designated asset is under-assessed in the WDES. Given the proximity of the scheme to the assets and the proposed major re-engineering of the immediate parkland setting (which the WDES acknowledges is an important feature of significance). This includes diversion of Brookhill Lane with major earthworks and the nearby Maghole Brook satellite compound. To suggest the degree of change is only of 'medium' magnitude is not credible. This is a colossal change to setting and assessment of a high magnitude of impact would be more appropriate here, resulting in a major adverse effect.

1.10 Land quality, Section 10.

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Volume, page and paragraph reference	Full ES comment
10.1.2	DCC welcomes the indication that HS2 Ltd will continue to engage with the County Council to discuss the potential impacts of the proposed scheme to inform the formal ES. This is particularly important to ensure that the baseline information in the ES is robust and up-to-date.
10.2.7	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase</p> <p>The proposed line passes through the potential 'Winterbank' opencast coal site, identified in the 1990's by the then British Coal and which is located mostly within Derbyshire to the south of the A38 intersect.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should licence for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>
10.3.40	Although not recognised by Mineral Safeguarding Areas or Mineral Local Plan historic identification of the 'Winterbank' opencast site to the south of the A38 suggests likely presence of shallow coal seams. HS2 advise intent to excavate up to 20m in depth at their crossing of the A38 in cutting. Investigation for the presence of shallow coal seams should be made to better inform baseline environmental assumptions.
10.3.42	Appropriate reference is made to the Derby and Derbyshire Minerals Local Plan and that the existing plan is to be replaced by a new Derby and Derbyshire Minerals Local Plan which is being prepared by Derbyshire County Council and Derby City Council, for which a rolling consultation process is ongoing with the production of a range of consultation papers.
10.3.43	Appropriate reference is made to the fact that the Adopted Derby and Derbyshire Minerals Local Plan does not identify any mineral site allocations within the study area.

10.3.46 and 10.3.49	This section correctly notes that the Derbyshire Minerals Local Plan shows that the whole of the study area lies over a surface coal resource and that all surface coal that has not already been worked shall be safeguarded. In this respect, to prevent the sterilisation of the coal resource in accordance with Policy M17 of the Derby and Derbyshire Mineral Local Plan, DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 23, there appears to be no plan to clarify or advise the location of these sites.
10.4.15	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 24, there appears to be no plan to clarify or advise the location of these sites.
10.4.16	With regard to mine water and mine gas mitigation measures that would be identified, DCC requests that HS2 LTD consult with the County Council's officers on any such scheme as an 'authoritative consultee'.
10.4.22	Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 25, there appears to be no plan to clarify or advise the location of these sites.
10.4.27	As correctly noted, construction of the proposed scheme has the potential to affect existing mineral resources and proposed areas of mineral exploitation and that this could occur by sterilisation of the mineral resource. DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advanced of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.

10.4.31	However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.
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1.11 Landscape and visual assessment, Section 11.

1.11.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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11	There are no substantive landscape and visual issues relating to this section of the route other than to state that some of the likely visual impacts of the proposed route identified in Tables 28 (11.4.7) and 31 (11.5.7), particularly during the operational phase (Years 1 and 15) have been under-estimated and would in my opinion be greater than assessed as a result of the proximity of receptors to the route and the scale of the change. Examples of views where the effects have been under-estimated include VPs 389-02-014, 389-03-015, 389-02-016 and 440-02-004.
11.4.6	This paragraph potentially understates the impact of overhead power lines - a pylon will need relocating, potentially massive disruption

1.12 Socio Economic, Section 12.

1.12.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Volume, page and paragraph reference	Full ES comment
12.4.9	There is no mention of the impact on the East Midlands Designer Outlet during construction. The outlet will be directly opposite a main construction compound with another on the other side of the A38. A cutting will also be constructed opposite the outlet and a box tunnel on the A38 which is the main access point to the site. All of these will create significant impacts on the site and will effect its attractiveness to customers and retailers.

1.13 Sound, Noise & Vibration, Section 13.

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Volume, page and paragraph reference	Full ES comment
13.1.4	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4-13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.1	The Council notes the assumptions and limitations and the need for assessment in the formal ES.
13.4.5	The Council notes the assumptions made in the assessment and wishes to record the need for consideration in the formal ES of any requirements specific to the LA08 area.
13.4.6	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.9	It is noted that the likely significant effects on St Webergh's Church, Old Blackwell will be confirmed in the formal ES.
13.4.10	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.4.12	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.5.2	The Council notes the lack of reference to the impacts of track maintenance and requests that these be included in the formal ES.
13.5.11	It is noted that baseline information will be confirmed in the formal ES.
13.5.13	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.14	It is noted that further work is being undertaken to confirm the extent, location and type of the noise mitigation to be included within the design of the Proposed Scheme, which will be reported in the formal ES.
13.5.19	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

1.14.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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14.1.2	<p>DCC as the Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.3.9	The scheme has the potential to impact on parking associated with the East Midlands Designer Outlet. The site for the line had previously been identified as a potential location to expand the current car park for the site.
14.4.14- 14.4.16	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).

14.4.17	<p>It is noted that potential effects on public transport will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>The vast majority of these bus services are provided on a commercial basis by operators with no direct support from local or central government. Prolonged diversions and increased journey times will reduce the attractiveness of these services. Mitigation in terms of funding to support these services during the construction period to lessen the impact and ensure their commercial sustainability will be required.</p>
14.4.21, 14.4.24 and 14.4.29	<p>It is noted that potential effects on PRoW will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.5.8	<p>Increased travel distance for bus service can impact on their commercial viability. To reduce the impact specific measures should be put in place to improve bus reliability in the area at the same time as the line opens.</p>
14.5.9	<p>This comment refers specifically to the Proposed Blackwell Trail South. This is a proposed non-motorised route identified as part of the Derbyshire Greenway Strategy and Derbyshire Local Cycle Network. It follows a former railway line to the south of the Blackwell Trail between the B6406 and the Fulwood Industrial Estate on the south side of Normanton Brook. Map CT-06-449 shows the route covered and lost by the West and East Normanton Brook Embankments. A mitigation proposal is for the creation of a connecting path leading south from the Blackwell Trail, across Normanton Brook and joining the HS2 Access Road east of Normanton Brook East Embankment, with multi user access rights to the main highway issuing into Fulwood Industrial Estate, as a non-motorised route to work.</p> <p>This comment refers specifically to the Blackwell Trail. It is noted that both the HS2 Mainline and the Sheffield Spur are carried on viaducts across the trail. It must be ensured that there is sufficient height clearance to accommodate the trail users. A minimum height for mounted horse riders is 3.7m (BHS standard specifications).</p> <p>This comment refers specifically to Blackwell Footpath 6. Where the path alignments connect to the Blackwell Trail all Access for All design standards should be adhered to. This path will have a significant impact on the journey time between the communities of Hilcote and Huthwiate.</p>

14.5.9(cont)	<p>This comment refers specifically to Blackwell Footpath 8. Map CT-06-449-L1 shows this path as permanently stopped up with no alternative. A mitigation suggestion would be to make provision for a 3m wide shared pedestrian/cycleway alongside the diverted New Lane between Pasture Lane and Huthwaite Lane.</p> <p>This comment refers specifically to Silverhill Trail. The proposed overbridge should ensure access for all and that standards are maintained with approach ramps no greater than a 1:20 gradient, and surface width no less than 5m, with parapets 1.8m high.</p> <p>This comment refers specifically to Blackwell Footpath 12/1. The new section of path shown on map CT-06-450 to divert B3/12/2 should be designed to meet access for all standards 3 with any approach ramp no greater than a 1:20 gradient.</p> <p>This comment refers specifically to Blackwell Footpath 12/1 & 12/2. This path extends south across the Derbyshire/Nottinghamshire county boundary by Longside Farm as a Public Bridleway to Huthwaite Lane. It is recommended that the footpath on the Derbyshire side linking directly onto the Silverhill Trail be upgraded to Public Bridleway status on completion to make this route of similar status. Construction of the section in Derbyshire should therefore reflect the required widths and specifications for bridleway design.</p>
14.5.12 and 14.5.15	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
CT-05-449, CT-05-449-L1	<p>This plan shows significant realignment and stopping up of the existing highway network on B6026 Blackwell Lane/Huthwaite Lane and Fordbridge Lane. DCC as the Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. Also the HS2 Project team have not sort Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussions are required.</p>

CT-05-450	This plan shows significant realignment and stopping up of existing highway network on Newtonwood Lane. The plan also makes reference to an Overbridge on Newtonwood Lane. DCC as the Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sort Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussion are required.
CT-05-601	This plan shows significant realignment and stopping up of existing highway network on Cragg Lane. The plan also makes reference to an Overbridge on Cragg Lane. DCC as the Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sort Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussions are required.

1.15 Water Resources & Flood Risk, Section 15.

1.15.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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15.4.16	The WDES states that balancing ponds for Highway and Railway drainage will be sized on a precautionary basis. The DCC Flood risk team were informed via consultations with the HS2 design teams that the ponds would be sized to a 1/100yr + 40%CC event.

15.4.16(1)	DCC seek clarification with regards to surface water run-off and attenuation, in particular the run-off from the viaducts. Following conversations with the Environment Agency, they have intimated that there has been some miss-understanding with regards to surface water run-off and attenuation with different Risk Management Authority (RMA) giving different advice. DCC have been advised that guidance was planned to be issued to all partners, LA's etc to try and provide an acceptable approach across the board.
15.4.17	Although this is not directly connected to this section, DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC have been supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the highway authority, but with no additional funding to maintain them which is not acceptable.

DRAFT

Consultation Response to Volume 2 CFA LA09: STONEBROOM TO CLAY CROSS

Version Number	Last updated	
1.0	16/11/18	
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VOLUME 2: CFA LA09: STONEBROOM TO CLAY CROSS

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 9 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.2 Overview and description, Section 2.

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2.1.23	Appropriate reference is made in this section to relevant local plans covering the study area including the Saved Policies of the Adopted Bolsover Local Plan 2000; Saved Policies of the Adopted North East Derbyshire Local Plan 2005; Adopted Derby and Derbyshire Minerals Local Plan (2000 and 2002); Derby and Derbyshire Adopted Waste Local Plan 2005. However, for consistency with other study area sections of the WDES, reference should also be made to the Derbyshire Local Transport Plan. It is not clear why reference is made to the Saved Policies of the Adopted Amber Valley Local Plan as no part of the study area is located within Amber Valley Borough. This section of the ES is not consistent with other Sections of the ES for the individual study areas in Derbyshire (LA05, LA06, LA07 and LA08), which also include an assessment of emerging Local Plans in the respective study areas that have reached submission stage and the indication that those plans would be considered in the assessment. In this respect, reference should be made to the Bolsover District Local Plan 2018, which was submitted to the Secretary of State on 31 August 2018 and the North East Derbyshire Local Plan 2018 that was submitted on 24th May 2018. Reference might also be usefully made to the emerging Derby and Derbyshire Minerals and Waste Local Plans currently being prepared by Derbyshire County Council and Derby City Council, although neither of these plans have yet reached the submission stage to the Secretary of State.
2.1.25 - 2.1.27	With regard to information on committed developments, local plan allocations and safeguarded land for mineral extraction, DCC requests HS2 Ltd to ensure that it continues to engage with the County Council on an ongoing basis to ensure that the baseline information for the ES is robust and up-to-date, particularly for committed developments for minerals and waste schemes, as the WDES is progressed to its final version.

2.1.29	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.6	DCC are concerned about the impact on the existing rail network during the electrification and engineering works on the Erewash Valley Line and Midland Main Line.
2.2.14	<p>DCC request that diverted PRow will not have excessive gradients, (ie will follow industry best practice). Where diverted across existing and new bridges, these should be upgraded for the required use, (eg equestrian fences). DCC will be looking for improvement of provision on affected routes.</p> <p>The scale of the proposed embankment at Blackwell North (up to 24m high), seems totally out of proportion with the surrounding area and road and watercourse it needs to cross. Could a viaduct be used instead at a lower height to lessen the impact?</p>
2.2.19	<p>DCC request that diverted PRow will not have excessive gradients, (ie follow industry best practice). Where diverted across existing and new bridges, these should be upgraded the required use, (eg equestrian fences). DCC will be looking for improvement of provision on affected routes.</p> <p>The permanent diversion of the River Rother is likely to require significant earthworks as it is diverted uphill! There is no indication of any associated works on plans CT-06-605 or 606, the concern is that the impact has not been properly evaluated.</p>
2.3.25	As the spur will link with the existing Erewash Valley rail line could this not this be used to move materials to site and to remove waste to lessen the impact on the road network as part of the construction and rail installation phase.

2.3.30	<p>Alfreton Road Transformer Station Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There is limited frontage available. There are only minimal highway margin widths, therefore achieving appropriate sightlines for the speed of road will require third party land.</p> <p>There are no footways and the road is unlit. The site lies some 1.4 km from Tibshelf or Blackwell and would be accessed mainly via an unlit B road with no footway and 60 mph speed limit. The Silverhill Trail runs behind the site and may provide walking/cycling opportunity to Tibshelf or Blackwell via Gloves Lane. The nearest bus stops is in Tibshelf or Westhouses.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.33	<p>Stonebroom Embankment Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. The site abuts the public highway at a point where the carriageway alignment is straight and level.</p> <p>A footway is provided to one side of carriageway and it is an unlit country lane. There is however a 4 metre height restriction at the rail bridge nearby, which may result in access limitations for large vehicles.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.37	<p>As the Stonebroom embankment and satellite compound will be adjacent to the existing Erewash Valley rail line could this not be used to move bulk earthwork material rather than the public highway lessening the impact of the project on the road network?</p>

2.3.43	<p>Morton Cutting Pond Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. It would appear that access is intended to be taken utilising the existing unmade vehicular access to the water treatment plant access at the end of Lime Tree Grove. This would necessitate vehicles accessing for a considerable distance through a traffic-calmed residential area, which has high numbers of pedestrians at the start and end of the school day due to the proximity of Sharley Park Primary School and a significant numbers of vehicles parked on-street due to limited off-street parking facilities in the general area.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.47	<p>Station New Road Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. An unmade, vehicular gated access exists at the location shown as access on the plan provided. The construction route is shown accessing the site from the east (St Lawrence Road) only, however the exit visibility is likely to be inadequate from the West (over the rail bridge) and forward visibility may also be an issue from this direction.</p> <p>Further investigation will be required to determine whether an adequate level of exit and forward visibility is achievable.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. Horizontal and vertical alignment of the carriageway may constrain adequate exit and forward visibility. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.50	<p>DCC support the proposed approach set out in section 2.3.50 that excavated material across the project scheme would be re-used as engineering fill material or environmental mitigation earthworks where suitable or reasonably practicable.</p>

2.3.51 and 2.3.52	<p>It is noted from this section that forecasts of the amount of construction, demolition and excavated waste that would be produced during construction of the proposed scheme is to be reported in Volume 3 of the ES. However, DCC considers it to be important that full details of the likely amounts of construction, demolition and excavation waste should be set out for this specific section of the route in the ES so that DCC can make a more detailed assessment of the potential environmental impacts of the generation of waste material, particularly if it is proposed that any excess waste material will need to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.3.53	<p>It is not clear which of the satellite compounds in this area, if any, would remain in place for the rail systems works. Figure 8 on page 32/33 shows the Alfreton Road satellite compound open from Q2 2029 to Q2 2030 the Stonebroom embankment satellite compound open from Q4 2024 until the end of Q3 in 2028, the Morton cutting pond satellite open from Q2 2026 to Q3 2027 and the New Station Road systems compound in Q1+2 of 2028. Yet rail systems work are not due to begin until Q3 2031 and end in Q4 2033.</p>

2.4.7 / 2.4.8	<p>With regard to operational waste and material resources, DCC considers it important that full details of the likely amounts of operational waste that would be generated by this specific study area of the scheme should be set out in the ES so that Derbyshire County Council can make a more detailed assessment of the likely environmental impacts of the scheme, particularly if there is likely to be a need for significant amounts of excess waste material to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.5.5	<p>DCC have asked on a number of occasion that HS2 look at the option of putting the Sheffield services onto the existing Erewash Valley rail line at the East Midlands Hub station in Toton doing away with the need to construct any type of spur line at all. We have never received a formal response to this suggestion and we would therefore ask that this option should be considered as well.</p>

1.3 Stakeholder engagement and consultation, Section 3.

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Volume, page and paragraph reference	Full ES comment
3.3.3	<p>DCC have asked on a number of occasion that HS2 look at the option of putting the Sheffield services onto the existing Erewash Valley rail line at the East Midlands Hub station in Toton, thus doing away with the need to construct any type of spur line at all. We have never received a formal response to this suggestion and we would therefore ask that this option should be considered as well.</p>
3.4.6	<p>There have been many meeting between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.</p>

3.4.6 / 3.4.9	DCC request that HS2 LTD continues to engage with the County Council on the scheme, particularly on the baseline information to be used in the ES to ensure that it is robust and up-to-date as the WDES progresses towards the final version.
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1.4 Agriculture, forestry and soils, Section 4.

1.4.1 At this time the council has no comment to make.

1.5 Air Quality, Section 5.

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Volume, page and paragraph reference	Full ES comment
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA09 area.
5.4.6	It is noted that the risk of dust effects from trackout could be "high" and human health effects arising could be "medium" in this area.
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA, Section 6.

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Volume, page and paragraph reference	Full ES comment
6	<p>The Council is concerned over the likely impact of the line upon Stonebroom and upon Clay Cross to a lesser extent. In the case of Stonebroom the line will come within 30 m of parts of the village.</p> <p>We also note that 4 dwellings will be demolished in order to construct the line and that a number of recreational facilities will be affected either temporarily or permanently, including Doe Hill community park.</p>
6.2.4	When reinstating or sourcing alternative public footpaths in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.
6.3	At this time the council has no comment to make
6.4.9	The construction of the Stonebroom cutting and Stonebroom embankment would temporarily require approximately 35% of the land within the Doe Hill Community Park for a duration of approximately two years and three months. 25% of the park will be lost permanently and the remainder will be cut in two. This would result in a major adverse effect, which would be significant.
6.4.12	Stonebroom embankment and associated works would require the demolition of two residential properties on Doe Hill Lane, Tibshelf and two residential properties on Stonebroom Lane, Stonebroom.
6.5	There is no detail available DCC are unable to comment.

1.7 Ecology and biodiversity, Section 7.

- 1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Volume, page and paragraph reference	Full ES comment
General	<p>The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage. It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES.</p> <p>Whilst not wishing to consider potential impacts on individual sites, features and species at this time, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <p>The principle issues along this stretch of the route are associated with habitat losses directly associated with the route construction. Affected habitats include ancient woodland, species rich grassland and other habitat types (particularly associated with Padley Wood) whilst habitat severance and impacts on recreational opportunities (e.g. around Doe Hill Community Park) can also be envisaged. It is assumed that thorough consideration of these impacts will fall within the scope of the ES.</p>

1.8 Health, Section 8.

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Volume, page and paragraph reference	Full ES comment
8.4.1	DCC agree with mitigation listed but ask that HS2 also consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.8	DCC request that HS2 also include reference to community connectedness in this section.
8.4.19	There is potential for communities to experience increased difficulty in accessing shops and community services (such as post offices, banks, libraries) as a result of increased journey times during construction.

8.4.22-23	There would be direct impacts on access to green space, recreation and physical activity at Doe Hill Community Park, where construction of the Stonebroom cutting and Stonebroom embankment would temporarily require approximately 35% of the land within the Doe Hill Community Park for a period of approximately three years and six months. Changes to landscape character can create stress, especially in deprived communities already less satisfied with their environment. Following this, approximately 10ha (approximately 25%) of open space within the park would be permanently lost. The overbridge provided to reconnect the paths, and to connect the two remaining sections of the park should be accessible to all. Notwithstanding the implementation of this mitigation, impacts on access to green space, recreation and physical activity would persist.
8.4.24	The route will intersect a number of PRow in the Stonebroom to Clay Cross area. There will be impacts on amenity and recreational value of these footpath networks, and therefore levels of physical activity and associated health and wellbeing effects. Health effects are felt disproportionately by deprived communities, which would describe much of this area. HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.
8.4.25	Some construction traffic including HGV, will use local roads. This could obstruct or deter pedestrians, cyclists and equestrians from using these routes.
8.4.29	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase. HS2 should ensure that construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme which will include monitoring against 'respecting the community'.
8.5	There is no detail available DCC are unable to comment.

1.9 Historic environment, Section 9.

1.9.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.10 Land quality, Section 10.

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Volume, page and paragraph reference	Full ES comment
10.2.7	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should license for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>
10.3.44	<p>Appropriate reference is made to the Derby and Derbyshire Minerals Local Plan and its policies for controlling minerals related development within the study area.</p>
10.3.45 / 10.3.47	<p>Appropriate reference is made in these sections to DCC's consultation response of 2014, which indicated that in relation to the Stonebroom to Clay Cross area, surface mining of coal was reported in the east of the County where potential for future applications for surface coal extraction was considered likely. In this regard and the fact that the study area lies in an area of surface coal, to prevent the sterilisation of the coal resource in accordance with Policy M17 of the Derby and Derbyshire Mineral Local Plan, DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan. reserves,</p>

10.3.46	Reference is made in this section to the fact that the Derby and Derbyshire Local Aggregates Assessment '2016' does not identify any aggregates sites in the Stonebroom to Clay Cross study area. It should be noted that the latest published version of the LAA is for 2017, which does not identify any aggregate sites in the study area.
10.3.49	Appropriate reference is made to Derbyshire Consultation response of 2014, which indicated that although there were no Minerals Safeguarding Areas in the study area, a MSA for coal is proposed by DCC, which has the potential to be exploited by opencast methods. Appropriate reference is also made to the County Council's 2014 response which indicated that minerals of economic importance, including surface coal resources, should be taken into account in the assessment of applications for non-minerals development to avoid the sterilisation of the resource. It is welcomed, therefore, that 10.3.49 indicates that surface coal reserves have been considered in the ES assessment for this section of the proposed route.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 16, there appears to be no plan to clarify or advise the location of these sites.
10.4.14	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 17, there appears to be no plan to clarify or advise the location of these sites.
10.4.17	With regard to any proposed mitigation measures required for minerals mine water or mine gas, DCC request that it is consulted on any such measures as an 'authoritative consultee'.
10.4.28	However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new hs2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.

10.4.24/10.4.25/10.4.29	As correctly noted, construction of the proposed scheme has the potential to affect existing mineral resources and proposed areas of mineral exploitation and that this could occur by sterilisation of the mineral resource. The whole of the study area lies over a surface coal resource. In this respect, to prevent the sterilisation of the coal resource in accordance with Policy M17 of the Derby and Derbyshire Mineral Local Plan, DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.
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1.11 Landscape and visual assessment, Section 11.

1.11.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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11.4.7	Table 20 identifies the two LCAs directly affected by the proposed scheme; Tibshelf and Doe Hill and Morton Colliery. The latter is an example of the concerns DCC raised in earlier consultation response to HS2 that the negative connotation attached to the naming of the LCA has then influenced the overall judgement that has been made in the assessment. The Doe Hill and Morton Colliery LCA has seen significant change historically as a result of past mining but more recently these areas have been restored to deliver significant environmental enhancement as evidenced by the work that has been undertaken at the Doe Hill Community Park. DCC judge the sensitivity and susceptibility of this landscape to be at least medium (which is greater than the judgement in the LVIA), which would give rise to a greater adverse effect during construction and on completion of the route as a result of the high magnitude of change that this LCA would experience.

11.4.11	Table 21 identifies the 'Significantly Affected Viewpoints' along this section of the route although it is noted that the table refers to viewpoints that then aren't shown on the associated plans for this section, such as VP 440-02-005 in Tibshelf, which is only shown on the maps for the LA10: Tibshelf to Shuttlewood section. In general viewpoint selection isn't sufficiently robust in some areas where a single viewpoint such as VP 440-02-004 aims to reflect the view for a number of residential properties along and users of Alfreton Road, Newton. The level of effects at this VP is assessed as Moderate adverse during the construction phase but not significant during the operational phase. This seems to be hardly credible when the residents of individual properties that currently enjoy open views over surrounding countryside will get these views curtailed by extensive new tree planting proposed as mitigation. The visual impact assessment should be a judgement on the changes in the view and not simply a reflection of whether you can see the proposed railway line and trains using it. Again there is no reflection in the description as to the likely number of visual receptors (people) who would experience any particular effect.
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1.12 Socio Economic, Section 12.

1.12.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.13 Sound, Noise & Vibration, Section 13.

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Volume, page and paragraph reference	Full ES comment
13.1.4	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4 - 13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.1	The Council notes the assumptions and limitations and the need for assessment in the formal ES.
13.4.4	The Council notes the assumptions made in the assessment and wishes to record the need for consideration in the formal ES of any requirements specific to the LA09 area.

13.4.5	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.9	<p>It is noted that the likely significant effects on All Saints' Church, Heath will be confirmed in the formal ES.</p> <p>It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.</p>
13.4.13	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.5.2	The Council notes the lack of reference to the impacts of track maintenance and requests that these be included in the formal ES.
13.5.10	It is noted that baseline information will be confirmed in the formal ES.
13.5.12	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
15.5.13	It is noted that Further work is being undertaken to confirm the extent, location and type of the noise mitigation to be included within the design of the Proposed Scheme, which will be reported in the formal ES.
13.5.18	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

1.14.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Volume, page and paragraph reference	Full ES comment
14.1.2	<p>DCC as the Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC would in the meantime appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.2.5	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.3.10	DCC has a long term aspiration to see a rail station opened in the Clay Cross area to serve the growing community. The design of this part of the route and where it joins the existing Erewash Valley line needs to consider how this could be accommodated.
14.4.16- 14.4.18	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).

14.4.19	<p>The majority of these bus services are provided on a commercial basis by operators with no direct support from local or central government. Prolonged diversions and increased journey times will reduce the attractiveness of these services. Mitigation in terms of funding to support these services during the construction period to lessen the impact and ensure their commercial sustainability will be required.</p> <p>It is noted that potential effects on public transport will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.20, 14.4.24, 14.4.27, 14.4.33 and 14.5.2	<p>It is noted that potential effects on rail services will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.5.9	<p>The proposed 4 HS2 trains an hour on this section of the Erewash Valley line have the potential to adversely affect the existing local and regional rail services on this route if they take paths currently used by them to accommodate the new service. The line capacity between the point where HS2 joins the Erewash Valley line and the connection with the Midland Mainline needs to be increased to ensure there are sufficient paths for all existing and proposed services.</p> <p>Increased travel distance for bus service can impact on their commercial viability. To reduce the impact specific measures should be put in place to improve bus reliability in the area at the same time as the line opens.</p>

14.5.11	<p>This comment refers specifically to Tibshelf Bridleway 5. The diversion of BW5 is acceptable however it should be noted that the route diverts onto The Silverhill Greenway, an existing multi user trail, a strategic part of the Derbyshire Key Cycle Network and an integral part of a visitor attraction known as the Phoenix Greenways. It is imperative that the accommodation overbridge identified on map numbered CT-05-602b remains level to the trail or if ramps to the overbridge are required, these should be designed to a maximum gradient of 1:20 to meet the required standards for retaining easy access status of the route. The diverted routes for Bridleway 5 should also be constructed to maximum gradients of 1:20 to allow for easy access connectivity.</p> <p>This comment refers specifically to the non-statutory non-motorised routes at Doe Hill Community Park. Map CT-06-603 shows the proposed development in cutting through the Doe Hill Country Park and is described in 14.5.11 of the corresponding report as footpath. This route carries a non-statutory bridleway between Love Lane and Doe Hill Lane is shown crossing the cutting on Doe Hill Park Overbridge. This bridge should be designed to carry all vulnerable users and maintenance vehicles and be fitted with parapets 1.8m high in line with British Horse Society standard specifications for horse riders on overbridges. The approach ramps should be no greater than 1:20 gradient to allow for access for all. On completion this route would benefit from dedicating it as a public bridleway between Love Lane and Doe Hill Lane.</p> <p>This comment refers specifically to Morton Bridleway 8 Overbridge. This bridge should be designed to carry maintenance vehicles and be fitted with parapets 1.8m high in line with British Horse Society standard specifications for horse riders on overbridges. The approach ramps should be no greater than 1:20 gradient to allow for access for all.</p> <p>This comment refers specifically to Pilsley Footpath 7 Overbridge. This bridge should be designed to carry maintenance vehicles with approach ramps no greater than 1:20 to be compliant with access for all standards.</p>
14.5.18	<p>It should be noted that the Doe Hill Community Park route carries horse riders and cyclists and although currently a non-statutory route, for accuracy should be treated as a bridleway rather than a footpath.</p>
14.5.19	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>

CT-05-603	Within this plan there is a structural asset identified within the Highway Authorities Structural Register No C46029 (Highway Authority). This structure appears to be impacted by the proposed construction works. HS2 project team will need to undertake in depth discussions with DCC as the Highway Authority to provide detailed information about the proposals and impact upon this structure.
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1.15 Water Resources & Flood Risk, Section 15.

Document: Volume 2: CFA LA09: STONEBROOM TO CLAY CROSS	
Volume, page and paragraph reference	Full ES comment
15.4.16	<p>The WDES states that balancing ponds for Highway and Railway drainage will be sized on a precautionary basis. The DCC Flood risk team were informed via consultations with the HS2 design teams that the ponds would be sized to a 1/100yr + 40%CC event.</p> <p>DCC seek clarification with regards to surface water run-off and attenuation, in particular the run-off from the viaducts. Following conversations with the Environment Agency, they have intimated that there has been some miss-understanding with regards to surface water run-off and attenuation with different Risk Management Authority (RMA) giving different advice. DCC have been advised that guidance was planned to be issued to all partners, LA's etc to try and provide an acceptable approach across the board.</p>
15.4.17	<p>Although this is not directly connected to this section, DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC have been supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the highway authority, but with no additional funding to maintain them which is not acceptable.</p>

Consultation Response to Volume 2 CFA LA10: TIBSHELF TO SHUTTLEWOOD

Version Number	Last updated	
1.0	19/11/18	
1.1	22/11/18 23/11/18 28/11/18	Historic environment Gb corrections IL & md check, TF

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VOLUME 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD

1.1 General Comments

- 1.1.1 This report contains our comments for the Community Area 10 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.2 Overview and description, Section 2.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
2.1.5	To the West of Bolsover, there are major redevelopment proposals that are underway (not just proposed) at Markham Vale and the former Coalite site. HS2 Ltd have been made aware of these site over the past 4 years.
2.1.25	Reference should be made in this section to the North East Derbyshire Local Plan that was submitted to the Secretary of State on 24 May 2018, and to the Bolsover District Local Plan that was submitted to the Secretary of State on 31 August 2018. These two plans should therefore be taken into account in the assessment process for the ES. For completeness, reference should also be made to the emerging Derby and Derbyshire Joint Minerals Local Plan and emerging Derby and Derbyshire Joint Waste Local Plan neither of which have yet to reach the submission stage.
2.1.26 - 2.1.29	In terms of committed development, allocations and safeguarded areas for minerals development, HS2 is requested to ensure that it continues to engage with officers at DCC, particularly to ensure that the baseline information for these forms of development is robust and up-to-date as the WDES progresses towards its finalised version.
2.1.30	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.12	Tibshelf bridleway 21 currently connects to footpath 35, both are diverted to Mansfield road on either side of the line. There is no connection shown across the bridge between them. Safe connection and crossing facilities will be required CT-05-452. (Should be same as Deep Lane overbridge ch CT-05-453).

2.2.14	<p>The depth of the proposed cutting at Tibshelf (up to 27m deep), seems totally out of proportion with the surrounding area. Could a cut and cover tunnel be built instead to lessen the visual impact linking with the tunnel already proposed below the M1 adjacent to the cutting?</p> <p>The depth of the Hardstoft south cutting is up to 37m deep so changes may also be required.</p>
2.2.17	<p>The depth of the Hardstoft north cutting is up to 36m deep so changes may also be required.</p> <p>The Council are concerned about the closure of Mill Lane and associated impact on access to Hardwick Hall.</p>
2.2.18	<p>There is no acknowledgement that a high voltage pylon will need relocation as part of the works - it is still shown in the middle of the embankment south of M1 junction 29 (CT-06-455). Associated works could have a major impact in the area. How will the impacts of associated works be addressed and mitigated?</p>
2.2.22	<p>The Council are concerned about the disruption during construction associated with the major works around M1 Junction 29.</p> <p>The depth of the proposed cutting at Heath North (up to 22m deep), seems totally out of proportion with the surrounding area. Could a cut and cover tunnel be built instead to lessen the visual impact? This could link with a cut and cover tunnel under the junction 29 roundabout.</p>

2.2.27	<p>Bolsover south embankment is NOT shown with mitigation planting on both sides CT-06-457. (It is shown on CT-06-456) this is an error.</p> <p>Can redundant sections of Chesterfield Road be landscaped? It is unclear where the permanent access will be to the railway Cottages from Chesterfield Road.</p> <p>Auto transformer at CT-06-457 (B5) does not appear to have a vehicular access route to permit construction or future maintenance - An access route is stated from Palterton Lane but not indicated on plan?</p> <p>During re-alignment of the A632 provision should be made for the construction of a shared 3m width NMU route separated from the carriageway by grass verge to replace link for which non highway land and planning consent have been secured within the Markham Vale DCC portfolio.</p> <p>Provision of turning head on the southern closed section of the A632 is admirable but the Council would prefer the land to be transferred to the adjacent farm owners as the only user of the closed road section, once all highway rights and utilities are diverted from its corridor lest the council be left with a long term maintenance liability.</p> <p>Provision of turning head on the northern closed section of the A632 is admirable but the Council would prefer the land to be returned to agricultural use and made available to the adjacent farm owners, once all highway rights and utilities are diverted from its corridor lest the council be left with a long term maintenance liability.</p> <p>No mention is made regarding need for the diversion of the overhead 132kV electricity apparatus though it is shown on at CT-06-460(F4-G8) The location of the viaduct over the M1 is likely to require a diversion which will have significant impacts.</p> <p>The County Council has long term plans for the creation of a new NMU greenway on line of the former Bolsover Rail trackbed as shown in the proposed Bolsover Local Plan (also a proposed route within the Derbyshire Strategic Cycle Network). Provision of an underpass to accommodate this future use of the trackbed is in progress at its intersection with the A632. To facilitate this future greenway Bolsover North Embankment needs to be reduced in length by approximately 130m at its southern end. This will remove both any impact upon Snipe Bog and create space around the base of the toe of the embankment for future greenway construction, principally on the former railway alignment.</p>
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2.2.27(cont)	<p>To control any cost increase from this work it is suggested that the Bolsover South Viaduct could be reduced in length by up to 200m at its northern end where it runs closely alongside the Bolsover South Spoil Tip and where alternate embankment provision could perhaps provide the better, and cheaper solution. The tip could perhaps be used to provide additional screen to HS2 and the footpath within Peter Fidler Reserve re-aligned to suit any new topography within the restored colliery tip site.</p> <p>In association with the shortening of the embankment, Bolsover North Viaduct needs to be extended by 130m to additionally overspan Snipe Bog. Snipe Bog culvert could then be removed if the above actions taken however care would be required to deal with drainage from the adjacent colliery spoil tip base.</p> <p>Footpath 34 provides a vehicular access route to property in ownership of both the county council and other. The suggested diversion is unlikely to be acceptable as it twists and turns. DCC request than an alternate provision of a vehicular access route capable of Short wheelbase use as an extension to the maintenance route proposed to serve the large railway drainage balancing pond. This is located to the west of Bolsover Woodhouse and shown on plan at CT-06-459 (E4) and could also double as the diverted footpath route.</p> <p>Shuttlewood Embankment is partly located on part of the Markham Vale owned land - there are insufficient details to provide a comment.</p>
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2.2.32	<p>Shuttlewood auto-transformer at CT-06-460 (F5) does not appear to have a vehicular access route to permit construction or future maintenance. An access route is stated from Woodthorpe Road but not indicated on plan.</p> <p>The depth of the proposed cutting at Shuttlewood (up to 24m deep), seems totally out of proportion with the surrounding area. Could a cut and cover tunnel be built instead to lessen the visual impact?</p> <p>Shuttlewood Cutting - The proposals do not provide details of how vehicular access to Markham Vale North Tip will be maintained.</p> <p>A balancing pond for highway drainage for the diverted B6418 Chesterfield Road/Buttermilk Lane, the reference to CT-06-454 is incorrect.</p> <p>DCC fail to see the need for the permanent diversion of Bolsover Footpath 34 adjacent to the Shuttlewood Cutting on to DCC Markham Vale estate land.</p> <p>DCC own land as part of the Markham Vale estate where HS2 propose woodland planting to western side of the Shuttlewood cutting. Map CT-o6-459 F5.</p> <p>DCC own land as part of the Markham Vale estate where HS2 propose ecological mitigation ponds to western side of the Shuttlewood culvert. Map CT-o6-459 I5.</p> <p>DCC own land as part of the Markham Vale estate where HS2 propose woodland planting to western side of the Shuttlewood culvert. Map CT-o6-459 G5 to I5.</p>
2.2.33	<p>This statement grossly understates the amount of work in this section, it does not mention the 40m high M1 Motorway North viaduct that extends from here into LA11; it also misses the potential major issues with electricity pylons. The power lines appear too close to the embankment. (See response to 2.2.12 for LA11). Associated map LV-03-397a does not show a photomontage location of this structure, (suggest 397-02-001 and Mastin Moor).</p> <p>The continuation/division of sheets is very confusing between CT-06-460 and CT- 06-635, (LA11). The M1 Motorway North Viaduct, the replacement flood plain, the balancing pond and access track are all described in LA11 despite being almost completely within the cut-line of maps of LA10.</p>
2.3.2	<p>DCC own land along the route of the proposed HS2 alignment as part of the Markham vale Estate. Discussions on access or acquisition of the land have not yet started.</p>

2.3.6	DCC have invested significant resources at Markham Vale to attract new businesses and create employment. How do HS2 and its contractors propose to engage with the business community to minimise impacts on their operations? How do HS2 propose to mitigate against job losses due to impacts on employment land and to compensate DCC for its lost investment?
2.3.12	How do HS2 propose to mitigate against disruption to utilities during construction phase so that there is no impact on business operation needs at Markham Vale.
2.3.23	DCC own land as part of the Markham vale Estate which have been identified for soil storage - notably at CT-05-458 F2 - G2, CT-05-459 H5 to I5. Discussions on access or acquisition of the land have not yet started.
2.3.30	<p>Heath South Cutting Main Compound, Mill Lane</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. It is unclear from the plan provided, specifically where the access will be taken from. Mill Lane is a narrow, tortuous unlit country lane, subject to the national speed limit. Due to the road alignment it is not currently possible to determine whether an access would meet minimum safety requirements. A speed survey will be required to determine if adequate visibility is achievable, and it is likely that modifications may be required to the existing public highway. Should this be the case, detailed layout designs complying with current design guidance will need to be required. This may require third party land.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.39	<p>Tibshelf Cutting Satellite Compound – Mansfield Road</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan although access appears to be taken directly through controlled land onto Mansfield Road, at a point where the carriageway alignment is level and straight, thus visibility is may be adequate within the 40 mph speed limit.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>

2.3.48	<p>Hardstoft South Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. Visibility is substandard at the junction onto Chesterfield Road. Third party land is required to provide necessary visibility sightlines. Visibility at the Biggin Lane/Chesterfield Road junction is substandard and may require third party land.</p> <p>There are potential conflicts with users of PROW. The route from Chesterfield Road requires widening and/or inter-visible passing places. This may require third party land.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.56	<p>Hardstoft North Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. No access details provided but visibility is likely to be restricted by existing road alignment so may require third party land.</p> <p>Topography of the site may present a highway problem, as there appears to be level difference between road and the site compound. The existing road alignment currently restricts visibility but the road appears to be being realigned, depends on the order of works as to whether a suitable access can be achieved. Also there is a level difference that may present a constraint to the establishing a safe compound at this location.</p> <p>The route to site is via narrow country lanes with restricted forward visibility so may require widening / passing places which may require third party land.</p> <p>The Hawking Lane diversion at its junction onto Deep Lane falls within a 60 mph limit so will require 2.4 metre x 203 metre splays. Visibility onto the Deep Lane/A6175 junction is possibly substandard so may require third party land.</p> <p>There are also potential conflicts with users of the PROW.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.64	<p>Stainsby Viaduct Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. No access details are provided. Two compounds are indicated in the plan. The Southern compound would appear to have no apparent link to public highway. Third party land may be required to address this.</p> <p>Visibility is substandard where Mill Lane diversion re-joins existing Mill Lane at Stainsby Mill. There are potential conflicts with users of the PROW.</p> <p>DCC have concerns about construction traffic using Stanley Lane (?) at its junction with Stainsby Brook Cottage /with Hawking Lane is constrained due to limited width and severely restricted forward visibility. Formation of a new junction onto Hawking Lane diversion will require 2.4 metre x 203 metre visibility sightlines and therefore may require third party land.</p> <p>There are also potential conflicts with users of PROW.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.69	<p>Mill Lane Diversion Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. No access details are provided.</p> <p>There are potential conflicts at junction of unclassified Mansfield Road with A617. Increases in traffic arising from the use from compound, Mill Lane diversion traffic, and diverted traffic may require mitigation, possibly by means of the introduction of traffic signal control.</p> <p>Visibility is substandard where Mill Lane diversion re-joins Mill Lane at Stainsby Mill. A re-prioritisation Mansfield Road route into Mill Lane diversion rather than T-junction may overcome this.</p> <p>There are also potential conflicts with users of PROW.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.74	<p>M1 Motorway South Viaduct Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. No access details are provided. The visibility is substandard due to the vertical alignment of the road.</p> <p>The development of the site would cause an adverse impact on surrounding highway network. There are restricted carriageway widths and the horizontal and vertical alignments which limit forward visibility and are not easily mitigated.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>

2.3.82	<p>Bolsover South Embankment Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. The position of the access is not shown but visibility is restricted by boundary features on both sides of road.</p> <p>The development of the site would cause an adverse impact on surrounding highway network.</p> <p>There are restricted carriageway widths and the horizontal and vertical alignment which limit forward visibility and are not easily mitigated.</p> <p>Land potentially required during construction as shown on the drawing, access is severely substandard in terms of visibility and conflicts with PROW, FP19.</p> <p>Access on the north side of Palterton Lane, opposite the compound, boundary features would require removal to achieve satisfactory visibility. Access widening would be required to allow two way vehicle movement for at least 20 metres into the site, passing bays need to be inter-visible . This may require third party land.</p> <p>The reason for potential works to Palterton Lane south of the site is unclear.</p>
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2.3.91	<p>Carr Vale Embankment Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan due to the vertical alignment of the road. The topography of the area presents a highway problem. The visibility is restricted by vertical the alignment, however realignment of Chesterfield Road may overcome restrictions to the visibility and access issues.</p> <p>Construction traffic on Buttermilk Lane (40 mph) and access into “land potentially required...” has visibility obstructed by the river bridge parapet. Note: WEAK BRIDGE.</p> <p>Construction traffic at the pinch point on Woodhouse Lane near the junction with Station Road may require mitigation and third parry land.</p> <p>Permanent closure of the disused railway line indicated on drawing impacts the aspirational multi-user route at this point.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.98	<p>Shuttlewood Viaduct Satellite Compound Buttermilk Lane, Chesterfield Road.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan due to lack of adequate forward visibility as demonstrated by existing solid white centre line. The exit visibility could be improved but forward visibility is restricted by existing carriageway topography. Any improvements may require third party land.</p> <p>The development of the site would cause an adverse impact on surrounding highway network. It is unlikely that any mitigation would be feasible from a safety perspective. The Site is constrained with solid white centre line, lack of controlled frontage and potential conflict with Buttermilk Lane (Coalite). The site topography presents a highway problem, the vertical alignment of the highway adversely impacts upon forward visibility.</p>

2.3.98 (cont)	<p>The footway fronting Chesterfield Road is narrow and on a bus route. There is a narrow and weak bridges on Buttermilk Lane presenting a constraint to accessing a compound on this site.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.105	<p>M1 Motorway North Viaduct Satellite Compound</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There is restricted visibility to left on exit from the existing access on Mill Lane which could be improved by the removal of adjacent trees and vegetation.</p> <p>Access is at the bottom of a dip so the approach gradients could impact on stopping distances. DCC would require structural assessment of the adjacent bridge to ensure suitability. Highway gradients approaching access also require investigation and may require third party land to overcome.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.106	<p>Reference is made to the demolition of an outbuilding at Seymour Link Road but there are no details provided about this building.</p>
2.3.116	<p>DCC support the approach set out in 2.3.116 that excavated material generated across the scheme would be re-used as engineering fill material or in the environmental mitigation earthworks of the scheme where suitable and reasonably practicable. This would help ensure that the amount of excess waste produced from the scheme is minimised.</p>

2.3.117	<p>It is noted from this section that forecasts of the amount of construction, demolition and excavated waste that would be produced during construction of the proposed scheme is to be reported in Volume 3 of the ES. However, DCC considers it to be important that full details of the likely amounts of construction, demolition and excavation waste should be set out for this specific section of the route in the ES so that DCC can make a more detailed assessment of the potential environmental impacts of the generation of waste material, particularly if it is proposed that any excess waste material will need to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.3.118	<p>DCC support the approach set out in 2.3.118 that local excess or shortfall of excavated material within the Tibshelf to Shuttlewood area would be managed through an integrated design approach with the aim of contributing to an overall balance of excavated material on a route wide basis. However, DCC's comments made on section 2.1.117 are reaffirmed. It is important that details are provided of the likely amounts of excavated waste that would be generated from this specific section of the route so that the County Council can make a more informed judgement of the likely environmental impacts of the scheme. This is particularly important if significant amounts of excess waste need to be exported from the area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>

2.3.121	<p>It is not clear which of the main or satellite compounds in this area, if any, would remain in place for the rail systems works. Figure 8 on page 50/54 shows the Heath South cutting main compound and 10 satellite compounds open at some point between Q42 2024 to Q3. Yet rail systems work are not due to begin until Q3 2031 and end in Q4 2033. Will these require work sites? If so where will they be?</p>
2.4.7 / 2.4.8	<p>With regard to operational waste and material resources, DCC considers it important that full details of the likely amounts of operational waste that would be generated by this specific study area of the scheme should be set out in the ES. DCC can then make a more detailed assessment of the likely environmental impacts of the scheme, particularly if there is likely to be a need for significant amounts of excess waste material to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>

1.3 Stakeholder engagement and consultation, Section 3.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
3.3.2	<p>There is no acknowledgement of the impacts on the business community at Markham Vale despite several meetings being held over the past four years between DCC officers with responsibility for Markham Vale and HS2 personnel.</p>

3.4.6 / 3.4.9	<p>DCC request that HS2 LTD continues to engage with the County Council on the scheme, particularly on the baseline information to be used in the ES to ensure that it is robust and up-to-date as the WDES progresses towards the final version.</p> <p>There have been many meetings between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.</p>
3.4.8, 3.4.10 and 3.4.19	<p>There is no acknowledgement of numerous meetings held over the past four years between DCC officers with responsibility for Markham Vale, Henry Boot developments Ltd and HS2 personnel regarding the major development proposals at Markham Vale and the impacts on them from HS2. There has been a significant exchange of information on this matter but the proposals do not use up to date OS information showing the new and proposed industrial units and infrastructure at Markham vale.</p>

1.4 Agriculture, forestry and soils, Section 4.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
4.1.2	DCC own agricultural and forestry land as part of its Markham Vale Estate and have not been consulted by HS2 in this context.
4.4.3	It is unclear how the agricultural land forming part of DCC's Markham vale estate will be accessed by vehicles over the proposed Bolsover Footpath 35 accommodation overbridge Woodside Farm (CT-06-460).
4.4.26	Part of the woodland on Markham Vale land has been planted (and managed) for commercial purposes but this is not recognised here.
4.4.28	Table 16: Summary of permanent effects on holdings from construction should be reviewed in the light of the previous comment

1.5 Air Quality, Section 5.

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Volume, page and paragraph reference	Full ES comment
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA10 area.
5.4.6	It is noted that the risk of dust effects could be "high" and human health effects arising could be "medium" in this area.
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond.
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA, Section 6.

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Volume, page and paragraph reference	Full ES comment
6	<p>The proximity of the line to a number of settlements is of concern to the Council, since this will plainly significantly impact on the lives and homes of the people living in these areas. Specifically the line will come within 20m of the edge of Tibshelf, a village already affected by being so close to the M1.</p> <p>We note with concern that a further 10 homes, the East Midland Ambulance Station and the historical Heath Church and burial ground will be significantly affected through demolition and works. The loss of the Ambulance Station and the facility also used by Derbyshire Police could impact adversely on local communities, increasing the travel time of emergency vehicles, and further endangering the lives of local people if they take seriously ill or are in an accident.</p> <p>DCC would also like to have more information about how the development will affect Stainsby Mill which is a historical monument and visitor attraction, and the land where the annual Stainsby festival is held. This is a hugely successful local social and music event, which draw people from outside the area and benefits the local economy.</p> <p>DCC note with disappointment that a number of wildlife sites will be affected or lost, impacting on local wildlife and fauna, and reducing the opportunities for local people to engage in leisure and recreation, and to learn about their local area.</p>
6.1.2	DCC are disappointed to note that there is no acknowledgement of the outcome of engagement discussions with DCC Officers re the impacts on the Markham Vale regeneration project.
6.2.3	It should be recognised that not all promoted routes for vulnerable users are dedicated as public rights of way. This should not lessen the value placed on them but rather ensure that safeguards are in place to accommodate them to avoid issues of severance in the network.

6.2.4	<p>For accuracy and inclusiveness DCC request that reference to "public footpaths and routes" could be replaced with "all statutory and non-statutory rights of way", or for HS2 to be clear that it is all public rights of way and all other vulnerable user pathways.</p> <p>When reinstating or sourcing alternative public footpaths in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.</p>
6.4.2 - 6.4.6	The loss of amenity to the residents and its impact on their physical and especially mental wellbeing should be considered
6.4.12 - 6.4.13	Effectively the demolition of 4 properties at one site.
6.5	There is no detail available and so DCC are unable to comment.

1.7 Ecology and biodiversity, Section 7.

- 1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

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Volume, page and paragraph reference	Full ES comment

General	<p>The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage. It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES.</p> <p>Whilst not wishing to consider potential impacts on individual sites, features and species at this time, with regards only to the section of the route (and potential receptors) within the county of Derbyshire, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <p>It is understood that the area around Hardwick is one of the most sensitive sections of the HS2 route for multiple interests and assets - heritage, archaeology, landscape, and to some extent, ecology. It is anticipated that the scheme design in this area will be subject to significant scrutiny, and potentially, redesign. Whilst it is accepted that the M1 currently presents a significant barrier to ecological connectivity in this area (and is also a significant environmental detractor in terms of noise, visual intrusion, landscape severance etc) the proposals for HS2 should not exacerbate this. A large cutting for HS2 (and indeed a second cutting to accommodate the diversion of Hawking Lane) arguably does. Any reconsideration of the scheme in this area should seek to address east-west connectivity issues, including for species movement. This should not only include reconsideration of the proposals for HS2 and associated highways work so as not to exacerbate the current situation, but should also consider the potential to use this scheme to help address the impacts currently arising from the M1.</p> <p>Does the realignment of the M1 near Sutton Scarsdale offer any opportunities to build-in improved habitat connectivity in this area, through the use of green bridges or underpasses etc?</p> <p>The use of a viaduct in the area of Peter Fidler and Carr Vale will to some extent alleviate some of the impacts that might have been foreseen, particularly associated with habitat loss that would have been caused had an embankment been proposed. Residual impacts will require further consideration both to protect the ecological interest and the public amenity value of the site. Reptiles, amphibians, riparian mammals and avian interests will require particular consideration in this area.</p>
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	There is insufficient information provided on the location and impacts on Markham Colliery Reedbed LWS.
7.3.7	There is insufficient information provided about the location and impacts on Woodside Field Slope and Stream LWS.
7.3.12	The report has not identified woodland located around the Markham Vale regeneration park, some of which is impacted by the proposals.
7.3.16	The report fails to acknowledge the presence of improved watercourses and ponds that were created around the former Markham Colliery (between Woodside Farm and the Doe Lea). These were created as part of the Doe Lea catchment improvement works and also as part of the Markham vale Environmental Improvement work and to manage the run-off from the former Markham Colliery North tip.
7.3.19	The report fails to acknowledge the presence of reedbeds that were created as part of the Markham Vale project along the toe of the former Markham Colliery north tip. These are impacted by the HS2 proposals in the vicinity of Woodside farm.
7.3.20	DCC hold several years of detailed ecological surveys undertaken as part of the Markham Vale project; the results can be made available if required.
7.4.16	There is insufficient detail about the Poolsbrook Flash LWS, part of which is within DCC's ownership as part of the Markham Vale estate.
7.4.19	Given previous comments, this area of woodland lost does not include the recently planted woodlands as part of the Markham Vale project.
7.4.24	The study report fails to acknowledge that the route crosses Hawke Brook in at least two locations, refer to CT-10380a I5 and H2-H3
7.4.40	The DCC Markham Vale project team need to be consulted on land that forms part of the Markham Vale estate as these areas may form existing mitigation measures to the Markham Vale project.

1.8 Health, Section 8.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
8.2.2	Demonstrates an understanding that the wider determinants of health will be affected as a result of this development.
8.2.3	Identifies that there will be adverse and beneficial health impacts.

8.2.4	DCC agree with the health determinants listed. However, HS2 has neglected to include: potential affects on mental health and wellbeing, community connectivity, employment, housing, local transport, food and farming and economy.
8.2.6	DCC agree that the strength of evidence does not necessarily determine the importance of the outcome. HS2 also need to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight for example the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order.
8.2.8	DCC encourage HS2 Ltd to use and refer to DCC's "Rapid Health Assessment of HS2" (2013) and "Update on the 2013 Rapid Health Impact Assessment of HS2" (2017) when constructing the formal ES document.
8.4.1	DCC agree with the mitigation listed but ask that HS2 also consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.5	Community engagement framework and personnel is vitally important.
8.4.8	DCC request that HS2 also include reference to community connectedness in this section.
8.4.16	DCC request that HS2 Include reference to mitigation such as using aesthetic design solutions.
8.4.18	Special attention must be paid to retaining easy access to healthcare services, particularly community services at Bolsover hospital.
8.4.23	Due to impact on PRoW in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.
8.4.24	DCC request that HS2 add an additional mitigation of avoiding using important local roads for construction traffic. Increased traffic congestion will make it more difficult for pedestrians and cyclists to utilise active travel options and increased journey times will lead to increased stress levels for commuters.
8.4.28	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase. HS2 should ensure that construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme which will include monitoring against 'respecting the community'.

8.4.32	A total of 11 residential properties would be demolished. The erosion of social networks resulting from these demolitions would have the potential to reduce social capital, reducing the beneficial health effects that are gained through social contact and support. Relocation, whether forced or voluntary, may cause stress impacting more on low income families and those with disabilities or poor social support
8.5	There is no detail available DCC are unable to comment.

1.9 Historic environment, Section 9.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
9.3.17-18 and 9.4.18-23 (<u>Hardwick assets</u>)	<p>The Hardwick group of heritage assets is considered to be of international importance, including 'perhaps the finest 16th century house in Europe'. It includes the Grade I Listed Old Hall and New Hall, a Scheduled Monument, a Grade I Registered Park, and a Conservation Area. It is one of only two places in Derbyshire (Bolsover Castle being the other) with Grade I buildings, a Grade I Park and a Scheduled Monument on the same site.</p> <p>The significance of the Halls and Park draws upon designed views over the Park and the historic estate landscape beyond. Views to the west over the Vale of Scarsdale are particularly important where the historic field pattern of the former estate is largely intact despite the obvious impact along the line of the M1. This was assessed as of 'exceptional landscape and visual sensitivity by Mott MacDonald in a study of the setting of Hardwick in 2004.</p>

9.3.17-18 and 9.4.18-23 (<u>Hardwick assets cont</u>)	The proposed impacts in this area of 'exceptional landscape and visual sensitivity' would be substantial. The large 'Hardstoft North' and 'Astwith' cuttings would be doubled by additional cuttings for the Hawking Lane diversion upslope to the west. Further impacts would also arise from the proposed material stockpiles, compounds and further disruption to the historic road network including diversion of the main visitor approach through Doe Lea. The landscape and visual assessment for this section assesses impacts in and around the Hardwick estate as a 'high' magnitude of change and 'major adverse' effect. It therefore seems scarcely credible that the historic environment assessment finds a 'low' magnitude of change leading to a 'moderate adverse' effect. Although no historic environment visualisations are submitted in the WDES it is clear from the sheer scale of the proposed changes that a 'moderate' or 'high' level of change should be assessed resulting in a 'major adverse' effect.
9.3.17-18 and 9.4.18-23 (<u>Hardwick assets cont</u>)	The current proposals do not represent the least harmful possible scheme for dealing with the route and its associated landscaping in the vicinity of Hardwick. The National Trust has drawn up a proposal which is much more sensitive to the historic landscape, in terms of reducing the size of cuttings, avoiding the deeply unsympathetic diversion of Hawking Lane, and reinstating the historic line of Mill Lane. Given the internationally important group of heritage assets and the profile of Hardwick as a major tourist destination it is essential that a world-class mitigation design is applied here in order to minimise harmful impacts. See also comments from DCC Landscape Architect on para's 11.4.7 and 11.4.11.
9.4.11	Heath Old Church and associated medieval earthworks (Grade II Listed and Derbyshire HER MDR5950 and MDR5951): the proposed total loss of these monuments is regrettable and alternative routes and designs should be explored. It is however recognised that the route in LA10 is also tightly constrained by other heritage designations and groups, and possible changes would need to be considered in the round.
9.4.25	Stainsby moated manorial complex (Scheduled Monument): impacts from the scheme will be within 100m of the Monument, including 'Stainsby North Embankment', 'Heath South Cutting', an attenuation pond and temporary material stockpiling. The WDES consultant places undue emphasis on the presence of the M1 in views, when the proposed cutting would be significantly closer, and larger. Other proposed works to the north (pond and stockpiling) are within 60m and Heath South Cutting main compound about 500m. There is consequently an underassessment of impact (low) and effect (moderate adverse) which lacks credibility. Impact should be assessed at least 'moderate' for this asset ('high' might be more appropriate) and effect at 'major adverse'.

9.4.26 – 9.4.27 (Sutton Scarsdale Hall)	<p>Historically the third member of the group of elite houses with designed views over the Vale of Scarsdale, Sutton Scarsdale Hall (Scheduled Monument, Grade I Listed, Conservation Area). This is an 18th century mansion enjoying designed views to the east over the Vale towards Bolsover Castle, in many of which the interposing M1 is hidden. This key aspect of the significance of the Hall would be disrupted by the proposed new landform (Bolsover South embankment, proposed stockpiling, satellite compounds at 'M1 Motorway South' and 'Bolsover South embankment'). The WDES consultant overstates the level of 'modern intrusions' in these views which are largely intact. There is consequently an underassessment of impact (low) and effect (moderate adverse) which lacks credibility. Impact should be assessed at least 'moderate' for this asset, and effect at 'major adverse'. Satellite compound locations should be re-assessed to minimise impacts.</p> <p>This asset would also benefit from the design solution discussed in relation to Bolsover Castle (9.4.28). The same concerns over the surrounding landscape treatment are also shared with those expressed by DCC's Landscape Architect, particularly in that "rather than mitigating the adverse effects of the scheme the landscaping is likely to add to them". There are concerns that through the incongruous arrangement of tree planting, insertion of embankments, large soakaways (plus associated land deformations) and cuttings that this will result in further cumulative damage to this sensitive historic landscape.</p>
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9.4.28 (Bolsover Castle)	<p>Bolsover Castle is an outstanding example of 17th century architecture of international importance. It includes the Grade I Listed Castle, a Scheduled Monument, and the Grade I Registered pleasure grounds and garden. It is one of only two places in Derbyshire (Hardwick being the second) with Grade I buildings, a Grade I Park and a Scheduled Monument on the same site. The setting of the Castle contributes strongly to its significance through its prominent and dominant landscape position designed to impress in both inward and outward views. The terrace adjacent to the 'Little Castle' is designed as a viewing platform, taking advantage of designed views westward over the Vale of Scarsdale.</p> <p>The key section of HS2 in relation to Bolsover Castle is therefore the section that runs south to north across this sector of the westward view. DCC have previously advised that the design of this section is critical to conserving the significance of the Castle. The large embankments currently proposed (Bolsover South, Carr Vale, Bolsover North) are major and visually intrusive new landforms at the interface between the planned town of Bolsover and rural Vale.</p> <p>Although no historic environment visualisations are available, the conclusion of the WDES consultants that this represents a 'low' level of impact to the significance of the Castle, is not credible. Impact should be assessed at least 'moderate', giving a 'major adverse' effect.</p> <p>Given the internationally important group of heritage assets and the profile of Bolsover Castle as a major tourist destination, it is essential that a world-class mitigation design is applied here in order to minimise potentially harmful impacts. We have previously advised that this might be achieved by a visually permeable viaduct, architect-designed to a high standard, to create a beautiful feature in its own right which might conserve or even enhance the setting of the Castle and contribute to its profile.</p>
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1.10 Land quality, Section 10.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
10.2.7	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should license for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>
10.4.16	With regard to any proposed mitigation measures required for minerals mine water or mine gas, DCC request that it is consulted on any such measures as an 'authoritative consultee'.
10.3.32	<p>The Chesterfield Canal is mentioned in this paragraph even though LA10 section of the HS2 route does not include the Staveley spur (see LA11). NOTE also that the use of Bullet points in LA10 - para 10.3.32 more clearly identifies the water feature intersections than the use of plain continuous text used in report LA11 - para 10.3.32. Bullet form is preferable.</p> <p>Recently created water features adjacent to Hawke brook and the Doe lea as part of landscape and environmental mitigation measures at Markham Vale are not acknowledged despite being located within the HS2 route boundary - see CT-10-420a B5.</p>
10.3.37	The report does not mention the potential contamination arising from previous land use as railway or rail sidings which applies across the whole HS2 route.
10.3.39	There are records of other opencast sites around the Markham Vale and Staveley area that are not included within the list provided.
10.3.42	No mention of Hartington Colliery nor Oxcroft Colliery.

10.3.56	Appropriate reference is made to the fact that Derby and Derbyshire Minerals Local Plan defines an Opencast Constraint Area called Hardwick Hall Constraint Area which covers part of the study area. This was designated due to its historic landscape and provides the settings for Hardwick Hall, Hardwick Old Hall and Hardwick Historic park and Gardens. Policy MP28 of the Minerals Local Plan indicates that within Opencast Constraint Areas, proposals for opencast coal extraction will not be permitted unless the proposal would not cause any material damage to the area's conservation interest.
10.3.59	This section notes that there is one area designated by the Coal Authority for future opencast licensing in the far north of the study area located west of Clowne Road between Stanfree and Shuttlewood Common for the Hoodcroft Openast Licensing Area. In this regard and the fact that the whole of the study area lies in an area of surface coal, to prevent the sterilisation of the coal resource in accordance with Policy M17 of the Derby and Derbyshire Mineral Local Plan, DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 25, there appears to be no plan to clarify or advise the location of these sites. Despite passing through the coalfields to the north of Tibshelf and from Bolsover northwards, there is no mention of consideration of the contaminative risk likely from Coal Mining, pit heads and spoil-heaps (See LA11 report).
10.4.14	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 26, there appears to be no plan to clarify or advise the location of these sites. Again any reference to Coal mining, pit heads and spoil mounds (and recorded mine entries) is omitted. (See LA11).
10.4.16	With regard to any proposed mitigation measures required for minerals mine water or mine gas, DCC request that it is consulted on any such measures as an 'authoritative consultee'.

10.4.23	<p>As correctly noted, construction of the proposed scheme has the potential to affect existing mineral resources and proposed areas of mineral exploitation and that this could occur by sterilisation of the mineral resource. The whole of the study area lies over a surface coal resource. In this respect, to prevent the sterilisation of the coal resource in accordance with Policy M17 of the Derby and Derbyshire Mineral Local Plan, DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.</p>
10.4.27	<p>However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.</p> <p>Except for brief reference in Para 10.3.62 deep coal reserve is poorly considered. Impact on deep coal reserve is unmentioned (as in LA11 report para 10.4.30) despite this section of the proposed route clearly passing through the North Derbyshire Coalfields. As well as consideration of shallow 'opencast' coal sterilisation, the EIA need consider impact on the deep coal reserve and determine what restriction the surface routing of the proposed HS2 rail line could introduce in respect of coal reserve which underlays the rail corridor and which if recovered by deep mining process could cause severe detrimental impact to rail embankment integrity and thus high speed travel in the event of future mining subsidence</p>
10.4.30	<p>Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 27, there appears to be no plan to clarify or advise the location of these sites.</p>
10.4.35	<p>.....except for the possible sterilisation of deep coal reserve which underlays the rail corridor and which if recovered by deep mining process could cause severe detrimental impact to rail embankment integrity in and thus high speed travel in the event of future mining subsidence</p>

1.11 Landscape and visual assessment, Section 11.

1.11.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
11.1.5	The Map series LV-04 forming part of the LA10 Map Book shows viewpoints that would potentially be significantly affected, it is fair to assume that there are other viewpoints that would be affected but these effects are not judged to be significant. It is also noted for the record that the viewpoint is not the visual receptor so any judgement should aim to reflect the amount of people that might be impacted by the proposal (e.g. is the occupants of a dwelling or hundreds of people using a footpath for example). It is not clear whether this judgement has been made at this stage
11.2.3	The extent of the study area has been informed by construction and operational phase Zones of Theoretical Visibility (ZTV) although the ZTV doesn't appear to be shown on the plans in the LA10 Map Book. Therefore it is not possible to comment on the findings of this work at this stage and the extent to which the visual impact assessment is a fair reflection of the theoretical visibility of the scheme
11.3	This section outlines the nature of the landscape in the section of the route between Tibshelf and Shuttlewood by reference to the National Character Areas and the Landscape Character of Derbyshire Publication prepared by DCC (11.3.6). These published LCAs have then been adapted to provide LCAs of an appropriate and consistent scale (11.3.7). The Tibshelf to Shuttlewood study area has been subdivided into 19 LCAs (11.3.8) although the suggestion at this stage is that these remain draft and subject to review.
11.3.9	This section states that only 5 of the 19 LCAs would not be significantly affected by the proposed scheme meaning that the other 14 LCAs are significantly affected. This suggests that a significant area overall would be impacted upon by the proposed scheme. And yet there has been no attempt to combine these findings to assess the effects on the wider landscape character types defined in the county scale study to understand whether these effects are more than locally significant but potentially significant at a county scale.

11.3.10 to 11.3.15	<p>The visual baseline describes the range and type of visual receptor potentially affected by the proposed scheme. The selected viewpoints are then set out in the map series LV-03 and LV-04 forming part of the LA10 Map Book and are all referred to as “Significantly Affected Viewpoints”. This implies that there are other viewpoints (representing visual receptors) that might also be affected but these effects are not judged to be significant and as a result are not therefore included on the supporting maps. It is not possible to fully understand the accuracy of these judgements at this time without the detailed assessment in Volume 5 of the formal ES and DCC should reserve its right to make further comment on this information once it has been made available.</p>
11.4.1	<p>The assessment acknowledges that the scale of the construction activities means that the works would be visible from many locations but these effects would be temporary. The assessment of landscape and visual effects during the construction period is based on the activities occurring during the peak construction phase. This seems to be a reasonable approach although at this stage there is no detailed description of what these impacts might be at this particular stage of the development. This may well form part of the detailed assessment in Volume 5 of the formal ES and DCC should reserve its right to make further comment on this information once it has been made available.</p>
11.4.2	<p>The effects associated with the peak construction phase are considered to be medium-term, which again doesn't seem to be unreasonable unless any component of the construction phase would be apparent and visible for the full indicative construction programme. It might then start to approach a medium to long term impact when the landscape restoration and establishment of these areas is taken into account.</p>

11.4.7	<p>The landscape assessment in this section acknowledges that there would be Major adverse (significant) effects during the construction period on :</p> <ul style="list-style-type: none">• Newtonwood Farmlands LCA,• Hardwick Estate LCA,• the Doe Lea Valley LCA, and• North East Derbyshire Estate Farmlands LCA. <p>HS2 acknowledge Moderate adverse (significant effects) on:</p> <ul style="list-style-type: none">• the Wooded Farmlands LCA,• the Sutton Estate Farmlands LCA, and• Bolsover LCA. <p>Based on the current design, Table 31 confirms those LCAs that would be significantly affected during operation, which would include:</p> <ul style="list-style-type: none">• Newtonwood Farmlands LCA,• Hardwick Estate LCA,• the Sutton Estate Farmlands LCA,• the Doe Lea Valley LCA,• Bolsover LCA, and• North East Derbyshire Estate Farmlands LCA. <p>Although the effects on North East Derbyshire Estate Farmlands and Bolsover LCAs would not be significant in year 15 of operation when landscape mitigation would assist in integrating the scheme with the surrounding landscape. This is not acceptable and DCC suggest that current proposals do not represent the least harmful possible scheme for dealing with the route and its associated landscaping particularly in the vicinity of Hardwick.</p> <p>The National Trust has drawn up a proposal which is much more sensitive to the character of the landscape, in terms of reducing the size of cuttings, avoiding the deeply unsympathetic diversion of Hawking Lane, and reinstating the historic line of Mill Lane. Given the internationally important group of heritage assets, the quality of the immediate landscape setting, and the profile of Hardwick as a major tourist destination it is essential that a world-class landscape mitigation design is applied here in order to minimise harmful impacts.</p>
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11.4.11	<p>Table 30 describes the potentially significant visual effects of the construction phase based on the current design for the proposed scheme from a range of viewpoint locations and Table 32 assesses the likely significant effects during operation at Years 1 and 15.</p> <p>It is DCC's view that these effects have been under-estimated. Where significant adverse effects at Year 15 have been identified such as those around Hardwick Hall, there is no evidence of any design response aimed at addressing these unacceptable impacts on what is a Grade1 listed House and Garden. The current proposals do not represent the least harmful possible scheme for dealing with the route and its associated landscaping particularly in the vicinity of Hardwick. The fact that there is no viewpoint from Bolsover Castle seems to be a significant omission in the assessment given that this viewpoint represents thousands of recreational visitors to the building, designed to appreciate views over the landscape to the west. If VP 395-03-005 has been used as a proxy, representative viewpoint then this should be made clear in the assessment and then assessed accordingly given that Bolsover Castle is an important vantage point designed to look at the view.</p> <p>VP 395-02-012 represents the residents and users of the A632, Chesterfield Road approaching Bolsover. The visual effects are assessed as Major adverse (significant) during construction and during operation up to year 15. This is not acceptable and would have an adverse impact on visitors to Bolsover Castle and the historic town centre. In order to assist in mitigating these clearly identified adverse visual effects, HS2 should engage an internationally renowned architect with a specialism in bridge design to create a world class feature that would endure as an attractive entry point to Bolsover. The fragmented nature of the current design utilising short sections of embankment add to the adverse effects rather than mitigating them and the scheme would benefit from a single long span viaduct that would extend from Carr Vale Nature Reserve to the Bolsover Colliery tip to the south of Woodhead Lane.</p> <p>Table 30 describes the potentially significant visual effects of the construction phase based on the current design for the proposed scheme from a range of viewpoint locations. As previously stated all of these locations represent "Significantly Affected Viewpoints" where the level of effect is at least moderate adverse.</p>
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11.4.11 (cont)	This does not take account of other viewpoints (representing visual receptors) that might also be affected but where the effects are not judged to be significant. Table 32 (11.5.8) assesses the same locations when the proposed scheme would become operational. It concludes that the visual impacts would remain significant at each of the identified locations other than viewpoints 391-03-005, 391-03-009 and 391-03-008 where the visual effect is not considered to be significant after 15 years of operation when landscape mitigation is sufficiently mature to screen the main impacts. DCC do not think this is acceptable for similar reasons outlined in 11.4.7 above.
11.5.3	There are locations along the route such as the section of the route north of the M1 near Deepdale Farm, Sutton Scarsdale (drawing no LV-04-394 (Volume 2: Tibshelf to Shuttlewood)) where the planting of trees to screen views seems to be at odds with the description of the established landscape character and would be inappropriate. In this area defined as Sutton Estate Farmland LCA (page 182, Volume 2: Tibshelf to Shuttlewood).
11.5.10	The summary of significant landscape and visual impacts in this section is an over simplification of the facts because viewpoints are not receptors. They are merely locations that represent the view of the receptors (people) experiencing the potential impact. There is no assessment of how many people these effects might impact upon although this information should form part of the detailed assessment in Volume 5 of the document. DCC reserve its right to make further comment on this information once it has been made available.

1.12 Socio Economic, Section 12.

1.12.1 Please refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.13 Sound, Noise & Vibration, Section 13.

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Volume, page and paragraph reference	Full ES comment
13.1.4	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4 and 13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.

13.4.1	The Council notes the assumptions and limitations and the need for assessment in the formal ES.
13.4.4	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.
13.4.8	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.5.2	The Council notes the lack of reference to the impacts of track maintenance and requests that these be included in the formal ES.
13.5.18	It is noted that noise effects arising from permanent changes to existing roads will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.19	It is noted that noise and vibration effects arising from the operation of the Staveley IMD will be reported in the formal ES.
13.5.20	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.
13.5.25	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

1.14.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
14.1.2	<p>DCC as the Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.</p> <p>DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. The requests and approaches to meetings from HS2 Project Leads has been very fragmented and often under extreme time pressures. Prior to meetings being set up HS2 representatives, very often clear agendas have not been provided to DCC and this has at times led to the wrong officers being in attendance and meetings have therefore become somewhat abortive. Only a limited number of meetings have been requested and were not formally recorded by the HS2 representatives. No official record of the discussion points have been provided back to DCC to date. Also although it is appreciated that this project is far reaching and complex it is DCC's view that the whole route was not presented as a complete package. Therefore DCC have had an inadequate opportunity to inform the initial engagement process in a meaningful joined up way.</p>
14.2.3, 14.3.5 and 14.3.8	There is no mention of Seymour Link Road despite this being discussed with the HS2 team on several occasions over the past 4 years.
14.3.3	It should be noted that PROW surveys capture only one element of data and rarely demonstrates the need of permeability across new barriers. It is important that decisions relating to both statutory and non-statutory Rights of Way demonstrate both demand and market need by considering journey destinations and trip generators as well as community locations.
14.3.10	The A6175Health Road/A617 Mansfield Road is also used by the Pronto bus service from Chesterfield to Nottingham.

14.3.13	<p>There are a number of PROWs around Markham Vale, particularly Markham vale North, that are not shown on the proposals maps. The HS2 team have been advised of this several times over the past few years. This latest round of consultation does not give any confidence that comments will be taken on board.</p>
14.3.14	<p>When describing the existing multi user Greenways (off road routes) for non-motorised users, it is noted that reference is made to the NCN67/Five Pits Trail, Stockley Trail, and the NCN67/Trans Pennine Trail. However there are proposed extensions and additions to the planned network of non motorised trails that form strategic connections for the Derbyshire Key Cycle Network which should be safeguarded for future development. These include:</p> <ul style="list-style-type: none"> • an extension to the Stockley trail northwards along the Bolsover Branch Line (currently shown to be covered by the Bolsover North Embankment); • an extension to the Stockley Trail west towards Arkwright Town (currently shown beneath the Bolsover South Viaduct but appropriate head room should be allowed in the vertical alignment to safeguard the trail development); • a section of the proposed route Stockley Trail to Five Pits Trail between Bramley Vale and Heath across the A617/M1 Interchange; and • a further extension southward from the Stockley Trail to Stainsby Mill and Hardwick Hall (It may be possible to add a 3m shared use path alongside the realignment of Mill Lane). <p>There are other off-highway routes that have either been constructed or are in the process of being constructed as part of the Markham Vale project. None of these are acknowledged by HS2's report.</p> <p>Non-highway land alongside the A632 between the Doe Lea at Bolsover Business Park and the Markham Vale site has been acquired by DCC, as part of the Markham Vale project. The land and route has been designated as an off-highway multi-user route. HS2 need to include this within their re-alignment of the A632.</p>
14.3.15	<p>The report says that there are no navigable waterways within this report phase study area. Yet the report mentions the Staveley Town basin at Staveley which forms part of the Chesterfield Canal.</p>
14.4	<p>Due to limited information a general assessment provided within. General Responses to WDES Volume 2 CAR.</p>
14.4.1	<p>One of the prime reasons why businesses have chosen to invest and locate on the Markham Vale regeneration site is due to the existence and proximity to the strategic highway network. How will HS2 prevent delays on the highway network such that business needs continue to be met?</p>
14.4.6	<p>How will HS2 enforce and or incentivise the use of construction workers using more sustainable travel options.</p>

14.4.8	The traffic and transport impacts during the construction period within the Stonebroom to Clay Cross area will include construction vehicle movements to and from the various construction compounds, including a compound proposed on Station New Road, Tupton. An assessment of the quantative impacts will need to be considered in the formal ES.
14.4.11	There is no mention of Seymour Link Road.
14.4.14 - 14.4.16	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.4.17	<p>It is noted that potential effects on public transport will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>The majority of these bus services are provided on a commercial basis by operators with no direct support from local or central government. Prolonged diversions and increased journey times will reduce the attractiveness of these services. Mitigation in terms of funding to support these services during the construction period to lessen the impact and ensure their commercial sustainability will be required.</p>
14.4.19	There is no mention of the existing and recently constructed PROWs on Markham Vale.
14.4.21	It is noted that potential effects on PROW will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.4.24	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.4.26	There is no mention of Seymour Link Road
14.4.28	There is no mention made of the existing and recently constructed PROWs on Markham Vale.
14.4.29	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).

14.5.1	Further mitigation measures should be considered for the safeguarding and, where reasonable, the provision of the proposed non-motorised multi-user network being developed across Derbyshire. This would strengthen the permeability of the vulnerable users (walkers, cyclists and horse riders) across the physical barrier of HS2 and provide improved connectivity to destination locations between communities.
14.5.9	Increased travel distance for bus service can impact on their commercial viability. To reduce the impact specific measures should be put in place to improve bus reliability in the area at the same time as the line opens.
14.5.11	<p>There is no mention made of the existing and recently constructed PROWs on Markham Vale.</p> <p>This comment refers specifically to Tibshelf Bridleway 21 (Saw Pit Lane) and Footpath 35; Mansfield Road/B6014 and overbridge between the realignment of Saw Pit Lane/BW21 and the realigned Footpath 35 on the northern side. There should be a 3m wide shared pavement for safe connectivity between the two paths and to allow safe movement of horses across the overbridge and to the east.</p> <p>This comment refers specifically to Ault Hucknall Footpaths 17 and 18. Both these paths are shown as permanently stopped up, leaving access to Hardwick Hall from the west along the Deep Lane overbridge and the Mill Lane reinstatement road. The movement of vulnerable users into Hardwick Park would benefit from an additional multi user overbridge in the vicinity of the Socksutt Woods Drop Inlet Cutting to connect to the existing M1 underpass and the vulnerable user path network into the park by Great Pond. Each of the realigned roads, Hawking Lane, Deep Lane and overbridge and the realignment/reinstatement of Mill Lane should allow for a landscaped 3m wide shared use path as minimum to ensure all connectivity to the park is as accessible as possible. This is a nationally important visitor attraction and dialogue with both DCC Conservation and Design and the National Trust is essential to understand the visitor needs and design access routes appropriately.</p>

14.5.11(cont)	<p>This comment refers specifically to Ault Hucknall Footpath 37. Map CT-06-454 of LA10 shows the whole of this path as stopped up with a diversion from part way along. It is assumed that this is a diagrammatic error and that the path alignment remains in place west of the intersect with the diverted section. It would benefit community permeability if all of the reinstated footpath 37 can be built as a 3m wide multi user path and dedicated as public Bridleway. The network would further benefit from the Mill Lane reinstatement accommodating a 3m wide path to and beyond the M1 underpass and a landscaped bridleway alongside the Mill Lane diversion route north from Stainsby Mill to Bramley Vale. This would accommodate a strategic section of the Derbyshire Key Cycle Network and emerging Bolsover Loop Greenway. Dialogue with Conservation and Design and National Trust are essential to planning this route appropriately.</p> <p>This comment refers specifically to the permeability of the M1 junction 29 interchange between Heath and Doe Lea/Bramley Vale. It is accepted that the footways within the junction are to be realigned, however it would benefit current and future vulnerable use/non-motorised needs to upgrade these routes to shared use cycletracks to allow for improved commuting across the physical barriers of HS2 and the M1 motorway and to reduce community severance. Consideration should also be given to the onward walking and cycling connections between the Five Pits Trail, Stockley Trail and routes into Hardwick Park. The remodeling of this interchange and HS2 cutting could provide a significant improvement for the non-motorised network.</p> <p>This comment refers specifically to the Bolsover South Viaduct which crosses an as yet unbuilt and undesignated path. This is a proposed Greenway which forms part of the Derbyshire Key Cycle Network and will provide a section of a significant non-motorised trail between Bolsover and Chesterfield. As such it is felt appropriate to highlight this route at this point in the report. The viaduct runs alongside the Peter Fidler Nature Reserve and crosses a former railway embankment planned as a multi-user trail to connect the Stockley Trail to the Trans Pennine Trail. In order to future proof this development a height clearance of 3.7m is required (to include mounted horse riders) and a width of 5m to carry the trail.</p>
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14.5.11(cont 2)	<p>This comment refers specifically to the Bolsover North Embankment which crosses an as yet unbuilt and undesignated path. This is a proposed Greenway which forms part of the Derbyshire Key Cycle Network and will provide a section of a significant non-motorised trail between Bolsover and Chesterfield. As such it is felt appropriate to highlight this route at this point in the report. The embankment sits directly over the former Bolsover Branch railway line which forms the norther extension to the existing Greenway, the Stockley Trail. The route will provide a much needed cycle and walking route through the Markham Vale Employment Growth Zone area to connect through various emerging employment development sites and onward to the north to provide connectivity to the Clowne Branch Line, the Trans Pennine Trail and to Chesterfield. Consideration would be welcomed to accommodate the route byway of an underpass of the embankment, this could be linked to the Snipe Bog culvert with short connecting sections of 3m wide trail to return to the former rail alignment.</p>
14.5.15	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>There is no mention of the impacts on Seymour Link Road despite this being discussed with the HS2 team on several occasions over the past 4 years.</p>
CT-05-453	<p>This plan shows significant realignment and stopping up of existing highway network on Hawking Lane and Deep Lane. DCC as the Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. The plan also identifies an overbridge on Deep Lane with no liaison taking place with the Highway Authority. HS2 need to appropriately liaise with the Highway Authority to seek technical input in to the proposed effects on Derbyshire's Highway Network.</p>

CT-05-454	<p>This plan shows significant realignment and stopping up of existing highway network on Astwith Lane, Hawkins Lane and Mill Lane. The Highway Authority has grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. HS2 need to appropriately liaise with the Highway Authority to seek technical input in to the proposed effects on Derbyshire's Highway Network.</p>
CT-05-455	<p>This plan shows significant realignment and stopping up of existing highway network on Junction 29 of the M1, Mill Lane, A617, A6175 and M1 slip road. The Highway Authority has grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. HS2 need to appropriately liaise with the Highway Authority and Highways England to seek technical input in to the proposed effects on both the Local and Strategic Highway Network.</p>
CT-05-459	<p>This plan shows significant re-alignment and stopping up of existing highway network on B6418 Chesterfield Road, Buttermilk Lane and Woodhouse Lane. The Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. HS2 need to appropriately liaise with the Highway Authority to seek technical input in to the proposed effects on both the Highway Network.</p>

1.15 Water Resources & Flood Risk, Section 15.

1.15.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA10: TIBSHELF TO SHUTTLEWOOD	
Volume, page and paragraph reference	Full ES comment
15.1.2	HS2 needs to consult with DCC as landowner in respect of existing surface water drainage and storage within the Markham Vale business park area.
15.3.5	There is insufficient detail to comment.
15.4.6	There is no mention of Hawke Brook as a tributary of the Doe lea.
15.4.11	There is no mention of Hawke Brook where the HS2 route crosses it.
15.4.16	<p>The WDES states that balancing ponds for Highway and Railway drainage will be sized on a precautionary basis. The DCC Flood risk team were informed via consultations with the HS2 design teams that the ponds would be sized to a 1/100yr + 40%CC event.</p> <p>DCC seek clarification with regards to surface water run-off and attenuation, in particular the run-off from the viaducts. Following conversations with the Environment Agency, they have intimated that there has been some miss-understanding with regards to surface water run-off and attenuation with different Risk Management Authority (RMA) giving different advice. DCC have been advised that guidance was planned to be issued to all partners, LA's etc to try and provide an acceptable approach across the board.</p>
15.4.17	Although this is not directly connected to this section, DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC have been supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the highway authority, but with no additional funding to maintain them which is not acceptable.

Consultation Response to Volume 2 CFA LA11: STAVELEY TO ASTON

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VOLUME 2: CFA LA11: STAVELEY TO ASTON

1.1 General Comments

- 1.1.1 This report contains DCC comments for the Community Area 11 of WDES Volume 2.
- 1.1.2 Please also refer to the General response to WDES Volume 2 where comments apply to all areas within Derbyshire.
- 1.1.3 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.
- 1.1.4 The Council continue to be disappointed with HS2's failure to address key concerns in this area. These include the failure to accommodate a route for the proposed Chesterfield and Staveley Regeneration Route and for the proposed Chesterfield Canal.

1.2 Overview and description, Section 2.

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Volume, page and paragraph reference	Full ES comment
2.1.10	There is no mention of A6192 Erin Road.
2.1.11	Chesterfield Canal is listed as part of the key transport infrastructure and as such should be accommodated in the scheme design.
2.1.21	Chesterfield Canal is listed as significant recreation, leisure and open space and as such should be accommodated in the scheme design.
2.1.22	There is no mention of recently created woodland, wetland and grassland areas created as part of the Markham Vale regeneration project which are accessible to the public. The same is true for the Staveley Town Basin and the planned mixed-use development proposed as part of the Markham Vale project.
2.1.23	There is no mention of the Clowne Greenway which is currently under construction.

2.1.25	Appropriate reference is made to the Chesterfield Borough Local Plan Core Strategy 2013; Saved Policies of the Chesterfield Borough Local Plan 2006; Saved Policies of the Bolsover Local Plan 2000; Saved policies of the North East Derbyshire Local Plan 2005; Saved Policies of the Derby and Derbyshire Minerals Local Plan (2000/2002); and Saved Policies of the Derby and Derbyshire Waste Local Plan 2005. However, for consistency with the policy assessment set out for other sections of the proposed route through Derbyshire, reference should be made to the Derbyshire Local Transport Plan 2011 - 2026.
2.1.27	Reference should be made to the North East Derbyshire Local Plan Submission, which was submitted to the Secretary of State on 24 May 2018; and the Bolsover District Local Plan Submission, which was submitted to the Secretary of State on 31 August 2018. These two emerging plans will therefore need to form part of the assessment in the ES as both are submitted plans. Reference could be made to the emerging Derby and Derbyshire Joint Minerals Local Plan and Derby and Derbyshire Joint Waste Local Plan, which are currently being prepared by DCC and Derby City Council. However, neither of these plans has yet to progress to the submission stage.
2.1.28 - 2.3.30	Mention is made in these sections to committed developments, local plan allocations and land safeguarded for minerals in adopted Local Plans. DCC request that HS2 Ltd engages with the County Council on an ongoing basis to ensure that the baseline information, particularly relating to planning application commitments is up-to-date and robust as the WDES progresses towards its final version.
2.1.28	Chesterfield Canal restoration is safeguarded in the North East Derbyshire Local Plan and Chesterfield Borough Council Local Plan and should therefore be accommodated in the design.
2.1.29	Canal restoration at Staveley was underway prior to the HS2 route announcement and would reasonably be expected to have been completed already were it not for the uncertainty caused by HS2 itself. It should therefore be included as a project likely to be constructed.
2.1.30	Severance of the Chesterfield Canal at Staveley by construction of the HS2 IMD line will have significant, permanent negative cumulative impacts and should therefore be included in the formal ES.
2.1.32	There are a considerable number of areas in the design which are subject to further development. As a result it makes it difficult to provide a meaningful response to this consultation.

2.2.12	<p>At up to 40m high the height of the proposed M1 motorway North Viaduct seems totally out of proportion to the road and watercourse it needs to cross. Can it not be lowered?</p> <p>It will be visible from a very wide area and create "major adverse (significant)" impact permanently. Are the power companies happy with the very close embankment slope? If the power lines are to be diverted - how have the associated impacts been assessed?</p> <p>Associated map LV-03-397a does not show a photomontage location of this structure, (suggest 397-02-001 and Mastin Moor.</p>
2.2.22	<p>Wales embankment needs provision for overspanning the future restoration alignment of the Chesterfield Canal with a viaduct spanning over a series of a minimum of 3 new canal locks required to lift the canal up the hillside from the location of the pond at the west portal of the original Norwood Tunnel (CT-06-640, C5). Further eastward extension of the canal thereafter either through provision of a further three locks to achieve the level of the farm underpass beneath the adjacent M1 motorway (C7) or through provision of a new tunnel running approximately west to east and extending into agricultural land to the east of the motorway (B10-C10). From here it can be connected at level gradient directly into the existing fishing lakes (intended new canal marina site) at Kiverton Waters.</p> <p>The issue of protection of the canal route has been raised on a number of occasions over the past five and a half years with both HS2 and DCLG but remains unaddressed by the current design. Embankment profiles, drainage and footpath links need to be revised to suit any change intended to protect the canal restoration - Although just outside the Derbyshire County / Rotherham Metropolitan Borough Council Boundary, the impact of the present HS2 design fundamentally and detrimentally affects the multi million pound restoration work already completed with the county of Derbyshire and jeopardises the longer term ongoing intended restoration of the canal by the Chesterfield Canal Partnership in that it fails to safeguard the canal route as required by DMRB Volume 11 - Section 3- Part 6 - Para 11.7.</p>

2.2.33	<p>There is no mention of the intended closure of the Clowne Branch Greenway indicated on Plan CT-06-635 (and currently under construction) which has on a number of occasions been raised and discussed with HS2 engagement teams and for which the western end of the new greenway will be lost to rail development by HS2.</p> <p>There is no mention of accommodation of the proposed Oxcroft Branch Greenway which as discussed with HS2 engagement team. This was intended to provide an alternate linkage in place of the length of the Clowne Branch to be lost to rail development and to provide future community Non Motorised User (NMU) linkage from Oxcroft & Stanfree toward Staveley, the Trans Pennine Trail (TPT) and Chesterfield Canal. The Oxcroft M1 underpass provides the only substantive 'bridge' crossing beneath both the M1 and future HS2 routes following the advised intended closure of the western end of the Clowne Branch Greenway by HS2.</p> <p>If both routes above are lost to public use, FP28 will need to be upgraded to Bridleway standard and definitive status and suitable provision also made for its safe crossing of the B6419. This will enable an onward route from Cresswell, Clowne and Oxcroft toward Staveley, the TPT and the Chesterfield Canal. Possibly a similar standard and status upgrade is required in respect of FP27 to provide the NMU linkage that will be lost, though an alternative would be the provision of an additional NMU route alongside HS2 to link with the existing stone surfaced track at Markham Vale and shown on Plan CT-06-635 (B4).</p> <p>The areas of suggested new wetland and woodland advised at CT-06-634 (E6 to H5) already exist and will first be lost to HS2 before their re-creation. The wetland area contains surface water attenuation ponds serving the two existing industrial plots located to the south of the existing branch line corridor.</p> <p>The existing line of FP64 is incorrectly shown on plan CT-06-634 (G6). FP64 follows the east flank of the River Doe Lea floodplain. FP Bolsover 13 crosses the M1 at the location (G6). FP64 has been omitted from mapping by HS2 despite its alignment being clearly shown on DCC definitive RoW mapping. The diversion shown as 'FP64' is substantive and in effect severs public right of access alongside the east fringe of the River Doe Lea flood corridor. The provision of a pedestrian underpass should be considered where a short fragment of the existing path is shown as being closed by HS2 at CT-06-634 (E6-E7) so that users can pass beneath the proposed rail embankment and continue along the east fringe of the floodplain to link with FP Staveley 31.</p>
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2.2.33 (cont 1)	<p>Details for footpath and greenway routes consented by CBC planners and constructed between 2014 and 2016 were provided to HS2 engagement in January 2018 and appear not to have been considered prior to publication of the present draft EIA map series.</p> <p>The balancing pond suggested at CT-06-634 (D4 to D5) is sited at location of an existing subsidence flash entirely within the River Doe Lea Floodplain and arguably can only be created through loss of river flood storage. Consequent to its location it may not be available for containment of railway drainage runoff when the river is in flood. This proposed pond is also sited on the line of existing public footpath (Staveley 31) shown as closed. It is unclear why the access track to this pond is located in the position shown when an existing access track runs parallel for most of its distance. This point applies to other proposed access tracks along this section of the HS2 route.</p> <p>It is noted that HS2 advise in the draft EIA that the entire floodplain will be lost to development at Staveley and Poolsbrook Flash sites though it is unclear where alternate floodwater storage is to be provided upstream of the site.</p> <p>The area of grassland suggested at CT-06-634 (B1 to D5) already exists as subsidence flash, grasslands and washlands though it is again noted that HS2 advise in the draft EIA that the entire floodplain will be lost to development at Staveley and Poolsbrook Flash sites though it is unclear where alternate floodwater storage is to be provided upstream of the site.</p> <p>The proposal for the 39m diversion of FP30 needs to provide for NMU access for all user types, pedestrian, cycle and equestrian users to DMRB standard.</p> <p>It is not clear why Lowgates Road bridge requires such substantive track clearance or raising above existing ground level but there is little shown land-take or impact on adjacent premises or businesses.</p> <p>A new balancing pond is shown located on high ground to the 'west of the Staveley spur' but outfall is by ditch crossing the restored Chesterfield Canal. Outfall may need to be into the canal under a discharge consent with and by consent of the owner, DCC. An oil interceptor may be required at the pond outfall to ensure that water is of sufficiently clean quality prior to discharge into the canal.</p>
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2.2.33 (cont 2)	<p>No mention is made of the required crossing of the restoration route of the Chesterfield Canal which presently extends in navigable form to a location just 15m from the existing rail corridor boundary. The canal is undergoing active restoration and has been advised repeatedly to both HS2 and DCLG for over five and a half years. Water level in the restored canal section has been set to allow sufficient clearance to pass beneath the existing rail track level.</p> <p>To accord with DMRB Volume 11 - Section 3- Part 6 - Para 11.7, provision should be made for maintaining continuity of the canal beneath the proposed rail line to facilitate its ongoing restoration and this requirement appears to have been omitted from current draft HS2 design. It is noted with concern that Chesterfield Canal is recognised by HS2 through its inclusion at Sections 2.1.23, 10.3.32 and 14.3.16 in this LA11 report though it is not shown on any plans.</p> <p>Realignment of FP47 as shown would introduce an unacceptable gradient on approach to the rail bridge. A ramped infill would sever the restoration route of the Chesterfield canal unless FP47 bridge is extended or replicated to link with the existing route on the north side of the canal 'cutting'.</p> <p>The diverted line of FP50 will require an additional bridge crossing of the recently restored length of the Chesterfield Canal immediately to the east of Eckington Road bridge.</p> <p>The landscape mitigation area includes the towpath of the Chesterfield Canal. Inclusion in the mitigation area will sever access for the public and does not take into account the management and maintenance requirements of the canal infrastructure.</p> <p>The area identified south of the Staveley spur as new public realm/community facility is inappropriate for two reasons. Firstly this area is already in the public realm, is a regeneration site development by DCC Markham Vale Employment Growth Zone project as part of the Canal restoration so will therefore not contribute to 'new' community facility by HS2. Secondly the Staveley Town Basin area has been developed in order to provide income to sustain the Chesterfield Canal in perpetuity. Seizure of this land by HS2 will therefore reduce the overall public realm viability of the whole canal section causing significant sunk cost losses to DCC as well as on-going additional liability costs.</p>
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2.2.33 (cont 3)	<p>Staveley West Embankment and its toe drain are shown encroaching into the toe of the support embankment to the Staveley Loop Road (Ireland Close). The toe of this proposed embankment also extends over and buries the outfall drain located immediately alongside the road embankment on its north side and serving as outfall and drain facility for the restored Chesterfield Canal.</p> <p>Closure of FP11 (only part as shown) will sever linkage northward for the remainder of FP11 and for FP12. Arguably an alternate extension needs to be provided outside the boundary of the IMD to link to Hall Lane OR FP11 and FP12 should be entirely closed to public use and the river bridges removed.</p> <p>Proposed lowering of Hall Lane by 6m at its crossing of the Staveley spur may sever an unmapped private surface water outfall drain serving the adjacent Hall Lane Landfill site to the north of the IMD which presently runs alongside the rail corridor on its south side and discharges to the River Rother. The drain is located close to where the tracks start to branch at the entrance to the IMD, crossing first the rail corridor then Hall lane and the depth needs to be verified.</p> <p>There are both an LV Electricity substation and a YWS Sewerage Pumping Station located immediately to the west of the Seymour Link Road to the south of the proposed IMD corridor at CT-06-634 (G6) These may require relocation.</p> <p>Despite written assurance from HS2 regarding prevention against future encroachment to development plots, the current preliminary embankment design for Staveley East Embankment clearly appears to show encroachment onto previously prepared and/or recently sold and subsequently developed industrial plots at Markham Vale North (Seymour) CT-06-634 (E7 to H5).</p> <p>There is insufficient detail regarding the impacts on DCC land re the diversion of Staveley Footpath 29.</p> <p>There is insufficient detail regarding the impacts on DCC land forming part of the Markham Vale expansion area re the proposed area of landscape mitigation planting and grassland habitat creation.</p> <p>There is insufficient detail regarding the construction of Oxcroft North culvert on DCC Markham Vale estate land nor on the new business developments - 375m north-east of the existing Seymour Link Road.</p>
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2.2.33 (cont 4)	<p>Despite several years of discussion with the HS2 team regarding the new business developments at Markham Vale, the proposals still show land taken from the Ferdinand Bilstein development and other adjacent plots for use by HS2. This is despite DCC having received written confirmation from HS2.</p> <p>The proposals do not include for a new rail overbridge at Seymour Link Road. HS2 Ltd have previously been advised of this.</p> <p>Bolsover Footpath 64 accommodation overbridge only provides pedestrian access and not vehicular access. HS2 Ltd have previously been advised.</p> <p>It is unclear why there is a need for Oxcroft South culvert, adjacent to the existing Seymour Link Road as the diversion of Hawke Brook at this point appears not to be required.</p> <p>There are insufficient details for the proposed River Doe Lea underbridge at Map CT-o6-634, C4);</p> <p>There are insufficient details regarding the realignment of the River Doe Lea Map (see map CT-o6-633, H7 to I8) and its impacts on the existing flood plain.</p> <p>Proposal for diversion of FP30 at 39m in length need provide for NMU access for all user types, pedestrian, cycle and equestrian users to DMRB standard.</p> <p>There are insufficient details on the proposed diversion of FP39 at Map CT-o6-633, H9);</p> <p>There are insufficient details on the proposed Staveley Footpath 30 overbridge at Map CT-o6-633, G8).</p>
2.2.34	<p>Despite commentary that 'This section of the route would NOT include any maintenance access points to the route of the proposed scheme', alignment of a proposed maintenance access for the River Doe Lea bridge appears to pass through DCC land at Markham Vale. Its alignment does not match with existing topographical features or follow the recently constructed highway and private roadway routes and greenway alignment constructed in 2015/16.</p>
2.2.36	<p>The proposed IMD site makes no provision for the route of the proposed Staveley Works Corridor regeneration road. HS2 Ltd are aware of this following several years of detailed discussions and attendance at various Staveley Works Regeneration meetings.</p>
2.3.2	<p>DCC own considerable areas of land along the proposed route, particularly in the vicinity of Markham Vale. This land currently forms part of the Markham Vale Estate and there has been no discussion from HS2 regarding access to the land nor its purchase.</p>

2.3.12	Advance works should include the earliest possible provision of new facility for crossing of the Chesterfield canal beneath the proposed IMD line to avoid further and protracted delay to the ongoing restoration which has to date been delayed and blighted by HS2 proposals for over five and a half years.
2.3.19	The proposals indicate that two satellite construction compounds are to be located adjacent to the B6419 (see Map CT-06-635 D2 to D6). These are located on a proposed extension to the Markham Vale North development for industrial use.
2.3.43	<p>Mastin Moor Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site plan as drawn. There is a level difference between site and carriageway that would require careful design to facilitate all geometric requirements for a 40 mph road. The site is located towards the end of a solid white line system therefore careful design of the access to achieve satisfactory visibility is needed although the wide verge could help.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.53	<p>Barlborough Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. It is on the inside of a bend with restricted visibility (forward and exit) and onto a classified Dual Carriageway with a 70 MPH limit.</p> <p>A considerable extent of land would be required to achieve the appropriate visibility both forward and exit for a 70 mph limit, the only other Highway frontage is to Westfield Lane which is inadequate in width to accommodate site traffic. The introduction of slow moving vehicles turning across a Dual carriageway (70 mph) would be contrary to the best interest of highway safety.</p> <p>Topography potentially presents a highway problem due to carriageway alignment, the proposed site is higher than the carriageway.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>

2.3.64	<p>Woodhall Common Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. The proposed site is on the inside of a bend with severely restricted visibility. Achievement of a satisfactory means of access is considered unlikely due to the extent of land which would be required to achieve the appropriate visibility both forward and exit for a 50 mph limit.</p> <p>The site is constrained due to a narrow Frontage, the M1 Underpass and being on the inside of a bend. Topography could present a highway problem due to horizontal alignment.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.74	<p>Norwood Viaduct Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan as access would require the clearance of vegetation to the left on exit to facilitate visibility splays on accordance with 60 mph speed limit. Fronting vegetation beyond the land shown for the compound restricts exit visibility and could present a further constraint. Topography could present a highway problem due to the gradient on the derestricted road and may impact on stopping distances for heavy vehicles. Absence of exit visibility onto a derestricted road is of significant concern to DCC as the Highway Authority.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>

	<p>Staveley East Embankment Satellite Compound</p> <p>The proposals indicate that two satellite construction compounds are to be located adjacent to the B6419 (see Map CT-06-635 D2 to D6). These are located on a proposed extension are to the Markham Vale North development for industrial use.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There are no pedestrian footways in the vicinity; bus stops exist at Bank House Farm and Woodthorpe Road; a cycle network exists within the Markham Vale development and is on the same alignment as the proposed HS2; PROW's cross the site with some proposed diversions; the closest settlement with the most amenities is Staveley (approximately 2 miles).</p> <p>This is a split site with direct frontage to Bolsover Road (B6419) of sufficient length that, although the highway is of an undulating and sinuous nature, creation of compound accesses with appropriate exit visibility sightlines should be achievable (particularly if all 'land potentially required during construction' is secured). However, should this not be the case, it's considered that introduction of temporary measures for the duration of the Works would be likely to prove acceptable. Notwithstanding, realignment of Bolsover Road is demonstrated and, in the event that this work precedes the creation of the depot, access to the site should be incorporated within the design of the diverted road.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway; it will be for the promoter to ensure that rights to access a site exist.</p>
2.3.100	
2.3.104	<p>The two temporary material stockpile areas located adjacent to the B6419 (see Map CT-06-635 D2 to C4). These are located on a proposed extension are to the Markham Vale North development for industrial use.</p>
2.3.108	<p>It is unclear on the maps where the proposed Oxcroft South Culvert is located nor the reasoning behind it.</p>

2.3.111	<p>A619 Lowgates Road Overbridge Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. The topography presents a highway problem since the existing rail line is located in a deep cutting which severs the proposed compound site. Pedestrian footways exist on each side of local highways; bus stops are located immediately adjacent to the site; access to cycle network/ Bridleway adjacent to Ireland Close is approximately 200 metres to the west of the site; and most amenities of Staveley are within approximately 750 metres of the site.</p> <p>This is a split site either side of the proposed HS2 line the western side having direct frontage to Fan Road where creation of a compound access with appropriate exit visibility sightlines should be achievable although this may require temporary relocation of an existing bus stop. Access to the eastern side would need to be taken via the same route crossing over the proposed HS2 line.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.117	<p>Staveley West Cutting Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There are no pedestrian footways in vicinity; the only bus stops within a reasonable distance are located on Lowgates (A619) and accessible only by cycle network/ bridleway immediately adjacent to, with a short length passing through, the site. All amenities of Staveley Town Centre are located within 1 mile of the site by road.</p> <p>Whilst this site has direct frontage to Ireland Close (A6192) the public highway is at a lower level than the proposed compound that may result in access gradient issues. Subject to gradient being satisfactorily addressed, it should be possible to create an access with Ireland Close at a point where adequate forward and exit visibility sightlines are achievable. However, should this not be the case, it's considered that introduction of temporary measures for the duration of the Works would be likely to prove acceptable. The existing cycle/ Bridleway is affected by the site.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.125	<p>Staveley IMD South Chord Viaduct Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There are no pedestrian footways in the vicinity, the closest is roughly 200 metres to the south on the opposite side of Hall Lane; bus stops are 600 – 700 metres to the south on Hall Lane; the Cycle network/ Bridleway is approximately 500 metres to the south accessed via Hall Lane; no PROW are affected. All main amenities of Staveley are within 1 mile of the site.</p> <p>This site is separated from the closest public highway by an existing rail line and 'land potentially required during construction' therefore creation of an access would require either a structure to cross the line or a (temporary) closure. In the event that crossing the rail line can be overcome, creation of an acceptable access may require land beyond that demonstrated as being 'potentially required during construction'. That said, it may be possible to introduce temporary measures to form an access for the duration of the Works. Notwithstanding, realignment of Hall Lane is demonstrated and, in the event that this work precedes the creation of the depot, access to the site should be incorporated within the design of the diverted road.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.131	<p>Staveley IMD Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. A pedestrian footway linking to the south only from proposed Depot Access; bus stops are 400 – 500 metres to the south on Hall Lane; the cycle network/ Bridleway is approximately 300 metres to the south accessed via Hall Lane; no PROW affected. All main amenities of Staveley are within 1 mile of the site.</p> <p>This site is separated from the closest public highway by 'land potentially required during construction' and land demonstrated as being allocated as 'Depot'. It's assumed that access would be taken via that proposed to serve the proposed Depot which, it would appear, requires modifications to the existing public highway (Hall Lane). Detailed layout designs complying with current design guidance will need to be submitted for the Depot access/ Hall Lane modifications for Constructional Approval prior to access being taken.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.144	<p>Works Road Rail Systems Satellite Compound.</p> <p>A satisfactory access cannot be achieved to serve the site as drawn on the plan. There is a narrow pedestrian footway on one side of the existing highway, this being on the opposite side of the road to the eastern compound and same side of the road to the western compound. Bus stops are approximately 350 metres to the south of the eastern compound on Works Road; the cycle network is approximately 650 metres to the south of the eastern compound and accessed from Works Road; PROW are likely to be affected by the eastern compound. The limited amenities of New Whittington are within 1½ miles with more extensive amenities of Staveley approximately 2 miles from the site.</p> <p>This is a split site with the east and west parts approximately 350 metres apart each on the southern side of Works Road/ Whittington Road. Both sites are separated from the closest public highway by 'land potentially required during construction.</p> <p>The closest highway to the eastern site is Works Road where the highway is located within a cutting with substantial retaining walls to each side. There is no footway or margin on the proposed compound side of the carriageway. In addition, visibility sightlines would be compromised by the existing carriageway alignment. Given the short duration of time this compound is proposed to operate, it may be possible to introduce temporary traffic management measures to accommodate an access; however, significant engineering works would also be required.</p> <p>It is possible that a satisfactory access may be created to the western site using the land identified as being 'potentially required during construction' although, due to the change in speed limit across the frontage of this land, this would be likely to involve significant clearance of existing boundary hedges in order to achieve adequate visibility sightlines. Alternatively, again due to the perceived duration of use of this site, it may be possible to introduce temporary traffic management measures to accommodate an access.</p> <p>This site has been assessed based on the information / plans provided by HS2 and on an individual basis looking at access to the existing local highway network issues only. No assumption has been made as to whether the boundary of a site necessarily abuts the public highway, it will be for the promoter to ensure that rights to access a site exist.</p>
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2.3.150	<p>In the other community area reports for Derbyshire it has been unclear which of the main and satellite compounds in this area, if any, would remain in place for the rail systems works. The wording here would seem to suggest that the Staveley site will be fulfilling this role for the whole eastern leg of the scheme. This needs to be clarified as it would seem to disagree with information displayed in figure 9 page 63/72 which shows all of the main and satellite in this community area closing by Q3 2030. Yet rail systems work are not due to begin until Q3 2031 and end in Q4 2033</p>
2.3.153	<p>DCC support the approach set out in 2.5.153 that excavated material generated across the proposed scheme would be reused as engineering fill material or in environmental mitigation works of the proposed scheme where suitable and reasonably practicable.</p>
2.3.154	<p>It is noted from this section that forecasts of the amount of construction, demolition and excavated waste that would be produced during construction of the proposed scheme is to be reported in Volume 3 of the ES. However, DCC considers it to be important that full details of the likely amounts of construction, demolition and excavation waste should be set out for this specific section of the route in the ES so that DCC can make a more detailed assessment of the potential environmental impacts of the generation of waste material, particularly if it is proposed that any excess waste material will need to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>

2.3.155	<p>DCC support the approach set out in 2.5.155 that local excess or shortfall of excavated material within the study area would be managed through the integrated design approach with the aim of contributing to an overall balance of excavated material on a route wide basis. However, DCC considers it to be important that full details of the likely amounts of construction, demolition and excavation waste should be set out for this specific section of the route in the ES so that DCC can make a more detailed assessment of the potential environmental impacts of the generation of waste material, particularly if it is proposed that any excess waste material will need to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.4.12 - 2.4.13	<p>With regard to operational waste and material resources, DCC considers it important that full details of the likely amounts of operational waste that would be generated by this specific study area of the scheme should be set out in the ES so that DCC can make a more detailed assessment of the likely environmental impacts of the scheme, particularly if there is likely to be a need for significant amounts of excess waste material to be exported from the study area.</p> <p>Without knowing the balance between cut and fill the extent to which borrow pits will be required is unknown and therefore an assessment of the accuracy of the proposal in forecasting the requirement for land take to accommodate borrow pits and stocking areas is uncertain.</p> <p>The transport implications of this uncertainty in cut and fill balance, and in the need to export/import materials is also uncertain. Movement of excavated and imported materials will have the potential for a significant impact on the local road network, this should be addressed.</p>
2.5.3	<p>Bluebank Pools (Chesterfield Canal) Local Wildlife Site has been overlooked.</p>

1.3 Stakeholder engagement and consultation

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
3.1.4	DCC welcomes the indication that HS2 LTD would engage with stakeholders on an ongoing basis on the design and assessment process of the scheme. The County Council considers it to be particularly important that ongoing consultation is carried out to ensure that the baseline information for the ES is up-to-date and robust.
3.3.2	Chesterfield Canal is identified as one of the main themes to emerge from stakeholder engagement however severance of the canal restoration by the construction of the IMD line is not addressed.
3.4.1	There have been many meetings between DCC and various HS2 staff and consultants with the local authority providing considerable amounts of information and views on the different elements of the proposed scheme. However it has often been felt that this is one way process with little or no feedback from HS2 on what they think of the views expressed by DCC. The lack of any notes from many of the meetings also is a cause of concern as it is hard to tell if the issues raised by DCC have been recorded, understood or taken on board.
3.4.1 - 3.4.4	DCC welcomes the indication that HS2 LTD would engage with stakeholders on an ongoing basis on the design and assessment process of the scheme. The County Council considers it to be particularly important that ongoing consultation is carried out to ensure that the baseline information for the ES is up-to-date and robust.
3.4.9	Whilst HS2 acknowledge their consultation with DCC regarding the Markham Vale development they have not acknowledged consultation with the Council's private sector partner Henry Boot Developments Ltd who also have an interest in the land affected.
3.4.14	Correction of error: the Chesterfield Canal Trust does not own any canal assets. The canal and infrastructure in the Staveley is wholly owned and maintained by DCC.

1.4 Agriculture, forestry and soils

1.4.1 At this time the council has no comment to make

1.5 Air Quality Section 5.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
5.4.1	It is noted that the control and management measures as specified are "generally sufficient to avoid any significant effects". The Council will wish to see confirmation in the formal ES that this holds true for specific impacts in the LA11 area.
5.4.6	It is noted that the risk of dust effects could be "high" and human health effects arising could be "medium" in this area.
5.4.7	Given 5.4.6 above the Council is concerned that no further assessment in the formal ES is mentioned.
5.4.9	It is noted that the WDES identifies "likely" routes and impacts, which will need to be confirmed, and impacts quantified, before the Council can respond. There is no mention of either Erin Road or Seymour Link Road, does this mean that no construction traffic will use these two roads?
5.4.10	It is noted that the effects of changes in air quality on local receptors will be considered in more detail within the formal ES.
5.4.13	It is noted that any significant residual effects from construction traffic emissions will be reported in the formal ES.
5.5.1	It is noted that "no specific mitigation measures for air quality are proposed during the operation of the scheme". The Council wishes to record that such measures may be required subject to the findings of the further assessment and monitoring set out in the WDES.

1.6 Community – incorporating health related issues outside of the HIA Section 6.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
6	<p>DCC welcomes the choice of Staveley for the maintenance depot, bringing job opportunities back to the area, and utilising the former industrial site. It recognises that this comes at a cost for a number of residents and will impact upon a number of communities during and after construction, with the loss of dwelling to demolition, and the loss or use of recreational sites. This will include impacts upon the national Trans Pennine Way which follows Chesterfield Canal for part of the route.</p> <p>DCC seriously doubt the claims made in this and other sections that taking a part of a household's driveway or garden will not impact upon the owners/ people living in the dwellings concerned. This is an inaccurate and unrealistic assessment of the likely experience of these families. The very presence of such a large development so near will have an immediate impact on the lives and privacy of the families concerned, with the possibility of additional noise and disruption to access and enjoyment.</p>
6.2.3	It should be recognised that not all promoted routes for vulnerable users are dedicated as public rights of way. This should not lessen the value placed on them but rather ensure that safeguards are in place to accommodate them to avoid issues of severance in the network.
6.2.4	<p>For accuracy and inclusiveness DCC request that reference to "public footpaths and routes" could be replaced with "all statutory and non-statutory rights of way", or for HS2 to be clear that it is all public rights of way and all other vulnerable user pathways.</p> <p>When reinstating or sourcing alternative public footpaths in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.</p>
6.3.3	There are also 4 proposed multi user trails in this community area, at Park Hall, Mastin Moor to Barlborough Common, Clowne Branch Line and Oxcroft Branch Line. Work to develop the Clowne Branch Line is underway and will be affected by the IMD line.
6.3.5	There is no mention of recently improved landscape and habitat areas and PROWs for leisure use recently created as part of the Markham vale project.

6.3.7	There is no mention of recently improved landscape and habitat areas for leisure use recently created as part of the Markham Vale project. This is also the case for the several PROWS that have not been recorded by HS2.
6.4.2-7	The loss of amenity to the residents and its impact on their physical and especially mental wellbeing should be considered
6.4.11	Chesterfield Canal should be included here and severance of the canal restoration addressed.
6.4.34	<p>Staveley West cutting permanent realignment of the Trans Pennine Trail and Cuckoo Way will need assessing at design to maximise suitability of the configurations.</p> <p>The proposals to realign both the TPT and the Cuckoo Way at Staveley West Cutting are of interest to DCC. Without taking into account other comments made elsewhere regarding the ongoing restoration of the Chesterfield Canal, on the face of things, the proposals for the diversions of these two routes, and also Staveley FP1 and FP47 and the TPT running north to south, are sound. The replacement TPT/Cuckoo Way routes must be constructed to a multi-user route standard, including the design of the Staveley Bridleway 47 overbridge and subsequent link onto Staveley BW48 and onward northbound section of the TPT. Because of the land levels in this area (a steep slope down and then up), the overbridge will need to extend the full length of the realignment path, to the connection with Staveley FP71. East to west connections of the TPT can only be resolved when the matter of the canal crossing is addressed.</p> <p>HS2 currently does not take the ongoing restoration work on the Chesterfield canal into account with these designs. The canal restoration is one of a portfolio of large economic regeneration projects in the Staveley area, and is crucial to the development of green infrastructure and the visitor economy in the wider Chesterfield area. An integrated solution is required to provision of canal route and the TPT, alongside the delivery of HS2.</p> <p>The construction phase drawing CT-05-631-R1 shows that the potential area used for HS2 construction includes considerable lengths of the land used by Brimington FP1 / Staveley Staveley FP1 (which double as the Trans Pennine Trail and the Cuckoo Way), between Troughbrook Road at Hollingwood and Hall Lane at Staveley. The construction area also takes in a crucial access point onto the TPT at Mill Green, Staveley. This route is a crucial public access corridor for walkers and cyclists, both for leisure and commuting use. It must remain accessible throughout the construction period, or alternative suitable provision made for regular users.</p>

6.5.1	It would be helpful to appraise the vulnerable user path connectivity in the area as a mitigation quick win. There are short sections of missing paths that would significantly improve permeability across this community area, particularly to connect built trail at Seymour to connect across the IMD line to Poolesbrook Country Park, and a replacement route for the section of the Clowne Branch Line (under construction) to be lost for the IMD line with connections from the Oxcroft Line.
6.5.6	The Chesterfield Canal restoration will be severed by the construction of the IMD line. The cumulative impact of this is significant and should be evaluated in the Environmental Statement

1.7 Ecology and biodiversity, Section 7.

- 1.7.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
General	The lack of a detailed analysis of ecological impacts and details of proposals for compensation and mitigation mean that a detailed site-by-site and feature-by-feature analysis of and response to ecological issues, impacts and opportunities is not possible at this stage. It is understood that various studies are ongoing and it is of course anticipated that a thorough analysis of this kind will be included within the final version of the ES.

General (cont)	<p>Whilst not wishing to consider potential impacts on individual sites, features and species at this time, with regards only to the section of the route (and potential receptors) within the county of Derbyshire, we would suggest that the following broad and/or overarching issues will need thorough consideration prior to the next step of the ES development:</p> <p>Staveley Spur – The Staveley Spur and the Staveley IMD would appear to have the potential to cause significant impacts to and even the complete loss of a number of designated sites and notable habitats outside of designated sites. It is unclear at this stage whether potential Local Wildlife Sites (pLWSs) have been appropriately identified and considered for protection. Whilst the impact on those sites –both designated and undesignated - will need to be considered in the ES, additional thought will need to be given to the cumulative impact of habitat losses in the Poolsbrook, Netherthorpe Flash, Doe Lea flash area, and the impacts this will have for protected and notable species. Additional consideration will need to be given to the potential of and need to compensate for impacts on Open Mosaic Habitats and open grasslands on previously developed land, associated with the Staveley IMD site.</p> <p>HS2 Main Line – the main line through the remainder of Derbyshire (from the M1 realignment northwards to Woodall Common) would appear to also result in direct habitat loss, with potential impacts on ancient woodlands (High Wood, a small woodland near Romeley House, south-east of Barlborough) and woodland and other habitats around Robinson’s Lumb a concern. Could Robinson’s Lumb and High Wood be traversed by a viaduct rather than embankment in order to minimise ecological impacts and maintain meaningful connectivity post construction? More broadly, opportunities should be sought to maintain and enhance east-west connectivity throughout this section.</p>
7.3.12	The proposals do not identify the recently created woodlands as part of the Markham Vale project
7.3.15	The proposals do not identify the recently created and improved grassland areas as part of the Markham Vale project
7.3.16	The proposals do not identify the recently created and improved hedgerows as part of the Markham Vale project
7.3.18	<p>The proposals do not identify the recently created and improved waterbodies as part of the Markham Vale project.</p> <p>Chesterfield Canal has been omitted.</p>

7.4.12	The proposals do not identify the recently created and improved waterbodies as part of the Markham Vale project. Chesterfield Canal has been omitted. Severance of the canal restoration by the construction of the IMD line as designed will impact on the long-term hydrological viability of the section already in water.
7.4.30	Chesterfield Canal has been omitted from the table and therefore acknowledgment that construction as planned will sever the canal.

1.8 Health, Section 8.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
8.2.2	The report demonstrates an understanding that the wider determinants of health will be affected as a result of this development.
8.2.3	The report identifies that there will be adverse and beneficial health impacts.
8.2.4	DCC agree with the health determinants listed. However, HS2 has neglected to include: potential affects on mental health and wellbeing, community connectivity, employment, housing, local transport, food and farming and economy.
8.2.6	DCC agree that the strength of evidence does not necessarily determine the importance of the outcome. HS2 also need to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight for example the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order.
8.2.8	DCC encourage HS2 Ltd to use and refer to DCCs "Rapid Health Assessment of HS2" (2013) and "Update on the 2013 Rapid Health Impact Assessment of HS2" (2017) when constructing the formal ES document.
8.3.6	There is no mention of recently improved landscape and habitat areas for leisure use and new PROWS recently created as part of the Markham Vale project.
8.4.1	DCC agree with the mitigation listed also consider adding: commission access to expert counselling services for dealing with loss related to demolition.
8.4.5	Community engagement framework and personnel is vitally important.

8.4.8	DCC request that HS2 include reference to community connectedness in this section.
8.4.22	There would be direct impacts on access to green space, recreation and physical activity where publicly accessible open space is either temporarily or permanently lost or where the usability of land is compromised. See Community section 6.
8.4.23	Due to the impact on PRow in this locality HS2 should pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of the planning for temporary diversions or permanent route/footpath changes.
8.4.26	DCC request that HS2 add an additional mitigation of avoiding using important local roads for construction traffic. Increased traffic congestion will make it more difficult for pedestrians and cyclists to utilise active travel options and increased journey times will lead to increased stress levels for commuters.
8.4.27	Chesterfield Canal should be included as a social capital receptor and the impact of severance of the restoration by HS2 assessed.
8.4.28	DCC request that HS2 include additional mitigation to work with Derbyshire constabulary and community safety partnerships during the construction phase to monitor any adverse impact on community cohesion and community safety during the construction phase. HS2 should ensure that construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme which will include monitoring against 'respecting the community'.
8.4.32	13 properties to be demolished in Staveley, Mastin Moor and Barlborough. The erosion of social networks resulting from these demolitions would have the potential to reduce social capital, reducing the beneficial health effects that are gained through social contact and support.

1.9 Historic environment, Section 9.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
9.2.8	The assessment of the impact of HS2 construction on the Chesterfield Canal at Staveley and Norwood as 'unlikely to be significant' is incorrect.

9.3.13	The statement is factually incorrect, evidence of an enclosed settlement dating from early bronze age, the imprint of a Prehistoric round house and Post Medieval fence line were identified and recorded through intrusive investigation undertaken by Trent and Peak Archaeology in 2014. A site which has only been partly investigated. The site is located approximately 750 metres to the south west of Woodthorpe, Derbyshire and is just 450m from the footprint corridor of the Staveley spur. Archaeological Record of the find is lodged at Sheffield Museum as accession number SHEFM:2015.297.
9.4.1	The proposed scheme has made no provision for the Chesterfield Canal at Staveley or Norwood.
9.4.5 and 9.4.14	An assessment of the temporary impacts and effects on the Chesterfield Canal and its supporting infrastructure (including Staveley Town Basin) has been omitted and should be included here.
CT-06-0637	Map number CT-06-0637 shows proposed 'landscape mitigation planting' just outside the boundary of the Grade II Registered Park/Gardens of Barlborough Park and around 300m from the Grade I Listed Barlborough Hall. This does not appear to be discussed or mentioned in the accompanying text. If there are potential impacts to Barlborough Hall/Park requiring mitigation then these should be identified and the proposed mitigation subject to consultation.

1.10 Land quality, Section 10.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
10.1.2	DCC welcomes the indication in 10.1.2 that HS2 Ltd will continue to engage with stakeholders, including County Councils on the design of the scheme and assembling the baseline information for the assessment in the ES. It is considered to be particularly important that the baseline information is up-to-date and robust to inform the preparation of the final version of the ES.
10.2.7	Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should licence for incidental coal recovery be required through application to the Coal Authority.

10.2.27	<p>Basing minerals assessment on mining records but ignoring inference of minerals provided by geological maps/reports may result in omissions of future issues from early consideration in the next design phase. The North Derbyshire coalfields are known to be susceptible to instance of spontaneous combustion where poor quality (Low CV) coal seams are exposed to air through the opening up of excavations. Spontaneous combustion of seams which migrate underground can be notoriously hard to extinguish and care need be taken by HS2 and their consultants to take geological seam mapping of seams and outcrops into account during design. It is suggested that guidance is obtained from the Coal Authority in this respect.</p> <p>Failure to deal with likely intersect of coal seams within cutting excavations could result in significant delay to construction should licence for incidental coal recovery be required through application to the Coal Authority followed by undertaking of the subsequent mineral recovery process.</p>
10.3.32	<p>The Chesterfield Canal is under construction and the route lies fully within the proposed construction area at Norwood and Staveley. Further the reference to the canal at Norwood as 'disused' should be removed and replaced with 'under construction'.</p> <p>NOTE also that the use of Bullet points in LA10 - para 10.3.32 more clearly identifies the water feature intersections than the use of plain continuous text used in report LA11 - para 10.3.32. Bullet form is preferable.</p>
10.3.42	<p>Re Table 24 the record is inaccurate. Both colliery shafts at the former Seymour Colliery were re-capped (and again left open beneath) during site development works and under supervision of the Coal Authority in March 2016. Provision has been made for monitoring of minewater /groundwater recovery.</p> <p>Re Table 25 - Whilst not historic, there is no mention of current commercial uses on Markham vale North.</p>
10.3.53	<p>Significant species diversity is being recorded at the site of the stormwater attenuation ponds at Markham Vale North (Seymour), Plan CT-05-634 (E6-F6). This site is presently not recorded as a Local Wildlife site. It is anticipated that the rich variety of fauna present will be recognised and recorded during ongoing ecological surveys by HS2 and their specialist consultants and that the site itself perhaps be protected during construction.</p>

10.3.55	Reference should be made to the fact that DCC and Derby City Council are jointly responsible for overall minerals and waste plans in Derbyshire and that a new Minerals Local Plan for Derbyshire is currently being prepared by the two Councils, which will guide minerals related development in Derbyshire until 2030 by setting out where it is expected that quarrying and mineral mining will take place and outlining principles to inform planning applications during this time.
10.3.58	It is welcomed that appropriate reference is made of the fact that dolomite and dolomitic limestone are present in the area around Barlborough. However, it should be clarified that the limestone resource is safeguarded under Policy MP17 of the adopted Derby and Derbyshire Minerals Local Plan. This indicates that the Minerals Planning Authority will resist proposals for any development which would: sterilise or prejudice the future working of important economically workable mineral deposits except where there is an overriding need for development; and where prior extraction of the mineral cannot be reasonably undertaken or is unlikely to be practicable or environmentally acceptable. DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.
10.4.10	Whilst screening assessment is advised as having been undertaken with each potential contaminated site given a unique reference, as listed in Table 27, there appears to be no plan to clarify or advise the location of these sites
10.4.16	Whilst consideration of construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 28, there appears to be no plan to clarify or advise the location of these sites
10.4.23	Whilst consideration of post construction effects is advised as having been undertaken with each potential significant site indicated by its unique reference, as listed in Tables 29, there appears to be no plan to clarify or advise the location of these sites

10.4.34	<p>However low the percentage of natural resource that it is considered would be sterilised by the permanent construction of the proposed new HS2 rail route, every effort should be made to ensure full extraction of mineral resource in advance of, or during early phases of construction, to ensure the resource is not lost for posterity. This approach would accord with adopted development plan policies.</p> <p>The effects of the proposed scheme on the future licensed open cast mining areas would be permanent where overlain by the footprint of permanent works. A slip of the mineral resource would become sterilised and appropriate mitigation measures would be discussed in advance with the relevant Minerals Planning Authority. Such engagement with the County Council is welcomed and supported. However, it should be noted that the whole of the surface coal resource in the area is safeguarded under Policy MP17 of the adopted Derby and Derbyshire Minerals Local Plan which indicates that the Minerals Planning Authority will resist proposals for any development which would sterilise or prejudice the future working of important economically workable mineral deposits except: where there is an overriding need for development; and where prior extraction of the mineral cannot be reasonably undertaken or is unlikely to be practicable or environmentally acceptable. DCC, as Minerals Planning Authority, expect to see an assessment that examines whether prior extraction of the mineral resource in advance of the development is practicable and environmentally feasible. DCC expect borehole evidence to be used to provide an indication of the quality and depth of the deposit, particularly when such areas are considered as borrow pits. Every effort should therefore be made to extract the mineral resource in advance of the proposed development in order to prevent the sterilisation of the mineral resource. This approach would accord with the policies of the Adopted Derby and Derbyshire Minerals Local Plan.</p>
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10.4.35	<p>Except for brief reference in Para 10.3.62 deep coal reserve is poorly considered. Impact on deep coal reserve is unmentioned (as in LA11 report para 10.4.30) despite this section of the proposed route clearly passing through the North Derbyshire Coalfields. As well as consideration of shallow 'opencast' coal sterilisation, the EIA need consider impact on the deep coal reserve. They also need to determine what restriction the surface routing of the proposed HS2 rail line could introduce in respect of coal reserve which underlays the rail corridor. And which, if recovered by deep mining process, could cause severe detrimental impact to rail embankment integrity and thus high speed travel in the event of future mining subsidence.</p> <p>.....except for the possible sterilisation of deep coal reserve which underlays the rail corridor and which if recovered by deep mining process could cause severe detrimental impact to rail embankment integrity in and thus high speed travel in the event of future mining subsidence.</p>
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1.11 Landscape and visual assessment, Section 11.

1.11.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
11.1.4	<p>The changes to the landscape resulting from the major regeneration scheme at Markham Vale has not necessarily been updated on to latest OS Maps and HS2 have previously been made aware of this. Plans LV-02-396 a and b are based on aerial photography from as far back as 2011(?) and does not include recent developments at either Markham Vale or Coalite.</p> <p>Plans LV-02-397 a and b are based on aerial photography from as far back as 2011(?) and do not include recent developments at either Markham Vale North nor at the former Oxcroft Colliery.</p> <p>Plans LV-02-450 a and b are based on aerial photography from as far back as 2011(?) and do not include recent developments at either Staveley Town Basin nor at the former Hartington Colliery.</p>
11.3.2	The Chesterfield Canal has been omitted from the existing landscape baseline and should be included here.

11.3.5	<p>The changes to the landscape resulting from the major regeneration scheme at Markham Vale has not necessarily been updated on to latest OS Maps and HS2 have previously been made aware of this.</p>
11.3.10	<p>Re Mastin Moor and Poolsbrook areas - The changes to the landscape resulting from the major regeneration scheme at Markham Vale has not necessarily been updated on to latest OS Maps and HS2 have previously been made aware of this.</p> <p>Table 31: The presence and on-going restoration of the Chesterfield Canal is acknowledged here but is not otherwise appraised in the chapter.</p> <p>This sections sets out the nine LCAs that would be significantly affected within the Staveley to Aston area. As DCC expressed in earlier correspondence to HS2 and their consultants, there is some concern with the way these areas have been defined and then evaluated. Staveley Post-Industrial River Valley LCA is by its very nature and character sensitive and susceptible to new development regardless of its current condition but this is not reflected in the value assigned to the landscape. Floodplains are inherently sensitive to development because of their linear nature and their susceptibility to flood.</p> <p>As DCC have expressed previously we are concerned that the LVIA has conflated character and condition and as a result the sensitivity of the landscape has been under-valued. The Poolsbrook Valley Restored Coalfield has been almost entirely defined based on condition incorporating as it does parts of the DCC defined Riverside Meadows Landscape Character Type (LCT) and Estate Farmlands LCT. By simply pulling out areas of poor condition it is inevitable within the context of the methodology that these areas will then score low with regard to their overall sensitivity and susceptibility to change. This leads to an under-estimation of effects and significance, and as a consequence does not inform high standards of design and mitigation, in other words poor quality areas lead to poor quality development.</p> <p>Table 31: The presence and on-going restoration of the Chestefield Canal is acknowledged here but is not otherwise appraised in the chapter.</p>
11.3.16	<p>Not all PROWs have been identified by HS2 and some are incorrectly mapped.</p> <p>Views from the Chesterfield Canal restoration route (Cuckoo Way) should be included here.</p>
11.3.17	<p>The Seymour Link Road has not been fully recognised by HS2.</p>
11.3.18	<p>The major employment area of Markham vale has not been fully recognised by HS2.</p>

11.4.8	Table 32: Impacts to the Chesterfield Canal have been overlooked.
	<p>No mention of the new bridge required to cross the Seymour Link Road.</p> <p>Table 33: Impacts on the users of the Cuckoo Way have been assessed without reference to this being the route of the Chesterfield Canal restoration (underway).</p> <p>Table 33: An 'overall high magnitude of change and major adverse effect' to users around the canal basin is included without acknowledging the canal itself.</p> <p>Table 33 identifies the significantly affected viewpoints during the construction phase whilst Table 35 (11.5.7) sets out those significantly affected viewpoints during the operational phase at Year 1 and Year 15. It is noted that there are a number of viewpoints within Derbyshire where there would be significant adverse visual effects up to year 15 of the operational phase. There is no assessment of how many receptors (people) these effects would relate to or how this assessment work has then informed the design process as part of an iterative exercise. For example VP 397-03-005 (PROW west of Romely Farm) is assessed as having Major adverse (significant) effect at Year 15 of operation as a result of "the M1 motorway North viaduct, the viaduct itself would remain a visually prominent component of the view". In response to this identified impact shouldn't the design be taking account of this significant effect and designing a viaduct that might provide greater visual amenity?</p>
11.4.12	
11.4.15	The high magnitude of change and major adverse effect on the Chesterfield Canal identified in Table 33 has been omitted here.
Subsequent sections	No mention of the new bridge required to cross the Seymour Link Road.

	<p>The new areas of public realm / replacement community facilities to be created already presently exist and are available to the public. Two sites as grassland and the recently restored canal. The area adjacent to Staveley town basin has also been earmarked for a mixed-use commercial development. Sites are owned by DCC and part of the Chesterfield Canal restoration. The land forms part of the sustainability plan for the canal and its removal by HS2 will have direct economic consequences to the scheme and DCC's liabilities.</p> <p>It is inappropriate to claim an area already in the public realm as mitigation for the HS2 scheme. The proposed mitigation scheme comes without a comprehensive access and management plan and is likely to constitute an additional liability to DCC in addition to the loss acquired from failure to develop the current model. The proposed public realm mitigation comes a long way short of mitigating the impact of severing the canal restoration at Staveley and Norwood and loss of public realm as a result.</p> <p>See Map LV-04-397a C9 - the proposal include mitigation planting of new woodland within the existing building of Ferdinand Bilstein on Plot 14 Markham Vale North. This is despite HS2 being advised of the new developments at Markham Vale on several occasions over a number of years.</p> <p>See Map LV-04-397a C10 - the proposal include mitigation planting of new woodland within the existing boundary of Great Bear on Plot 13 Markham Vale North. This is despite HS2 being advised of the new developments at Markham Vale on several occasions over a number of years.</p>
11.5.2	
11.5.4	<p>Table 34: Staveley Town Basin is described as 'partially restored' the basin was completed in 2016 and the canal now extends towards Eckington Lane, which is the current construction site.</p> <p>Tree planting along the Chesterfield Canal and Staveley Town Basin falls a long way short of adequate mitigation for the 'high magnitude of change and major adverse effect' identified.</p>
11.5.7	<p>The changes to the landscape resulting from the major regeneration scheme at Markham Vale has not necessarily been updated on to latest OS Maps and HS2 have previously been made aware of this.</p> <p>RE VP 450-03-010 and VP 450-03-011: This is the first ever mention of the need for install of overhead line equipment on the IMD - previously its been suggested the line would be diesel use due to need for power outage during maintenance works on the main line, though more latterly the intended train types has been less clear.</p>
Subsequent sections	<p>The changes to the landscape resulting from the major regeneration scheme at Markham Vale has not necessarily been updated on to latest OS Maps and HS2 have previously been made aware of this.</p>

1.12 Socio Economic, Section 12.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
12.1.1	Socio economic changes resulting from the major regeneration scheme at Markham Vale cannot have been incorporated in to this report as HS2 have consistently failed to acknowledge its physical presence despite several years of discussions with HS2 Ltd. Therefore the socio economic appraisal in this general locality carried out by HS2 cannot be given any bearing.
12.4.10	The proposals clearly show the land required for the construction of HS2 incorporating land within the boundary fence of Ferdinand Bilstein on Markham vale North - see Map CT05-634 H4. Similarly other development land within this area is similarly affected despite HS2 Ltd having provided written confirmation to the contrary in late 2016.

1.13 Sound, Noise & Vibration, Section 13.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
13.1.1	The maps showing the noise impacts of the scheme need also to show the before situation to allow residents and other stakeholders to make comparison of what noise the scheme will generate.
13.2.4 and 13.2.5	It is noted that the WDES relies upon qualitative assessment, initial estimates and professional judgement. The Council will wish to see the full quantitative assessment in the formal ES before providing its own definitive response.
13.4.1	The Council notes the assumptions and limitations and the need for assessment in the formal ES.
13.4.3	The Council notes the assumptions made in the assessment and wishes to record the need for consideration in the formal ES of any requirements specific to the LA11 area.
13.4.4	The intention to conduct work towards estimating the requirement of noise insulation or temporary rehousing of residents and report in the formal ES is noted.

13.4.6	As the overbridge at Seymour Link Road has not been included within the proposals then surely the noise level impacts at Woodthorpe cannot be accurate nor assured without including the additional construction works within the noise assessment.
13.4.7	It need be noted that plans SV-01-420b and SV-01-421 do not show predicted noise levels at this time as HS2 has not yet completed assessment of impacts. There is insufficient information on which to comment.
13.4.8	It is noted that residual temporary noise or vibration likely significant effects associated with construction practices will be reported in the formal ES.
13.4.12	It is noted that further work is being undertaken to confirm significant construction noise and vibration effects, including any temporary indirect effects from construction traffic.
13.4.13	It is noted that further consideration will be given to the noise and vibration impacts on non-residential receptors in the formal ES.
13.5.2	The Council notes the lack of reference to the impacts of track maintenance and requests that these be included in the formal ES.
13.5.15	It is noted that noise and vibration from the depots and associated access lines has not been assessed at this stage but will be fully assessed in the formal ES
13.5.18	It is noted that likely significant airborne noise effects arising from permanent changes to existing roads, will be reported in the formal ES. This will needs to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
13.5.19	It is noted that noise and vibration effects arising from the operation of the Staveley IMD will be reported in the formal ES.
13.5.20	It is noted that Further work is being undertaken to confirm the extent, location and type of the noise mitigation to be included within the design of the Proposed Scheme, which will be reported in the formal ES.
13.5.25	The Council notes that further assessment of operational noise and vibration will be reported in the full ES, and requests that these take into account the impacts of track maintenance activities.

1.14 Traffic and transport, incorporating PROW, highway design and Traffic Safety, Section 14.

1.14.1 Please also refer to General Responses to WDES Volume 2 CAR's for general comments on this section.

1.14.2 DCC have concerns regarding management and maintenance liabilities of new routes, for example at Staveley. There is also concern regarding the impact on the canal, the Public Rights of Way, Trans Pennine Way and Staveley Town Basin development site.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
14.1.2	Engagement with DCC and Highways England has been undertaken. DCC as Local Highway Authority for Derbyshire welcomes that the engagement process will continue as part of the development of the Proposed Scheme. It is noted however that much of the work carried out as part of the ES to date is mostly qualitative and that quantification of much of the impact of the Proposed Scheme will be presented in the formal ES. However DCC would in the meantime appreciate early sight of any preliminary outputs of the environmental appraisal prior to the ES's publication as part of the Hybrid Bill.
14.2.5	It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).
14.3.3	It is noted that surveys were carried out on existing rights of way to determine current usage. This data should be used with caution as it will not represent wholly where people need to travel to or desire to travel to. It can only represent what can be accessed given the current stat, connectivity and condition of the routes.
14.3.13	It is noted that all existing routes will have been identified in the assessment. However, there are as yet undeveloped routes in the area or paths requiring upgrading that have been identified to provide multi user trails for non-motorised users of the Local Cycle Network (LCN) and Key Cycle Network (KCN). These are at Park Hall, Mastin Moor to Barlborough Common for the LCN, and Clowne Branch Line (as identified and as a current scheme under construction) and the Oxcroft Branch Line for the KCN. The report fails to acknowledge the presence of a number of PROW in the Markham Vale North area and of those that are identified several are incorrectly shown.
14.3.16	The Chesterfield Canal is acknowledged as a navigable canal and under construction. However the project design severs the canal at Staveley and Norwood.

14.4.1	<p>The proposals indicate that the M1 overbridge (CT-05-364 G8) will be used during the construction period and that a haul road (CT-05-364 G8 to G7) will provide the access to the HS2 Staveley Spur. The proposed route fails to acknowledge that a new track has been built (as evidenced in the background OS details at this point) connecting the M1 overbridge with Seymour Link Road. The HS2 proposed construction route negatively impacts the development Plot 15 at Markham Vale North.</p>
14.4.12	<p>It should be noted that there is no vehicular access between Woodthorpe village and the Seymour Link Road. Seymour Link Road terminates at a cul-de-sac off Erin Road. Beyond the limit of Seymour Link Road, the surfaced track is a private gated track providing access to agricultural land. It is very important that HS2 recognise that all traffic access to Markham Vale North along Seymour Link Road is via access off Erin Road.</p> <p>No mention of A6192 Erin road.</p> <p>In light of the above two comments, do HS2 Ltd propose to use J29A M1?</p>
14.4.13	<p>It should be noted that Seymour Link Road is closed to all motorised traffic use at its northern end and that there is no right for vehicular use other than for farm traffic and emergency vehicle access due to planning restriction condition contained in the Markham Employment Growth Zone (Markham Vale) consent. Traffic access to Markham Vale North (Seymour) is via access off Erin Road.</p>
14.4.16 - 14.4.19	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.20	<p>It is noted that potential effects on public transport will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p> <p>The majority of these bus services are provided on a commercial basis by operators with no direct support from local or central government. Prolonged diversions to other roads in the area will increase journey times will reduce the attractiveness of these services. Mitigation in terms of funding to support these services during the construction period to lessen the impact and ensure their commercial sustainability will be required.</p>
14.4.21	<p>It is noted that potential effects on the rail network will be reported in the formal ES. This will need to take into account any effects on both passenger and freight operations over the wider rail network.</p>
14.4.23	<p>It is noted that not all PROWs within the Markham Vale scheme have been identified nor mitigated.</p>

14.4.25	<p>It is noted that potential effects on PRow will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.26	<p>Under DMRB Volume 11 Section 3 Part 6 - Para 11.7 provision should be made for ongoing restoration of the canal and this appears to have been entirely omitted.</p> <p>The document suggests that the Proposed Scheme would have 'no significant effect'. The scheme has made no accommodation for the canal at Staveley or Norwood and will in fact sever the route and cause the already restored section to be redundant.</p> <p>It is noted that potential effects on PRow will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
14.4.30	<p>No mention of A6192 Erin Road nor of Seymour Link Road.</p>

14.5.6	<p>There is no reference to the Chesterfield and Staveley Regeneration Route. HS2 were made aware of development proposals back in January 2013 consultation and as a result adjusted the footprint of the IMD in subsequent publications 2017. The County Council and their development partners are extremely disappointed that the current footprint of the depot compromises the route, and therefore sterilises development opportunities around the Staveley Works Area.</p> <p>Alongside the Chesterfield Station Masterplan the Northern Growth Zone is designed to accommodate and complement the Infrastructure Maintenance Depot (IMD) at Staveley and connectivity improvements between here and Chesterfield Station delivered through the Chesterfield-Staveley Regeneration Route (CSRR). This is a major intervention, facilitating significant housing and employment development, and is receiving significant current investment towards design and business case preparation. The major landowners along this corridor are fully engaged in this work. The IMD, though, places significant constraints on both the quantum of development achievable and on the alignment of the CSRR. These are issues are acknowledged by HS2 Ltd, which is welcome, but much remains to be done through further engagement to ensure that the needs of all parties can be met in full.</p> <p>At this stage, the operational impacts of the IMD are not fully understood. Inevitably, though, maintenance activities will be concentrated within off-peak periods for passenger services, mostly at night. It is anticipated that lighting at the IMD, movement of maintenance trains and vehicular traffic associated with its workforce shift changes could all be significant impacts on adjacent communities.</p>
14.5.7	No mention of the Seymour Link Road overbridge.
14.5.12	<p>The proposed 4 HS2 trains an hour on the existing Midland Mainline and the Erewash Valley line have the potential to adversely affect the existing local and regional rail services on this route if they take paths currently used by them to accommodate the new service. The line capacity between the point where HS2 joins the Erewash Valley line and then further north where it joins the Midland Mainline to Sheffield needs to be increased to ensure there are sufficient paths for all existing and proposed services.</p>
14.5.13	<p>Increased travel distance for bus service can impact on their commercial viability. To reduce the impact specific measures should be put in place to improve bus reliability in the area at the same time as the line opens.</p>

14.5.14	Information regarding new footpath and greenway routes which are not yet included in the adopted RoW network at Markham Vale was provided to HS2 engagement leaders in January 2018. It is disappointing to see that this information was not included in the plans published in October. New routes at Markham vale should be considered for continuity and severance impacts in the same was as definitive RoW routes.
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14.5.14 (cont)1	<p>This comment relates specifically to Public Footpath Killamarsh 47 and Barlbough 25. A proposed bridleway extension from Woodall is planned to use the M1 underpass and upgrade these 2 footpaths to form a multi user trail across the Yorkshire-Derbyshire Local County boundary. The proposed diversion of the route alongside Rotherham Road would need to provide a 3m wide shared use path separated from the carriageway by a 1m wide verge for the full section to connect with the bridleway at Pebley Oaks east of the M1 underpass.</p> <p>This comment relates specifically to Public Footpath Barlbough 6. The use of the M1 underpass as a safe means of accessing the countryside from the community of Barlborough shall be lost. The re-alignment along Sheffield Road should provide a 3m wide shared use path to allow for safe and pleasant access the physical barriers.</p> <p>This comment relates specifically to Public Bridleway 12 Woodhouse Lane. A proposed multi user trail has been identified to connect Woodhouse Lane with Slayley Lane to connect to the Clowne Branch Greenway at Barlborough Common. Where the route is proposed to be diverted a suitable crossing and receiving 3m wide path should be considered along the length of A619 Worksop Road/Chesterfield Road.</p> <p>This comment relates specifically to Public Footpath Staveley 30. A major strategic route is under construction to connect Clowne to Chesterfield (and wider NCN6 to Trans Pennine Trail). It is of vital importance that the realignment and over bridge of footpath 30 is constructed to accommodate this onward trail and provide a connection to Poolesbrook Country Park. A minimum width should allow for a 3m wide path with suitable parapets on the bridge to accommodate a bridleway. This should also be constructed to connect to the existing trail (not shown on map CT-06-633 in the LA map book) constructed east of FP30 to Seymour Link Road as part of the Markham Vale Growth Zone development. The resulting route between Erin Road and Seymour Link Road should (once constructed) be dedicated a public bridleway. However, the resulting location of the proposed realigned FP30 and overbridge is not shown on the map number CT-06-633 in the LA11 map book. It is assumed that this is an oversight and the overbridge will accommodate higher access rights to accommodate the trail at this location.</p>
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14.5.14(cont)2	<p>This comment relates specifically to Public Footpaths Staveley 29 and 28. The realignment of these paths to fit with the realignment of B6419 Bolsover Road warrants further discussion with regard to the additional trail development that is occurring in this area to develop Derbyshire's Key Cycle Network. The Clowne Branch Line is under development as a multiuser Greenway and there are plans to connect this to and develop the disused Oxcroft Branch Railway. At delivery of HS2 2b the western section of the Clowne Branch Line shall be used by the proposed HS2 development and an alternative alignment will need to be provided to Seymour Link Road/Poolesbrook Country Park. Further discussion is required to agree a preferred route for the planned multi user trail.</p> <p>The suggestion to reinstate FP1 via footbridge for users of the TPT & Cuckoo Way (the former including cyclists and equestrian users!) is unfeasible.</p> <p>Realignment of FP47 as shown would introduce an unacceptable gradient on approach to the rail bridge. A ramped infill would sever the restoration route of the Chesterfield canal unless FP47 bridge is extended or replicated to link with the existing route on the north side of the canal cutting'.</p> <p>The diverted line of FP50 will require an additional bridge crossing of the recently restored length of the Chesterfield Canal immediately to the east of Eckington Road bridge.</p> <p>The existing line of FP64 is incorrectly shown on plan CT-06-634. The diversion of FP64 shown is substantive and severs public access alongside the east fringe of the River Doe Lea flood corridor. An underpass should be considered where the path is shown as closed so that users can pass from north to south or vice versa along the east fringe of the floodplain as presently.</p> <p>No mention is made regarding the intended closure of the Clowne Branch Greenway indicated on Plan CT-06-635 (and currently under construction) for which the western end will be lost to development by HS2.</p> <p>No mention is made for accommodation of the proposed Oxcroft Branch Greenway. This will provide future community NMU linkage from Oxcroft & Stanfree toward Staveley, the TPT and Chesterfield Canal and will provide the only substantive 'bridge' crossing beneath both the M1 and future HS2 routes, (following the proposed closure of the western end of the Clowne Branch Greenway by HS2).</p>
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14.5.16	<p>If both routes above are lost to public use, FP28 will need to be upgraded to Bridleway standard and status. Suitable provision is required for its crossing of the B6419 to enable an onward route toward Staveley, the TPT and the Chesterfield Canal. This could be provided through a similar standard and status upgrade to FP27 or by inclusion of an additional NMU route to link with the existing stone surfaced track at Markham Vale and shown on Plan CT-06-635 (B4).</p> <p>Construction of the IMD line without accommodating the canal will cause direct financial losses and on-going liabilities for DCC.</p>
14.5.22	<p>It is noted that potential effects on traffic and transportation will be reported in the formal ES. This will need to take into account any effects on how traffic uses the network (ie reassignment to different routes, re-timing of journeys or the release of suppressed demand).</p>
CT-05-632	<p>Within this plan there is a structural asset identified within the Highway Authorities Structural Register No C47853 (Highway Authority). This structure appears to be impacted by the proposed construction works. HS2 project team will need to undertake in depth discussions with DCC as the Highway Authority to provide detailed information about the proposals and impact upon this structure.</p> <p>This plan shows significant realignment of the existing highway network on Hall Lane and the construction of an overbridge on B6053 Eckington Road. The Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussions are required.</p>
CT-05-634	<p>Within this plan there is an omission as the HS2 line is shown to sever Seymour Link Road, but no infrastructure provision is shown as to how this impact will be mitigated.</p>

CT-05-635	<p>Within this plan there is a structural asset identified within the Highway Authorities Structural Register No C47068 (Highway Authority). This structure appears to be impacted by the proposed construction works. HS2 project team will need to undertake in depth discussions with the Highway Authority to provide detailed information about the proposals and impact upon this structure.</p> <p>This plan shows significant realignment and stopping up of the existing highway network on B6419 Bolsover Road. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner. The Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussions are required.</p>
CT-05-637	<p>This plan shows significant realignment and stopping up of the existing highway network on Sheffield Road. The HS2 Project team have not sought Highway Authority comments about the need to stop up sections of the existing highway and how these parcels of land will need to be reverted to the subsoil owner/adjacent land owner.</p> <p>The Highway Authority have grave concerns about the lack of engagement and discussion surrounding these proposals. No information has been provided around vertical and horizontal alignment and proposed limits of adoption. The HS2 project team are required to provide the Highway Authority with detailed information surrounding these proposals and in depth discussions are required. Also amendment is shown to Westfield Lane again this proposal has not been discussed with the Highway Authority.</p>

1.15 Water Resources & Flood Risk, Section 15.

Document: Volume 2: CFA LA11: STAVELEY TO ASTONOD	
Volume, page and paragraph reference	Full ES comment
15.1.2	There are several water features, surface water drains and ponds that do not yet fall within the remit of the named consultees but have been constructed under planning approval as part of the Markham Vale regeneration scheme. HS2 Ltd do not appear to have included these within their surveys nor assessments.
15.3.5	<p>The level of detail is insufficient to allow pin-point accuracy of the water features listed in the table.</p> <p>Table 36: Note that tributaries of the Doe Lea and Smithy Brook are hydrologically connected to the Chesterfield Canal restoration and as such any impact identified as a result of HS2 construction should take impact on the Chesterfield Canal into account.</p> <p>Table 36: Noted that Chesterfield Canal is described as 'under construction' here.</p>
15.3.20	<p>There are several water features, surface water drains and ponds that have not been identified in previous sections of the report so presumably this assessment does not include them and will need revising.</p> <p>The recently GCN Ponds (part of the Markham Vale project) adjacent to the western end of the Staveley East embankment (not identified by HS2 Ltd) are surface water fed.</p>
15.3.22	Chesterfield Canal (Bluebank Pools) LWS has been overlooked.
15.3.27	Table 38: Chesterfield Canal has been classed as low risk of flooding. The canal restoration is not complete and it will not be hydrologically stable until such time as it has. By severing the canal at Staveley HS2 should undertake a study on the flood risk impact of the resulting isolated 5 mile section.
15.4.5	The impact of the realignment of the Doe Lea at Staveley on the Chesterfield Canal restoration is not clear.
15.4.15	There is insufficient detail provided regarding the replacement flood storage areas to replace those lost due to the construction of Staveley East Embankment. New floodplain is indicated at Map CT-06-634 to the north west of and including across part of the Markham North Tip but this is omitted entirely on map LA10 - CT-06-459-L1 and the proposed flood mitigation extents cannot be determined for consideration or comment.

15.4.16	<p>It states that balancing ponds for Highway and Railway drainage will be sized on a precautionary basis. The DCC Flood risk team were informed via consultations with the HS2 design teams that the ponds would be sized to a 1/100yr + 40%CC event.</p> <p>DCC seek clarification with regards to surface water run-off and attenuation, in particular the run-off from the viaducts. Following conversations with the Environment Agency, they have intimated that there has been some miss-understanding with regards to surface water run-off and attenuation with different RMA's giving different advice. DCC have been advised that guidance was planned to be issued to all partners, LA's etc to try and provide an acceptable approach across the board.</p> <p>Although this is not directly connected to this section, DCC have a general concern as to whom will be adopting and maintaining the Highway Balancing Ponds post construction. DCC have been supplied with a document "HS2 - Maintenance of Landscaped Areas Version 1 June 2018" and Section 6.7.2 in this document states "The location of these features would determine who is responsible for maintaining them". This suggests that all highway balancing ponds would be adopted by the highway authority, but with no additional funding to maintain them, this is unacceptable.</p>
15.4.28	<p>There are several water features, surface water drains and ponds that have not been identified in previous sections of the report so presumably this assessment does not include them and will need revising</p>
15.4.35	<p>The recent GCN Ponds (part of the Markham Vale project) adjacent to the western end of the Staveley East embankment (not identified by HS2 Ltd) are surface water fed.</p> <p>The impact of the realignment of the Doe Lea at Staveley on the Chesterfield Canal restoration is not clear.</p>
15.4.37 and 15.4.39	<p>HS2 advises the project will result in the total loss of both the Doe Lea Flash LWS and Poolsbrook Flash LWS. It is unclear how HS2 intend to mitigate for loss of either the flood storage (see 15.4.43) within the existing river corridor upstream of the impacted site. How the provision of substitute habitat suitable for sustaining the variety of ecology present in these Local Wildlife Sites (see 7.4.4) will be provided is unclear. These provide a mosaic of habitat and are known to support a great crested newt population. A new floodplain is indicated at Map CT-06-634 to the north west of and including across part of the Markham North Tip but this is omitted entirely on map LA10 - CT-06-459-L1 and the proposed flood mitigation extents cannot be determined for consideration or comment.</p>
15.4.44	<p>The impact of the realignment of the Doe Lea at Staveley on the Chesterfield Canal is not clear.</p>

16. References	Consultants should refer to the DCC adopted Waterways Strategy.
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Consultation Response to Volume 2
MML01: DANESMOOR TO BRIERLEY BRIDGE
MML02: UNSTONE GREEN TO SHEFFIELD STATION

Version Number	Last updated	
1.0	20/11/18	
1.1	22/11/18	Historic environment
	28/11/18	JS text IL

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1 MML GENERAL

1.1 General Comments

1.1.1 This report contains our comments for the Community Area MML01 and MML02: WDES Volume 2.

1.1.2 Detailed comments on other CFA's are contained in separate local area volume which also form part of this consultation response.

1.1.3 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text.

Section 1: an introduction to HS2 and the purpose and structure of this report;

Section 2: overview of the community area, a broad description of the Proposed Scheme within the community area;

Section 3: consultation and stakeholder engagement; and

Section 4: potential environmental impacts.

1.1.4 The Council has concerns regarding the impact on the existing rail services which use this line during the construction period. It is important that HS2 work with Network Rail and the rail operator to minimise the impact during this phase. This also applies to the impacts of the work on the adjacent highway network, local business and residents.

1.1.5 Notwithstanding the above, the incorporation of the electrification of the Midland Main Line between Clay Cross and Sheffield into the Phase 2b Hybrid Bill is welcomed and will give much needed certainty to local partners (meaning that, taking account of existing plans to electrify as far as Market Harborough, at least 62% of the Midland Main Line will be fully electrified by 2033). However, it is to be understood that electrification of the MML is not to be considered at the expense of delivering HS2 East and fully mitigating its impacts.

2 MML01: DANESMOOR TO BRIERLEY BRIDGE

2.1 Section 1: an introduction to HS2 and the purpose and structure of this report

2.1.1 The council does not wish to make comments at this time.

2.2 Section 2: overview of the community area, a broad description of the Proposed Scheme within the community area.

Document: Vol. 2: 1 MML01: Danesmoor to Brierley Bridge	
Volume, page and paragraph reference	Full ES comment
2.2	This element of the project is at early stage of development therefore there is very little detail of what is being proposed. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.3	DCC has a long term aspiration to see a rail station opened in the Clay Cross area to serve the growing community. The design of this part of the route needs to consider how this could be accommodated.
2.2.10	DCC suggests that modifications may result in increased traveller stress associated with this development. HS2 should consider the following mitigation: 1) ensure that a Disability and Access Champion is involved at all key decision points; 2) provide details on proposed strategies for mitigating potential transport and access-related adverse impacts within Derbyshire 3) avoid utilising important local roads for construction traffic which will worsen existing congestion and exacerbate traveller stress, and consider movements of construction traffic outside of peak road use times
2.2.11	Chesterfield Borough Council and DCC are actively creating redevelopment proposals for the area immediately adjacent to the station. It is essential that HS2 Ltd and Network Rail actively engage in this process so that any proposed changes to Chesterfield station can be incorporated into this redevelopment scheme.
2.4.1	Previously it was proposed that there would be 2 trains an hour on the spur route to Sheffield 1 of which would serve Chesterfield and then Sheffield and the other running non stop to Sheffield. However it is now proposed that there will be 4 trains an hour. This section states that only 1 of these 4 train will serve Chesterfield. This needs to be reconsidered as previous studies on potential demand for the HS2 service showed that Chesterfield could justify a second train each hour stopping there in each direction.

2.3 Section 3: consultation and stakeholder engagement

Document: Vol. 2: 1 MML01: Danesmoor to Brierley Bridge	
Volume, page and paragraph reference	Full ES comment
3.1.2	<p>Significant work has been undertaken to prepare a Masterplan for Chesterfield Station, to which HS2 Ltd has been party. This Masterplan sets out an ambitious but achievable vision to fully capture the benefits of HS2 through a combination of infrastructure and regeneration projects. This meshes with the ongoing development of Chesterfield's adjacent Northern Gateway and Waterside regeneration projects, and will have significant synergies with the Chesterfield College and University of Derby campus. It seeks to maximise the important role of Chesterfield as a visitor destination and as a gateway to a wide variety of others across the north Midlands, including the Peak District, Clumber Park and Sherwood Forest. A Local Development Framework document covering the Station Area is being proposed as a policy for inclusion in the Chesterfield Local Plan Core Strategy to be issued for consultation in January 2019. Supporting site development appraisals and phasing plans have been produced, and steps have already been taken towards the assembly of key parcels of land required in order to put this vision into practice. Derbyshire County Council has already taken an 'in principle' decision to exercise compulsory purchase powers in pursuit of the Masterplan if required.</p> <p>Partners in the Chesterfield Station Masterplan are investing substantial resources in this, and through the D2N2 Local Enterprise Partnership's Local Growth Fund programme already have access to committed resources for delivery. These resources make provision for the Station Link Road, which would provide a high-standard access to the Station and its car parking avoiding the need for traffic to pass through the town centre. This would also allow for re-routing of a number of existing bus services to provide much better integration with the Station and rail services. The Link Road, though, follows an alignment close to the Midland Main Line, and it is a matter of concern that the safeguarding requirements of HS2 Ltd for electrification and for Station modifications are, at present, unknown.</p>

2.4 Section 4: potential environmental impacts.

Document: Vol. 2: 1 MML01: Danesmoor to Brierley Bridge	
Volume, page and paragraph reference	Full ES comment
4.12	<p>It is extremely disappointing that none of the economic potential of growth in and around Chesterfield has been reflected in the consultation documents, and equally that the likely visual and environmental impacts of the proposed line as it approaches the town centre have been completely underplayed.</p> <p>There are limited impacts in alterations to landscape setting as connects to Erewash Valley Line and Midland Main Line through introduction of electrification equipment/infrastructure. This may have some adverse impacts on buildings astride and any listed railway structures.</p> <p>These issues and mitigation strategies do not currently appear to have been discussed.</p>
4.1.2 Table 2 Traffic and Transport	<p>Table 2 topic Traffic and Transport. The proposed 4 HS2 trains an hour on this section of the Erewash Valley and Midland Mainline have the potential to adversely affect the existing local and regional rail services on this route if they take paths currently used by them to accommodate the new service. The line capacity between the point where HS2 joins the Erewash Valley line and then onto the Midland Mainline needs to be increased to ensure there are sufficient paths for all existing and proposed services.</p>

3 MML02: UNSTONE GREEN TO SHEFFIELD STATION

3.1 Section 1: an introduction to HS2 and the purpose and structure of this report

3.1.1 The council does not wish to make comments at this time.

3.2 Section 2: overview of the community area, a broad description of the Proposed Scheme within the community area

Document: Vol. 2: 1 MML02: Unstone Green to Sheffield Station	
Volume, page and paragraph reference	Full ES comment
2.2	This element of the project is at early stage of development therefore there is very little detail of what is being proposed. As a result it makes it difficult to provide a meaningful response to this consultation.
2.2.10	DCC suggests that modifications may result in increased traveller stress associated with this development. HS2 should consider the following mitigation: 1) ensure that a Disability and Access Champion is involved at all key decision points; 2) provide details on proposed strategies for mitigating potential transport and access-related adverse impacts within Derbyshire 3) avoid utilising important local roads for construction traffic which will worsen existing congestion and exacerbate traveller stress, and consider movements of construction traffic outside of peak road use times
2.4.1	Previously it was proposed that there would be 2 trains an hour on the spur route to Sheffield one of which would serve Chesterfield and then Sheffield and the other running non stop to Sheffield. However it is now proposed that there will be 4 trains an hour. In the MML01 community area report it states that only 1 of these 4 train will serve Chesterfield. This needs to be reconsidered as previous studies on potential demand for the HS2 service showed that Chesterfield could justify a second train each hour stopping there in each direction.

3.3 Section 3: consultation and stakeholder engagement

3.3.1 The council does not wish to make comments at this time.

3.4 Section 4: potential environmental impacts.

Document: Vol. 2: 1 MML02: Unstone Green to Sheffield Station	
Volume, page and paragraph reference	Full ES comment
4.1.2	<p>There are limited impacts in alterations to landscape setting as connects to Erewash Valley Line and Midland Main Line through introduction of electrification equipment/infrastructure. This may have some adverse impacts on buildings astride and any listed railway structures. Notably:</p> <ul style="list-style-type: none">• Unstone Manor House (Grade II*)• Dronfield Conservation Area. <p>These issues and mitigation strategies do not currently appear to have been discussed.</p>
4.12 Table 2 topic Traffic and Transport	<p>The proposed 4 HS2 trains an hour on this section of the Erewash Valley and Midland Mainline have the potential to adversely affect the existing local and regional rail services on this route if they take paths currently used by them to accommodate the new service. The line capacity between the point where HS2 joins the Erewash Valley line and then onto the Midland Mainline needs to be increased to ensure there are sufficient paths for all existing and proposed services.</p>

**Consultation Response to
Volume 3: Route-wide Effects
Volume 4: Off Route Effects
EIA Scope and Methodology Report
Alternatives Report
Draft Code of Construction Practice**

Version Number	Last updated	
1.0	20/11/18	
1.1	22/11/18 27/11/18	Historic environment SB IL update

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5.7	Agriculture, forestry and soils, Section 6.	1
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5.9	Cultural heritage/historic environment, Section 8.	1
5.10	Ecology, Section 9.	2
5.11	Ground settlement, Section 10.	2
5.12	Land quality, Section 11.	2
5.13	Landscape and visual, Section 12.	2
5.14	Noise and vibration, Section 13.	3
5.15	Traffic and transport, Section 14.	3
5.16	Waste and materials, Section 15.	3
5.17	Water resources and flood risk, Section 16.	3

1 VOLUME 3: ROUTE-WIDE EFFECTS

1.1 Route-Wide Effects

1.1.1 This section of the report contains our comments for the Route Wide: WDES Volume 3.

1.1.2 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text. The order of comments are:

Agriculture
Air Quality
Climate change
Community
Ecology and biodiversity
Health
Historic Environment
Land quality
Landscape and visual assessment
Major accidents and disasters
Socio Economics
Sound, Noise & Vibration
Traffic, & Transport
Waste and material resource
Water Resources & Flood risk
Phase 1 and Phase 2 combined impacts

1.2 Agriculture, Section 2.

1.2.1 The council has no comment to make on this section at this time.

1.3 Air Quality, Section 3.

1.3.1 The council has no comment to make on this section at this time.

1.4 Climate Change, Section 4.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
4.1	As in volume 1, the framework of how climate change is going to be addressed is comprehensively addressed. DCC would like to see this widened out to include some indirect opportunities in the formal ES, particularly with regards to climate change mitigation. The draft ES gives little indication of climate change mitigation or adaptation measures which DCC expect to see in the formal ES.

1.5 Community- incorporating health related concerns, Section 5.

1.5.1 The council has no comment to make on this section at this time.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
5.1.1	Public Health have commented on specific community impacts in Volume 2 templates. However, there needs to be recognition throughout that the effects of construction and reduced access to open green space as a result will be significant. This should be mitigated against in the longer term. Particularly in relation to physical activity and community connectedness. Consider adding the following mitigations to the statement - 1) "Compensate communities for the loss of local amenities and support their relocation, replacing 'like-with-better' rather than 'like-for-like' via a process that involves the community in the decision-making" 2) "There may be opportunities to facilitate new greenway links between communities utilising the HS2 corridor to bridge connections that have yet to be formally established" 3)
5.1.3	Add mitigation to the statement: Ensure construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme, which will include monitoring against 'Enhancing the appearance' and 'respecting the community' standards

1.6 Ecology and biodiversity, Section 6.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
6.3.6	DCC welcome the recognition that ancient woodland is an invaluable irreplaceable resource. It is therefore very disappointing that the Proposed Scheme will result in the loss of a significant area of ancient woodland, giving rise to “a permanent adverse residual effect, which is significant at the national level”
6.4.1	The extent of habitat losses envisaged, whilst apparently not a significant proportion of the national resource, are still quite alarming, amounting to some tens (and in some cases hundreds) of hectares of habitats of principle importance. This is especially concerning considering that these losses will occur in a relatively short period of time, due to a single phase of a single infrastructure project. The lack of firm mitigation proposals, or indeed any significant detail, make it impossible to determine the significance of residual impacts
6.5.1	Whilst the potential for significant impacts on protected species is acknowledged, the lack of a detailed impact assessment, or of firm mitigation and compensation proposals makes assessment of residual impacts impossible at this stage

1.7 Health, Section 7.

1.7.1 The council has no comment to make on this section at this time.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
7.1.1	The intro explains that all localised impacts through construction on recreational routes is discussed in volume 2 thus Public Health comments are further detailed in Vol 2 documents.

7.2.4	<p>Agree with health determinants listed. However, has neglected to include: any potential affects on mental health and wellbeing, community connectivity, and physical activity.</p> <p>These were all identified as significant health and wellbeing considerations in the Derbyshire Health Impact Assessment (2013) and subsequent Updated Health Impact Assessment (2017). These can be found here: https://observatory.derbyshire.gov.uk/wp-content/uploads/reports/documents/health/specialist_reports_and_assessments/2013/Derbyshire%20HS2%20HIA%20Final%20web.pdf https://observatory.derbyshire.gov.uk/wp-content/uploads/reports/documents/health/specialist_reports_and_assessments/2017/Update_of_HIA_HS2_Realignment_Phase_2b.pdf.</p> <p>In relation to mental wellbeing, Public Health would recommend following the interventions stated in Public Health England: Preventing Suicide in Public Places (November 2015) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/481224/Preventing_suicides_in_public_places.pdf are included as mitigation in the statement.</p> <p>Area 1. Restrict access to the site and the means of suicide This can be achieved by:</p> <ul style="list-style-type: none"> i) Closing all or part of the site ii) Installing physical barriers to prevent jumping iii) Introducing other deterrents, for example, boundary markings or lighting <p>Area 2. Increase opportunity and capacity for human intervention This can be achieved by:</p> <ul style="list-style-type: none"> i) Improving surveillance using CCTV, thermal imaging and other technologies; increasing staffing or foot patrols ii) Providing suicide awareness/intervention training for staff working at or near the site; increasing whole-community awareness and preparedness to intervene. <p>Area 3. Increase opportunities for help seeking by the suicidal individual This can be achieved by:</p> <ul style="list-style-type: none"> i) Providing Samaritans signs and/or free emergency telephones ii) Providing a staffed sanctuary or signposting people to a nearby one
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7.2.4(cont)	<p>Area 4. Change the public image of the site; dispel its reputation as a 'suicide site'</p> <p>This can be achieved by:</p> <ul style="list-style-type: none"> i) Ensuring media reporting of suicidal acts is in line with Samaritans guidelines ii) Discouraging personal memorials and floral tributes at the site iii) Introducing new amenities or activities; re-naming and re-marketing the location <p>Implementing and adhering to the PHE Guidance:</p> <ul style="list-style-type: none"> • Physical barriers and deterrents regarding access to the line itself, especially at stations, crossings and high speed areas (Area 1) • Physical barriers and deterrents regarding access to constructions, viaducts, bridges, tunnels, multi-storey car parks, roads (Area 1). • Training and awareness of construction staff and subsequently staff working on the rail network (Area 2) • Appropriate signage and emergency telephones at commuter and potential access points (Area 3) • Relationships with owners, operators and those with statutory responsibility. Currently Network Rail, British Transport Police and East Midlands Trains are local partners in suicide prevention in Derbyshire. Any additional or new partners should contribute to local suicide prevention plans and to data collection in relation to suicide incidents. <p>Proactive prevention of root causes of mental ill health and suicide ideation</p> <p>Consideration of mitigating factors for those disrupted by the construction and future service activity of HS2, including</p> <ul style="list-style-type: none"> • Compulsory purchase and demolition of housing leading to relocation • Loss of property value and property blight • Construction noise and ongoing noise • Visual intrusion • Increased traffic re-routed temporarily during construction and permanently during service • Loss or displacement of employment within local businesses • Potential social isolation resulting from changing communities, loss of social capital and public transport routes
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7.2.4(cont 2)	In relation to physical activity, Public Health would recommend adding the following mitigation to the statement:- 1) Work with and support health partnerships in Derbyshire to promote HS2 as an 'active travel' compatible solution, as increasing exercise will help prevent and mitigate obesity and diabetes (a significant health issue for eastern Derbyshire) 2) Pay particular attention to design solutions that enhance the safety of all road users (including pedestrians and cyclists), taking the opportunity to reconfigure high-risk crossings/ junctions impacted by the proposed route—most especially in NED where the risk of RTAs is already high and in Long Eaton where station-related traffic flows are likely to increase injury rates. 3) Pay particular attention to the impact of disrupted access upon those with physical disabilities, such as wheelchair users, to ensure any particular needs are catered for as part of planning for temporary diversions or permanent route/ footpath changes.
7.2.4	Whilst employment is considered during construction it is not considered under health during operation. The HiA 2013 noted a major health impact would be that inward investment and job creation following the initial windfall of increased employment during the construction phase would create improved job prospects and will be beneficial to the mental health and wellbeing of residents. P51 A positive for HS2 that they might want to include.
7.2.5	Important that HS2 limited continue to recognise that health effects may be felt by people further afield.
7.2.6	Agree that strength of evidence does that necessarily determine the importance of the outcome. Also need to consider what our community tells us. The Derbyshire HS2 HIA outlines extensive community insight for example that the development might improve pride in the area/better self-worth or anxiety over the threat of a compulsory purchase order.
7.2.7	Don't agree with the statement that "there is no established or widely accepted framework for assessing the significant health effects of a development proposal". Health Impact Assessments (HIAs) clearly provide a methodology for doing this. Derbyshire conducted a Health Impact Assessment (HIA) of the initial HS2 route in 2013. This was updated in 2017 in line with the HS2 route realignment. This document clearly outlines the evidence base, literature and community insight to assess the overall impact/significance on a specific health determinant. These can be found here: https://observatory.derbyshire.gov.uk/wp-content/uploads/reports/documents/health/specialist_reports_and_assessments/2013/Derbyshire%20HS2%20HIA%20Final%20web.pdf https://observatory.derbyshire.gov.uk/wp-content/uploads/reports/documents/health/specialist_reports_and_assessments/2017/Update_of_HIA_HS2_Realignment_Phase_2b.pdf

7.4.1	Agree with mitigation mentioned in Vol 3. Would suggest adding the following mitigation that was identified in the Derbyshire HIA (2013/2017): 1) Utilise mitigation solutions intended to minimise the impact of HS2 to improve upon the existing impacts of the M1 upon Hardwick, aiming to improve resident satisfaction with the local area. 2) Demonstrate how HS2 will enhance the Trent Valley Vision being developed and promoted by the Lowland Derbyshire and Nottinghamshire Local Nature Partnership. 3) Provide detail on proposed strategies for mitigating potential environment-related adverse impacts within Derbyshire. 4)
7.4.3	Ensure construction sites and all companies contracted to service them are registered with the Considerate Constructors Scheme, which will include monitoring against 'Protecting the environment' standards
7.4.4	The nominated undertaker is required to take reasonable steps to engage with the community with regards to construction impacts. A major positive health impact in the 2013 HIA was that construction may present training opportunities/ apprenticeships, leading to on-going employment. P131 Are the undertakers tasked with recruitment as part of this engagement? What mitigation is in place to ensure those low skilled jobs are targeted to areas of low educational attainment, high NEET and unemployment and who is responsible for this mitigation.
7.5.1	New jobs outlined in Vol 3 are welcomed. In order to support the health and wellbeing of local residents Public Health recommend that the following mitigations are considered 1) In recognition of high overall unemployment locally, commit to employing a significant proportion of local workers during the construction and operational stages of the proposed development (balancing this with a potential increase in occupational injuries. 2) In recognition of high rates of local youth unemployment, commit to employing inexperienced workers during the construction and operational stages in combination with educational initiatives leading to qualifications that increase the prospect of long-term employment . 3) Support persons losing their jobs as a result of compulsory relocation or demolition of business premises to find alternative employment, perhaps with preferential treatment in relation to jobs created as part of the HS2 scheme if they have suitable skills or wish to be re-trained
7.5.5	DCC recommend adding the following mitigation: 1) Provide detail on proposed strategies for mitigating potential economy-related adverse impacts within Derbyshire. 2) Businesses subject to land take or relocation should be financially assisted to locate new premises that are an improvement on the premises they are vacating and should be adequately compensated for the disruption caused to the conduct of their business

7.5.7	Impacts on vulnerable members of the community due to relocation of business and inability to commute resulting in unemployment is discussed here but there is no mitigation suggested. This needs to be considered further to minimise negative health impacts on the most vulnerable community members. Possible mitigation could include Support persons losing their jobs as a result of compulsory relocation or demolition of business premises to find alternative employment, perhaps with preferential treatment in relation to jobs created as part of the HS2 scheme if they wish to be re-trained
7.5.9	DCC agree that there may be increased traveller stress associated with this development. HS2 limited should consider adding the following mitigation: 1) Ensure that a Disability and Access Champion is involved at all key decisions points. 2) Provide detail on proposed strategies for mitigating potential transport and access-related adverse impacts within Derbyshire. 3) Avoid utilising important local roads for construction traffic, which will worsen existing congestion and thereby exacerbate commuter stress.
7.5.10	Add the following mitigation: Work with local authorities, emergency services and the Highways Agency to develop a traffic management strategy aimed at minimising disruption to road users and limiting the risk of road traffic accidents or injuries to pedestrians as a result of construction-related traffic
7.5.16	This development will result in the demolition of 536 properties. This will have a significant impact on Derbyshire residents. Evidence in the HIA suggests that • The stress and anxiety induced by demolition does not depend upon identification of replacement housing. Other areas of consideration not included in the HS2 document include:- • Relocation induces stress and community severance; • An improvement in housing is linked to decrease in illness, with general well-being benefits and with gentrification (wealthier communities, resulting in less affordable housing due to a rise in property value); • New infrastructure can reduce perceptions of amenity value and thus lower the value of local properties;
7.5.20	Agree with statement that the health effects of involuntary relocation would vary between individuals, with some groups being more vulnerable to adverse effects. In order to mitigate against that suggest that the following recommendations are incorporated where possible 1) Provide relocated families with housing that is better than what they are losing (rather than like-for-like), recognising the relationship between housing quality and health and that this cannot fully compensate for community severance . 2) Work with local authority housing departments to upgrade social housing exposed to higher noise levels with appropriate noise insulation. .

7.5.21	Ensure that residents who are not owner-occupiers (and therefore not covered by the compensation scheme) are also treated fairly, recognising the particular difficulties those in park homes may face in seeking alternative accommodation if relocation is required or desired
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1.8 Historic environment, Section 8.

1.8.1 The council has no comment to make on this section at this time.

1.9 Land quality, Section 9.

1.9.1 The council has no comment to make on this section at this time.

1.10 Landscape and visual assessment, Section 10.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
10.1.2	It states that the National Forest and the Northern Forest are the only landscape receptors where effects have the potential to occur at a geographical scale greater than the community areas, DCC do not agree with this statement given that a strategic landscape initiative is planned for the Trent Valley as promoted by the Local Nature Partnership and the scale of these identified landscape receptors is no different to the scale of a Landscape Character Type as defined and described in local authority landscape character assessments some of which have their own strategic aims and objectives.

1.11 Major accidents and disasters, Section 11.

1.11.1 The council has no comment to make on this section at this time.

1.12 Socio Economics, Section 12.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
12.4.2	<p>There is no specific detail listed as to the impacts, therefore it would appear the assessment is lacking.</p> <p>Whilst this could be significant, previous experience has shown that the impact on the local community in terms of creating new jobs during these phases is often limited by the contractors moving staff into the area to work rather than employing indigenous residents. Monitoring of contractual arrangements offering both work experience, jobs and apprenticeships need to be robust in order to enforce agreements such as those identified in HS2 Phase One Information Paper G4.</p> <p>In order to maximise the benefits, especially to those in the most deprived wards which are affected by the development contract awards should be weighted to include aspects of social value to the areas in which the work is to take place. By including local authorities in the contract award process should increase the influence of local social value.</p> <p>In order to maximise benefit from the construction, significant and timely investment needs to be made in the upskilling and training of residents within the affected area to make them ready to access any future work. Skills preparation traditionally has lagged behind the development of the “infra-structure”. This needs to change not only to ensure the maximum benefits are derived to the local economy, but also if severe skills shortages during construction are not going to jeopardise the delivery of the project within timescale and budget.</p> <p>A failure to train more local people could also see a drain on skills from other development projects taking place in the area, with a consequential reduction in the positive economic impacts on the area as other projects are delayed.</p>

12.4.2 (cont)	<p>The recruitment of local residents must go beyond the traditional use of recruitment agencies and Job Centres. HS2 needs to invest in pre-recruitment training. Sector based work academies are a proven method of ensuring local residents are prepared to apply and successfully secure the opportunities on offer. It is suggested therefore that this should form part of the delivery proposals.</p> <p>In addition the education and careers projects outlined within HS2 Ph1 Information Paper G7 needs to be rolled out across the whole area as a matter of priority if local young people are to take advantage of the opportunities that will be delivered. For example many of the civil engineering opportunities could be taken up by young people in secondary education now.</p> <p>Further consideration needs to take place on the impacts of significant inward migration of labour on services in the areas being developed, including the displacement of local residents from services such as GPs, schools etc</p>
12.4.3	<p>There is no specific detail listed as to the impacts, therefore it would appear the assessment is lacking.</p> <p>The impact seems to be limited to the sites directly effected through loss of use. There is little or no detail on what these businesses are or what the impact of the construction maybe. DCC are aware that the proposed line cuts directly through one of the country's most important centres for furniture in Long Eaton (LA05: Ratcliffe-on-Soar to Long Eaton). Whilst businesses may not be directly impacted on as part of the construction, in terms of loss of use etc, it will have significant impact on this important industry not only to the area but the UK.</p> <p>Further work is required on the impact on businesses on disruption to transport networks. In particular the main arterial routes of the M1 A38 and A42, where the impact on business could be severe. Local businesses have reported significant difficulties associated with the widening of the M1 in the area, and the HS2 proposals will have a more significant impact on a greater number of roads.</p> <p>The ability of local businesses to gain access to the contracts associated with HS2 is key to the offsetting of some of the negative impacts of the construction phase. It is therefore important that greater weighting is given to local suppliers in the awarding of contracts.</p>

12.4.4	<p>There is no specific detail listed as to the impacts, therefore it would appear the assessment is lacking.</p> <p>In addition to the work required to meet the construction phase skill needs, work is also needed with local schools to prepare young people for the opportunities associated with the running of the line in 2033 and beyond. Many of those young people are currently in primary education. Whilst HS2 has a number of programmes designed to support this aim a number of them, especially the primary project, has been embargoed. This block either needs to be lifted, or local areas should be funded to offer their own solutions.</p> <p>Delivery of education, careers and training activities, should not only be seen as an essential part of ensuring the HS2 has the skills it needs for the medium to longer term, but should also be seen as a key activity in mitigating some of the fears of local communities by ensuring that residents, their children and grandchildren benefit from the jobs HS2 will bring through delivery of careers and education.</p>
12.6	<p>In the introduction to this section the report states that it “provides an assessment of the route-wide socio-economic impacts”. The report, in paragraph 12.6 simply focuses on the wider benefits of HS2 and fails to review any of the possible negative impacts in any detail. The report then fails to do any assessment other than to outline the basis on which the assessment takes place. Further the report then goes on to suggest that “significant localised effects” are reported in Vol 2 community area reports. These “significant” localised effects are restricted purely to the loss of business premises in a few areas and none of the wider socio-economic impacts that will occur on adjacent communities or businesses. The reports belief that only those few sites where business premises are lost are significant, serious undermines the validity of the assessment that has taken place and calls into question its quality.</p> <p>The development of HS2 is a once in a generation opportunity to impact of the socio-economic landscape of the eastern districts of Derbyshire, which since the 1980’s have suffered from the decline of traditional industries, and have struggled to break free of that industrial decline. This has left many of the areas with higher levels of deprivation, unemployment and sickness than other parts of Derbyshire. Equally, the areas affected have shown higher level of social immobility, which a project like HS2 could help address, but only if the level of investment and intervention is sufficient and timely.</p>

1.13 Sound, Noise & Vibration, Section13.

1.13.1 The council has no comment to make on this section at this time.

1.14 Traffic, & Transport; incorporating PROW, highway design and Traffic Safety, Section 14.

Document: Volume 3: Route-Wide Effects	
Volume, page and paragraph reference	Full ES comment
14.5.2	<p>The ES indicates that impacts of construction traffic are focused on the road network close to the Proposed Scheme, which includes the principal corridors for bulk material movements. It is noted that contractors would seek to use rail for the transport bulk materials, where reasonably practicable. Clearly this would help to reduce wider traffic impacts of such movements. The ES suggests that construction traffic movements are expected to represent a small proportion of total traffic on the strategic highway network although no information is provided to substantiate this assertion. Derbyshire provides a significant proportion of minerals in the East Midlands. Although detailed information on the transport of minerals within the Council is limited; the last East Midlands Regional Aggregate Working Party survey on transport occurred in 2009 when of the total limestone produced for use as aggregates of some 7.2 million tons approximately 71% was transported by road and 30% by rail. Of the limestone aggregate that was exported i.e. 4.9 million tonnes, 58% was transported by road and 42% by rail.</p> <p>The formal ES should therefore provide an indication of the demand for construction materials and consider their potential cumulative impacts particularly in areas where the raw materials should be sourced. These could be some considerable distance from the actual construction compounds themselves. Further advice in this regards is provided in the Guidelines for the Environmental Assessment of Road Traffic Institute of Environmental Assessment (IEA) (1993).</p>

1.15 Waste and Material Resources, Section 15.

Document: Volume 3: Route-Wide Effects	
Full ES comment	
Volume, page and paragraph reference	Full ES comment
15	The section outlines how HS2 will deal with waste arisings both during the construction phase, employees' arisings during the construction and waste created afterwards i.e. Commercial and Industrial. This section will be scrutinised by the Environment Agency (EA) as it refers mainly to National policies, frameworks and regional information published by the EA. Within the section they refer to the Waste Planning authorities responsibilities to make provision for sufficient waste infrastructure capacity. Waste Management have no additional comments to make within this Volume.

1.16 Water Resources & Flood risk, Section 16.

1.16.1 The council has no comment to make on this section at this time.

1.17 Phase 1 and Phase 2 combined impacts, Section 17.

1.17.1 The council has no comment to make on this section at this time.

2 THE COUNCIL HAS NO COMMENT TO MAKE ON THIS SECTION AT THIS TIME.VOLUME 4: OFF-ROUTE EFFECTS

2.1.1 This section of the report contains our comments for the Off Route Effects: WDES Volume 4.

2.1.2 The council has no comment to make on any of this Volume at this time.

Introduction

Stakeholder engagement and consultation

Off-route railway stations

Off-route depots

Modifications to the conventional railway network

Other off-route works

DRAFT

3 EIA SCOPE AND METHODOLOGY REPORT

- 3.1.1 This section of the report contains our comments for the EIA Scope and Methodology Report: WDES.
- 3.1.2 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text. The order of comments are:

3.2 General comments

Document: Scope and Methodology Report	
Volume, page and paragraph reference	Full ES comment
General	<p>The draft documents set out broad aims and intentions, the detailed surveys and baseline data are not yet available. Therefore it is only possible to state that the relevant issues and draft methodologies have been identified and taken into consideration. The scale of impacts and the adequacy of mitigations will only be know when the detailed surveys have been completed.</p> <p>The detail of how environmental impacts will be addressed will form part of the Local Environmental management Plans discussed/ in consultation with, local authorities. Local authority consultations regarding LEMPs should include parish, District and County authorities.</p> <p>The route is sub divided into community areas which do not follow administrative boundaries. These appear to have been identified on an arbitrary basis rather than the existence of a coherent community. The boundaries of the community areas could be aligned with administrative boundaries to enable a more meaningful assessment of data, particularly population, and land use data.</p> <p>While the normal hours of working are set as 0800 to 1800 Monday to Friday and 0800 to 1300 on Saturdays, a number of other circumstances in which working outside these hours have been identified. In practice construction traffic, noise and lighting could occur at any time. Where planned works are to take place outside the 0800 to 1800 times, this should be indicated to local populations in advance of working. It is accepted that there may be occasions when unplanned/abnormal circumstances will prevent prior notice. Where possible the working hours should form part of the LEMPs.</p>

Environmental and construction site management	<p>The working draft ES volume 1 states that contractors will be required to develop an Environmental Management System complying with BS EN ISO 14001:2004 and that the work of all sub-contractors will be within scope of the EMS. This is considered to be best practice and will contribute to ensuring legal compliance and controlling the environmental impacts of the construction phase. However, this standard has now been superseded by BS EN ISO 14001:2015. This reference must be corrected.</p> <p>For a project of this scale the EMS of the nominated undertaker and the lead contractors should be subject to external verification/certification by a UKAS accredited certification body.</p> <p>Compliance failures and the identified corrective actions should be brought to the attention of the local community/authority as part of the Community Engagement Framework.</p> <p>The sustainability policy meets the requirements of ISO 14001:2015 and should be welcomed. The policy states a commitment to legal and other compliance, continual improvement in environmental performance, pollution prevention and most interestingly, 'no net loss in biodiversity'. Given the nature of the proposal it is difficult to conceive of how this 'no net loss' policy objective can be achieved unless measured over very long time scales.</p>
Local Environmental Management Plans	<p>Local Environmental Management Plans will be drafted to control construction works at a local level within each local authority area. LEMPs will ensure that local circumstances are identified and taken into consideration, they provide the opportunity for the detail of local circumstances to be taken into account and should be used to address during construction. The relevant local authorities should be consulted on the content of the LEMPs prior to the commencement of construction in the relevant areas/communities. The use of LEMPs is good environmental and community relations practice.</p>

3.3 Council Comments

3.3.1 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text.

3.4 Changes between Phase One, Phase 2a and Phase 2b approach to EIA, Section 2.

3.4.1 At this time the council has no comment to make.

3.5 Stakeholder engagement and consultation, Section 3.

3.5.1 At this time the council has no comment to make.

3.6 Environmental Impact Assessment (EIA) methodology, Section 4.

3.6.1 At this time the council has no comment to make.

3.7 Reporting of alternatives, Section 5.

3.7.1 The council has no comment to make on this section at this time.

3.8 Agriculture, forestry and soils, Section 6.

3.8.1 The council has no comment to make on this section at this time.

3.9 Air quality, Section 7.

3.9.1 The council has no comment to make on this section at this time.

3.10 Climate change, Section 8.

3.10.1 The council has no comment to make on this section at this time.

3.11 Community, Section 9.

3.11.1 The council has no comment to make on this section at this time.

3.12 Ecology and biodiversity, Section 10.

Document: Scope and Methodology Report	
Volume, page and paragraph reference	Full ES comment
General	<p>The Ecology section of the SMR report would appear to be largely unaltered from the draft version we were consulted on in September 2017. As such, it fails to respond to the issues and criticisms we raised at that time.</p> <p>Generally, the approach and coverage of ecological studies would seem to be appropriate, including desktop study, consultation and various field surveys. It is noted that these field surveys include both general habitat surveys (10.2.6) and a breadth of specialist surveys for species and particular habitat types (10.2.7).</p> <p>However, the methodologies used in these surveys are apparently set out in a 'Field Surveys Methods and Standards' Technical Note "referenced in Annex A" of the SMR. Whilst Annex A does indeed refer to a FSMS document, this appears to relate to HS2 Phase 2a, whilst the Annex does not contain any further details, or a link to the document in question. Whilst the SMR states that "the methods set out in the SMR follow recognised methodologies (deviating only where considered appropriate)", it would unfortunately therefore appear that at this stage of EIA preparation it is still not possible to comment on the survey methodologies employed.</p> <p>The ecology section of the SMR also continues to state that the Government and HS2 Ltd are "seeking to achieve no net loss of biodiversity" for the Proposed Scheme where a firm commitment to achieve no net loss would be preferable and would better accord with Government policy elsewhere.</p>

3.13 Electromagnetic interference, Section 11.

3.13.1 The council has no comment to make on this section at this time.

3.14 Health, Section 12.

3.14.1 The council has no comment to make on this section at this time.

3.15 Historic environment, Section 13.

Document: Scope and Methodology Report	
Volume, page and paragraph reference	Full ES comment
General	

13.2.7	<p>Risk-based approach to prioritising archaeological surveys. This appears to be at a very early stage and no evidence or conclusions on the proposed 'Archaeological sub-zones' (ASZ) or the assessment of risk therein is included in the WDES. The Council should be afforded the opportunity to comment on and input into the methodology and conclusions of this process.</p> <p>The proposed methodology has the potential to be a useful and effective approach to quantifying archaeological 'risk' along the route, particularly in light of the observation that much of the eastern part of Derbyshire is under-researched and imperfectly understood in terms of its archaeological resource.</p> <p>However, the efficacy of the model depends on the extent to which an appreciation of the multi-layered nature of 'archaeological character' is built in to the methodology, and this is not clarified in the existing technical note. For example, earthworks may be evidenced at the land surface, lithics and other artefacts in the ploughsoil, and 'cut features' at the subsoil/natural interface, in some cases representing different periods of human activity. Existing information on one layer of evidence alone (for example earthworks), should not be taken as confirmation that 'archaeological character is understood', where there is an absence of understanding of sub-surface archaeology.</p> <p>The potential for Palaeolithic archaeology is another layer of evidence that should be built separately into the model. This type of evidence can be associated with gravel terraces and fluvial landforms, fissures in e.g. limestone geology, wind-blown loess deposits, cave and rock shelter sites, and surface lithic scatters, and in some cases can be deeply buried. Assessment of Palaeolithic potential is not easily achieved using standard archaeological prospection techniques (e.g. geophysics) and needs to take into account the geological and borehole evidence for each landform unit along the route.</p> <p>Another important factor is the quality and resolution of data on opencast coal extraction. Large parts of eastern Derbyshire have been subject to opencasting during the recent past, but there are also significant gaps in this activity. The data used must be fine-grained enough to identify these significant lacunae. DCC recommend that the County Council's opencasting data is used, because this allows actual extraction areas to be identified rather than consented areas which can be much more extensive.</p>
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13.2.9	<p>The proposed 500m buffer for the 'study area' is a very narrow corridor and risks constraining the understanding of archaeological settlement patterns in the wider landscape which should strongly influence the planning and delivery of archaeological evaluation and mitigation fieldwork. At the regional level this overview will be delivered by the Regional Research Framework but there is currently a lacuna between this high level and the micro-level afforded by e.g. HER data within the study area. Appropriate research and consultation needs to be in place to ensure that period narratives on the sub-regional level are understood and appropriately feed in to research aims and the fieldwork planning stage.</p>
13.6.12 and Table 17	<p>Significance criteria. The study area in Derbyshire contains heritage assets recognised as being internationally important: for example the asset groups at Hardwick Halls/Park and Bolsover Castle, both of which combine Grade I Listed Buildings, Scheduled Monument and Grade I Registered Parks/Gardens. These are asset groups of exceptional importance and should be weighted accordingly in the EIA process.</p> <p>Table 17 shows the groupings of different types of designations proposed at 'High', 'Moderate' and 'Low' importance. At present no distinction is made between the internationally important, exceptional asset groups discussed above, and a whole range of designated assets of demonstrably lesser importance. This includes some Grade II Listed Buildings and Conservation Areas and even some undesignated assets. The assessment of significance on this rather broad brush basis runs the risk of under-assessing impact to some of the county's most important heritage assets.</p> <p>Some consideration should therefore be given to a category of 'Very High' or 'Exceptionally High' to capture the exceptional importance and sensitivity of these key asset groups which sets them above some of the other designations.</p> <p>Grade II Listed Buildings and Conservation Areas can be assessed at either 'moderate' or 'high'. This may be a valid approach but at present there is no rationale presented for assessment to either group and the validity of the conclusion in each case cannot therefore be assessed.</p>

3.16 Land quality, Section 14.

3.16.1 The council has no comment to make on this section at this time.

3.17 Landscape and visual, Section 15.

3.17.1 The council has no comment to make on this section at this time.

3.18 Major accidents and disasters, Section 16.

3.18.1 The council has no comment to make on this section at this time.

3.19 Socio-economics, Section 17.

3.19.1 The council has no comment to make on this section at this time.

3.20 Sound, noise and vibration, Section 18.

3.20.1 The council has no comment to make on this section at this time.

3.21 Traffic and transport, Section 19.

3.21.1 The council has no comment to make on this section at this time.

3.22 Waste and material resources, Section 20.

3.22.1 The council has no comment to make on this section at this time.

3.23 Water Resources & Flood Risk, Section 21.

3.23.1 The council has no comment to make on this section at this time.

3.24 Structure of the Environmental Statement, Section 22.

3.24.1 The council has no comment to make on this section at this time.

4 ALTERNATIVES REPORT

4.1.1 This section of the report contains our comments for the Alternatives Report: WDES.

4.1.2 At this time the council has no comment to make.

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5 DRAFT CODE OF CONSTRUCTION PRACTICE

5.1.1 This section of the report contains our comments for the Draft Code of Construction Practice: WDES.

5.2 General comments

Document: Draft Code of Construction Practice	
Volume, page and paragraph reference	Full ES comment
General	<p>The draft Code of Construction Practice (CoCP) identifies the measures and standards of work to be applied by all contractors throughout the construction phase. This document identifies the intentions of the CoCP but not the detail of how these will be achieved. This information is anticipated to be provided by procedures, processes and toolbox talks determined by the contractors in compliance with the CoCP.</p> <p>Contractors will also be required to sign up to the Considerate Constructors Scheme and meet the requirements of the nominated undertakers/lead contractors EMS. This is to be welcomed.</p> <p>The CoCP will be supported by the nominated undertakes/lead contractor EMS, which should include details procedures etc to control the significant environmental aspects identified.</p> <p>The CoCP identifies the need for measures to prevent the spread of invasive non-native species (INNS) throughout the entire route. Details of the procedures/processes involved should form part of the nominated undertaker/lead contractors EMS and be highlighted in the LEMPs. There are locations along the route where INNS are found. The lead contractor should consult local authorities at all levels to identify records of INNS locations.</p> <p>There is comprehensive guidance on the requirements for pollution prevention, control and emergency preparedness measures detailing staff competence, the drafting of plans, reporting and investigation. Details of how this is to be achieved should form part of the nominated undertaker/lead contractors EMS.</p> <p>DCC as the Highway Authority would like to document its disappointed at the level of detail and the alarming number of sweeping statements contained within the Draft Code of Construction Practice. HS2 will need to provide far greater detail and utilise informed accurate information to enable the Highway Authority to assess and comment upon the proposals</p>

5.3 Purpose of the Code of Construction Practice, Section 2.

5.3.1 At this time the council has no comment to make.

5.4 Policy and environmental management principles, Section 3.

5.4.1 At this time the council has no comment to make.

5.5 Implementation, Section 4.

5.5.1 At this time the council has no comment to make.

5.6 General requirements, Section 5.

5.6.1 At this time the council has no comment to make.

5.7 Agriculture, forestry and soils, Section 6.

5.7.1 At this time the council has no comment to make.

5.8 Air quality, Section 7.

5.8.1 At this time the council has no comment to make.

5.9 Cultural heritage/historic environment, Section 8.

5.9.1 At this time the council has no comment to make.

5.10 Ecology, Section 9.

Document: Draft Code of Construction Practice	
Volume, page and paragraph reference	Full ES comment
General	Ecology is a very light touch and superficial document covering ecology in just over three pages. As such, whilst many of the measures mentioned in this section can be supported, it will need to be significantly expanded, if it is to be meaningful for nominated undertakes and contractors, and if it is to lead to effective ecological protection.

5.11 Ground settlement, Section 10.

5.11.1 At this time the council has no comment to make.

5.12 Land quality, Section 11.

5.12.1 At this time the council has no comment to make.

5.13 Landscape and visual, Section 12.

Document: Draft Code of Construction Practice	
Volume, page and paragraph reference	Full ES comment
General	This is very general statement and would be applicable to any major construction site. There are no reassurances within the text that vegetation loss will be kept to an absolute minimum. There is also no assurance that the nominated undertaker would be required to design their construction activities in such a way that maximises the retention of existing vegetation (minimises the loss) particularly where that vegetation might play an important role in mitigating any identified adverse effects. Ideally all vegetation that is expected to be retained should be included on a plan supplied to the nominated undertaker and the CoCP should perhaps state that this would be done.

12.1.1	The 4th bullet point needs to go further and state that new planting will accord with relevant guidance where available. The Landscape Character of Derbyshire document provides detailed tree planting guidance that is consistent with similar guidance in DWT's Habitat Creation Guide and DCC would expect any planting within Derbyshire to accord with that guidance.
12.2.6	<i>"Trees intended to be retained which may be accidentally felled or die as a consequence of construction works will be replaced. Where reasonably practicable, the size and species of replacement trees will be selected to achieve a close resemblance to the original trees"</i> . What happens if this option is not 'reasonably practicable'? Perhaps the CoCP needs to also outline what might happen in these circumstances such as replacement on a 3:1 ratio for example (3 new trees for each tree accidentally damaged).
12.4	Monitoring, the onus is placed on the nominated undertaker and their contractors to monitor all landscape works undertaken as part of the scheme. This feels very much like self-regulation so who will be independently scrutinising the progress of new planting and seeding to ensure that it does indeed fulfil the intent of the landscape mitigation proposals?

5.14 Noise and vibration, Section 13.

5.14.1 At this time the council has no comment to make.

5.15 Traffic and transport, Section 14.

5.15.1 At this time the council has no comment to make.

5.16 Waste and materials, Section 15.

5.16.1 At this time the council has no comment to make.

5.17 Water resources and flood risk, Section 16.

5.17.1 At this time the council has no comment to make.

**Consultation Response to HS2
EQIA SCOPE AND METHODOLOGY REPORT
WORKING DRAFT EQUALITY IMPACT ASSESSMENT**

Version Number	Last updated	
1.0	20/11/18	

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1 EQIA SCOPE AND METHODOLOGY REPORT

1.1.1 The council has no comment to make on this report at this time.

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2 WORKING DRAFT EQUALITY IMPACT ASSESSMENT

2.1 Council Comments

2.1.1 The council's comments are addressed in the order they appear in the document and sub divided by topic to aid the reader's understanding. Where the council has not provided comment, this should not be taken as agreement or consent for the text. The order of comments are:

- a) Introduction
- b) Scope and methodology
- c) Stakeholder engagement and public consultation.
- d) Baseline
- e) Route-wide assessment
- f) Development Area 2 assessment: Birmingham to Bolsover
- g) Development Area 3 assessment: Bolsover to Leeds
- h) Next steps

Document: EQIA: Working Draft Equality Impact Assessment Report	
Volume, page and paragraph reference	Full EQIA comment
General	<p>The purpose of the EQIA is to identify 'protected characteristic groups' within communities along the route and how the proposal impacts upon them. The EQIA will assess whether significant effects identified in the ES (e.g. community; health; socio-economic; traffic and transport; air quality; sound, noise and vibration; or landscape and visual) would have disproportionate impacts on protected characteristic groups (PCGs). The identification of community areas as indicated in the draft ES may hamper this as there appears to be little regard for actual communities with social or economic connection.</p> <p>The EQIA identifies a number of assessments that will be made and discusses how these will be interpreted, including the environmental, social and economic impacts on affected groups. While the intention is good, these groups have not been identified and the assessments have yet to be completed, there is therefore, no data to be evaluated at this stage. What effect it will have on the progress and nature of the construction programme will depend on the rigor of its implementation.</p> <p>The route has been divided into a number of 'community areas' which unfortunately do not coincide with local authority boundaries. Statistics relating to the number of properties/businesses, populations and protected characteristic groups affected are therefore difficult to interpret on a local level. This applies to all matters, not just the EQIA.</p>

a) Introduction, Section 1.

Document: EQIA: Working Draft Equality Impact Assessment Report	
Volume, page and paragraph reference	Full EQIA comment
Page 10 1.3.2	The council does not agree with HS2's assessment and believes that this is not explicit enough. It should highlight that you are seeking to identify and understand the likely impact upon people, their lives and well-being/ livelihood, who may have one of more of the nine protected characteristics. And then to see whether the scheme will adversely affect specific people/ groups or communities, so that measures can be considered to avoid or reduce these impacts.

b) Scope and methodology, Section 2.

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 12 2.2.3.	The council does not agree with HS2's assessment of the spatial scope of the Equality Impact Analysis. Whilst the Development areas work as the spatial or administrative areas they effectively split administrative district and counties across different areas. From the DCC perspective, it is important to assess the impact across the area of Derbyshire, and specifically to consider the areas within Bolsover district as one for equality purposes. This makes it easier to consider data and to bring together feedback from the public which highlights how they view the scheme as impacting on them, their families and lives.
Page 13 2.3.1.	The bolded text in this paragraph needs to list the formal guidance in relation to the Equality Act 2010 and specifically the public sector equality duty, which can be found on the website of the Equality and Human Rights Commission, or the Government Equalities website.
Page 13. 2.3.3. and 2.3.4.	DCC are concerned that the use of maps and data which clusters only some of the protected groups could give the impression that there is no need to consider the impact where LSOAs are not shaded/ have lower number or proportions. When this is applied the extent to which the position of people in Derbyshire, (which is more rural and may have few people from some groups), is made to look unimportant. This does a dis-service to anyone from a protected group living in the county and potentially affected by HS2.

c) Stakeholder engagement and public consultation, Section 3.

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 15 3.3.	The council does not agree with HS2's assessment. There is insufficient explanation of the methodology used to engage with communities and the steps taken to ensure people from protected characteristic groups could participate equally, including the robustness of the methods of engagement which were used.

d) Baseline, Section 4.

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 17 4. Whole section	<p>The data referred to provide only a numerical or distributive picture of protected characteristic groups, albeit with some omitted. This is not an adequate approach towards describing potential or actual impact and deciding whether this might amount to a lack of equality, discrimination, poorer community relations or even adverse impact. Additional information which looks at the lives and position of people, which understand how the development will impact on their lives, futures, opportunities, long term well-being, and financial and housing situation is also necessary. There is nothing which identifies what it could be like for a particular group of people.</p> <p>Data sources – There is no detail on HS2 sources in relation to sex/ gender, gender re-assignment, marriage or civil partnership, pregnancy and maternity, and sexual orientation. There appears to be no reasons why HS2 chose to ignore these protected characteristics within the analysis. Whilst it may be more difficult to gain information in relation to some of these groups, plainly the census and other sources contain significant information in relation sex/ gender, and in other areas of public life a number of EIAs have highlighted the impact on women, families and children/ carers etc.</p> <p>The data referred to provide only a numerical or distributive picture of protected characteristic groups, albeit with some omitted. This is not an adequate approach towards describing potential or actual impact and deciding whether this might amount to a lack of equality, discrimination, poorer community relations or even adverse impact. Additional information which looks at the lives and position of people, which understand how the development will impact on their lives, futures, opportunities, long term well-being, and financial and housing situation is also necessary. There is nothing which identifies what it could be like for a particular group of people.</p>

Page 17/18 4.2.3.	Identifying disabled people is difficult because the meaning within the Census and those who could be covered by the Equality Act 2010 are dependent upon people self-identifying in a consistent way, and understanding the difference. That said, reliance on a count of people in receipt of DLA is unlikely to provide an accurate figure or to capture all ages of people who are entitled to protection under the Act. HS2 ought to consider using the Social Model of Disability when seeking to estimate the numbers and distribution of disabled people. Throughout the document discussion of access seems to focus solely on physical access, whilst a key barrier is not necessarily the only or main barrier for many disabled people.
Page 18 4.2.5.	When considering the needs and potential impact on people from different BME communities is hampered by limiting categories to Mixed, Asian, and Black etc. The areas in Derbyshire affected by HS2 have relatively lower proportions of the population from BME communities, in adjacent areas. It could be important to know and use more detailed data, and to explore what this could mean in relation to needs, culture and the way in which the line will impact on households, and result in different economic impacts. No assessment is made in areas such as Derbyshire of people from the EU, especially Eastern Europe, often the largest ethnic minority groups in areas such as Bolsover district.
Page 19 4.2.15	It is not clear why HS2 have not considered people aged 25 to 64 as an age group. Whilst it is not uncommon to focus on younger and older groups of people, not reviewing the position for the age groups between 25 and 64 years could mean that important impacts are not captured.

Development Area 2 assessment: Birmingham to Bolsover

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 23 4.5.2	<p>Whilst DCC welcome the fact that it is acknowledged that areas such as Newton are amongst some of the most deprived areas along this part of the proposed route, there is little information which shows an understanding of how the development will impact on this and other communities in Bolsover District which experience higher levels of deprivation.</p> <p>It is not clear how HS2 will ensure that opportunities arising out of development will be available first to people from these communities, nor is it clear whether HS2 appreciates the impact that deprivation has on the capacity and resilience of people locally to cope with and adapt to the development. Adverse impacts are likely to be magnified for some groups of people in these communities. It is disappointing that no attempt is made by HS2 to overlay protected characteristics data and data in relation to levels of social and economic deprivation. No account is made of how coming from such communities tends to exercise limitations on the capacity of people to engage and have their views recorded properly.</p>

Development Area 3 assessment: Bolsover to Leeds

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 25. 4.6.2	DCC welcome reference to levels of deprivation in the area Stonebroom to Clay Cross but believe insufficient attention is paid to this issue and the overlap of protected characteristics in this area of North-East Derbyshire. It is not clear whether any work will be carried out by HS2 to try and target opportunities at these communities, and whether there has been any assessment of the impact on these communities, especially those living in deprivation and from a protected characteristic group.
Page 26. 4.6.7	DCC welcome reference to the distribution of disabled people in relation to the Tibshelf area but no assessment is made of the impact of the development on disabled people in these specific geographical communities.

e) Route-Wide Assessment, Section 5.

Document: EQIA: ROUTE WIDE ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 28. 5.2.2	The EIA needs to explain in more detail how the Draft Code of Construction Practice will work in relation to the disruption that people will experience. It needs to outline the measures that will seek to minimise any adverse impact on the lives of those in the line of and adjacent to the routes, to those affected during construction, and to those left with the inheritance of communities being affected.
Page 29 5.2.8	Whilst DCC welcome that the Government has offered to go above the minimum legal requirements, it would be useful to describe in more detail exactly what support and financial help is available, how people will be able to access this, and how disputes over this will be resolved.
Page 32 5.2.20	This section should be further expanded to illustrate the level and nature of help and support.
Page 32 5.2.21	DCC welcome the provision of apprenticeship opportunities and the Council would welcome working with HS2 to ensure that people from Derbyshire can access these opportunities. Contractors should be encouraged to recruit apprentices from groups and communities which are under-represented within the construction industry, including women, people from local BME communities, and where practical people with disabilities.

Page 32 5.2.23	HS2 must ensure that all contractors use signage which is easy to read and makes clear which direction pedestrians should go. Where signage will be present for lengthy periods of time, signage which can aid disabled people and other adjustments should be made to ensure travel is easy and smooth.
Page 33 5.2.30	DCC request that regular communication over road closures or diversions are notified to the local media as well as the Council and the emergency services. Where a specific road closure will impact on a geographical community DCC ask that plenty of notice is provided and that every household and business, and schools are notified, with an explanation of diversions which are available. This should include a contact number for questions about specific access needs. During winter, spring and autumn, all closures should be clearly visible in the dark to avoid accidents, falls and injuries to the public.
Page 34 5.2.32	DCC request that specific consultation is carried out with individual geographical communities over what reasonable adjustments will be required in that location, taking account, wherever practicable, of people with disabilities, older and younger people, and families with young children.
Page 34 5.2.35	Specific steps should be included to help protect vulnerable groups of people from traffic generated during construction, including by ensuring contractors raise awareness with drivers about local schools, pedestrian crossings, and recreational facilities where children may be playing.
Page 34 5.2.36	DCC request that contractors are specifically asked to brief workers to be good neighbors and to respect those who live in the towns and villages impacted upon. DCC encourage the use of local shops and other facilities so that some income is placed back into the hands of local people, and helps compensate for any adverse impact of road closures etc.
Page 34/5 5.2.37	DCC remind HS2 that some protected characteristic groups can be more adversely affected by noise, such as people with autism, older people, and people who may be ill or disabled. Noise levels should also be managed to minimise the impact upon residential properties, schools and other local facilities, especially early in the morning and during the evenings or overnight, as this can impact on the people listed above, as well as the general population.
Page 35 5.2.39	DCC ask that HS2 ensure that such steps are taken well in advance of work commencing, and that all efforts are made to support households where alternative accommodation will be required over the move, including help where children would then have to travel further to school.
Page 35 5.2.40	The provisions for the management of the impact on air quality need to be outlined in this EIA, with specific reference to people with respiratory illnesses, older and younger people, and people with disabilities.

Page 39 5.3.19	Loss of places of worship – Kingdom Hall, LA05. DCC hope that support is provided to the local organisation, should they wish to relocate their hall locally.
Page 39/40 5.3.21	The impact of raised areas of line adjacent to urban built up areas such as Long Eaton will have a major impact on the town, the environment, and local people. HS2 needs to take all possible steps to minimise the impact, especially on those nearest to the line, upon the townscape, and to reduce noise and disruption. During construction, the impact on Long Eaton is likely to be very substantial and we would request a specific plan be developed for dealing with the issues that will arise.
Page 40 5.3.25	Although Greenwood Community Centre is located outside of Derbyshire, it is near to Long Eaton and could be used by people from the town. DCC request that specific consultation is carried out with the organisation to identify the impact upon the local community, and where possible, HS2 provide assistance to relocate services to other local community centres, supporting those providing the services.
Page 40/1 5.3.28	The Council is concerned that the development will lead to the relocation of Police and Ambulance emergency service depots. What are the impacts anticipated by HS2? The Council is concerned that relocation could delay response times especially by the ambulance service, thus further endangering the health of people in the area.
Page 43/4 5.3.39/40	The Council is concerned over the loss of Hilcote Royal Oak Meadows and Woodlands, and Nor Woods and Killarmarsh Ponds. These provide an asset and recreational facility for the local communities, support healthy lifestyles, and aid education. The EIA needs to provide more specific information about what will be lost at each site listed in 5.3.39, and the impact on the local communities, including young and older people, families, people in poor health and people with a history of mental ill-health.
Page 46 5.3.52	The assessment of which groups benefit from exercise and recreation is too limited and can extend across all protected characteristics, including specific BME communities with higher incidence of heart disease or conditions such as diabetes.
Page 47 5.3.56	Please refer to earlier feedback on restriction to access. All new pedestrian access routes should take account of access needs and the safety of vulnerable groups of people.

Page 47 5.3.57	The Council is particularly concerned over the likelihood of villages such as Newton becoming more cut off as roads are closed or diversions are put in place. This will have a detrimental impact on the well-being of local people, restrict access to services and facilities which help avoid isolation, and will impact adversely on businesses, potentially threatening their futures. During construction, where a settlement will become more isolated, HS2 should put in place additional means to help people from those settlements to continue to access facilities, support, leisure and other resources that can help people stay well and resilient.
Page 48 5.3.60.	Please refer to earlier comments in relation to air quality and the impact on vulnerable groups of people.

f) Development Area 2 assessment: Birmingham to Bolsover, Section 7.

Document: EQIA: DEVELOPMENT AREA ASSESSMENT – BIRMINGHAM TO BOLSOVER	
Volume, page and paragraph reference	Full EQIA comment
Page 64/5 7.10 – 7.10.7	The Council is concerned over the impact of the demolition of the Nook given its important role in providing housing to some vulnerable groups of people, and in aiding the release of family housing within Long Eaton and Erewash, reducing the supply of rented/ affordable housing. Given that Bonsall Court will also be lost, this means a significant detrimental impact on the tenants and the housing association's ability to help people in the town with affordable and suitable housing. DCC are aware that tenants are likely to be entitled to rehousing and assistance with moving costs from their landlord, but the lack of other housing could force people to move away from where they have family, support or need specific access to services.
Page 65/6 7.11 -7.11.5	DCC repeat concern over the loss of this valuable supply of social and affordable housing for mature people in Long Eaton, and Erewash.
Page 66/7 7.13 – 7.13.4	Please refer to earlier comments on the loss of this community centre and its possible adverse impacts for Long Eaton residents.
Page 68 7.15	The impact of temporary closure and reduction in site is likely to have a significant adverse impact on the Moo-Haven centre, those who use it and the animals that are helped. DCC encourage continued consultation with the owners as detailed within paragraph 7.15.4.

g) Development Area 3 assessment: Bolsover to Leeds, Section 8.

Document: EQIA: DEVELOPMENT AREA 3 ASSESSMENT: BOLSOVER TO LEEDS	
Volume, page and paragraph reference	Full EQIA comment
Page 69 8.2	DCC are disappointed by the lack of information provided in the draft EIA in relation to the likely adverse impacts arising out of the demolition of this depot, on local communities of Bolsover, Holmewood, Heath and surrounding villages. Some of these are areas of higher levels of deprivation, higher levels of ill-health and any reduction in service or lengthier wait for services, especially ambulance services, could increase the likelihood of death or injury to the local population.

h) Next steps, Section 9.

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Page 75. 9	DCC believe that HS2 should provide more information to describe the stakeholder engagement that is to be carried out. This should explain the methods being used, when this will take place, with whom and where. DCC believe that specific engagement needs to be carried out in locations along the route, offering a chance for inclusive engagement.

i) Appendices

Document: EQIA: WORKING DRAFT EQUALITY IMPACT ASSESSMENT	
Volume, page and paragraph reference	Full EQIA comment
Appendix A.	<p>General – whilst DCC understand why regional data has been used, DCC would have suggested using data from the LSOAs affected, as these could be significantly different to the regional average, and would better inform the EIA. DCC also believe that actual numbers as well as % figures would be useful. When it comes to disability DCC understand that the measures within the census do not equate easily to the definition of disability under the Equality Act 2010, so an estimate may also have been useful. It would also be useful to further break down into the types of disability, as this could have an importance when assessing likely impact for the many different disabilities which exist. For example, noise could prove problematic for people with autism people with mental ill health, but a lack of clear signage and poor repair could prove to be problematic for people with a visual impairment or mobility difficulties.</p> <p>No data is presented in relation to gender which is of concern and DCC would have expected some kind of estimation of the other measurable protected characteristics.</p>
Appendix B	<p>Whilst helpful, the EIA does not give any examples of why the sub-groups could be important when considering likely impact, culturally or otherwise.</p>
Appendix C	<p>Again the lack of explanation or supporting text means the relevance of groups who could experience multiple discrimination/ inequality is not made clear, from an impact assessment perspective.</p>
Appendix D.	<p>These narratives may be helpful in seeking to understand the relative position and impact, but the actual text draws sometimes on stereotypes or generalisations. Whereas reporting on actual feedback from communities would serve better in describing “what it might mean” for people in relation to issues such as housing, community and open space, employment and business, transport and accessibility, noise and air quality, crime and safety, and social capital. Using a mixture of actual local data and the findings of consultation would provide a more accurate assessment of possible impact.</p>