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

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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 Community Area Reports 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 which have been raised by DCC on numerous occasions. These include the design options for the viaduct through Long Eaton and the Trent Valley, the lack of surface access to Toton Hub Station from Long Eaton and the wider impacts of the project on the community and businesses in the immediate area. DCC do however welcome the proposals for the developments of Toton Station provided that they take account of access arrangements and rail connectivity.

1.1.5 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 promotors to support the recommendations. See Appendix C for a copy of this report.

1.2 Overview and description, Section 2

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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 DCC 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 a 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.
2.3.56	Long Eaton Satellite No.1 A satisfactory access cannot be achieved to serve the site as drawn on the plan. 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. 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. 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. 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. 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.
2.3.56 (cont)	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.

2.3.63	Long Eaton Satellite No.2 A satisfactory access cannot be achieved to serve the site as drawn on the plan. The site is accessed by an adopted highway (Trent Lane). The carriageway is approximately 3m wide with few opportunities to pass oncoming vehicles. The proposed compound fronts directly onto Trent Lane and access may be achieved into the site. 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 3m wide and no footways are provided. There are verges on both sides to enable pedestrians to step out of the carriageway. 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. 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.
2.3.71	Meadow Lane, Long Eaton The nature of Meadow Lane is part light industrial and part residential. The site compound would increase vehicle and pedestrian movements on Meadow Lane. 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.

2.3.73-2.3.78	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 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.
2.3.77	If the low level line was removed, DCC support the use of the vacant Forbes Park industrial site which could then be used as the Long Eaton main construction depot with access directly from Fields Farm Road. This would avoid construction traffic using Main Street and New Tythe Street, and would avoid the need to demolish 21,000sqm of occupied industrial floorspace and the consequent displacement of 450 jobs. This one change would halve the negative impact of demolitions on the local economy.
2.3.83	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.
2.4.7 and 2.4.8	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. 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. 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.

2.5.5-2.5.10	With the exception of a single 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.

1.3 Stakeholder engagement and consultation, Section 3

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Paragraph reference	**Full ES comment**
3.3.2	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.
3.4.6	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.

1.4 Agriculture, forestry and soils, Section 4

1.4.1 At this time the council has no specific comments to make on this community area. Please see Volume 2 General Responses for more details.

1.5 Air Quality, Section 5

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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 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. DCC request that further work is undertaken as part of the formal ES.
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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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. 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. 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.
6.4 Permanent effects	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. 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. 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. The design of the viaduct through Long Eaton also requires particular care to reduce its harmful effect on perceived severance, the townscape and thus on views. The Long Eaton Viaduct will need to be of its own bespoke design. For the viaduct to integrate with the townscape, its design should avoid a monolithic horizontal linearity, and instead comprise a combination of visually rich components with a significant emphasis on verticality, e.g. like a streetscene.

6.4 Permanent effects (cont)	The design of the viaduct is so essential to the continued wellbeing of Long Eaton, and to the legacy of HS2, that an international design competition is justified to ensure that the highest quality design is achieved. 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. Sandiacre and Stapleford lie adjacent to each other, with Sandiacre within Derbyshire, but Stapleford within Nottinghamshire. 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.
6.4.2	DCC request an additional mitigation point needs to be added. • 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.
6.4.32	A significant form of mitigation should be the economic uplift from close proximity to the East Midlands Hub Station at Toton and consequent investment in new jobs and homes to improve the wellbeing of the town. However, the current proposals only include road access to the station from the north, a 5km diversion to a destination that is only 1km away as the crow flies. DCC and Erewash Borough Council have continued to request the provision of direct road access from Long Eaton since the original proposals for HS2 in 2014. This request further developed in the 2015 Toton Area Plan as a recommendation to extend Midland Street to a western access to the Hub Station. The current proposals of the WDES include a secondary western access and a footpath / cycleway extension of Midland Street to provide a link to Long Eaton. However, this is insufficient to provide the benefits the town needs to mitigate the permanent harm it will suffer from HS2, not least because the distances involved make walking unattractive, and the resultant unobserved route does not meet basic anti-crime design standards.

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.
6.5.3	In order to enable the town to benefit from its geographical proximity to the station at Toton, improved connectivity is required. Parts of the town centre could then be redeveloped at scale to provide new commercial and town centre living opportunities. However, an investment plan is required to raise the quality of the town. In particular, Long Eaton High Street needs to be raised up to the standards provided by s106 investment in Union Street, and Heritage Lottery Fund investment in Market Place, to make Long Eaton HS2 ready.
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.

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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 off 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. •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 harm to the recreational value of the area caused by the intrusion of the Trent Valley Viaduct should be mitigated by implementing elements of this vision, especially in combination with other mitigation measures such as providing additional flood storage capacity as mitigation for displacement of flood water, and in the restoration of land taken temporarily for construction.

General (cont)	•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

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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 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 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. See appendix A.
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.
8.4.23	Demolition of The Kingdom Hall of Jehovah's Witnesses on New Tythe Street will be a major adverse effect which would be significant.
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.
8.4.32	Loss of a section of the Norfolk Road Recreation Ground for approximately five years and nine months this will be a minor adverse effect.
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.

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Paragraph reference	**Full ES comment**
9.2.4	DCC suggest 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 fixed, 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.
9.3.4	The following designated heritage asset, within the 2km study area, is currently not included and so a full assessment towards any impacts on its setting will be required: • Sandiacre Canalside (Conservation Area) 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 around it, will be required.

1.10 Land quality, Section 10.

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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 (MCA) 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. Plans therefore need to be provided.
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. Plans therefore need to be provided.
10.4.16	With regard to potential impacts associated with mine water and mine gas and potential mitigation measures, DCC 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. Plans therefore need to be provided.

10.4.28	This paragraph is confusing as it initially states that there are no MCAs in either Leicestershire, Nottinghamshire or Derbyshire but then 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, DCC 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 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 sterlisation 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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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 "Construction works would therefore adversely affect a substantial part of the LCA" 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. DCC support the use of the space under the Long Eaton Viaduct for a modern commercial space in the form of 21st Century railway arches, as proposed by the SNC Lavalin report, see Appendix B. This type of use would avoid anti-social behaviour in this otherwise poorly observed space, re-building the fabric of New Tythe and Bonsall Streets and providing new opportunities for economic growth. Consequently the proposal would help to mitigate against the identified harm from HS2 to local townscape, community, economy and wellbeing.
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 significant at Year 15 "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". 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.

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.

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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.

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Paragraph reference	**Full ES comment**
14.1.2	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. DCC 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.
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.
14.2.6	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). 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.
14.3.1	The Highway Authority do not feel as though we were provided with an 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.
14.4.4	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.
14.4.6	How will HS2 enforce or incentivise the use of construction workers using more sustainable travel options.

14.4.12	It is noted that the WDES identifies Midland Street as a suitable access for construction traffic for the Hub Station, which would require construction of a haul road. The additional cost of making this haul road into a permanent street in order to improve access to the station would not appear to be prohibitive. An active street would provide observed and therefore safer cycling and pedestrian access than the link currently proposed by HS2, whilst also supporting taxis, busses and general traffic. The resultant road would need to be able to access all available parking provision at the Hub Station itself, in order to avoid fly-parking in Long Eaton.
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 – 14.4.16	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. 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	It is noted that potential effects upon accidents 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).
14.4.18	It is noted that potential effects parking and loading 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	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). 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.

14.4.20	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 change mode to less sustainable forms of transport during the construction phase.
14.4.24	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).
14.4.26	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.
14.4.27	The walkway and cycle route along the Trent Valley is a key access spine that enables and enhances the wide range of recreational activity here. Further to the east, in Nottingham and Nottinghamshire, this route has been developed into the Big Track, a multi-user recreational route. There is an opportunity to mitigate the harm that will be caused to these uses from temporary footpath closures and the long term perceptual severance of the viaduct by extending the Big Track along the Trent Valley under the Trent Valley Viaduct.
14.4.28	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. 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).
14.4.30	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.
14.5.9	As identified in the 2015 Toton Area Plan, although road access from Long Eaton is essential it will also change traffic patterns in and around the town. Modelling of these effects is awaiting the outcomes of traffic modelling for HS2, but it is clear that the double roundabout at Long Eaton Green will be affected. An urban design led intervention is required that better integrates pedestrian and traffic flows to avoid gridlocking within the junction, freeing space on the south side of Long Eaton Green for new tree planting to create a stronger sense of place and arrival in Long Eaton town. Enhancement to the character of Long Eaton Green is not an optional extra. Although improved functionality of the junction is a requirement to mitigate traffic impacts, for the town to access the economic benefits of co-location with the East Midlands Hub Station it must also develop its local character to provide a unique and attractive investment proposition.
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. . A new street to the Hub Station will allow access by private car and taxi users but this street terminating at the station will not on its own be amenable to bus services. As previously identified in the 2015 Toton Area Plan, buses require a through route in order to offer viable service patterns, e.g; Derby to Nottingham via the Hub Station taking in Borrowash, Draycott, Breaston and Long Eaton; Derby to Nottingham via Risley and Sandiacre and Long Eaton; or East Midlands Airport to Ilkeston via the Hub Station taking in Sawley, Long Eaton and Sandiacre. The through route would need to connect the A6005 with the B5010, as these are the principal bus routes. Precisely how a through route is achieved depends on the design of the Hub Station, which lies outside Derbyshire. However, either connecting Midland Street in Long Eaton to Bessell Lane in Stapleford via an east-west link across the HS2 line, or an extension of Midland Street in Long Eaton alongside the HS2 line to Station Road in Sandiacre, would both be effective. Prior to detailed traffic modelling it cannot yet be concluded whether or not this through link should be open to all traffic, or limited to buses, cycles and pedestrians only.
14.5.16	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. 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 (cont)	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. 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. 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. 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. As identified in the 2015 Toton Area Plan, the main opportunity to provide additional walking and cycling links is to utilise the high quality National Cycle Route 67 along the Erewash Canal towpath. Though the WDES does propose a link to the western access to the proposed Hub Station at Toton via Royal Avenue, the only links to the towpath from the west remain the canal bridges at Derby Road and from Willoughby Avenue to Dockholm Lock. These neither connect to the adjacent St James Park district of Long Eaton, nor to the east west National Cycle Route 6 from Nottingham to Derby. The former can be achieved by building a new cycle bridge over the canal from Britannia Road, whilst the latter is achievable by replacing the cycle bridge at Broad Street with a level swing-bridge. These interventions would significantly extend the number of residents within effective walking and cycling distance of the Hub Station.

14.5.21	Use of the Low Level Line to provide new passenger rail services from the HS2 East Midlands Hub Station at Toton to Derby will result in an increase in physical severance from more frequent closures of the level crossings on Main Street and Station Street. This would cause additional economic harm to Long Eaton, both directly through traffic delay and indirectly through harm to the vitality and viability of Long Eaton Town Centre. DCC support the 2015 Toton Area Plan which recommends amending Trent Junctions to enable classic rail services to run to the HS2 Hub Station through Long Eaton on the High Level Line, thus avoiding the severance effects of using the Low Level Line. DCC support the option to build a new rail link between the High Level Line and the Midland Mainline to Derby, allowing the Low Level Line to be closed and redeveloped as an extension to adjacent industrial and commercial estates. Refer to the study in Appendix C. Closure of the Low Level Line also enables the creation of new east-west crossings by extending Peel Street to Bonsall Street and Huss's Lane to New Tythe Street. The improved connectivity from these new streets would directly address the perceived severance effect of the new viaduct.
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.

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Paragraph reference	**Full ES comment**
15.4.16	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. 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. 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.
15.4.5	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.