

Consultation Introduction and Response to Volume 1 Introduction and Methodology

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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 and actively preparing to maximise 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. It is the firm view of the Council that 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 would strongly advocate that consideration of representations received as part of the WDES and Working Draft Equality Impact Assessment (WDEQIA) process are used to inform more detailed and meaningful engagement with businesses, residents, local authorities and other stakeholders going forward – and certainly in advance of the formal Environmental Statement (ES) being issued. The Council asks that the Government and HS2 Ltd take full account of all the representations they receive.
- 1.1.3 This response forms part of a suite of documents that has been prepared following publication of the HS2 Phase 2b Consultation, 2018. It 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. It should also be read in conjunction with those representations submitted by the East Midlands HS2 Mitigation Board and those of associated local authorities within Nottinghamshire, Derbyshire and Leicestershire. The full Health Impact Assessment is included again in Appendix A of this response.

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, substantial changes have been made to the route through Derbyshire.
- 1.2.2 On 7 July 2016, HS2 Ltd published revised proposals for the line 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 included 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 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 two consultations on the draft Environmental Impact Assessment (EIA) and the draft EQIA. These have now been followed by publication of the WDES and draft EQIA on 11th October 2018, confirming inclusion of the electrification of Midland Mainline as part of the HS2 work programme.
- 1.2.6 Having regard to the published East Midlands HS2 Growth Strategy, Derbyshire County Council welcomes the potential economic growth and prosperity that HS2 will bring to the region. In particular, the proposed new hub station at Toton, the Infrastructure Maintenance Depot at Staveley with its potential opportunities for the construction and rail supply industries, and the proposal to serve Chesterfield with high speed rail services that will provide a much needed economic boost to Derbyshire.
- 1.2.7 The scheme, however, will have a significant impact on large areas of Derbyshire and the County Council is keen to ensure the adverse impacts of the proposed line are effectively mitigated, especially where the route passes close to, or through, residential and other sensitive areas.
- 1.2.8 It is important to note that the county is also bounded by the proposed HS2 West line and this brings similar economic opportunities via the planned stations at Crewe, Manchester Airport and Manchester. As the highways and transport authority for the region though, Derbyshire County Council would advise there is a need to improve East-West connectivity (for example, the A50, A6 and A52) to link Derbyshire communities to the new western stations; without more meaningful engagement with HS2 Ltd over the coming months, the growth potential associated with HS2 West will not be fully realised.
- 1.2.9 The remainder of this response, focuses predominantly on the likely impacts of HS2 East which runs directly through Derbyshire.

2 GENERAL OBSERVATIONS ON THE DOCUMENTS THAT FORM THE WDES

2.1 Introduction.

2.1.1 In providing its detailed response to Volumes 1, 2, 3 and 4 of the WDES, the Council has set out its specific comments using the overall structure of the documents as its framework.

2.1.2 To aid the reader the Council has, where possible, followed the methodology and sequence 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
- This report contains DCC comments for the Community Area 11 of WDES Volume 2.

2.1.3 Where a comment by the Council refers to a specific issue or map, a corresponding reference is included in the left hand column. Also, there are a number of areas within the documents where the Council has not offered a comment or has reserved its position; the absence of a definitive comments should not be taken as tacit agreement or consent for the text or proposal.

2.1.4 Our specific comments are supplemented in Volume 1 with a strategic overview that sets out some of the Council's significant concerns on a number of issues. This overview is provided in sections 2.2 and 2.3 which follow. In section 4 of this response, the Council has also provided a number of comments on issues that are currently not contained within the WDES itself, namely:

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

2.2 Overview of Process

- 2.2.1 Derbyshire County Council welcomes the opportunity to provide a response to the WDES and WDEQIA. It represents a key milestone in the development of Phase 2b and for local stakeholders and communities to have input into the detailed development of the project. Over the coming months, the County Council is keen to actively engage with HS2 Ltd to ensure the potential benefits 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.
- 2.2.2 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 and long-awaited advantages for local businesses, for the two Derbyshire growth zones identified in the HS2 Growth Strategy and for the East Midlands generally.
- 2.2.3 Whilst acknowledging that the published consultation scheme is 'work in progress', the Council does have serious concerns regarding the very limited time that has been afforded to consider the full suite of HS2 proposals and the vast array of technical matters identified in the WDES. The proposed route clearly presents a number of significant and pressing challenges for Derbyshire businesses and communities and the Council is keen to ensure HS2 Ltd addresses its concerns; these are set out below and in associated documents. It is vital the scheme put forward in the Hybrid Bill meets the needs of local people, our growth aspirations and the Government's objectives.
- 2.2.4 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 need to undertake more 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.
- 2.2.5 Given the limited time available, the Council has undertaken as thorough an exercise as possible to examine the information contained in the WDES. There are serious concerns however, regarding the very limited evidence and lack of detail provided in relation to key technical areas, along with the systematic downplaying of the likely social, economic and environmental impacts and notable inaccuracies in the documents which inhibits a full 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.

- 2.2.6 As a result, the Council considers the consultation draft of the WDES is based on limited, inaccurate and poorly evidenced information and this significant lack of detail means it has been difficult to reach any meaningful conclusions. The Council has been unable, therefore, to provide a full or robust response on a number of matters and reserves its right to identify and present additional issues that may emerge when more detailed information is available.
- 2.2.7 Derbyshire County Council is keen to resolve as many matters as possible through the forward engagement and project development process over the coming months and years. However, depending on the level of resolution of such matters with HS2, the Council further reserves its position to pursue representation and satisfactory solutions through Parliamentary processes.

2.3 Strategic Comments

- 2.3.1 The Council is keen to ensure the adverse impacts of the scheme are effectively mitigated, especially where the route passes close to, or through, residential and other sensitive areas. To assist its understanding, and in liaison with other East Midlands local authorities, the Council commissioned an independent rail consultant, SNC-Lavalin, to examine the potential to reduce or remove adverse impacts of the line. The report, "East Midlands Consortium - HS2 Route Mitigation Study RTUKR-T40125-001" is provided as a technical annex and has helped inform the Council's response.
- 2.3.2 The findings identify several sites within Derbyshire where it is recommended mitigation should be developed further by HS2, 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 Council has provided more detailed responses to the proposals in these localities in Volume 2 of its submission. However, the above list does not cover the

entirety of the Council's concerns and there are a number of strategic issues and themes which link these (and other) sites along the route. These are set out below.

- 2.3.4 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. Given the ambitions of the East Midlands Growth Strategy and those of the County Council, there is a clear need for more detailed attention to be paid in this regard, particularly in acknowledging the significant wealth of world class heritage, cultural and environmental assets in the County which could be adversely affected by the proposals.
- 2.3.5 The County Council and economic stakeholders in the Derbyshire Economic Partnership (DEP) are supportive of the case for HS2 set out briefly in the WDES. The proposed major rail investment is fundamental to the Government's long term objective to "rebalance the economy" and this is welcomed; however, it should be noted that further investment is required to ensure Derbyshire receives the 'enhanced connectivity' outlined as a key objective of HS2 as this is critical to unlocking latent growth potential.
- 2.3.6 In addition to the environmental assessment, a comprehensive economic impact assessment is required as soon as possible to provide the evidence, mitigation and opportunities that will ensure Derbyshire remains 'open to business' and 'open for business' – particularly during the construction phase. Although headline figures are provided for job creation and re-location in the Non-Technical Summary, no real evidence is provided and there is little apparent consideration of key economic factors such as the effect of HS2 on the price and availability of employment/ industrial land and potential inward investment trends, as well as impact on key economic sectors.
- 2.3.7 A proactive approach to economic mitigation should include a comprehensive package of financial and business support and the remedial transport plans required to mitigate disruption. An appropriate skills package should also be included to support the very welcome, proposed IMD at Staveley in Chesterfield and ensure it fulfills its potential in transforming job outcomes for local residents.
- 2.3.8 Derbyshire has a fast growing visitor economy that yields in excess of £2.15bn GVA per annum and supports in excess of 29,000 jobs; this sector is critical to the success of the North Derbyshire Growth Zone (and Southern Growth Zone around the National Forest). In this regard, mitigating the visual and economic impacts of the proposed line on the amenity and attractiveness of key heritage assets such as Hardwick Hall and Bolsover Castle are a key area of concern for the Council and partners such as English Heritage, National Trust and Bolsover District Council. More detailed and collective discussion around the potential solutions in this locality is requested.
- 2.3.9 In addition, as the original birthplace of the industrial revolution, Derbyshire is globally recognised for its strength in advanced engineering and manufacturing and

home to world class companies such as Rolls Royce, Toyota, Bombardier and Buxton Water and the long-established supply chains that form the backbone of the Derbyshire economy. Storage, logistics and distribution also form a key economic sector, located along the major spine routes through the county, most notably the M1 corridor. These industries are likely to be badly affected by delays, congestion and disruption to the strategic highway.

- 2.3.10 The concerns raised by Erewash Borough Council regarding the impact of construction – and the resulting high level line - will have on the economy and amenity of Long Eaton are particularly noted. The town is world renowned for its niche specialism in upholstery manufacturing which underpins the heritage, culture and economy of the town. All efforts must be made to work with local partners to minimise the impact on Long Eaton.
- 2.3.11 We have significant socio-economic concerns regarding the construction phase of the HS2 eastern leg and the physical and economic disruption this will cause for a number of years. It is imperative that Derbyshire is perceived, and remains, 'open for business' during this period and that all efforts are made to mitigate the disruption for communities and businesses and the key economic sectors outlined above.
- 2.3.12 With this in mind, the lack of traffic modelling and impact assessment in the WDES is a matter of serious concern for the Council. The likely level of disruption to the strategic highway network e.g. the M1, M42, A38, A52 during construction will be significant and will inevitably result in delay, congestion and disruption that could harm the local economy and its attractiveness as a place in which to invest/ locate.
- 2.3.13 The number of proposed realignments of the M1, as well as the new bridges/ underpasses proposed for both the strategic and local highway network, and the size and scale of the grade separated junction north of the A38, are also significant and will impact on the effective movement of goods, people and services in, around and through Derbyshire. The earthworks, temporary closures and diversions required to facilitate their construction will inevitably have a material and detrimental impact on network reliability, residential amenity and business confidence.
- 2.3.14 With no transport assessment, it is not possible for the Council to quantify or comment on the level of this potential harm but it is imperative that detailed and urgent consideration be given by HS2 Ltd to identifying and assessing this and how impact can/ will be mitigated, including the potential use of alternative modes of transport such as rail or bus to help reduce network pressures. The Council believes it is possible to mitigate some of these impacts through constructive and timely dialogue and it is important HS2 Ltd engages directly – and in detail – with the Council as the transport and highway authority for the area.
- 2.3.15 We believe HS2 will enhance our economic strength and attractiveness as a place to live, visit, work and invest but it is fundamental that HS2 investment is supplemented by further long term investment in road and rail connectivity across

Derbyshire that will allow our more rural businesses and communities to benefit from the arrival of the HS2 stations at Toton and Chesterfield – along with those on the western leg of the route which provide access into the Derbyshire Dales and Peak District.

- 2.3.16 It is also important that investment and support is available to the local business community. The Council has noted references made to the business support and compensation proposed for relocation of affected businesses and also, the £30m funding package announced to support communities and businesses affected by the construction on the HS1 route from London to Birmingham. In the 11 community areas for the East Midlands, it is anticipated that approximately 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. The Council is very concerned therefore, that no such announcements appear to have been made to date for support packages for Phase 2b and the Government is urged to provide this commitment at an early stage to reduce uncertainty and maintain business confidence in our economy. The County Council and its partners and stakeholders are taking pro-active steps to prepare local businesses for the arrival of HS2 but this needs to be supplemented and supported by a strategic response from Government.
- 2.3.17 It is disappointing that the WDES is largely silent on the wider social impacts of the route, particularly in relation: to the scale and size of viaducts or major earthworks within close proximity to homes; ‘temporary’ road closures and diversions which could last for several years and attract significant amounts of noise and air pollution from heavy plant; residential demolition and the break-up of communities (approx 342 residential properties affected); severance and amenity impact as some communities effectively become sandwiched between the new line and the M1.
- 2.3.18 The proposed route has noted impacts on property, land and other assets for both the public and private sector; the effects of the scheme will be both temporary and permanent.
- 2.3.19 In the wake of the route announcement, properties have been blighted due to their proximity and the perceived negative impact on either the enjoyment of property or its value. (It is accepted that in other areas it is possible that uplifts in prices will be experienced as investors move to capitalise on potential increases in value as a consequence of the economic benefits manifesting themselves post construction).
- 2.3.20 During construction there could be potential damage to property situated close to the construction site or along transport routes due to the physical impact of an infrastructure project of this magnitude. Post construction some properties will remain impacted by the railway as a result of noise, fumes, smell, vibration, smoke, light and discharges. This will compromise the quality of life and impact on property values. These issues need to be addressed and mitigated as far as possible and

more detailed dialogue is requested with HS2 Ltd to help secure the necessary improvements.

2.3.21 Similarly, there is only limited reference to the potential impact of the proposal on the health and wellbeing of local communities; for example, due to the reduction in access to open green space and rights of way, reduced community connectivity due to viaducts and re-routing of highways, and mental wellbeing due to changes in employment, compulsory purchase of residential properties or increased traffic during the construction phase. More meaningful mitigation measures are required, including the appropriate identification of sensitive receptors in relation to air quality and noise and the effective use of monitoring and modelled data. Further details in terms of local level assessment and mitigation will be welcomed within future Environmental Assessments.

2.3.22 The Council has a number of other strategic and/or cross – cutting concerns, some of which are set out below and others of which are dealt with in the Volumes 2, 3 and 4 responses:

- HS2's continued failure to address significant issues that have been raised previously; for example, the need to accommodate a route for the proposed Chesterfield and Staveley Regeneration Route and proposed reinstatement of Chesterfield Canal. Both these proposals are long-standing commitments within the Chesterfield Borough and are critically important to growth ambitions for the area being realised. The issue has been raised many times in discussion with HS2 and the County Council would request, again, they be reflected in any future maps and proposals for the area.
- 'No net loss' as a principle of mitigation should reflect the minimum standard to be achieved in this proposal but yet it seems to be the upper benchmark. In highly sensitive environmental, habitat and ecological areas, the Council does not consider 'no net loss' to be acceptable and requests that more detailed discussion take place to secure appropriate mitigation. Similarly, Environmental Minimum Requirements should take full account of the disruption during construction, visual and noise impacts in the Code of Construction Practice.
- When dealing with ecological mitigation and compensation measures, 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.
- The apparent preference given to choosing the lowest cost development 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.

- Lack of detailed dialogue on the location and suitability of site compounds and lack of technical information against which detailed assessments can be made on the size, scale and suitability of earthworks. More meaningful engagement is requested with HS2 on these matters as potentially better solutions are available.
- The proposed line will result in a significant number of additional drains, bridges and structures that will require maintenance over the medium to long term. The Council has been party to very little discussion regarding the details of these structures, the associated liabilities and the real financial consequence for the Council's asset register and insurance. Similarly, significant utility diversions are not quantified in the WDES; maintenance access routes and watercourse diversions are not shown with any earthwork provision and not all historical sites are listed. More detailed information and discussion is requested with regard to these matters
- The severance of footpaths and rights of way, especially those without formal recognition/designation is of concern, in particular the level of protection given to concessionary paths 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 and more local investigation is required.
- The Council's own land, property and assets are also impacted by the scheme and to date, there has been little dialogue (e.g. 'Land Interest Questionnaire') to identify, confirm and fully assess the extent to which the Council's interests are affected. The information being used to set the baseline for asset ownership is incomplete and sites such as Markham Vale are significantly impacted. Also, assets such as public rights of way, highway easements, drainage rights, tenancies and covenants will need to be identified. Based on the available information, it appears that up to a 100 Council-owned parcels are directly affected by the scheme, however, many other properties or assets may be either indirectly or directly affected at the construction stage or by the physical presence of the operational line. There is little detail in the publications indicating how the aforementioned issues might be dealt with but dialogue between the concerned parties is essential. This may allow some of the impacts of the scheme to be designed out at an early stage, avoiding unnecessary costs and problems.

2.3.23 In conclusion, the County Council welcomes the economic opportunities that could result from HS2. These include the significant growth potential from the new 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 areas in Derbyshire which would bring significant benefit to the economy. Every effort must be taken therefore, to mitigate the detrimental impacts of such a major infrastructure project if this benefit is to be realised.

3 VOLUME 1 RESPONSE.

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

- 3.1.1 Notwithstanding the numerous documents that form part of the WDES, the limited time available for considering and providing comment, the Council has undertaken a thorough review of the available information. 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 in any way be taken as agreement or consent for the text contained in the WDES.
- 3.1.2 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	
Paragraph reference	Full ES comment
1.4	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 been published at the same time as the draft ES?
1.4.4	<p>The EMR imposes a requirement to use "reasonable endeavors" to adopt 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 throughout the document and other volumes.</p> <p>It is presumed that these important concept also set the context within which all expectations and proposals are made by HS2.</p>

3.2 Background to High Speed Two, Section 2

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Paragraph reference	Full ES comment
2.3.5	<p>No mention of potential impact on local and other rail services from Sheffield to Clay Cross because of the existing track capacity that 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 be impacted.</p> <p>It is requested that HS2 look at options to increase line capacity in order to minimise the detrimental impact on existing services. The economic and social implications of these proposals needs to be understood and shared.</p>
2.5	<p>Climate Change is comprehensively addressed for HS2 itself and the Council looks forward to reading the results and conclusions once these are available. This information would be beneficial to share before the formal ES in order to understand what is proposed.</p> <p>However, the Council would like to see those climate change issues, particularly climate change mitigation, a clear potential benefit 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, facilities and communities on either side of the track which will inevitably develop along the length of HS2 should be promoted in order to reduce greenhouse gas (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>Little information is provided about other mitigating potential, such as renewable energy generation particularly at hubs and depots. More thought needs to be given to the use of low carbon materials, low carbon rolling stock, low carbon procurement of labour and resources and materials and the maximising of planting and big solutions along the trails to 'soak up' the greenhouse gas emissions.</p>

3.3 Stakeholder engagement and consultation, Section 3

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Paragraph reference	Full ES comment
3.2.5	There have been many meetings between the Council and various HS2 staff and consultants at which the local authority has provided considerable amounts of information and views on the different elements of the proposed scheme. However, it has often been felt this has been a one way process with little or no feedback from HS2 on the information presented. 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 have been recorded, understood or taken on board.
3.3.5	The Council 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 the Council was advised that they would only have the standard 10 week period to respond.

3.4 The Proposed Scheme, Section 4

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Paragraph reference	Full ES comment
4.2.4	<p>Whilst the Council appreciate that 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.</p> <p>The Council has to reserve its position in providing a fuller response to MML proposals when such information is available. It is requested that given the significance of this proposal, that such information and updates of the proposals are shared with the Council at the earliest opportunity.</p>

Figure 7+8	<p>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?</p> <p>HS2 need to investigate options to improve capacity of this line to minimise impact on the existing services.</p>
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3.5 Permanent Features of the Proposed Scheme, Section 5

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
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 and MML02. The Council strongly requests that more information is provided 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 for such a major piece of long-standing and highly visible infrastructure needs to take account of the location and special characteristics of the area, particularly highly valued or heritage areas. A 1 size does not and should not fit all.
5.1.5	The availability of the design panel is welcomed but its role and access needs to be explained in more detail. To date, it has proved to be difficult to understand what impact it will have in relation to the design of permanent features such as viaducts in particularly sensitive locations such as Long Eaton town centre. The Council would wish to actively engage with the design panel on a number of issues within the County and looks forward to dialogue on how this will be facilitated.
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 as 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	The Council has a greenway and action policy commitment to support active travel. 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).
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3.6 Construction of the Proposed Scheme, Section 6

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
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. Clearly further survey work will identify additional issues, challenges and opportunities and the Council requests that active dialogue is maintained between HS2 and the Council regarding findings.
6.4.10	<p>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.</p> <p>Derbyshire has a very natural, beautiful, historically and geologically important landscape that has multiple characteristics. It is important these characteristics are protected at least and that opportunities are taken to enhance areas, through the design process of the HS2 line. Vast planted areas are not typical of Derbyshire and the use of locally sensitive and native planting is welcomed.</p>
6.8.3	Specific environmental protection measures related to site clearance and the protection of nesting birds and other species, is entirely appropriate and given the role/value of the landscape in supporting Derbyshire's unique visitor economy this protection is essential. The caveat that this will only be undertaken where reasonably practicable is unacceptable, given that this is likely the minimum that is legally required.

6.10.1	It is unclear the extent to which borrow pits have been assessed as part of the Landscape and Visual Impact Assessment (LVIA). 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 of the line, construct compounds and utility facilities.
6.27.2	It is vital that all restoration proposals 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 the Council (www.derbyshire.gov.uk/landscape).

3.7 Environmental Impact assessment, Section 7

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

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
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 significant. During times when incidents occur on the existing Motorway, routes parallel to the M1 in Derbyshire 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 critical the Motorway remains open to traffic at all times and that the wider strategic road network is effective and efficient at distributing traffic.

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	
Paragraph reference	Full ES comment
8.3	Air quality and congestion
8.5	The effects of disruption and diversions will be widely felt and impact on communities and the local economy. The impact on particular sectors such as logistics and distribution, affect the attractiveness of Derbyshire as well as impacting on the wider visitor economy.
8.6.1	Given the very limited summary which is presented, it is not possible to provide substantive comments although the scope and approach to ecological impact assessment set out in this section generally appears to be reasonable and appropriate.
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 has, or 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	<p>Social differences in health status (e.g. disability-free life expectancy) or 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.</p> <p>Up-date of the 2013 Rapid Health Impact Assessment of the 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. Refer to Appendix A for details.</p> <p>The Council agree with health effects resulting from the impacts listed. However, the potential effects on mental health and wellbeing, community connectivity, food and farming should also be included here or in Volume 3 Route -Wide Effects.</p> <p>This should also be cross referenced to the Equalities Impact Assessment that has also been undertaken.</p>
8.7.6	At this time, any additional comments will be added under the Volume 2, community area reports.

8.7.7	<p>The Council agree with health effects resulting from the impacts listed. However, the potential effects on mental health and wellbeing, community connectivity, food and farming should also be included here or in volume 3 Route -Wide Effects.</p> <p>The Council has also added the health profiles of each locality along the HS2 route effecting Derbyshire and these need to be fully considered.</p>
8.7.8	DCC has no additional comments to make on this point as it is covered elsewhere in the document.
8.7.10	DCC has health profiles of each locality along HS2 route effecting Derbyshire and these need to be fully considered.
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. Such impacts, especially cumulative impacts, (both +ve and –ve), need to be considered.</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 lack of design details, mean that it is difficult to provide definitive comments on the potential impacts on health or indeed their amenability to mitigation or enhancement. Further consideration and discussion is therefore required.</p>
8.8.3	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 fixed ¹ , or in other words, it has no definable limit. Therefore the potential impacts, and the study area, should be considered more organically in response to this.
8.8.6	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. The Council is concerned more is not mentioned here.
8.8.8	"Survey work is being discussed ... with local authority archaeologists". No consultation at all has taken place on survey work to date.

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.

8.8.16	<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 conclusions in the WDES are 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 is needed to understand the significance.</p>
8.10.3	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.
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 Further detailed dialogue is required to fully understand the implications and potential mitigation.
8.10.13	It is stated that published LCAs have been adapted for this assessment to provide a more appropriate and consistent scale. Whilst DCC has 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
8.10.16	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, however, the Council would advise there has been no engagement to date on the design of the scheme only on the assessment methodology. Further detailed dialogue is awaited.
8.14.6	Going forward, 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. 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 two-way traffic (or 5% in congested or other sensitive locations) or such other thresholds as may have been established by the highway authority. It is disappointing and concerning to note that these considerations will only be addressed in the formal ES. More detailed dialogue is required with the highway authority to agree the detail and scope of the formal ES.

8.15	The following is noted: 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. The Council have no further comment to make on this element of Volume 1.
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3.9 Approach to mitigation and monitoring, Section 9

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
Paragraph reference	Full ES comment
9.1.4	It is not possible to fully comment on the scale of landscape and visual effects at this stage, 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. The Councils reserves its right to provide more detailed comments once further information is available and understood on the detailed design mitigation rationale.
9.1.9	<p>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.</p> <p>The Council would welcome detailed discussions on the best way to protect and enhance the landscape characteristic along this part of the route.</p>
9.5.2	<p>The Council is concerned that some areas of public realm / replacement community facilities proposed to be created may already exist and are already 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 approach has been made to the County Council to suggest that HS2 would either facilitate improvement of accessibility or provision of community facilities.</p> <p>Where HS2 is identifying existing public realm for community facilities 'to be created' there is clearly no net gain to the county; indeed, it is a potential deficit.</p>

9.6.1	<p>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.</p>
9.6.4	<p>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.</p>
9.7.1	<p>Where the introduction of viaducts is in significantly populated areas like Long Eaton (higher alignment route) HS2 Ltd needs to consider the provision of aesthetically pleasing barriers in order to prevent such structures being used by those with mental health issues and suicide tendencies.</p> <p>The WDES needs to provide detail on proposed strategies for mitigating potential mental health and well-being adverse impacts. These should be referenced to the evidence base for intervention effectiveness and proposals for monitoring and evaluation during both the construction and operational stages as appropriate.</p>
9.7.2	<p>The WDES needs to provide detail on the proposed strategies for mitigating potential adverse impacts on employment with reference to the evidence base for intervention effectiveness. It also needs to provide proposals for monitoring and evaluation during both 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 both the construction and operational stages as appropriate.</p>
9.8.8	<p>It is the Council's view that as a result of the line heritage assets could be rendered unviable through their total destruction. Where heritage assets will be impacted on, either directly or indirectly, mitigation should be addressed on a case by case basis with relevant stakeholders. The Council welcomes detailed discussion on these matters in the future.</p>

9.10.3	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.
9.10.4	The statement "the design or external appearance of new structures would be subject to the approval of the relevant local authority", is welcomed, although there has been no engagement or discussion with DCC in respect to the proposed structures along the route.
9.10.5	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 reserves judgement on how appropriate and effective the advanced planting might be until it has been identified on drawings.
9.10.6	The Council is concerned that throughout the WDES, there is inference to new structures and assets which will ultimately become the responsibility of the Council. In this paragraph, 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 whom. This not only adds to the uncertainty of how successful any landscape treatment might be but also the potential liability.
9.10.7	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. This remains a concern for DCC.
9.10.12	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?
9.14.11	<p>The Council is keen to ensure all aspects of the HS2 proposals advocate the principals of good growth. This includes ensuring sustainable transport principals are embedded in proposals for the construction period and compounds.</p> <p>The potential of travel plans to reduce the impacts of worker traffic 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.</p> <p>Further the Council is keen to insure HS2 promotes sustainable travel for future users. The 4000 space car park proposed at Toton does not accord with these principals and needs to be amended.</p>

9.14.15	<p>In many instances, HS2 appears to suggest that low use of footpaths and other rights of way in rural settings means it is appropriate to close or 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. More importantly, in Derbyshire they are likely to be an important part of the visitor economy. The number of users is of no consequence in terms of the protection that needs to be afforded to each definitive right of way and the network as a whole should be protected.</p> <p>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; 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.</p>
General	<p>Information regarding footpath and greenway routes which are newly constructed with recent planning consent but 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.</p> <p>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 definitive RoW routes at other locations. Path diversions exceeding well over a 1km or the suggested closure of what HS2 sees as 'fragmented' paths suggests a poor design methodology and lack of concern in respect of the impact the scheme will have on the existing and additionally advised path network.</p> <p>A number of new maintenance access routes are indicated by red outline on plans throughout the publication series. The Council is concerned that no thought has been given to how these will sit in the landscape where generally, tracks in the countryside follow closely alongside hedgerows or walls and do not simply sit within unbounded field spaces. Further detail and discussion is requested in this regard.</p>

3.11 Strategic, route-wide and route corridor alternatives, Section 10

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

3.12 Local alternatives, Section 11

Document: Vol. 1: Introduction to the Environmental Statement and the Proposed Scheme	
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 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. A clear and high-quality design rationale is required and should be developed in response to the specific conditions on this section of the route.</p> <p>Whilst the Council is keen to maintain a pragmatic approach to mitigation, alternatives should not be ruled out just because of costs. Alternatives should be explored which could include a world-class viaduct structure within the locality. See also comments on similar suggested alternatives; Volume 2: Community Area Reports; General Issues.</p> <p>A study by the National Trust advises that Hardwick Hall alone contributes £8m to the local economy each year. Therefore, DCC would advise that all three heritage assets are considered holistically in terms of issues and mitigation, and, in doing so, question what all three heritage assets contribute currently and how this could be enhanced through good design.</p>

4 COMMENTS ON ISSUES NOT CONTAINED WITHIN THE WDES

4.1 Future transport projects including Key Cycle Network

Major Transport Projects

- 4.1.1 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 in its preparation of the formal Environmental Statement. These are:

A61 Chesterfield Inner Relief Road Junctions (Grade Separation)

- 4.1.2 Although not designed or currently 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

- 4.1.3 Although not designed or currently 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. Within the wider context, DCC would request detailed discussion with HS2 DfT and Network Rail on the whole route proposals and their mutual impact on current and future line capacity.

A61-A617 Avenue Link Road

Although not designed or currently 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

- 4.1.4 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. More detailed discussion is requested with HS2 Ltd.

Chesterfield-Staveley Regeneration Route

- 4.1.5 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 investment towards design and business case preparation. The major landowners along this corridor are fully engaged in this work. The HS2 Infrastructure Maintenance Depot, whilst very welcome and being of great benefit to the economic potential to the Northern Growth Zone, 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

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

4.2 Limestone supplies and haulage

- 4.2.1 The WDES 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 of bulk materials where reasonably practicable. Clearly this would help reduce wider traffic impacts of such movements. The WDES suggests that construction traffic movements are expected to represent a small proportion of total traffic on the strategic highway network, although disappointingly 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, (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.
- 4.2.2 Although the potential quarry sites lie some distance from the Proposed Scheme, locally, the transport of minerals and associated traffic is one of the most significant impacts relating to minerals development and is usually what causes most concern to communities, particularly those in and around the Peak District National Park. The movement of minerals and the importation of fill material to restore mineral workings can generate large volumes of traffic which mainly constitutes heavy good vehicles travelling on roads. Such traffic can have a considerable impact on local communities causing problems such as public safety, noise and vibration, air pollution and visual intrusion. These problems are most severe where heavy good vehicles use roads unsuited to their weight and size, where they pass through sensitive areas and at the access to the site from the public highway.

- 4.2.3 The formal ES should therefore provide full details 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).

4.3 Opportunities for sustainable travel

- 4.3.1 The Council would very much welcome detailed discussion regarding these proposals. 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.

4.4 Light Pollution

- 4.4.1 The impact of light pollution does not appear to be mentioned within the report. This pollution will occur both during the construction phase (with particular reference to engineering works which will operate during night time hours) and during operational phase, particularly with IMD operations. Measures need to be made to mitigate the impact of this on surrounding residential communities and the natural environment.