



CHESTERFIELD BOROUGH COUNCIL DRAFT RESPONSE TO HS2'S WORKING DRAFT ENVIRONMENTAL STATEMENT (WDES) October 2018.

Introduction

Chesterfield Borough Council has developed a positive and constructive relationship with HS2 Limited since it has been determined that the Proposed Scheme will include a substantive Infrastructure Maintenance Depot at Staveley and at least one HS2 stop per hour at Chesterfield Station by virtue of an electrified Midland Mainline route from Stonebroom through to Sheffield. Long may that continue as we try to work through the delivery of this amazing and transformative opportunity for the Borough.

The Council has a duty to examine and respond to the detail of the WDES and indeed point out where sufficient detail is lacking. It does so as part of an iterative process, fully believing that in the fullness of time, most if not all of the issues addressed in this document can be resolved without the recourse to Panel or Petition during the Hybrid Bill process, (though it reserves the right to do so). The Council recognises the substantial work that HS2's Team has put into the Proposed Scheme and has seen correspondence from HS2 Limited in support of other related projects and growth propositions in the Borough. These give strong assurance that mutually supportive and workable solutions exist or can be found for any areas where there is still much more to be done.

The Council also recognises that the published Volume 2 material on which this response is largely based reflects the Proposed Scheme designs as they were at CP2, in Spring of 2018 and fully expects to see further amendments in future published versions. In the case of the electrification of the Midlands Mainline, the Council recognises that the plans are at an even earlier stage and that there is still much work to be done. As a result of the way this design process has unfolded, it is unfortunate, but necessary that the Council will need to place as a matter of public record some considerations and design approaches that HS2 Ltd should re-assess prior to the Hybrid Bill's submission.

The Council's response is divided into 3 Sections:

- Section A - Strategically important considerations and issues of concern;
- Section B - Borough level environmental considerations;
- Section C – Issues where the Council requests that HS2 present further information, as the current WDES is inadequate to determine whether the Proposed Scheme is the most appropriate way forwards.

Excepting regional & national matters the response directly relates to Vol. 1 Introduction and methodology; Vol. 2 Community Area Report LA09: Stonebroom to Clay Cross; Vol. 2 Community Area Report LA10: Tibshelf to Shuttlewood; Vol. 2 Community Area Report MML01: Danesmoor to Brierley Bridge and Vol. 2 Community Area Report MML02: Unstone Green to Sheffield Station. The Council's response to HS2 Ltd 's Whole Route Working Draft Equalities Assessment is presented in a separate companion document.



Section A: STRATEGIC CONSIDERATIONS AND MAJOR ISSUES REQUIRING RESOLUTION

General Comments

CBC is disappointed by the limited amount of time given (10 weeks) to respond to the thousands of pages of consultation, particularly as the Phase 2b Hybrid Bill submission has been put back to mid-2020. We would welcome further formal opportunities to influence designs moving forwards. We have been encouraged by the effort that HS2 has made to contact individual communities and householders where the designs have most impact but believe more should be done. The WDES volumes and maps are extremely dense. Local authorities have constrained resources and some sections of the community could struggle with the complexity and format of the documents. The arbitrary nature of some of the community area boundaries used by HS2 Ltd, basing them on engineering works areas and contract lots, has also added some unnecessary confusion.

Notwithstanding the issue of time-lag between publication of materials and actual progress on the designs, there is a genuine concern that elements of the process to date lack solid audit trails. Some solutions and information from the Local Authority and its partners has been submitted on more than one occasion, without apparent impact on the designs. In certain instances out of date base-line information or mapping evidence has been pointed out to HS2 which has yet to be addressed in a publicised form. We would urge HS2's next iteration of the designs to reflect these weaknesses and particularly to allay concerns that the only solutions coming forward will be those which save the most money. In many instances the terminology seems to underplay the significance of the feature or effect in question. The long term economic growth that underpins our support for HS2 should be based on the designs which create most opportunity and special attention must be given to the cumulative effects the project will generate, particularly in the communities most directly affected.

A1. Ensuring that HS2's plan of works and construction practices do not adversely affect wider connectivity and economic activity in the East Midlands and the area of the Northern Growth Zone in particular.

Inevitably building HS2's route will have an impact on the strategic road network e.g. the M1, M42, A38, A52 during and after construction. The number of realignments of the existing strategic road network (especially to the Junctions of the M1 in particular, 27,28, 29 and 30), together with impacts on local road networks needs to be carefully managed and better understood. WDES lacks significant detail, in particular the absence of traffic assessments and transport modelling, which has made it difficult to draw meaningful conclusions on parts of the proposals. We would urge HS2 to undertake further work to plan and organise a programme which helps our priority economic sectors, particularly logistics and distribution, and minimises the adverse effects to one of the most competitive areas of the local economy. We would urge careful planning and staggered timing of various stages of the construction to allow the economy to continue to function. A linear approach to junction re-modelling may compound the time period of maximum disruption or cause adverse traffic congestion on



surrounding routes. We believe that HS2 needs to engage more fully with meaningful dialogue with key statutory bodies such as Local Transport Authorities, Highways England and all major business representational bodies in the development of the proposals moving forwards. This approach should be extended into areas like Staveley and the routes into and out of Sheffield along the MMLe, especially where new bridges are proposed to carry the new railway (over or under) or temporary diversions and road closures are proposed for long periods during the construction phases.

We would welcome consideration of the impact of construction and operational phases on transport connectivity and the inclusion of measures to ensure community access to active and sustainable travel is maintained and where possible enhanced during design, including connectivity to the HS2 network.

A2. Maximising the positive impact of the Midland Mainline Electrification (MMLe),:

One of the most vital and substantive impacts of HS2 in Chesterfield comes from the electrification of the Midlands Mainline and the attraction of at least one stopping HS2 service per hour between Sheffield and London. We understand that a £300 million fund has been made available from DfT to achieve this. CBC has worked with EM and Sheffield City Region to demonstrate just how positive the economic case for this service is to both HS2 and the northern Derbyshire Economy. An economic assessment of the benefits of an additional stop has been undertaken jointly by the partnership which has been provided. This illustrates that the doubling of HS2 services to 4 trains an hour proposed in the WDES further reinforces the strategic case for more of these services to stop at Chesterfield, be it the Leeds Birmingham service or an additional London service.

Unfortunately the WDES documentation on MML lacks any detail as to how this part of the Proposed Scheme is to be delivered. Much further work is required. It is extremely early in the process to speculate about the timetabling implications for the services post 2033 and there are concerns from some quarters that the HS2 service may compromise other services that cumulatively make Chesterfield the 6th busiest station in the East Midlands and one of the best connected locations by rail in the country. We urge HS2 to work with us to make sure the competitive advantages of the Chesterfield rail offer grow once HS2 becomes operational. The Borough Council is having a further piece of work produced to model the improvements required to the network to accommodate 2 stops per hour. We would seek to obtain guarantees that any works include sufficient additional capacity to the Midland Mainline north of Clay Cross to accommodate HS2 as well as the existing local and regional services, plus any future enhancements to these or to local infrastructure. We look forward to the emerging details and to an opportunity to share any future modelling work so that HS2 and local partners can devise a programme of engineering works and an indicative timetable to best serve the area.



A3 Helping to establish the Master Plans for the improvement of Chesterfield Midland Railway Station;

The Borough Council has put a significant amount of work into preparing a comprehensive Masterplan for Chesterfield Station. We have appreciated the help HS2 have provided thus far and particularly the engagement in our consultation process. The latest version of our Masterplan sets out an ambitious but achievable vision to fully capture the benefits of HS2 through a combination of infrastructure and regeneration projects. This synthesises development of Chesterfield's adjacent Northern Gateway and Waterside regeneration projects and will have significant synergies with the future development of Chesterfield College and University of Derby St Helena's campus. Considerable economic growth and value uplift can be achieved in a locality that has yet to fully recover from past economic changes and moreover, could insulate the area from future transitions to the economy as referenced in HS2 studies.

The important role of Chesterfield as a visitor destination and as a gateway to a wide variety of other areas of visitor appeal across the north Midlands, including the Peak District, Clumber Park and Sherwood Forest, should be recognised. The principle of destination and dispersal is embedded in the East Midlands Growth Strategy and is referenced in the Sheffield City Region Draft Strategy. Given that 50% of HS2 travellers will probably be leisure users, Chesterfield Station's role will be a critical element in ensuring the wider economic and social benefits of HS2 are maximised.

A Local Development Framework document covering the Station Area is being proposed as a policy for inclusion in the Chesterfield Local Plan Core Strategy to be issued for consultation in January 2019. Supporting site development appraisals and phasing plans have been produced, and steps have already been taken towards the assembly of key parcels of land required in order to put this vision into practice. Derbyshire County Council has already taken an 'in principle' decision to exercise compulsory purchase powers in pursuit of the Masterplan if required and the work is currently being supported by grant funding from D2N2 and SCR LEP's and potentially from the HIF application.

We believe that the WDES consultation is an opportunity missed for HS2. There are some alignment issues and modest platform improvements which have been suggested but have scant detail to work off. We have appreciated being party to initial discussions and so far we have worked well with HS2 but we seek to gain assurances that this work will be in partnership with HS2 moving forwards?

In this sense we would have expected to see the economic potential of growth in and around Chesterfield reflected in the consultation document and equally have some early commentary about the likely visual and environmental impacts of the proposed line as it approaches the town centre. Equally we are unsure about the scale of works and land requirements and how they relate to the emergent Master Plan. We need to understand more about the proposed scheme and hope that moving forwards HS2 Ltd and Network Rail will work with us. We reserve the right to make further comments at some point in the future to ensure that key Masterplan deliverables are achieved.



The station approach road (currently known as the Hollis Lane Link Road), which aligns closely to the Midland Main Line, and future related development must be deliverable. Equally we have produced work on the future aspirations for the modification/ modernisation of the station itself and seek assurances that more detail and further partnership working will be forthcoming moving forwards.

A4 Ensuring that the IMD footprint does not curtail plans for the wider regeneration of the Staveley Works Corridor;

The regeneration of the Staveley Works Area (SWA) remains a long standing objective of a range of partners in northern Derbyshire. The Council has formed an SWA Board which now reports into the HS2 Delivery Board to guide and co-ordinate development. The former SWA comprises c.200ha of largely derelict land between the settlements of Staveley, Brimington and Barrow Hill in the Staveley and Rother Valley Corridor (SRVC). Chatsworth Settlement Trustees (CST) own c.150ha of the SWA, St Gobain c.50ha, with smaller areas owned by Derbyshire County Council (DCC) and Rhodia and Ominvale. Recent development opportunities have highlighted neighbouring areas of land such as the Suon Site and land adjacent to Barrow Hill Round House that will benefit if an integrated approach is taken to the redevelopment of an area which has significant brownfield challenges, created by its industrial and minerals extraction past. Bringing this former industrial land back into economic use is of paramount importance. We were therefore delighted when HS2 confirmed that their northern leg Infrastructure Maintenance Depot and Rail Head would be based there as it has the capacity to accelerate development and bring forwards up to 250 much needed jobs. However fitting the 22 HA IMD site into the existing plans published in the draft Staveley and Rother Valley Corridor Area Action Plan, (preferred options) 2012, has remained challenging and is one where we have appreciated the dialogue with HS2.

The above plan showed an illustrative development masterplan prepared with stakeholders (including landowners) to lead to the comprehensive development of the corridor including a new spine road, part of the Chesterfield Staveley Regeneration Route (CSRR) running centrally through the site. Although the SRVCAAP was subsequently set aside, the Chesterfield Borough Local Plan: Core Strategy (adopted in 2013) identifies the SWA as a 'strategic site' and provides for mixed use development in line with a comprehensive redevelopment masterplan by way of 'Policy PS5 Staveley and River Rother Valley Corridor'. This policy provides for the site to deliver up to 2,000 dwellings and c.50ha of employment land. The Chesterfield Canal Corridor and its programme of reinstatement is also a critical part of the proposition.

Notwithstanding the issue around the publication of potentially out of date CP 2 maps for the Proposed Scheme, we remain seriously concerned that the overall land-take for the Depot and its allied mitigation proposals does not integrate well with the rest of the plan. Overall HS2's designs are too isolated from the existing plans and we believe that it could be much better integrated and help to achieve a more valuable economic asset for HS2 and accelerate our proposals if some of the suggestions made by ourselves and partners were incorporated into the designs. The CSRR is covered separately in the section below.



The most significant issue is overall land take. The plans shown create phasing and final development issues for our partners which could impact on the viability of plans. Some of the land anticipated for employment and housing is shown on the HS2 proposals for works including mitigation measures such as planting and balancing ponds. We have previously suggested that these features be reduced or absorbed into the Masterplan and urge HS2 to do so. The placement of the balancing ponds below the goites or even a scheme which saw water filtered cleanly back into the water system would be much more beneficial and would release land for development that makes the site a much more viable proposition. Similarly other pockets of developable land could be sterilised by the footprint. We understand there are some options that would be mutually beneficial and urge HS2 to work with the SWA Board to do so. Taking this land away is detrimental to the viability of the corridor and we would urge a re-think on this point.

We do not believe that the capping of the IMD with a further 3 M of clay is the best option for the remediation of the site. There are some detailed studies which have been produced by Rhodia that show that elements of the soil on site could be washed and re-used to balance other areas of development in the corridor. This should save money for both HS2 and could help lessen the visual impact of the depot and the associated mitigation. It would help to alleviate the viaduct and re-modelling of Hall Lane and potentially have some bearing on the solutions for the Canal. There would also be a positive impact on junctions of rail at grade and we therefore urge HS2 to consider these options and continue to work with us to find mutually compatible designs.

We also ask that HS2 consider incorporating some of the training and staff development proposals into our plans for a Rail Skills and Innovation Centre at Barrow Hill. We believe that the presence of quality learning and training facilities less than a quarter of a mile from the IMD would deliver efficiencies and early jobs into the area and potentially reduce the footprint of the Depot. We therefore urge the company to work with us on these emerging designs and functions.

A5. Ensuring there is adequate provision for the Chesterfield Staveley Regeneration Route OAR to be achieved;

One of the most welcome pieces of information received in our pursuit of the HIF grant to deliver the benefits of HS2 in Chesterfield was a letter from the Managing Director of HS2 2b, to the Secretary of State, confirming that HS2 are confident that a line of route can be accommodated within the existing footprint of the IMD. This underpins the spirit of co-operation and progress that has been present between partners and HS2. We would however urge HS2 to work with us further to ensure the detail of the road is mutually beneficial and economical to both parties.

The CSRR is a longstanding public policy objective dating back to 1927. As such, a comprehensive redevelopment masterplan, including the provision of the CSRR, was prepared in 2017 by CST/Rhodia and Saint-Gobain/Omnivale in liaison with CBC and DCC to



inform applications for mixed use development in the former SWA. DCC are further working at considerable risk to design a road through the whole corridor to draw down HIF and possible developer contributions to build it.

Whilst being exceedingly grateful for the support above we believe HS2 need to acknowledge three further points:

- a.) The Line of Route shown on the accompanying plan and OAR has forced partners to look to bring the road further south than would ideally be the case. This has meant the road having to take a more expensive alignment, particularly as it has had to cross one of the more heavily polluted areas of the corridor. If the road could travel on a tighter alignment further to the north this would create savings.
- b.) We have previously suggested that both parties could generate considerable savings if the road could be used for both its primary purpose and be the service road for the IMD. This may require some re-configuration but equally could save several million pounds;
- c.) If neither option a.) or b.) were forthcoming the Council would need to consider asking for Section 106 or Section 278 contributions towards the road.

Chesterfield Borough Council believes a promising approach to collaboration has started, but much more remains to be done through further engagement to ensure that the needs of all parties can be met in full.

A6. Ensuring the plans to extend and improve the Chesterfield Canal are not curtailed by HS2

As with issue A5.) encouraging discussions and information exchanges have taken place, and a positive response has been made from Ministers following a question raised in Parliament. But the well documented issues around the alignment of the Chesterfield Canal remain unresolved at the time of drafting this response. The impact on Chesterfield Canal is to potentially stifle attempts to reinstate it in two locations. The site adjacent to the proposed Infrastructure Maintenance Depot is particularly affected. The HS2 link line to the depot crosses the route for the proposed canal at this point and the proposed vertical alignment is not compatible. There are also implications for the adjacent Trans Pennine Trail. There are significant concerns that the WDES underestimates the impact on the long term project to reinstate the Chesterfield Canal from Staveley. The current proposals are not compatible with the infrastructure already in place and if there is no alternative design a different route for the canal will be required. The Borough is therefore encouraging HS2 Ltd to continue to work with local partners to come forward with meaningful measures to mitigate the impact on the proposed reinstatement of the Chesterfield Canal and the Trans Pennine Trail. We would also encourage a constructive dialogue around the plans to use land around the Staveley Marina for works compounds to ensure the completed re-instatement improves the canal basin.



No mention is made of the required crossing of the restoration route of the Chesterfield Canal which presently extends in navigable form to a location just 15m from the existing rail corridor boundary. The canal is undergoing active restoration and this has been advised repeatedly to both HS2 and DCLG for over five and a half years. Water level in the restored canal section has been set to allow sufficient clearance to pass beneath the existing rail track level. Provision should be made for maintaining continuity of the canal beneath the proposed rail line to facilitate its ongoing restoration and this requirement appears to have been omitted from current draft HS2 design.

Realignment of FP47 as shown would introduce an unacceptable gradient on approach to the rail bridge. A ramped infill would sever the restoration route of the Chesterfield canal unless FP47 bridge is extended or replicated to link with the existing route on the north side of the canal 'cutting'. The diverted line of FP50 will require an additional bridge crossing of the recently restored length of the Chesterfield Canal immediately to the east of Eckington Road bridge. Advance works should include the earliest possible provision of a new facility for crossing of the Chesterfield canal beneath the proposed IMD line to avoid further and protracted delay to the ongoing restoration which has to date been delayed and blighted by HS2.

The landscape mitigation area includes the towpath of the Chesterfield Canal. Inclusion in the mitigation area will sever access for the public and does not take into account the management and maintenance requirements of the canal infrastructure.

The area identified south of the Staveley spur as new public realm/community facility is inappropriate for two reasons. Firstly this area is already in the public realm, is a regeneration site development by DCC Markham Vale Employment Growth Zone project as part of the Canal restoration, so will therefore not contribute to 'new' community facility by HS2. Secondly the Staveley Town Basin area has been developed in order to provide income to sustain the Chesterfield Canal in perpetuity. Seizure of this land by HS2 will therefore reduce the overall public realm viability of the whole canal section causing significant sunk cost losses to local partners as well as on-going additional liability costs.

Staveley West Embankment and its toe drain are shown encroaching into the toe of the support embankment to the Staveley Loop Road (Ireland Close). The toe of this proposed embankment also extends over and buries the outfall drain located immediately alongside the road embankment on its north side and serving as outfall and drain facility for the restored Chesterfield Canal.

Closure of FP11 (only part as shown) will sever linkage northward for the remainder of FP11 and for FP12. Arguably an alternate extension needs to be provided outside the boundary of the IMD to link to Hall Lane, or FP11 and FP12 should be entirely closed to public use and the river bridges removed.

A7 Ensuring the prosperity and potential benefits are directed to the communities of most need and where possible adverse effects on them are well catered for.



This point relates to the disparity between the Community Area outlined in WDES for Volume 11 and the areas which require the jobs and benefits from the IMD and the wider area. One of the principle concerns is for Barrow Hill. The community is not affluent and many residents rely on a tunnel and footbridge connecting with Staveley. The Volume 11 proposals identify the segregation of this route and a diversion along the busy Hall Lane, which will also be subject to considerable works during the construction phases. The Council believes this unsatisfactory and request further dialogue on this issue.

The communities of Staveley, Poolsbrook, Middlecroft and Brimington all receive some dis-benefits from the HS2 construction and potentially its operation. There is a need to ensure appropriate levels of mitigation are delivered to these communities and potentially the new residential areas along the SWA Corridor. A report originally prepared for Talgo is attached with this response. This highlights some of the alarming social deprivation issues that affect the communities surrounding the depot. These communities will undoubtedly benefit from the additional employment and economic activities that the depot brings but there is also a need for HS2 to deliver further mitigative measures to help relatively poor communities receive more support than is currently apparent through the WDES information. One such opportunity would be to ensure the IMD is not raised unnecessarily higher, and could in fact be lowered. Other measures are highlighted in Section 2.

Not enough is known about the MMLe proposals to understand whether some of the more deprived areas of urban Chesterfield will have to bare any adverse impact and the Council reserves the right to add additional commentary in the future.



Section B ENVIRONMENTAL ISSUES & COMMUNITY IMPACTS IDENTIFIED

In this section the response follows the Chapter headings within WDES. It would be repetitive to reconfigure all the responses detailed by other partners such as Derbyshire County Council in their substantive response to WDES. Some of chapters in WDES are issues where the County Council is the lead service. Council officers both here and at Derbyshire County Council who are specialists in the specific topic areas have been examining the volumes in considerable detail. Independent technical advice has been procured by the EM Mitigation Board in the form of a Mitigation Scoping Report commissioned from SCL Lavalin. We are aware of many of these issues and support Derbyshire County and EM HS2 Growth Partnership Council's detailed response to Volume 1 (Introduction to the project and the methodology used on the WDES); Volume 3 which deals with route wide effects, and Volume 4 (off route effects), in so far as they relate to Chesterfield Borough. We would also refer HS2 to the comments received from the above partners. The Borough Council has therefore limited its response to the issues that will have most impact on the communities we serve in Volumes 10 and 11.

This general approach has one major exception: the issue of protection of the Chesterfield Canal restoration route. A collection of concerns been raised on several occasions over the past five and a half years with HS2 Ltd, DfT and DCLG but remains unaddressed by the current design. The Trust is based in the Borough and it is felt important to urge HS2 Ltd to produce additional work to ameliorate the concerns of the Trust along the whole restoration route including the sensitive issues to the north and east of the Borough at Norwood and under the M1.

We acknowledge the work done by HS2 to date and wish to underpin the statements made in our introduction and Section A, about the level of detail presented at this stage and our general welcoming of the benefits of the Proposed Scheme to the Borough. We acknowledge that a major Proposed Scheme of this nature cannot be constructed without some unwelcome impacts but look forwards to working with HS2 Limited to attempt to mitigate the most significant of these. In the meantime we wish to put on record the following points:

i.) There are a number of important terrain features of our area that have been omitted from consideration and should not have been. There is no mention of recently created woodland, wetland and grassland areas created as part of the Markham Vale regeneration project which are accessible to the public. The same is true for the Staveley Town Basin and the planned mixed-use development proposed as part of the Markham Vale project. The impact on Poolsbrook Country Park has also been down-played.

ii.) The areas of suggested new wetland and woodland advised at CT-06-634 (E6 to H5) already exist and will first be lost to HS2 before their re-creation. The wetland area contains surface water attenuation ponds serving the two existing industrial plots located to the south of the existing branch line corridor. We ask HS2 Limited to amend future drawings to correct this.



iii.) A footpath diversion shown as 'FP64' is a substantive issue as it effectively severs public right of access alongside the east fringe of the River Doe Lea flood corridor. The provision of a pedestrian underpass should be considered where a short fragment of the existing path is shown as being closed by HS2 at CT-06-634 (E6-E7) so that users can pass beneath the proposed rail embankment and continue along the east fringe of the floodplain to link with FP Staveley 31.

iv.) The balancing pond suggested at CT-06-634 (D4 to D5) is sited at location of an existing subsidence flash entirely within the River Doe Lea Floodplain and arguably can only be created through loss of river flood storage. Consequent to its location it may not be available for containment of railway drainage runoff when the river is in flood. This proposed pond is also sited on the line of existing public footpath (Staveley 31) shown as closed. It is unclear why the access track to this pond is located in the position shown when an existing access track runs parallel for most of its distance. This point applies to other proposed access tracks along this section of the HS2 route. It is noted that HS2 advise in the draft EIA that the entire floodplain will be lost to development at Staveley and Poolsbrook Flash sites though it is unclear where alternate floodwater storage is to be provided upstream of the site.

v.) It is not clear why Lowgates Road bridge requires such substantive track clearance or raising above existing ground level but there is little shown land-take or impact on adjacent premises or businesses.

vi.) Despite previous assurance from HS2 regarding prevention against future encroachment to development plots, the current preliminary embankment design for Staveley East Embankment clearly appears to show encroachment onto previously prepared and/or recently sold and subsequently developed industrial plots at Markham Vale North (Seymour) CT-06-634 (E7 to H5). In respect of the new business developments at Markham Vale, the proposals still show land taken from the Ferdinand Bilstein development and other adjacent plots for use by HS2, these are developments which have already taken place and need correction. The proposals do not include for a new rail overbridge at Seymour Link Road. The proposals indicate that two satellite construction compounds are to be located adjacent to the B6419 (see Map CT-06-635 D2 to D6). These are located on a proposed extension to the Markham Vale North development for industrial use. The two temporary material stockpile areas located adjacent to the B6419 (see Map CT-06-635 D2 to C4) are located on a proposed extension to the Markham Vale North development for industrial use.

vii.) A619 Lowgates Road Overbridge Satellite Compound.

A satisfactory access cannot be achieved to serve the site as drawn on the plan. The topography presents a highway problem since the existing rail line is located in a deep cutting which severs the proposed compound site. Pedestrian footways exist on each side of local highways; bus stops are located immediately adjacent to the site; access to cycle network/ Bridleway adjacent to Ireland Close is approximately 200 metres to the west of the site; and most amenities of Staveley are within approximately 750 metres of the site.



This is a split site either side of the proposed HS2 line the western side having direct frontage to Fan Road where creation of a compound access with appropriate exit visibility sightlines should be achievable although this may require temporary relocation of an existing bus stop. Access to the eastern side would need to be taken via the same route crossing over the proposed HS2 line.

vii.) Staveley West Cutting Satellite Compound.

A satisfactory access cannot be achieved to serve the site as drawn on the plan. There are no pedestrian footways in vicinity; the only bus stops within a reasonable distance are located on Lowgates (A619) and accessible only by cycle network/ bridleway immediately adjacent to, with a short length passing through, the site. All amenities of Staveley Town Centre are located within 1 mile of the site by road.

Whilst this site has direct frontage to Ireland Close (A6192) the public highway is at a lower level than the proposed compound and this may result in access gradient issues. Subject to gradient being satisfactorily addressed, it should be possible to create an access with Ireland Close at a point where adequate forward and exit visibility sightlines are achievable. However, should this not be the case, it's considered that introduction of temporary measures for the duration of the Works would be likely to prove acceptable. The existing cycle/ Bridleway is affected by the site.

viii.) Staveley IMD South Chord Viaduct Satellite Compound.

A satisfactory access cannot be achieved to serve the site as drawn on the plan. There are no pedestrian footways in the vicinity, the closest is roughly 200 metres to the south on the opposite side of Hall Lane; bus stops are 600 – 700 metres to the south on Hall Lane; the Cycle network/ Bridleway is approximately 500 metres to the south accessed via Hall Lane; no PROW are affected. All main amenities of Staveley are within 1 mile of the site.

This site is separated from the closest public highway by an existing rail line and 'land potentially required during construction' therefore creation of an access would require either a structure to cross the line or a (temporary) closure. In the event that crossing the rail line can be overcome, creation of an acceptable access may require land beyond that demonstrated as being 'potentially required during construction'. That said, it may be possible to introduce temporary measures to form an access for the duration of the Works. Notwithstanding, realignment of Hall Lane is demonstrated and, in the event that this work precedes the creation of the depot, access to the site should be incorporated within the design of the diverted road.

ix.) Staveley IMD Satellite Compound.

A satisfactory access cannot be achieved to serve the site as drawn on the plan. A pedestrian footway linking to the south only from proposed Depot Access; bus stops are 400 – 500 metres to the south on Hall Lane; the cycle network/ Bridleway is approximately 300 metres to



the south accessed via Hall Lane; no PROW affected. All main amenities of Staveley are within 1 mile of the site.

This site is separated from the closest public highway by 'land potentially required during construction' and land demonstrated as being allocated as 'Depot'. It's assumed that access would be taken via that proposed to serve the proposed Depot which, it would appear, requires modifications to the existing public highway (Hall Lane). Detailed layout designs complying with current design guidance will need to be submitted for the Depot access/ Hall Lane modifications for Constructional Approval prior to access being taken

x.) Works Road Rail Systems Satellite Compound.

A satisfactory access cannot be achieved to serve the site as drawn on the plan. There is a narrow pedestrian footway on one side of the existing highway, this being on the opposite side of the road to the eastern compound and same side of the road to the western compound. Bus stops are approximately 350 metres to the south of the eastern compound on Works Road; the cycle network is approximately 650 metres to the south of the eastern compound and accessed from Works Road; PROW are likely to be affected by the eastern compound. The limited amenities of New Whittington are within 1½ miles with more extensive amenities of Staveley approximately 2 miles from the site. This is a split site with the east and west parts approximately 350 metres apart each on the southern side of Works Road/ Whittington Road. Both sites are separated from the closest public highway by 'land potentially required during construction'.

The closest highway to the eastern site is Works Road where the highway is located within a cutting with substantial retaining walls to each side. There is no footway or margin on the proposed compound side of the carriageway. In addition, visibility sightlines would be compromised by the existing carriageway alignment. Given the short duration of time this compound is proposed to operate, it may be possible to introduce temporary traffic management measures to accommodate an access; however, significant engineering works would also be required.

It is possible that a satisfactory access may be created to the western site using the land identified as being 'potentially required during construction' although, due to the change in speed limit across the frontage of this land, this would be likely to involve significant clearance of existing boundary hedges in order to achieve adequate visibility sightlines. Alternatively, again due to the perceived duration of use of this site, it may be possible to introduce temporary traffic management measures to accommodate an access.

xi.) Clarity is sought on the functions and duration of these Compounds. It remains unclear which of the main and satellite compounds in this area, if any, would remain in place for the rail systems works. The wording here would seem to suggest that the Staveley site will be fulfilling this role for the whole eastern leg of the scheme and this work will last much longer than the construction works compounds.



xii.) In consideration of the plan for construction traffic neither Erin Road or Seymour Link Road are mentioned and we seek clarity as to whether construction traffic will use these two roads ?

xiii.) The construction phase drawing CT-05-631-R1 shows that the potential area used for HS2 construction includes considerable lengths of the land used by Brimington FP1 / Staveley Staveley FP1 (which double as the Trans Pennine Trail and the Cuckoo Way), between Troughbrook Road at Hollingwood and Hall Lane at Staveley. The construction area also takes in a crucial access point onto the TPT at Mill Green, Staveley. This route is a crucial public access corridor for walkers and cyclists, both for leisure and commuting use. It must remain accessible throughout the construction period, or alternative suitable provision made for regular users.

xiv.) There is a general concern about the pathways in the area. It would be helpful to appraise the vulnerable user path connectivity in the area as a mitigation quick win. Solutions for short sections of missing paths that would significantly improve permeability across this community area, particularly to connect built trail at Seymour to connect across the IMD line to Poolsbrook Country Park, and a replacement route for the section of the Clowne Branch Line (under construction) to be lost for the IMD line with connections from the Oxcroft Line.

xv.) There are nine Local Character Areas that could be significantly affected within the Staveley to Aston area. We share DCC's expressed concerns in the way these areas have been defined and then evaluated. A number of the areas in the Borough do not reflect the work that has been done to restore these landscapes from their previous coalfield legacy. By simply pulling out areas of poor condition it is inevitable within the context of the methodology that these areas will then score low with regard to their overall sensitivity and susceptibility to change. This leads to an under-estimation of effects and significance, and as a consequence does not inform high standards of design and mitigation, in other words poor quality areas could lead to poor quality development.

xvi.) We understand that DCC as the Highways Authority are extremely disappointed by the lack of engagement and the limited information provided prior to the WDES going into publication. We strongly suggest that this matter is addressed as a matter of some urgency. There needs to be further work done on sustainable travel planning for local communities affected by the developments. A more joined up approach would be of benefit to all communities. Some of the local roads affected on the periphery of the Borough are important to the local economy, connectivity, public transport and community and we draw particular reference to DCC's comments on the impacts on the A6175 Health Road; A617 Mansfield Road; significant re-alignment and stopping up of existing highway network on B6418 Chesterfield Road, Buttermilk Lane and Woodhouse Lane.

xvii.) We would like to see more detail on the air quality mitigation issues. The WDES does acknowledge that there may be adverse effects on the local communities during the site preparation/demolition/construction phases, however, this will be temporary and will be considered in more detail on the Environmental Statement. Mitigation measures refer to industry standard codes of best practice (CoCP – code of construction practice) and ensuring



that all construction vehicles meet the Euro 6 standards. If Euro 6 standards change, this needs to be reflected in the Environmental Statement. It would be helpful to understand much more about this situation before the publication of Volume 5. The WDES report does provide an assessment of the impacts and likely significant effects on air quality identified to date arising from the construction and operation of the Proposed Scheme within the Staveley to Aston area. Oxides of nitrogen (NOx) including nitrogen dioxide (NO₂), fine particulate matter⁴⁸ (PM₁₀, PM_{2.5}) and dust have been considered in the assessment. Emissions of all or some of these air pollutants are likely to arise from construction activities, demolition, site preparation works and the use of site haul routes. Emissions would also arise from road traffic during construction and operation of the Proposed Scheme. We endorse the view that assessment and mitigation in line with recently developed East Midlands Air Quality Network; Air Quality and Emissions Mitigation Guidance for Developers using the DfT Threshold Criteria for Transport Assessments^{[to assess impact and mitigations. We would recommend monitoring and assessment during the pre-construction, construction and operational phases to ensure accurate assessment of baseline and impacts rather than using synthetic modelling as has been detailed.}

xviii.) Currently the Borough has one AQMAs within respective areas which is on the A619 at Brimington just off the scope of the map. It is hoped that this will have been addressed by the CSRR prior to the construction phase commencing. It must be noted that AQMAs will be subject to change and whilst areas may not currently have AQMAs in operation currently the increase in traffic created by construction may result in decreases in air quality at local levels, therefore requiring the declaration of AQMAs.

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

xx.) The Noise & Vibration section reports on the initial assessment of the noise and vibration likely significant effects arising from the construction and operation of the Proposed Scheme within the Staveley to Aston area on:

- o 'residential receptors'; people, primarily where they live, in terms of individual dwellings and on a wider community basis including any shared community open areas¹⁶⁸; and
- o 'non-residential receptors'¹⁶⁹ such as:
community facilities including schools, hospitals, places of worship and 'quiet areas'¹⁷⁰;
- o and commercial properties such as hotels.

We believe more could and should be done to some sensitive properties along the route particularly once the noise assessments are complete.

xxi.) Bank House Farm has been identified as a 'Noise Important Area' (as defined in the DEFRA 2014 national noise action plans) and possibly being eligible for noise insulation. We are in agreement with this.



xxii.) Map SV-01-381 shows Woodthorpe Hall Farm on the boundary of the contour line of the 'operational noise contour map'. What is not clear from the WDES is the noise criteria used to measure (is it a 5, 10, 15 or 60 minute LAeq?).

xxiii.) The WDES does acknowledge that noise and vibration are possible issues during the site preparations/demolition/construction phases. What is not clear is how these issues will be mitigated. Suggestions within the WDES include temporary re-housing residents during the construction phase; other suggestions include using modern equipment and providing insulation. Generally we recommend that hours of site preparation/demolition/construction are limited to 7:30am to 6:00pm Monday to Friday and 9:00am to 5:00pm on a Saturday. We would normally recommend that no site preparation/demolition/construction work shall take place on a Sunday or Public Holiday. HS2 Ltd. have proposed that tunnelling and directly associated activities (such as removal of excavated material, supply of materials and maintenance of tunnelling equipment) will be carried out on a 24-hour day, seven days a week basis. Where reasonably practicable, material will be stockpiled within the site boundary for removal during normal working hours. Mitigation measures will need to be implemented to ensure minimal disruption

xxiv.) - The Volume of LA11 contains a section of the report presents the baseline conditions that exist along the Proposed Scheme in the Staveley to Aston area in relation to land quality, and contamination and reports the likely impacts and significant effects identified to date resulting from construction and operation of the Proposed Scheme. Consideration is given to land that potentially contains contamination and land that has special geological significance, either from a scientific, historical, mineral exploitation or mineral resources point of view including geological sites of special scientific interest (SSSI) and local geological sites (LGS), and areas of designated mineral resources. Consideration is also given to petroleum (including gas) prospects and licensing.

xxv.) - The WDES acknowledges that there will be 'made ground' along the proposed scheme and whilst locations of possible sites of historical contamination is known, precise depths or contaminants are unknown at present. We recommend that further information is provided in site investigation reports, remediation reports and verification/validation reports. There is much information and moving forwards we encourage closer working with SWA land owners to identify appropriate issues and strategies.

xxvi.) For mining sites, a potential for significant adverse effects has been identified associated with the uncertainty around mine gas and mine water in historical workings. For the working draft ES, the CoCP does not address this in detail, but is being further developed in consultation with authoritative consultees to develop mechanisms for mitigating any significant adverse effects.

xxvii.) The WDES does recognise that the construction of the IMD could impact on the quality of nearby water sources such as the River Rother and the Chesterfield Canal. Liaison with the Environment Agency will be necessary.



xxviii.) The Council is a land owner and manages a number of industrial units off Fan Road, Ireland Close and Stephenson Road. We would appreciate an understanding of the interaction between these business and HS2 Ltd and discuss possible impacts in advance of the final EIA.

lxxx.) The Council owns and maintains an overbridge at Barrow Hill as the line approaches the Engine Shed. We would ask for clarity and detail on any impacts to this structure moving forwards.



Section C ISSUES WHERE THE COUNCIL REQUESTS THAT HS2 PRESENT FURTHER INFORMATION, AS THE CURRENT WDES IS INADEQUATE TO DETERMINE WHETHER THE PROPOSED SCHEME IS THE MOST APPROPRIATE WAY FORWARDS.

Currently Chesterfield Borough Council regards the WDES as inadequate due to missing or incomplete information in a number of areas. The two volumes on the MMLe have been identified in this category and we look forward to receiving further information on the Proposed Scheme as this emerges. This is particularly important as the Railway Act 1993, section 122 provides an exemption to the operator of all rail stock and infrastructure from nuisance complaints. This means that if the hybrid bill is passed, the local authority would have no legal powers to investigate complaints about the line and/or operation of the line. We do therefore wish to work closely with HS2 to understand the proposals in more detail.

The two volumes which intercept the Borough 10 and 11, also possess significant information deficiencies. 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. This is not any different from other Community Areas where there is a similar lack of detail and or subsequent underplaying of possible impact. We ask HS2 to provide more detail on a number of major features in both Community Areas 10 and 11 in line with similar request from colleagues in authorities whose jurisdiction covers other Community Areas. There are also some quite concerning areas where in comparison to other Community Areas the intelligence in Volumes 10 and 11 is severely lacking. We therefore request that HS2 performs further work to rectify these omissions. These include the following:

- a.) The noise assessments for the area around the former Oxcroft Minerals line, joining the main HS2 line near Woodthorpe are deficient/ missing. This also includes the operational area around the IMD. We are unclear about why these have been omitted from Volume 11 but would point out that we anticipate that the line may not necessarily run electric trains and could run diesels or bi-modal units. It is therefore imperative that any noise assessments are run on the basis of worst case (diesel trains) and that night sensitivity issues are addressed when the assessments take place.
- b.) The WDES provides limited information on the Infrastructure Maintenance Depot (IMD); it does make reference to an Environmental Statement that will be released as part of the hybrid bill. At this stage we would expect more information to be available, such as background noise measurements, proposed/modelled noise data and the impact the IMD may have on nearby residential communities such as Barrow Hill and Staveley.
- c.) In terms of Air Quality the WDES states that the operational line of HS2 will have no impact on local residents; we believe this is because it will be on an electrified line and will produce minimal emissions. However if the above is proven correct this information will not be the case for the spur and IMD. There is minimal information on the IMD and Staveley Spur throughout the section and we therefore request that HS2 Ltd. generate additional AQ assessments based on the above worse-case scenario (which is likely to be



heavier bi-modal engines). If there is combustion plant at the IMD there will be an air quality assessment. We would welcome this being produced also.

- d.) The WDES does not make any reference to lighting (either during the construction phase or during the operational phase), either along the track or at the IMD. Tree planting has been proposed around the IMD to provide a visual barrier. Taking our comments into consideration from Section A, we would like to see much more information about position of lighting and lighting columns would be welcome so that we can together aim to minimise disturbance to local residents without diminishing the viability of other parts of the corridor.
- e.) The WDES does recognise that the construction of the IMD could impact on the quality of nearby water sources such as the River Rother and the Chesterfield Canal. Liaison with the Environment Agency will be necessary if it has not already taken place. At this stage, no additional measures are considered necessary to mitigate risks from land contamination during the construction stage beyond those that are set out in the draft CoCP and/or instigated as part of the site specific remediation strategies that would be developed at the detailed design stage if required. These measures would ensure that risks to people and property from contaminants in the ground would be controlled such that they would not be significant. For example, measures might include excavation and treatment of contaminated soils or controls to manage movement of landfill gas and leachate. We request that HS2 Limited provide further information of detail so that we may work together to devise a whole corridor plan.
- f.) We are disappointed that the landscape assessment sections do not contain visual cross sections of the impact on the landscape. The section appears to make suggestions of certain viewpoints where the work will be undertaken but isn't included. Instead the maps and plans presented such as plans LV-02-396 a & b; plans LV-02-397 a & b and plans LV-02-450 a & b are all based on aerial photography from as far back as 2011. Therefore this information omits recent developments at both Markham Vale, Staveley Town Basin, the former Hartington Colliery and Coalite. The changes to the landscape resulting from the major regeneration schemes have not been incorporated although HS2 have been previously informed of this problem.
- g.) Route-wide, local area and site-specific traffic management measures will be implemented during the construction of the project on or adjacent to public roads, bridleways, footpaths and other PRow affected by the Proposed Scheme as necessary. The details of this have not yet been provided. A route-wide traffic management plan will be necessary. We strongly support the production of this documentation at as early a juncture as possible as the detail will need careful consideration.
- h.) Most of the operational maps, contain generic tree planting as the only form of mitigation. These may be out of character with the areas and lack detail. There are many different options to mitigate the effects and urge HS2 Ltd. to work with us to devise schemes of planting which are in keeping with the surrounding landscape and broader objectives.



- i.) Climate Change is comprehensively addressed for HS2 itself and it is important that more details emerge in order to understand what is proposed once the results and conclusions are presented in the formal ES. However little information is provided about other mitigating potential, such as renewable energy generation particularly at hubs and depots and we would welcome further engagement on this point.

- j.) Supplementary information is given through the published sections on the Environmental Minimum Requirements (EMRs), Code of Construction Practice (CoCP). The EMR imposes a requirement to use "reasonable endeavours" to adapt measures to reduce the adverse environmental effects reported in the formal ES provided that this does not add unreasonable cost or delay the construction or operation of the proposed scheme. There is however no definition of what reasonable endeavours means in this case nor is it explained in the glossary and the same is true of unreasonable cost. More clarity is required in both cases of what is meant by the terms used as they are repeated used throughout the suite of documents. Moving forwards these definitions will be of exceptional value as we try to assess a balance in Chesterfield between the exciting opportunities the development brings and any unwelcome localised impacts.