

# HS2 Phase 2b Scope & Methodology Report consultation comments

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## 1. Introduction

- 1.1 The S&MR for Phase 2b of the HS2 route covers the possible impacts of the railway line from the end of 2a at Crewe to Manchester and on the eastern side through from Kingsbury railhead in North Warwickshire through the borough and on towards Leeds.
- 1.2 The S&MR sets out in principle the main areas of consideration for the subsequent draft and full environmental statements. The document establishes the scope, possible effects, their magnitude and duration. At this stage it does not conclude what those effects are or how to mitigate them.

## 2. Technical comments on the consultation report.

- 2.1 Table 1 below sets out the specific comments of the County Council in respect to the open consultation. The tabulated layout sets out the document reference, an abridged version of the HS2 report the two right-hand columns identify the broad concern of the council, then finally what the alternative preferred measure or action should be.

Table 1: EIA comments

<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative/ inclusion</b>
<b>Section 1: Introduction</b>			
1.6.3	<p>Four underlying sustainable development priorities were used for the assessment:</p> <ul style="list-style-type: none"> <li>protecting natural and cultural resources and providing environmental enhancement;</li> </ul>	The Council welcomes these underlying principles.	
1.7.8	The EMRs will also impose requirements on the nominated undertaker to use reasonable endeavours to adopt measures to further reduce the adverse environmental effects reported in the ES, provided that this does not add unreasonable cost or delay to the construction or operation of the Proposed Scheme.	The Council acknowledges that ecological impacts look to be reduced during the construction phase. It remains important for the ES to demonstrate how important habitats or species have been avoided and where this is not possible the reasons why they could not be avoided.	The council expects that HS2 will actively mitigate the ecological effects and plan to avoid the impacts now, rather than rely on the hybrid bill and planning regime at a later stage.
<b>Section 2: Changes between Phase One, Phase 2a and Phase2b approach to EIA</b>			
2.4.6	<p>There are a number of changes contained in the EIA Directive 2014, which include the following:</p> <ul style="list-style-type: none"> <li>the need to address the significant effects of projects on</li> </ul>	The Council welcomes this change and as it illustrates a commitment that reflects the need to ensure paragraph 1.7.8 is not used as benchmark for the bare minimum.	The council expects HS2 will actively mitigate the ecological effects and plan to avoid the impacts now, rather than rely on the hybrid bill and planning regime at a

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	<p>biodiversity, to avoid or minimise such effects (Article 3 refers to 'Biodiversity with particular reference to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC');</p> <ul style="list-style-type: none"> <li>• in relation to historical and cultural heritage and landscape - the need to address the visual impacts of projects, in relation to the built or natural landscape and urban areas;</li> </ul>		later stage.
<b>Section 3: Stakeholder engagement &amp; consultation</b>			
section 3.2.1	<p>HS2 Ltd will organise and facilitate stakeholder engagement activity, working closely with its consultant team. The general approach to stakeholder engagement for the Proposed Scheme will comprise.....</p>	<p>The council welcomes the proactive approach to engaging stakeholders</p> <p>Further clarification is requested on the use of 'varied engagement techniques'. This is a qualitative statement which provides no certainty as to what these techniques will be or how they will achieve successful engagement.</p>	<p>The council requests that HS2 provides details on the exact usage of techniques and how they are to be measured.</p>
3.2.2	<p>Building on stakeholder engagement work already undertaken, it is important that</p>	<p>Reference is made to obtaining local experience and knowledge to identify effects not previously</p>	<p>HS2 to provide information on data capture and reporting.</p>

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	engagement is used to provide a voice to those who may be affected by the Proposed Scheme generally, but also specifically to those who may be more vulnerable to impacts.....	identified.  We welcome this and would like to know how this information will be captured and reported on.	
3.3.4 and 3.3.5	Engagement, and specifically the formal period of consultation, will adopt a 'design-led' approach which will present the Proposed Scheme from a multi-disciplinary perspective.....	We are pleased to note that engagement and consultation will be design led and stakeholders will have the opportunity to help identify mitigation.	Clarity from HS2 on who the stakeholders are for each area and detail how their input will be recorded is essential.
3.4.5	The role of ongoing community engagement will be to consider local issues and discuss potential ways to avoid and mitigate impacts of the Proposed Scheme, such as screening views of the railway, managing noise and reinstating highways, and identifying possible community benefits.	The suggestion of "community benefit" maybe confused with the Community Environment Fund in Phase one.	The council wishes to see clarity on this point and establish what the statement means.
3.4.6	Reporting will be undertaken on a community area basis to assist engagement and understanding of the impacts of the Proposed Scheme within local communities across the route. The list of community areas is set out in	There needs to be a definition of the 'community areas' and a rationale as to what basis these areas have been selected.  Are they based on recognised community/ administrative	HS2 to define areas and selection criteria.

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	Section 4.1.12 of this SMR.	boundaries or engineering packages of work for the scheme	
3.4.8	Engagement will continue with local authorities throughout the design and assessment processes to maximise the opportunity for local authorities and parish councils to positively inform the development of the Proposed Scheme both in the context of technical input to the assessment and local knowledge and issues.	We welcome the intention to continue to engage with local authorities. However, the reference to local authorities 'positively informing' the development of the proposed scheme is presumptive. Due to the nature of the scheme, the county council cannot be reasonably expected to provide a positive emphasis on each interaction with HS2 Ltd.	HS2 must provide a balance when wording this.
3.5.1	The feedback and data received from stakeholders through both ongoing engagement and formal periods of consultation will be recorded and used to influence the design and assessment of the Proposed Scheme, where appropriate. Ongoing engagement will provide the opportunity to update stakeholders on the design evolution and assessment progress, identifying where feedback has helped inform both,	The council endorses the approach to keep stakeholders updated throughout the hybrid bill development.	The council requests that HS2 establish specific milestones in advance of engagement to manage and inform community expectation.

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	up to hybrid Bill deposit.		
<b>Section 4: Environmental Impact assessment (EIA) methodology</b>			
4.2.4	<p><b>Scope of Assessment – Temporal scope</b> Effects arising from longer term considerations after the opening of Phase One, Phase 2a and Phase 2b, the progressive growth in background road traffic or the maturing of mitigation (e.g. growth of planting or habitat creation) will be considered. Where this applies, the environmental topic sections in Part B of this SMR identify the appropriate temporal scope that would be adopted, taking account of these factors.</p>	The Council understands that Natural England Guidance on Temporal factors relating to habitat creation is forthcoming and could be available to inform this aspect of the ES.	<p>The Council believes the HS2 should be an active participant in the consultation.</p> <p>Until such time as the Sec. of State, Environment makes this national policy.</p>
4.2.6	<p><b>Scope of Assessment – Geographic scope</b> The term geographic scope (also called spatial scope) means the area over which the EIA will consider effects. In general, this will take into account the distance from the Proposed Scheme over which changes to the environment are likely to occur as a result of the</p>	The Council suggests that the scheme could impact (positively or negatively) on national and regional ecological flows (how species move through a geographical area). This has not been recognised in this chapter.	Suggested addition: <i>“National baseline ecological habitat data will acquired to predict impacts, be these positive or negative, on ecological connectivity”.</i>

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	construction or operation of the Proposed Scheme.		
4.3.1	<p><b>Approach to mitigation</b> The ES will set out mitigation measures that would help to avoid, reduce, repair or, where appropriate, offset significant adverse effects. The EIA Regulations 2017 require an ES to include “a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment”.....</p>	<p>The Council welcomes this acknowledgement of the 2017 changes that embeds the ‘Mitigation Hierarchy’ into the ES process. It also is encouraged to see that ‘offsetting’ will be considered at the onset and recommends that the Ecological Community is involve at the early stages to assist with the mechanisms to evaluate and deliver mitigation/compensation.</p>	<p>The Council recommends that an Ecology Group is established as soon as possible. This could utilise the existing HS2 Ecology Technical Group or extend the membership for Phase 2b.</p>
4.4	<p><b>Cumulative effects</b> Cumulative effects are broadly defined as incremental effects that result from the accumulation of a number of individual effects. They may result either from.....</p>	<p>The Council notes that this chapter does not recognise that impacts can be positive as well as negative.</p>	<p>Suggested addition text in bold: <i>“Cumulative effects <b>can be negative and positive and</b> are broadly defined as incremental effects that result from the accumulation of a number of individual effects. They may result either from.”</i></p>
4.6.6	<p>It is likely that there will be topic specific limitations due to gaps in data sets and lack of survey data</p>	<p>The Council believes that predictive modelling should be employed for a number of species (e.g. great</p>	<p>Suggested addition text in bold: <i>“It is likely that there will be topic specific limitations due to gaps in</i></p>

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	<p>where access to land has not been obtained. Such limitations will be set out in the ES. Assessments may employ professional judgement, where the definition of baselines is constrained by lack of data; use of professional judgement will be made explicit in the ES.</p>	<p>crested newt and bats) to reduce the need for early survey work. This will significantly reduce the costs and expectations on HS2 and smooth the process. However it is essential that this modelling is accepted by the ecological community and so recommends that an Ecology Review Group is established as soon as practically possible. This utilise the existing independent HS2 Ecology Technical Group.</p>	<p><i>data sets and lack of survey data where access to land has not been obtained. Such limitations will be set out in the ES. <b>Where there are gaps in data these will be initially filled through predictive modelling based on accepted scientific principles. Where this is not possible, assessments may employ professional judgement, where the definition of baselines is constrained by lack of data; use of professional judgement will be made explicit in the ES.</b></i></p>
<b>5: Reporting of alternatives</b>			
The Council has no comment on this section			
<b>6: Agriculture, forestry &amp; soils</b>			
The Council has no comment on this section			
<b>7: Air Quality</b>			
The Council has no comment on this section			
<b>8: Climate Change</b>			
The Council has no comment on this section			
<b>9: Community</b>			



Section 9.1.7	This will include community facilities and infrastructure such as education, health, emergency services.....	It is key that stakeholders across the whole health economy are included in the EIA. Each of the clinical commissioning groups (CCG) in Warwickshire hold Local Estates Forums (LEF) on a regularly basis.	WCC Public Health wish to see representations from primary, secondary and mental health trusts at each of them.
9.2.1	The potential for adverse impacts on communities has influenced the development of the Proposed Scheme.	There is no qualification for this statement. On its own it has limited value.	The council requests an explanation of the actual adverse impacts that have been considered.
9.2.5	The baseline will include data collected on both resources and receptors. Potential resources include:.....	There are other physical elements of community infrastructure to consider. This should include pubs, shops, bus stops, post boxes, noticeboards and any technology elements - broadband connections.	HS2 to include and consider additional physical aspects of community infrastructure in the Environmental Statement.
9.2.8	The information collected on community resources and receptors, drawing on the above sources, will be limited by the extent of publicly available data and data obtained through consultation and engagement with communities.	Reference is made to data obtained through consultation and engagements with communities themselves. The council is aware that some communities and groups have undertaken, or intend to undertake, their own surveys for village plans and HS2 research. These are an important source of material and must not be overlooked.	HS2's commitment must be extended to include consideration of this specific type of data collection during the compilation of the Environmental Statement.
9.5.3	The temporal scope for this topic is outlined in Section 4.2 (Scope of the assessment). Community	The council welcomes the temporal scope of assessment to a year after the opening of the railway. It would	HS2 to extend the assessment period.

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	effects will be assessed for the construction period (including a period of commissioning) (2023 - 2033) and for the year of opening in 2033. However, the assessment will also need to reflect the temporal scope of other topic assessments such as Air quality (Section 7); Landscape and visual (Section 15); Sound, noise and vibration (Section 18) and Traffic and transport (Section 19).	be advantageous for this to be considered for longer.	
9.7.1	For assessment purposes it will be necessary to assume that the baseline characteristics established during the EIA process will remain largely unchanged. However, where it is possible to predict change, or to identify planned community facilities.....	We welcome the intention to incorporate changes into the future baseline. During the development of Phase One of the HS2 hybrid bill. During Phase 1 there was a significant change to the scheme (Kingsbury Railhead) in Warwickshire. The council would not expect to see a similar situation occur in Phase 2b.	The council expects that sufficient planning will be possible to avoid any significant changes to the scheme. Significance is defined as any changes requiring additional land or structures to the original scheme.
<b>10: Ecology</b>			
10.2.1	<b>Ecology - Establishment of baseline and definition of survey</b> The baseline conditions for the ES will be established through a	The Council suggests that the ES would be greatly enhanced by modelling impacts for certain species.	Suggested addition text in bold: <i><b>“The baseline conditions for the ES will be established through a combination of desk study,</b></i>

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	combination of desk study, field survey and consultation.		<b>scientific modelling</b> , field survey and consultation.”
10.2.2	Existing biological data for the route of the Proposed Scheme will be obtained from relevant Biological Records Centres and from national and local specialist data sources, such as bat groups. The data to be collated will include.....	National data should be acquired at a Land Cover Level (or a derived output from this source) to conduct ecology flow (connectivity) modelling. The Council considers this interpretation in a material consideration with ES production to comply with Local Planning Authority Local Plan Policies regarding Green Infrastructure.	Suggested addition text in bold as bullet points: <ul style="list-style-type: none"> <li>• <b>National Land Cover data (or a derived output from this source) to evaluate ecology connectivity</b></li> <li>• <b>Master Map</b></li> </ul>
10.2.5	The width of the survey corridor will be defined by the potential area of ecological impact. This will vary depending on a number of factors, including the engineering of the route, the topography and ecological connectivity of the landscape, and the ecological receptor. In rural sections, the survey corridor for some species, such as great crested newt, could extend up to 500m either side of the land required for construction; in urban sections, the survey corridor will, in general, be much narrower as the zone of impact will	The Council is encouraged that ‘ecological connectivity of the landscape’ is contained in the scoping document. However, there is not reference to the data needed to evaluate this impact.	Please note comments to 10.2.1 and 10.2.2 above.

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	be more restricted.		
10.2.7	Specialist surveys will include: <ul style="list-style-type: none"> <li>Great Crested Newt Habitat Suitability Index (HSI) surveys of water bodies and eDNA surveys;</li> </ul>	The Council notes that population estimate surveys have not been included in this list (e.g. bottle trapping). This infers that HS2 will be modelling sensitivity and predicting impacts on great crested newts populations based on HIS scores, presence and absence and suitable habitat. This approach is being pioneered by the Council with Natural England. If this assumption is correct then the Council has expertise in this approach, but it is reliant on acquiring data at a greater spatial level than the prescribed distances within the Scoping Report to date. The Council also notes that the list is an 'inclusive' list not an 'exclusive' list. Therefore, suggests that the NERC Act Section 41 lists are included in this section of the document. The Council notes that the NERC Act (2006) is referenced in section 10.5.5.	The Council seeks clarification on how great crested newts will be considered within the ES.  For the avoidance of doubt, the Council recommends a reference to the NERC Act (2006) within this section.
10.2.9	The desk study and field surveys, aided by consultation, will support	The Council welcomes the inclusion of local Green Infrastructure (GI)	

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	the identification of sites and features of value. In addition, the assessment will identify landscape-scale ecological features, such as linear features (e.g. hedgerows, watercourses, and disused railway lines) that have additional value in providing habitat connectivity and potential migration corridors. This will include identification of landscape scale initiatives such as green infrastructure strategies and living landscape initiatives.	strategies, but would like to inform HS2 that The Council's GI strategy is based on connectivity mapping and the data analysis available online at <a href="http://maps.warwickshire.gov.uk/greeninfrastructure">maps.warwickshire.gov.uk/greeninfrastructure</a> . Therefore, to comply to or take into consideration this strategy the Council would expect the use of modelling reference in our comments 10.2.1, 10.2.2 and 10.2.5 above.	
10.3	Consultation & engagement	In addition to the statutory agencies and environmental NGOs local users of and residents have a large stake in the natural environment. The EIA needs to reflect Multiple Value Systems, including those expressed by the general public, to determine significance. Significance should be expressed in a rational, consistent, impartial and transparent way.	
10.5.7	In order to ensure that all likely significant effects of the Proposed Scheme will be identified, where	The Council welcomes the adoption of the 'precautionary approach'.	

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	<p>baseline information is incomplete a precautionary approach of assuming a reasonable worst-case evaluation is to be adopted. This approach will be utilised to assign precautionary values to both known receptors and potential receptors based on the best available information. Further details are provided in the Ecological assessment method Technical note (referenced in Annex A).</p>		
10.5.13	<p>The Government and HS2 Ltd are also seeking to achieve no net loss of biodiversity for the Proposed Scheme. The methodology used for this no net loss assessment has been adapted from the approach used for Phase One and Phase 2a, taking account of the review undertaken by Natural England during 2016. It will be used to compare the habitats present pre and post-construction, see Technical note Methodology for demonstrating no net loss in biodiversity (referenced in Annex</p>	<p>The Council suggests that Government and HS2 commit to a net gain for the proposed scheme. At a minimum the word 'seeking' is not acceptable. A net gain approach would meet the Government's commitment to leave the environment in a better state than when it came into government. It would also support the NPPF and Local Plan policies within the Warwickshire LAs. The Council needs the Scoping Report to acknowledge that if the scheme impacts on an</p>	<p>The Council recommend either of the following changes to the document: <i>"The Government and HS2 Ltd <b>will</b> achieve no net loss of biodiversity for the Proposed Scheme"</i> or <i>"The Government and HS2 Ltd <b>will</b> achieve a net <b>gain</b> of biodiversity for the Proposed Scheme</i> "</p>

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	A). The outputs from the no net loss calculation will be reported separately at <a href="http://www.gov.uk/hs2">www.gov.uk/hs2</a> .	irreplaceable habitat (e.g. Ancient Woodland) then a net gain objective cannot be achieved for this habitat type. The Council welcomes the commitment to the reporting of no net loss / net gain calculations, but would seek how often this reporting will take place and what protocols will be in place to hold the Government and HS2 to account on this objective.	
10.6.3	The assessment also takes into account relevant guidance set out in national, regional and local planning policy and other guidance, including, but not limited to;:	The Council welcomes the commitment to ‘take into account’ the listed policies and guidance, but would like to note for the record that North Warwickshire Borough Council’s Local Plan requests that all development will result in a ‘no net biodiversity loss’. This is stronger than the commitment within 10.5.13 that ‘seeks’ to result in no net loss. However, the Council acknowledges that if an Ecological Community agreed Defra metrics accounting system is used appropriately in the measuring of	

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		biodiversity impact, then a 'net gain' or not net loss' objective become a minor issue.	
10.6.13	In the event that any significant residual impacts remain, procedures for monitoring those significant effects will be developed, as appropriate, as part of the overall monitoring approach.	The Council welcomes this approach and would suggest working with the ecological community and so recommends that an Ecology Review Group is established as soon as practically possible. This utilise the existing independent HS2 Ecology Technical Group. The Council would like HS2 to consider the formation of a Biodiversity Strategy to outline how nature conservation will be considered within the scheme.	
	<b>Unconsidered impacts</b>	The ES does not include in its scope the need to consider turbulence and air pressure effects as high speed vehicles pass under hard structures. Evidence suggests that there a significant sudden pressure changes that may cause bat fatalities (barotrauma).	The Council recommends that the effects of pressure changes of sensitive ecological species and their receptor sites are include in the scope of the ES.
<b>11 Electromagnetic Interference</b>			
The Council does not wish to comment on this section			
<b>12: Health</b>			



Overall WCC Public Health agrees with and supports the proposed methodology for carrying out the health section of the EIA.			
Section 12.2.1		WCC Public Health collects and has access to a wide variety of health and wellbeing data for Warwickshire.	WCC Public Health can provide the most up-to-date and relevant health and wellbeing data, we would expect this resource to be used in the EIA process.
Section 12.3.5		WCC Public Health note the list of key stakeholders missed some groups.	WCC Public Health expect key stakeholders will also need to include Clinical Commissioning Groups (CCGs) as commissioners of primary care; and local hospital trusts as providers of secondary care.
Section 12.3.6		WCC Public Health note the stakeholder identification.	WCC Public Health can identify the most appropriate local health and wellbeing groups to be used in the EIA process.
<b>13: Historic environment</b>			
13.2.8, pg. 137	That the study area for data gathering to identify impacts upon non-designated assets will encompass the entire land requirement plus 500m either side in rural areas and 250m in urban areas; that the study area for data gathering to identify impacts on designated heritage assets... will be 2km either side of the land required in rural areas and urban areas.	Paragraph 139 of the NPPF states that 'Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'. The proposed method may result in non-designated heritage assets of equivalent significance to designated sites being missed.  The primary dataset for designated	The data gathering should extract data on non-designated sites from an equivalent areas to that proposed for designated sites in order to ensure that any non-designated sites of equivalent significance to designated sites are identified and the impacts upon them appropriately assessed.  The above comments are primarily in respect of the data gathering process rather than the area to be subject to detailed assessment.

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		<p>sites does not include non-designated sites (irrespective of their significance), the extraction of data from that source would not identify any such heritage assets, and the data extraction from the sources for non-designated heritage assets would only extract data from a study area within 500m of the land requirement. Therefore any non-designated heritage assets which are of equivalent significance to designated sites which lie outside of the 500m study area would not be identified e.g. a non-designated heritage asset which should be assessed in the same way as a designated heritage asset could lie &gt;500m from the route and not be identified by the proposed study parameters.</p>	

13.3.3, page 138		It states that the analysis will include consideration of non-designated heritage assets of schedulable quality. However, this is not referenced in para. 13.2.8, or how this is to be achieved if information on any such sites is not obtained during the data gathering.	The council wishes to see clarity on this point
<b>Section 14: Land quality</b>			
The Council does not wish to comment on this section			
<b>Section 15: Landscape &amp; visual</b>			
The Council does not wish to comment on this section			
<b>Section 16: Major accident &amp; disasters</b>			
Table 32,	Receptors to be excluded from assessment of major accident and or disasters	This doesn't seem to cover wider site impacts, eg neighbouring sites that might have a relationship on the route.	That neighbouring sites are considered
16.4.14 page 183	Spatial Scope	There does not appear to be any mention of Counter Terrorism or similar threats in the assessment	That counter terrorism and malicious threat must from part of the assessment
16.5.12 Page 183	Risk identification will use existing sources of information wherever possible	There is no indication of who the sources are.	That the partners are identified and listed
16.5.16		Noted the omission of Civil Contingences Act	The Civil Contingences Act should be referenced

<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative/ inclusion</b>
General observation		There is little to no information on the linkage between the CCA and how this links to Network Rail and operating companies.	
General observation		The document focuses on the H&S aspects in preference to the resilience	
16.6.2	In terms of the assessment methodology the following assumptions are made	There appears to be no specific mention on multi-agency working, engagement, response and recovery considerations	
<b>Section 17: Socio Economic</b>			
Section 17.0 Page 193		This section is broad and does not appear to recognise the visitor economy in its own right. There will be locations along the route that are key attractors in the local tourism and day visitor sector. Their value and contribution should be assessed	The council wishes to see clarity and confirmation that micro and small business interests will be assessed and not overlooked by a desk top study. In Warwickshire this is particularly important at Kingsbury Water Park and Pooley Park.
17.5.1 Table 36 Page 197	The table identifies “moderate” as measurement term	The use of moderate as a term leaves much to the interpretation of the reader.  Moderate at a national level of review may be high or severe if	The council requests that a clear definition of narrative terms is established here and throughout the document.

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		reviewed at a sub-regional level	
General observation		The council wishes to see the assessment take account of the unprecedented levels of growth and development outlined in the North Warwickshire local plan and the Combined authority aspirations for regional growth as well as the consented development as at August 2017	
<b>Section 18: Noise</b>			
The council does not wish to comment on this section			
<b>Section 19: Traffic &amp; transport</b>			
19.2.1	Traffic data, traffic surveys and, where appropriate, modelling will be undertaken to inform the transport assessment along the route of the proposed scheme, this data will also be used to provide information to determine the baseline for the traffic and transport assessment within the ES.	WCC would recommend road condition surveys included for all LA routes proposed for use by construction traffic, and to feed into models for predicted life expectancy of carriageways etc. WCC would like bridge condition surveys included. Also, accident data, to identify at an early stage any routes or locations where may need remedial or mitigation measures.	Accident data – should be site specific (cluster sites) and route lengths (acc/km). Including data for HGV accidents per km.
19.2.2	The future baseline will include consideration of the growth in	WCC welcomes this. However, development opportunities are	The use of the local plans as a measure of development is strongly

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	travel demand, including changes arising from other developments and proposed transport network improvements	ongoing. Any newly emerging developments should be included as they emerge.	recommended.
19.3.3	Engagement with <ul style="list-style-type: none"> <li>• Highway Authorities</li> <li>• Highways England</li> <li>• Network Rail</li> </ul>	The emergency services as statutory engagement partners is necessary.	The council expects to see the emergency services actively engaged.
19.5.2	Spatial Scope – construction The assessment will focus on traffic and transport issues resulting from land required for the proposed schemes, lands required for worksites, the presence of construction traffic on the local road network and effects on routes crossing the construction areas (PRoW and highways).	Mitigation measures should be considered for locations off line of the construction route where diversion to normal base line traffic flow is expected to avoid long delays because of construction.  It is unclear how the highway network is affected. Or why only the Strategic road network is referred to.	The council expects an Aol (area of influence) to be agreed prior to any survey work
19.5.4	Spatial scope – operation  assessment	It is not clear from the text whether the assessment deals only with the immediate impact or whether the total impact on the network is assessed.	The council wish to see the overall displacement of traffic on the wider network assessed not just a series of isolated incidents that underplay the full effects on the Warwickshire road network.  WCC has a suite of microsim models available for this purpose.

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19.5.5	Temporal scope <ul style="list-style-type: none"> <li>• Common Base Year</li> </ul>		The council requires clarification of this term and the use of it in the assessment.
19.6.1	The traffic and transport effects arising from the construction strategy and engineering design for the proposed Scheme will be assessed as part of the EIA process.....	It is unclear from the text how the background growth be determined or what focus will be given to accounting for relevant Local Plan proposals in growth calculations.	The council would wish to see local growth assumptions agreed prior to any assessment work.
19.6.3	The criteria used for the identification and assessment of potentially significant impacts are ..... and professional judgement.	If professional judgement is being used then the document needs to identify what judgement is being used.	The council expects that their “local experts” and professional judgement will be used throughout the exercise. Furthermore all Computer modelling platforms and assumptions should be agreed beforehand.
19.6.8	Significance criteria for construction assessment – Impacts with a duration of less than 4 weeks not considered significant	Any impact of whatever length of time (less than 4 weeks) that results in significant accidents patterns emerging must be considered significant.	The council expect HS2 to address this and amend the methodology.
19.6.9	Public transport delays	In rural areas, such as North Warwickshire, there is likely to be a significant impact on rural public transport journeys. Rural public transport plays a vital part in ensuring communities have access	Public transport must be maintained throughout the construction phase without undue delays or timetable changes.

<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative/ inclusion</b>
		<p>to services and facilities. Frequency of bus journeys must be maintained as should journey times and timetabling. Failure to achieve this may lead to the withdrawal of vital services and cause unnecessary isolation.</p>	
19.6.11	Traffic delays	<p>This is likely to have significant impact on journey times to some minor villages and settlements during the construction phase. HS2 need to consider the proposals for diversions/road closures/traffic management to ensure no community is “cut-off” from access to public transport. May have significant ‘severance’ impact for some communities.</p> <p>It is unclear how will a "significant change to delay" will be determined in the “Microsim” model which do not provide degree of saturation, network delay over the AoI and journey time routes should be considered.</p>	The council expects that school bus routes will not be subject to delays or disruption even for a short period of time as this poses an unacceptable burden on the education of young people and their attendance records. .
19.6.12	Vulnerable Road Users	Many villages have an older population who rely on walking and	The council expects care and consideration is given to enable



<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative/ inclusion</b>
		<p>cycling routes as a main form of transport link. Severance in rural communities can be severe and has a detrimental effect on people's sense of well-being and community. In addition, there are many locations where equestrian activities are common.</p>	<p>these activities to remain safe and accessible throughout the construction period.</p>
19.6.31	<p>Accidents and Safety Significant impacts on accidents and safety risks will be defined for links and junctions for which data is available that have experienced more than nine personal injury accidents in the latest available three year period and which would also be subject to an increase of 30% or more in total traffic flow during construction.</p>	<p>The measure of accidents at junctions of 9 Personal Injury Accident is higher than expected, for use as a base line. WCC would prefer 6 PIA's to be used as the baseline number. WCC is concerned that over a route length the number of PIA per km should be measured, and used as a baseline. Including a risk factor for Killed or Seriously injured accidents (KSI) where HGV's were involved. Concerned about the need to have 30% additional traffic before the route is considered for safety improvements.</p> <p>Also a need to look at any alternative routes being used by traffic, to avoid lengthy delays due</p>	<p>The council expects that 6 PIA's should be used as the baseline, rather than 9. This is because 6 is the standard "professional judgement" used by most local authorities.</p> <p>The council expects the project to consider both the nodes and links especially where HGV's are involved in collisions thus reducing the possibility of undervaluing the collision data.</p> <p>The council does not consider that there should be a specific % increase in traffic before safety measures are considered and implemented as needed. It is the councils view that failure to assess</p>

<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative/ inclusion</b>
		to construction, to see if there is a spike in accidents as a result of rat-running.	the either/ or of links and nodes is an artificial suppression of data and possible safety.
19.6.39	Traffic flows and delays to vehicle occupants. If there is a significant delay in relation to junction congestion resulting from the operation of the proposed scheme is forecast in the traffic model.	WCC wishes to see confirmation that if traffic delays occur (that have not been predicted in the traffic model), then these will be dealt with quickly.	That unforeseen traffic delays (not identified prior to the construction phase) will be addressed and remediated as necessary.
19.6.41	Traffic related severance	WCC has a mostly rural community in this area. Severance due to traffic is a real issue, and may increase due to construction traffic. Consideration at an early stage should be given to reducing the impact of traffic, either directly or indirectly associated with the construction or enabling works.	
19.7.2	The traffic and transport assessment will require a number of assumptions to be made.....	The text does not give clarity on what or how assumptions will be determined	The council expects that any assumptions will be agreed with the local authorities prior to assessment.  It is the local authorities who are the experts in these matters.
<b>Section 20: Waste &amp; Minerals</b>			
The council does not wish to comment on this section			

Document reference	HS2 statement	WCC observation	Preferred alternative/ inclusion
<b>Section 21: Water resources and flood risk</b>			
21.4.1, second bullet point	“the assessment will consider whether existing drainage systems will be impeded.”	This should also include natural drainage features and flow paths.	The council requests that an assessment will consider whether existing drainage systems <i>or flow paths</i> will be impeded.
Paragraph 21.5.1	Professional judgement will then be used to decide whether additional assessment of these is required.	There should be some consultation with LLFAs, the EA, and IDBs to help inform this decision.	The council requests that a consultation is undertaken
Paragraphs 21.6.3 to 21.6.5	Significance criteria	We would seek clarification on the magnitude of impact and value of receptors when there are properties at risk of internal flooding and a “moderate” impact of a >50mm increase in flood level may be the difference between water entering the property or not. This level difference could be the difference between PLR and other resilience measures working or not.	Consider whether properties at risk of flooding (and on the edge of flood risk zones) can be assigned to a higher value receptor value as they are more sensitive to increases in flood level.
Paragraph 21.6.16	A separate stand-alone, route-wide WFD compliance assessment will be undertaken.	A route-wide WFD compliance assessment may be too general. The route passes through several areas with their own River Basin Management Plans and possibly own priorities.	The WFD assessment should consider the different RBMPs and any differences between them that may be relevant.



# Warwickshire County Council's response to the Equality Impact Assessment (EqIA) Scope & Methodology Report consultation 2017

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## 1. Introduction

1.1 An EqIA is a way of considering the effect on different groups protected from discrimination by the Equality Act, such as people with a disability. There are two reasons for this:

1. to consider if there are any unintended consequences for some groups
2. to consider if the policy will be fully effective for all target groups

1.2 It involves using equality information and the results of engagement with protected groups and others, to understand the actual effect or the potential effect of your functions, policies or decisions. It can help to identify practical steps to tackle any negative effects or discrimination, to advance equality and to foster positive relations.

## 2. Technical comments on the consultation report.

2.1 Table 2 below sets out the specific comments of the County Council in respect to the open consultation. The council only has one point to make on the EQIA, namely that by only establishing and not assessing the effects, the document fails in its primary purpose.

**Table 2: EQIA comments**

<b>Document reference</b>	<b>HS2 statement</b>	<b>WCC observation</b>	<b>Preferred alternative</b>
3.6.5 Page 18	The EqIA will <b>not assess</b> significance of effects.	<p>Whilst carrying out an EqIA, it is necessary to ensure public sector organisations comply with the PSED (Public Sector Equality Duty.)</p> <p>The point of an EqIA is to assess the significance of the effects, building HS2 will have in relation to equality and diversity.</p> <p>The point of an EqIA is to measure the impact of any change that is put forward.</p> <p>Therefore, this sentence is contradictory and will do what the exact opposite of what an EqIA is intended for.</p>	<p>To use the EqIA as a means for assessing the significance of the effects HS2 will have in relation to equality and diversity.</p> <p>The text as currently drafted does not give that certainty.</p>