

HS2 Environmental and Equality Assessment Processes/Methodology – consultation response

HS2 Ltd has published two documents for comment by 29th September 2017. These are:

- Environmental Impact Assessment Scope and Methodology Report
- Equality Impact Assessment Scope and Methodology Report

The Environmental Statement and Equality Statement will both be deposited with the Hybrid Bill to give Parliament sufficient information to make informed decisions on the viability of HS2.

An independent Sustainability Appraisal (SA) has already been prepared using four underlying sustainable development priorities:

- Reducing greenhouse gas emissions and combating climate change
- Protecting natural and cultural resources and providing environmental enhancement
- Creating sustainable communities
- Enabling sustainable consumption and production

The results of this work were used to advise the route sifting process and has enabled the independent reporting of sustainability performance. The next stage is to carry out the formal environmental and equality assessment processes and we are invited to comment on these documents as they stand.

We have reviewed both documents and feel that it is important to pass on to HS2 Ltd that we have a largely positive attitude to these impact assessment processes, as we feel that they will be key to achieving appropriate mitigation to those who are adversely affected by the scheme.

Our comments for submission to HS2 Ltd as a response to this consultation, are as follows:

Preamble for both responses:

North West Leicestershire District Council is pleased to have the opportunity to respond to the consultation on the Scope and Methodology Reports for both the Environmental Impact Assessment and the Equality Impact Assessment.

We have reviewed this document and are pleased to offer our broad support for the detailed processes that are defined within it. We will be strongly encouraging our residents, businesses and local groups to take part in the public consultation process.

We are pleased to note that there may be further refinements of the HS2 Scheme resulting from the Environmental and Equality Statements as it may provide opportunities for high-quality mitigation in and around the Safeguarding Zone.

Our specific comments are below.

Environmental Impact Assessment (EIA):

- We strongly support that the Secretary of State will be setting the Environmental Minimum Requirements for the scheme as it adds transparency and may help to allay communities' fears about the scheme being controlled by one entity with those commensurate freedoms
- We support HS2's Sustainability and Environmental Policies and expect to be able to view the governance data resulting from the compliance monitoring of these
- We expect the Environmental Statement for Phase 2b to be in line with Phases 1 and 2a, and where possible to exceed it
- We fully support the notion of separate consent processes and a further Environmental Impact Assessment if it becomes apparent that limits identified in the Environmental Statement and Environmental Minimum Requirements are to be exceeded
- We will assume that all minimum European Standards and legislation will be met (and preferably exceeded) post Brexit
- We support the proposed Environmental Impact Assessment process as set out on page 25 of the Scope and Methodology document
- We feel that the statement, "*mitigation measures will be incorporated within the proposed scheme wherever appropriate and practical*" requires some clarification as to how much "practicable" will be influenced by cost, and whether there are circumstances where mitigation would be overruled by cost alone
- We agree that HS2 should consider the longer term environmental effects which may be observed after Phase 1 and 2a are operational
- We support HS2 considering community infrastructure and organisations when assessing impacts on communities in general
- We note that the Ecological Assessment section refers to the Conservation Habitats and Species Regulations 2010. As the River Mease is the only SAC along the HS2 route, we request that there is a statement added to the document which sets out that a separate Habitats Regulation Assessment will be carried out
- We feel that within the Ecology section, some explanation about protected sites and areas, such as SSSIs and SACs would be useful to the reader
- We support the complexity of the assessment process for Landscape and Visual effects
- We agree that community views should be an important part of the socio-economic effects in Section 17 of the document
- We are pleased to note that managing the impacts related to all traffic issues (including road traffic) is given detailed attention
- We entirely support that the Environmental Statement will be set out in community areas as this will ensure that it is easy to find information relating to our District.

Equality Impact Assessment:

- We are pleased that two of the key priorities in the Equality Impact Assessment process are to uphold the Equality Act 2010 and the Public Sector Equality Duty. As there is a possibility that some of our residents will work on the construction phase, we are aware that these principles will also apply to all those who are employed by HS2 or any of its constructors or allied industries
- We feel it is of great importance that the Equality Impact Assessment will incorporate relevant data from the Environmental Impact Assessment as this will help to strengthen both processes

and guard against disparate information on the same issue, which avoids creating unnecessary confusion

- We note that there is a list of reference points between the Equality Impact Assessment and Environmental Impact Assessment and we support this.