

HS2 Phase 2a 2016 Consultations –Design Refinement Consultation

Staffordshire Wildlife Trust Comments 7 November 2016 (sent via the online comments form)

Temporary construction facility (railhead) with potential to convert to a permanent maintenance facility near Stone

It is difficult to comment on the wildlife implications of the proposed railhead, as the alternative design without the railhead has not been presented.

4.3.12 States that 'Permanent maintenance facilities near Stone could also mean that the maintenance loops located at Pipe Ridware, in the Fradley to Colton area, may not be required.' The maintenance loops would appear to add very little in terms of extra width to the final design or extra working areas during construction, so their removal would not appear to make a major difference.

In terms of the railhead itself we therefore comment on the design as presented. If avoidance of damage to important habitats can be avoided as far as possible, and if mitigation and compensation can provide a net gain to biodiversity in the area then we would not have an issue with the design refinement in terms of ecology.

The main impact on known biodiversity assets is that 'Construction of the Yarnfield North embankment would result in the permanent loss of approximately 3ha (100%) of two woodlands that form Pool House Wood LWS'. The Local Wildlife Site (LWS) is actually 3.31 ha in size. It should be born in mind that the LWS has not been checked or re-surveyed since 1991, and therefore its current condition is unknown, as well as whether the boundary may need to be updated. Therefore the site has the potential to be made larger or smaller dependant on re-assessment.

It would appear from map CT-05-222 that the eastern woodland would be impacted by the embankment, but the western part would be lost due to the railhead. On CT-06-222 a balancing pond and access road are shown within the remaining area of the eastern wood, beyond the embankment. It would appear that this part of the wood could be avoided and retained – this should be included in the detailed design, although keeping the wood within the land required would enable restoration of the remaining part to be made part of mitigation. Another option would be to extend the proposed Filly Brook Viaduct to the north and reduce the embankment length, to reduce impacts on the LWS. As the railhead area is large, we request that a design that retains the western part of the LWS in situ be considered as far as possible. The mitigation shown on CT-06-222 appears broadly appropriate, although possibly not sufficient area to allow for delays in time to target condition especially for woodland.

Two other Local Wildlife Sites within 1km of the land required for construction have not been mentioned in the draft EIA. Micklow Wood SBI at SJ890329 is around 270m north of the land required. There do not appear to be any obvious impacts to the LWS, but it may have potential for enhancement, and due to its isolation in the landscape, improved habitat links via enhanced hedgerows. Filly Brook (west of Stone) SBI is located adjacent the Filly Brook at SJ892335, downstream of the scheme around 240m north-east of land required at the closest point. The site contains parkland/scattered trees, semi-improved lowland grassland, marshy grassland, running

water, and intact species-rich hedges. Indirect impacts from changes to water flows may need to be considered. There are also opportunities to enhance this site, as well as grassland along the existing railway which is also damp and somewhat diverse. These sites need to be considered in the final EIA and detailed design.

There are many other habitat features within the railhead site, some of which will be priority habitats, and some of which may be potential Local Wildlife Sites if assessed in detail. These are mainly hedgerows, watercourses, ponds and small areas of woodland. These should be retained wherever possible, but if not, sufficient mitigation will be required. The Proposed Scheme maps show several areas of woodland habitat creation on top of existing woodland areas – this needs to be corrected.

Regarding the potential for the railhead's use to become permanent – this would presumably mean that the reinstatement and landscape/ habitat planting would not be carried out as presented in the map book. No alternative mitigation is mentioned or shown for loss of Poolhouse Wood LWS. If losses do result from the final design of the railhead, mitigation would be required outside of the permanent facility, ideally adjacent to the small surviving fragment of the LWS which should if possible be restored back to wet woodland by manipulation of drainage and re-use of peat from the lost site. Filly Brook would be adversely affected and wetland compensatory habitat would be required. We suggest that enhancement of downstream sections of the brook to the north-east, along the existing rail line, such as restoring a natural meandering course and wetland habitat creation would be most effective.

Opportunities to enhance or create habitat further from the line, to enhance habitats, strengthen habitat links and provide other landscape, access and amenity benefits. There are several areas along the River Trent floodplain that are targeted for enhancement by the Green Infrastructure Strategy for Stafford Borough, and 3 areas are designated LNRs. Large sites such as Stone Golf Course, Stone Business Park or larger landowners already in stewardship schemes may present opportunities for habitat creation/ enhancement, with the agreement of landowners. Liaison with the Stone Town Council and others involved in emerging Neighbourhood planning in the area should be undertaken to potentially contribute to local priorities.

In the absence of any mitigation for habitat loss within the railhead, we object to the facility becoming permanent, unless sufficient biodiversity compensation is provided.

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