

HS2 Phase 2a 2016 Consultations – Working Draft Environmental Impact Assessment (EIA) Report

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

Route-wide issues

We support the comments of Staffordshire County Council and the Woodland Trust in terms of ecology.

Designated Sites and Ancient Woodlands (AWs)

Although the assessment concludes that no existing SSSIs would be impacted by the scheme, this precludes any sites being found to be of national value. Lount Farm Local Wildlife Site (LWS) and Wrinehill Wood LWS have both in the past been considered by Natural England for potential SSSI designation, and the results of assessments at these sites, and any others of high value, should be discussed with Natural England.

A number of Local Wildlife Sites, both SBIs and BASs are missing from the Environmental Baseline maps, and some also from the draft EIA. These are listed in the spreadsheet that will be emailed separately.

Many LWS along the route have not been re-surveyed in the last 10 years, so their status and boundaries are not up-to-date and may be subject to change following re-assessment. There are also many other areas of habitat that have potential to be designated as LWS that have not yet been surveyed in detail – much of the county does not have complete habitat survey coverage and Stafford Borough in particular only has 41% that has been surveyed, meaning that LWS designation is by no means comprehensive. The EIA guidelines recommend that local criteria are used when assessing a site's value, and we request that the Staffordshire LWS selection guidelines are used to assess existing sites, and any areas of habitat are deemed to be district value or above.

Indirect impacts to AW, other woodland and other habitats need to be included in the assessment and biodiversity offsetting. This must include potential disruption of, or changes to, management of the sites during and after construction due to access issues or ongoing viability of management.

We request that any AW and LWS impacted by the scheme are included in the Bill limits for the purposes of restoration, enhancement and long-term management, which would contribute to the overall compensation for impacts. Although this would potentially increase land-take (unless areas for habitat creation were reduced, where this would not negatively affect the no net loss of biodiversity calculations), this would not change the use of the land as new creation would do, and would have less impact on landowners. This is especially important for ancient woodland, as this cannot be re-created, therefore restoration and long-term management of remaining areas is particularly key to preserve the resource.

We welcome the identification of further potential ancient woodlands, and support the comment of the Woodland Trust in terms of additional woodlands that should be considered. We request that the methods and raw data used to determine likely ancient woodlands are made available in the final EIA. We request that any new ancient woodlands that are confirmed are avoided where

possible, and the design of the route, access tracks, road diversions, storage areas and other impacting elements are amended to avoid impacts to ancient woodlands.

Hedgerow loss

We would like to see, alongside new hedgerow creation, the translocation of any suitable hedging and diverse flora in order that new features reach target condition sooner. We would also like to see restoration of hedges further out from the land required, with the addition of woody species, standard trees, and appropriate flora.

Ponds

A number of ponds shown within land required for the scheme on the Construction Phase maps are also shown as new ponds 'ecological mitigation ponds' on the Proposed Scheme. This is misleading as the ponds are already there. These should either be shown as retained, lost, or labelled as to be enhanced if that is what is proposed.

Footpaths

Many along and around the route are badly signed, overgrown, or with aging wooden stiles and bridges. All problems observed are being reported to the Staffordshire county Council Rights of Way webpage, so that there is a record of improvements that could be made. Although there are regulations regarding footpath maintenance, we feel it would be very valuable if HS2 could contribute towards improving footpaths surrounding the line, not just those directly affected- perhaps by providing funding for co-ordinating footpath work and materials such as signs and structures.

Deer

This species group is again missing from the draft EIA, as for Phase 1. There are several areas along the route where herds of deer are known, including Lionlodge Covert, Swynnerton park, Trentham, Whitmore Heath and Wrinehill. In fact, any large area of woodland has potential to support deer species. Although deer are not a conservation concern in terms of their populations, they are an issue in terms of collision risk, both for the trains but more significantly, road traffic. All available data on deer presence should be gathered, and potential hot spots identified. Fencing, habitat loss and provision of new woodland areas is likely to change deer commuting routes in the short term, and potentially populations over time. Where there are no viaducts or culverts for deer to cross the route, there is a risk that animals will be funnelled to the nearest road crossing, and come into increased conflict with road traffic, with animal welfare and safety issues resulting. The EIA needs to identify potential pinch points where deer populations and route design may cause a problem, and include deer-friendly crossing features and habitat corridors that will allow migration without conflict with road users.

Priority Mammals

While we welcome consideration of Polecat, several other species present on the route are not mentioned, such as Brown Hare, Harvest Mouse and Hedgehog. Without baseline data and consideration of impacts on particularly rich habitat for these species, it is not possible to judge the significance of impacts. Several important sites and species near the line have been mentioned, with the conclusion that impacts would not be significant, which at least shows that these receptors have been considered. We request that the full EIA considers all priority species likely to be impacted, and explains how and why any significant impacts have been identified or dismissed. Harvest mouse are particularly localised with specific habitat requirements, so could be more vulnerable to impacts. Hedgehog are also declining and vulnerable to not only habitat changes but potentially changes to traffic.

CA4 Whitmore Heath to Madeley

We are aware of potential alternative designs for the route in this area, including an extended tunnel which would avoid damage to Whitmore Ancient Woodland, and connecting earlier to the West Coast Main line. We would support an option that reduces impacts to important wildlife habitats in this area.

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