

HS2 Phase 2a

Ecology

11.2.2

It is not specified as to how often data searches will be updated.

11.2.3

Neighbourhood plans could be another source of such information, although many in Staffordshire are at an early stage. The EIA process will need to keep in touch with progress of these and other plans in terms of the data gathering and biodiversity planning that may happen over the course of the assessment.

11.2.3

There is a need to search for and collate survey data from any ecology reports associated with developments, not just ESs. This could be collated in collaboration with Local Record Centres to ensure the data is centrally stored and usable by all, rather than 'double handling' the data. Ancient woodland assessments will need to include more than a desk study to be added to the Ancient Woodland Inventory- ground surveys will also be necessary to confirm the woodland's status. Key elements of the ancient woodlands' ecological, structural, historical and geological characteristics should be recorded as an accurate baseline for informing impact assessment, plus potential mitigation/ compensation including restoration of retained areas.

11.2.5

The width of the survey corridor, or more accurately, the survey area, should extend to anywhere that the project will cause effects, including areas where rebuilding of structures will be needed. We are particularly concerned with Ingestre Golfcourse, which will be impacted by the route, and may be redeveloped elsewhere. The EIA should include any areas or effects that are known at the time to be impacted by the rail project.

11.2.6

This section states:

'On the basis of the habitats present, and on the basis of professional judgement by an ecologist as to the potential for the presence of protected or otherwise notable species, further detailed specialist surveys will be undertaken where possible.' We would expect the evidence and rationale for such decisions to be included within the ES, especially where impacts are not predicted to be significant. We particularly note that priority mammals and deer are not mentioned within proposed surveys. We request that in the ES, data on these species records and habitat availability along the route are collated and examined; potential hotspots for these species are identified along with risks of fragmentation, and that surveys are carried out where potential significant impacts are predicted.

11.2.10

Great crested newts are a species that can persist for a long period without breeding, and historic records are still generally a good indicator that the species may be present, unless significant landscape changes have occurred. A longer cut-off date should be implemented, using available evidence.

11.4.1

Irreplaceable habitats are mentioned only once. There is a need to identify and describe any irreplaceable habitats during surveys, and the methods/ reasoning behind the selection of these. In Staffordshire, in addition to ancient woodland of all types, ancient hedgerows, veteran trees we would consider several other habitats that are present in the route corridor to be considered as irreplaceable, unless evidence can be presented otherwise; such as inland saltmarsh, some peatland habitats and wetlands with complex hydrology and raised bogs.

11.4.2

Some indirect impacts are mentioned here, but 'edge effects' are a key impact on retained habitats that rely on specific conditions to support species- mainly affecting woodlands. Increased light, wind, knock-on effects such as wind throw etc., should all be considered.

11.5.4

The spatial scope should also include any knock-on developments or actions that occur as a direct result of the project, such as relocation of buildings and businesses, removal of farm hedges etc, that can be reasonably predicted.

11.6.9

Mitigation and compensation measures must have regards to existing plans including neighbourhood plans.