



Yorkshire Wildlife Trust



Phase Two Route Consultation
PO Box 1152
HARROW
HA1 9LH

23rd Jan 2014

Dear Sir/Madam

HS2 Phase 2 Consultation

The Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 95 reserves and with a membership of over 36,000. The YWT is the second oldest of the 47 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people. We manage three reserves which would be directly affected by the proposed HS2 route; Woodhouse Washlands, Water Haigh Woodland Park and Rothwell Country Park.

As a Wildlife Trust we understand that rail projects are a necessary part of establishing a robust sustainable transport network. However, individual projects need to contribute to a sound strategy which maximises the economic and social benefits whilst minimising the impacts on the natural environment. Whilst HS2 could form a part of that strategy we are yet to be convinced by the socio-economic arguments and we have significant concerns over the ecological impacts. We **object** to the proposal on the grounds that the environmental statement has not examined the impacts on ecology adequately and it completely fails to address the loss of ecological connectivity.

Ecological Impacts

Insufficient information

The analysis of the impacts on Biodiversity and Wildlife (section 6.11) within the Sustainability Statement is lacking sufficient detail to allow a conclusion to be made on the potential impacts on biodiversity and whether another route would be more suitable. In accordance with the NPPF (paragraph 118) the route should be designed to avoid impacts on biodiversity wherever possible and mitigation and compensation should only be used as a last resort. The potential impacts (including species records and Local Wildlife Sites data) should therefore have been identified earlier in the process to allow these to be taken into consideration.

SSSI

Appropriate measures need to be put in place to avoid any indirect impact on Kirkby Wharfe SSSI as highlighted in paragraph 4.2.11 Sustainability Statement Appendix E4.

Local Wildlife Sites

As highlighted above there is no information with regards to the impacts on Local Wildlife Sites. Local Wildlife Sites are areas of high conservation value and are often of a similar or higher quality than SSSI's (due to the guidelines for designating SSSI's which restricted the number in any given area¹). It is therefore essential that these sites are taken

¹ http://jncc.defra.gov.uk/pdf/sssi_ptB.pdf



into consideration when deciding on a route. At the beginning of last year we (in conjunction with the other Trusts along the route) sent through data for all of the Local Wildlife Sites, Ancient Woodlands and Wildlife Trust Reserves within 20km of the potential Y route to allow these to be included within any analysis for this reason. We are therefore very concerned that these sites have not been included within the Sustainability Statement. We have now carried out a more in depth analysis of the potential impacts based on the proposed route and we have included maps in Appendix 1 and 2 showing the sites which we are most concerned about.

Wildlife Trust Reserves

Paragraph 6.11.11 of the Sustainability Appraisal incorrectly states that '*no county Wildlife Trust reserves would be directly affected by the proposed route*'. However three YWT reserves will be directly impacted by the current HS2 proposal these are:

- **Woodhouse Washlands, Rotherham²** - The site is a rich mosaic of grassland, marsh, ponds, ditches and temporary pools and is also designated as a Local Wildlife Site. It has a good dragonfly assemblage and water voles within the site. The route will run along the eastern edge of the reserve and include an embankment which will result in a direct impact to the site.
- **Water Haigh Woodland Park, Leeds³** - This site is managed by YWT in partnership with Leeds City Council. It is an important part of the Lower Aire Valley green corridor with a mix of unimproved grassland, woodland and wetland and a good assemblage of butterfly species. The site sits at the point where the current proposed line splits in two with one leg going to Leeds and the other joining the existing mainline. With a viaduct and embankments proposed through the site, Water Haigh Woodland Park will be effectively destroyed with massive fragmentation to the habitats of the Park and very significant habitat loss.
- **Rothwell Country Park, Leeds⁴** - This site is also managed by YWT in partnership with Leeds City Council. It is an important part of the Lower Aire Valley green corridor with a mix of species rich grassland, woodland and wetland and a population of great crested newts. The proposed route would result in the creation of a viaduct adjacent to the site which is likely to result in direct as well as indirect impacts on the reserve.

Ancient Woodland

As highlighted within the NPPF (paragraph 118) ancient woodland's are an irreplaceable habitat and therefore impacts on these sites should be avoided. There are four ancient woodlands within Yorkshire which will be crossed by the line and result in significant habitat loss but also fragmentation. We have included maps in Appendix 1 and 2 showing the sites which we are most concerned about based on the initial preferred route.

Fragmentation, Habitat Loss and Disturbance

A review by the Transport Research Laboratory on behalf of Natural England highlighted the impact of the line with regards to collisions, noise, pollution, vibration and fragmentation which will occur along the entire length of the HS2 route. This will result in a significant impact on biodiversity which will require appropriate mitigation/compensation. The route will also cross a number of areas which we have identified as important corridors for wildlife where we are

² <http://www.ywt.org.uk/reserves/woodhouse-washlands-nature-reserve>

³ <http://www.ywt.org.uk/reserves/water-haigh-woodland-park>

⁴ <http://www.ywt.org.uk/reserves/rothwell-country-park>



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working with landowners and local communities to restore these areas for wildlife and people. These Living Landscapes⁵ are included within the maps in Appendix 1 and 2. The Dearne Valley NIA⁶, one of only twelve areas identified following the Natural Environment White Paper, will also be crossed by the proposed route. Both the 'Lawton Review' and the NPPF highlight the importance of establishing coherent ecological networks and we would expect the mitigation/compensation to contribute to this aspiration.

Cumulative impacts

The potential cumulative impacts also need to be taken into consideration for example the impact on the Rivers Rother, Doe Lea, Aire and Calder due to the cumulative impact of multiple crossing points and the potential for in-channel works including diversions.

Socio-economic case

As mentioned above we are concerned about the socio-economic benefits of HS2. Whilst we are not experts in this area we do feel that it is important to highlight that the considerable amount of money that will be spent on HS2 may be better spent elsewhere⁷. In particular we have noticed that the cost benefit analysis states that for every £1 spent on HS2 there will be £1.80 worth of benefits. However this assumes that no-one works on trains which we know is not the case and is therefore likely to overestimate the benefit. If you compare this to cycle paths then Sustrans estimate that for every £1 spent there will be £20 worth of benefits. Given the lack of understanding regarding the potential ecological impacts we are also concerned that the cost of mitigation/compensation has been underestimated.

With regards to the social benefits these are likely to be greatest closer to the few train stations on route. Further away from the stations we are concerned that local commuting routes may cause bottlenecks in the system. Again it may be better to spend the money elsewhere for example on local sustainable travel which connects to the existing mainline. We are also concerned about the fragmentation caused by the line, both to communities and to habitats, which may lead to isolation as there will be few crossing points.

Alternative Routes

The alternatives to the proposed route are not detailed enough to give a view of whether they would be more suitable. As with the current route we would be concerned that insufficient information has been obtained by HS2 Ltd to make a judgement on the impact they are likely to cause. Further information should therefore be obtained before a final decision is made.

Conclusions

In conclusion we are concerned that the money which will be invested in HS2 could be better spent elsewhere to establish a more robust sustainable transport network with less impact on the natural environment and we believe that these options should be considered further. The route will also cause significant damage and fragmentation along the entire route which will require sufficient mitigation and compensation. There are also important sites

⁵ <http://www.ywt.org.uk/living-landscapes>

⁶ <http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/funding/nia/projects/dearnevally.aspx>

⁷ Theiss (2013) High Speed 2: the best we can do? <http://www.neweconomics.org/publications/entry/high-speed-2-the-best-we-can-do>



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along the current proposed route which have not been considered so far and it is essential that these are now taken into consideration.

Yours faithfully

A handwritten signature in black ink, appearing to be 'R Stoneman'.

Dr Rob Stoneman
Chief Executive