



in England No. 409650 and is a registered charity No. 210807. VAT No. 170 3914 75

This document has been created on behalf of Yorkshire Wildlife Trust (and its 42,000 members) to notify HS2 of our **objection** to the proposed scheme.

Although Yorkshire Wildlife Trust supports sustainable transport schemes, we do not support those which propose to create irreparable damage to our natural landscape. The Trust therefore, **objects** to the proposed HS2 scheme due to the significant number of nationally and locally important designated sites which will be impacted, both directly and indirectly, across Yorkshire.

The loss of these sites will have a significant effect on the local (and in some cases national) biodiversity, including a number of protected and highly threatened species and notable habitats. These habitats can be near impossible to recreate, particularly within the lifetime of this scheme, hence their loss will lead to an unprecedented impact to local biodiversity which can take decades if not centuries to recover. Furthermore, the severance impact the scheme will have upon our landscape, which has not yet been fully considered, is extremely difficult to quantify.

The founders of Wildlife Trusts and their successors fought to save wildlife-rich places for decades - woods, marshes, meadows, and moorland – protecting many as nature reserves and designated sites. But these were emergency measures, taken against a tide of widespread destruction to our natural habitats. It was always hoped that nature would be able to re-colonise the wider landscape from these refuges when conditions were right¹.

However, due to ever increasing agricultural intensification and developmental pressures, it became clear that the wider landscape was continually becoming more fragmented. The nature reserves which were fought for thus became isolated from connective and supporting habitat leaving them often unable to perform their intended function and decreasing their resilience to other environmental pressures such as a changing climate. This has led to the emergence of landscape-scale conservation in order to move beyond nature reserves and consider the full range of factors in the landscape that influence wildlife and people². The Wildlife Trusts have done this by creating their Living Landscapes where wildlife habitats are bigger, better managed and more joined-up. Living Landscapes consider the landscape and environment as a complete whole – as a dynamic, complex and linked system and aims to recreate and reconnect features which have been lost over the years.

It is extremely difficult to quantify the impact a large transport scheme such as HS2 will have upon these landscapes; however it is abundantly clear that the current proposed '*no net loss*' of biodiversity by HS2 is unachievable under current plans which provide highly inadequate provisions.

The current mitigation proposals follow traditional methods which consider nature conservation by protecting specific sites and replacing specific habitats. However it has now been shown that these traditional methods of protecting specific sites mean wildlife habitats outside of these areas have been lost on an unprecedented scale³ with over 40% of priority habitats and 30% of priority species in

¹ Sands 2012 Wildlife in Trust: A hundred years of nature conservation.

² Ahern et al. 2012 Landscape scale - towards an integrated approach. ECOS, 33(3/4).

³ Lawton 2010 Making Space for Nature: a review of England's wildlife sites and ecological network. Defra.



1 St. George's Place, York, YO24 1GN T 01904 659570 E info@ywt.org.uk @YorksWildlife Yorkshire Wildlife Trust is registered in England No. 409650 and is a

in England No. 409650 and is a registered charity No. 210807. VAT No. 170 3914 75

decline⁴. There is therefore a great need for <u>any</u> large scale infrastructure scheme to consider the potential landscape-wide impacts it will have, not only on biodiversity, but also the secondary functions which they provide us, referred to as eco-system services.

It is unquestionably highly insufficient for ecological mitigation to merely be squeezed into parcels of land which will remain in HS2 ownership following construction.⁵

Should HS2 go ahead, the Trust **expects an overall net gain in biodiversity implemented by specific habitat creation/restoration and the (re)creation of a green corridor either side of the scheme.**

<u>As 'Europe's largest infrastructure project</u>⁶', we believe that HS2 should create Europe's largest green infrastructure scheme.

Within this corridor, efforts must be made to reduce the impact of fragmentation on species such as mammals (including bats), birds and invertebrates. We feel this should be mitigated through the construction of green bridges, tunnels and underpasses which will allow species to move freely across the scheme with reduced risk of mortality and injury. Consideration must be given in particular for sensitive species such as barn owl (*Tyto alba*), bittern (*Botaurus stellaris*) and birds of prey who are sensitive to train collisions and are known to be present in local areas across the scheme.

Preliminary costings suggest that environmental restoration on this scale could be achieved with **less than 1% of HS2's initial budget** of £42bn and a Cost Benefit Analysis undertaken by researchers at Newcastle University show that the benefits of restoring nature and providing access will outweigh the costs.

We do however, believe that **HS2 could offer a unique opportunity to create a green legacy** supporting coherent ecological networks by protecting and enhancing currently designated sites and creating a linked up corridor of habitats. This should be achieved by moving away from biodiversity net loss to biodiversity net gain by supporting healthy, well-functioning ecosystems and coherent ecological networks.

⁴ Biodiversity 2020: A strategy for England's wildlife and ecosystem services

⁵ Select Committee for Phase 2a of the Hybrid Bill Second Special Report of Session 2017–19

⁶ https://www.highfieldps.co.uk/high-speed-rail/





As stated within Biodiversity 20207:

'Actions taken and decisions made now will have consequences far into the future for ecosystems, ecosystem services and human wellbeing. It is important that these are understood, so that we can make the best possible choices for present and future generations.'

On Behalf of Yorkshire Wildlife Trust,

Laura Hobbs

Conservation Planning Officer laura.hobbs@ywt.org.uk

⁷ Biodiversity 2020: A strategy for England's wildlife and ecosystem services