

Wildlife Trust for Sheffield and Rotherham Position Statement on HS2

January 2014

High Speed 2 Railway (HS2) is proposed as a potential project to run trains up to 225mph from London to the north of England. The project is proposed in two Phases – each of which would have to be approved by Government in two separate ‘Hybrid Bills’. Phase 1 would run between London and Birmingham and, if approved, would be constructed from 2017 to open in 2026. Phase 2 (the Y-route) is proposed to branch to Manchester and Leeds and, if approved, would be constructed by 2032/3. It is proposed that the Leeds branch could pass through South Yorkshire with the current station location favoured by HS2 being Meadowhall.

A map of the suggested route thorough Sheffield and Rotherham and the likely impact on local sites of importance for wildlife can be found [here](#).

Analysis of the proposed route through Sheffield and Rotherham, using a 50m buffer either side of the track, has identified that the following sites will be impacted.

- Twelve local wildlife sites (totalling 329 hectares), including three ancient woodlands (totalling 46 hectares): Smithy Wood, Hesley Wood and Woodland at Hesley Tip.
- Other important wildlife sites including: Holbrook Marsh, Woodhouse Washlands and Treeton Dyke.

Many other wildlife sites may also be affected in South Yorkshire during track construction.

Our Position is as follows:

Currently we cannot see any gain for wildlife from this proposal and so we would oppose this development.

The proposed route would cause significant, in some cases, irreparable damage to designated wildlife sites, including the loss of irreplaceable ancient woodland habitat.

We recognise that the proposed high speed link could potentially benefit local people and the jobs market, and that a sustainable transport network could have a positive impact on the drive for a low carbon economy.

However, following recent published reports, eg from the Audit Commission and the Select Committee, there is still a very mixed view of the economic case for this proposal and the likelihood of actually realising the benefits for local people and jobs. Even if the economic case could be proven convincingly, this proposal must not be achieved at the expense of the natural environment and our local wildlife.

Our response to the recent HS2 Phase 2 consultation is [here](#).

The Value of our Local Wildlife

As our Chief Executive, Liz Ballard, explains, “Our main concern is obviously for the wildlife in our region. With so many areas potentially destroyed or damaged, our vision for a connected network for nature and all the work we’ve done over the last few decades towards this vision, will be under threat. Local ancient woodlands and wildlife sites could be lost”

We are especially concerned about the impact that this proposal will have on our Local Wildlife Site and Reserves. The loss and significant fragmentation of 12 local sites and more than 329 hectares will have a considerable impact on the Network for Nature that runs through Sheffield – a network that is constantly under erosion.

The gradual loss of sites adds up over time to a significant loss in habitat and green space to the area – something that is special and unique about Sheffield and Rotherham.

We are particularly concerned about the proposed loss of ancient woodlands. Ancient woodland sites are irreplaceable – once lost they are lost forever. Destruction of part of the wood is irreversible: by definition, ancient woodland soils, wildlife, and historical meaning cannot be compensated for by mitigation techniques.

For example: Smithy Wood is an ancient woodland and designated [Local Wildlife Site](#) within Sheffield’s Green Belt. It is 22.3Ha in size and supports the Biodiversity Priority Habitats of Ancient Woodland and Grassland. It supports a wide range of ancient woodland flora, birds, fungi and butterflies. It has significant historical interest – as described by local historical woodland expert Mel Jones in his book [‘Sheffield’s Woodland Heritage’](#) and in his submission to this consultation response. (Read Mel’s ‘History of Smithy Wood’ by downloading the pdf at the bottom of the page.) A large area of smithy wood will be lost if this proposal goes ahead.

Please see our full consultation response to HS2 at this link.

Mitigation

Should the proposed route go ahead, then steps must be taken to mitigate and compensate for environmental damage and losses following the principles of requiring a ‘net gain’ for biodiversity as clearly set out in paragraph 9 of the National Planning Policy Framework *“pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment...including...moving from a net loss of biodiversity to achieving net gains for nature...”*.

Having considered the latest proposals, together with the supporting documentation, we have identified the following improvements that we wish the Government and HS2 Ltd to make:

- To carefully analyse the impacts and effects of the route on biodiversity. So far discussions about the environmental case for HS2 have not properly considered this aspect.
- To undertake a comparative assessment of base line ecological data to inform the HS2 route selection and so avoid key habitats wherever possible;
- To undertake and make available as part of the consultation a comprehensive Environmental Impact Assessment (EIA) of the route. Until this has happened it is not possible to understand the full impact of the route on biodiversity, including the

cumulative impact of habitat loss and fragmentation. This has not been made available so far and would be expected to have been provided prior to consultation by any other developer.

- To include Local Wildlife Sites in the Sustainability Statement and Appendices impact analysis.
- To commit to ensure that sufficient funds are made available to mitigate or compensate the adverse effects of the route on biodiversity.
- To commit to a mitigation package that results in a 'net gain for nature' as stated in the Government's own National Planning Policy Framework. A position of 'no net loss' is not sufficient.

What happens next?

The Wildlife Trust for Sheffield and Rotherham will:

1. Work with other potentially affected Wildlife Trusts and partner organisations along the route to share information and good practice (such as ecological principles and practices that can be applied to any design and delivery of the project) as appropriate
2. Gather information on the potentially affected sites
3. Comment on any forthcoming Environment Statements and Environmental Impacts Assessments
4. Campaign for environmental best practice along the principles of 'avoidance, mitigation, compensation and enhancement'
5. Stand up for nature and object vocally if the environmental impacts of the proposals are ignored or misrepresented
6. Work with partners to inform the Hybrid Bill
7. Engage with HS2, Local Authorities, statutory agencies other Wildlife Trusts and other partners on any proposals for mitigation

HS2 - Take Action!

- Keep an eye on the HS2 Ltd website for more information on their consultation process and submit your thoughts directly to them. Feel free to use any of the information in this position statement and the attached maps if you support our stance. Go to: <http://www.hs2.org.uk/developing-hs2/consultations/>
- Tell your local MP what you think, write to them with your concerns. Let us know if you do and what response you received.
- If you have any concerns or questions about the proposals or consultations, do contact us via 0114 2634335 or mail@wildsheffield.com Again, we would love you to tell us your views.

The Wildlife Trust for Sheffield and Rotherham's

Phase 2 consultation response

Consultation Q. – relevant Questions only

iv) Do you agree or disagree with the governments proposed route between W. midlands and Leeds as described in chapter 8? This includes the proposed route alignment, the location of tunnels, ventilation shafts, cuttings, viaducts + depots as well as how the high speed line will connect to the ECMC.

We disagree with the current route and details of this route as it would cause significant, in some cases, irreparable damage to designated wildlife sites.

We have analysed the route with a 50m buffer either side and identified the following sites that would be directly affected in Sheffield and Rotherham:

Twelve local wildlife sites (totalling 345 hectares), including three ancient woodlands (totalling 46 hectares): Smithy Wood, Hesley Wood and Woodland at Hesley Tip. Other sites affected include: Holbrook Marsh, Woodhouse Washlands and Treeton Dyke. See map 1 and Table 1 in appendix for details. Many other wildlife sites may also be affected in South Yorkshire during track construction.

In our view, this is unacceptable. We are particularly concerned about the proposed loss of ancient woodlands for the following reasons:

Ancient woodland is defined as an area that has been wooded continuously since at least 1600 AD. It supports more threatened species than any other habitat in the UK, however, only around 550,000ha remains. It is a functionally irreplaceable resource for biodiversity that is also an important part of our cultural heritage.

As well as providing a wildlife and recreational resource for local people, woodlands can be part of a sustainable economy. Jobs and revenue streams are created through direct woodland management posts, timber management and the supply of sustainable biomass fuel. The woodland itself also provides natural 'services' for people, for example CO₂ and rainwater absorption.

The following extracts are taken from the Government's own '*Standing Advice on Ancient Woodland*' (Natural England)¹

The value of ancient woodlands

Ancient woodlands are of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodlands:

- Are exceptionally rich in wildlife, and support many rare and threatened species.
- May contain surviving descendants and features from the original natural forests.
- Act as reservoirs from which wildlife can spread into new woodlands.
- Are an integral part of England's historic landscapes.

¹ '*Standing Advice on Ancient Woodland*' (Natural England)
http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf

- Contain a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance.
- Contribute to people's sense of place and imagination.
- Are important elements in the biological and visual functioning of a landscape.

*'Keeper's of Time'*², issued Defra/The Forestry Commission, is a statement of policy for England's ancient and native woodland which re-emphasises their value and includes six policy statements for ancient woodland:

- The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland.
- Ancient and native woodland and trees should make an increasing contribution to our quality of life.
- Ancient and native woodland should be exemplars of sustainable development, and provide opportunities for enterprise and employment.
- The ecological condition of ancient and native woodland should be improved and maintained.
- Rare, threatened or Priority species associated with ancient and native woodland should be conserved and enhanced.
- The cultural heritage associated with ancient woodland and veteran trees should be protected and conserved.

The National Planning Policy Framework (NPPF) and ancient woodland

NPPF states that the planning system should contribute to and enhance the natural local environment, including by protecting and enhancing valued landscapes, minimising impacts on biodiversity, and providing net gains in biodiversity

Paragraph 118, states that *"planning permission should be refused for developments which result in the loss or deterioration of irreplaceable habitats, including ancient woodland, and the loss of aged or veteran trees in areas outside ancient woodland, unless the need for the development outweighs the loss of the woodland habitat."* *"Policy G3 goes beyond this by setting out a framework for ensuring development does not have an unacceptable impact on trees and woodlands in general. Specifically, the second part of the policy prohibits development that would damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows."*

We would like:

- For HS2 to be reconsidered as the wider environmental impacts of the proposals, particularly with respect to carbon emissions, the wider landscape and habitat fragmentation have not yet been properly assessed; and no compelling environmental case for the proposals has yet been made;
- If HS2 is to be built we would like to see the most sensitive sites avoided, either through route alterations or cut & cover/bore tunnels/green bridges/viaducts – this would include all areas designated for their value to wildlife, including Local Wildlife Sites, which in Sheffield and Rotherham include irreplaceable ancient woodland habitat.

² *'Keeper's of Time'* (2005) Defra/The Forestry commission <http://www.forestry.gov.uk/keepersoftime>

- A robust package of mitigation and compensation for any final agreed route based on a 'net gain for nature'. (see Q vii)

**v) do you agree or disagree with the government's proposals for
b) A S. Yorks station to be located at Sheffield Meadowhall as described in chapter 8 (sections 8.5.1-8.5.8)?**

A route through Sheffield City Centre, if the route we have found is correct, in theory would result in a slightly lower cumulative impact on the area of protected wildlife sites, although a greater number and different set of sites would be impacted. This suggests that a Sheffield City Centre route would be more favourable to us from an ecological impact point of view, however, without HS2 conducting a proper ecological assessment of these potential impacts, it is difficult for us to have a more informed opinion at this stage.

Impact within 120m corridor only	Meadowhall route (13 local wildlife sites)	Sheffield City Centre (17 Local Wildlife Sites)
LWS	56.36ha	56.81ha
Ancient Woodland	12.81ha	8.56ha

vii) Please let us know your comments on the Appraisal of Sustainability (as reported in the sustainability statement) of the governments proposed phase 2 route, including the alternatives to the route as described in chapter 9.

Our comments on the Appraisal of Sustainability for phase 2 are:

1. Overall our opinion is that the Government needs to ensure that if HS2 is to go ahead, that it must not be achieved at the expense of the natural environment. The current proposals and Sustainability Statement and Appendices do not reassure us that this will be the case.

We have the following specific comments to make on the 'Sustainability Statement: Appendix E4 – Biodiversity'

2. Our view is the methodology is inconsistent. The consultants were asked to "Provide detail on the possible effects on sites of regional importance¹ Local Nature Reserves (LNR), Ancient Woodland, UK Habitats of Principal Importance (HPI), and publicly accessible information on Wildlife Trust Reserves;" but why not include Local Wildlife Sites (and Local Geological Sites) in this list? The importance of Local Wildlife Sites has been recognised in numerous Government documents including in Defra Local Site Guidance³ and The 'Making Space for Nature' report⁴. 'Natural Environment White Paper'⁵, and the National Planning Policy Framework.

We note that para 2.3.2. says "There are also a number of non-statutory, locally listed designations, information on which is held by a number of sources, notably the Wildlife

³ Local Sites: Guidance on their Identification, Selection and Management 2007 www.defra.gov.uk

⁴ Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) *Making Space for Nature: a review of England's wildlife sites and ecological network*. Report to Defra.

⁵ The Natural Choice: Securing the value of nature 2011 www.official-documents.gov.uk

Trusts and local data sources. The occurrence of particular species is not known at this stage, other than where they are mentioned within citations for protected sites. Surveys of protected species and consideration of locally designated sites will be addressed in due course as part of the EIA”

In our view, this is too late in the process for Local Wildlife Sites to be considered. It is not clear whether there will be a consultation on the EIA before it is submitted as part of the Hybrid Bill, to give interested parties such as ourselves, time to comment. The timescale seems very short to enable this to be a thorough process – especially when ecological surveys seasons have to be taken into account.

3. *“4.3 Sites of Regional Importance 4.3.1. The proposed route directly affects a number of sites as follows: Nine Ancient Woodland sites, with notable impacts to New Farm Wood and Watnall Coppice (both within HSL13) and Smithy Wood, Hesley Wood and Wombwell Wood (all within HSL16 Blackburn to Cold Hiendley). Impacts on these woodlands would be a moderate adverse effect.”*

We completely disagree with the view that the impacts on these woodlands would be only a moderate adverse effect as the route would cut through ancient woodland which is irreplaceable. How can this be a moderate effect? As the habitat is irreplaceable, we see no justification for this statement. And the report itself is contradictory, as para 4.4.1. says *“Southern Magnesian Limestone NA (HSL13) and Coalfield NA (HSL16) are where most of the adverse impacts are located with particular focus around Chapletown, Worsborough (HSL16) and Hucknall (HSL13). The cumulative loss of Ancient Woodland and large areas of HPI woodland would be of regional importance and a major adverse impact.”* We agree with this assessment of it being a “major adverse impact of regional importance and would like this impact to be avoided through a route alteration or modification (see Q iv).

4. 2.4.1. We welcome the mention of Living Landscape Strategies in this paragraph as we see these as being key to achieving the vision for creating robust ecological networks for the future. This is not only a vision of the Wildlife Trusts, but also of the *‘Natural Environment White Paper’*⁵, the National Planning Policy Framework, *‘Making Space for Nature’*⁴ and the *‘England Biodiversity Strategy’*⁶. However, it is not clear how the information in para 2.4.1 is actually being obtained (The Wildlife Trust for Sheffield and Rotherham have not been asked for our Living Landscape Strategy/maps) or analysed/considered as part of the process?

5. Should the proposals go ahead, then steps must be taken to mitigate and compensate for environmental damage and losses following the principles of requiring a ‘net gain’ for biodiversity. We therefore cautiously welcome para 2.4.2. *“At the EIA stage a package of mitigation and enhancement measures will be considered (in consultation with Natural England (NE) and other wildlife organisations) to address the impacts on habitats and species. These measures would seek to address both the direct impacts on designated sites, and to reflect the wider strategic ecological priorities of affected areas (be these NAs, or the updated NCAs, LLS or similar). Profiles for these areas contain a series of ecological objectives or opportunities to, for example, reinforce fragmented woodlands, re-establish hedgerows, or restore, create and manage grazing marsh. These objectives will help to shape both mitigation strategies and to support, where appropriate, any wider programmes*

⁶ Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services 2011 www.defra.gov.uk

of enhancement or compensation (such as LLS or Community Forests). They may also be coupled with initiatives on ecosystem services, which could be introduced in the future.”

However, as the EIA has not been carried out yet and the proposed methodology is not public, we cannot say whether we are happy with the mitigation and enhancement measures. We (with the other Wildlife Trusts) would like to be consultees for this stage. We are very concerned about the use by ministers of the phrase ‘no net loss of biodiversity’. This is based on outdated policy. Current policy, including the National Planning Policy Framework. Paragraph 9 of the NPPF is clear: “*pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment...including...moving from a net loss of biodiversity to achieving **net gains** for nature...*”.

Therefore we would expect to see an unambiguous objective of a ‘net gain for nature’ with metrics, tests, strategies and monitoring clearly set out to achieve this to guarantee success. This would help contribute to the targets in the England Biodiversity Strategy and help the UK meet its international biodiversity obligations.

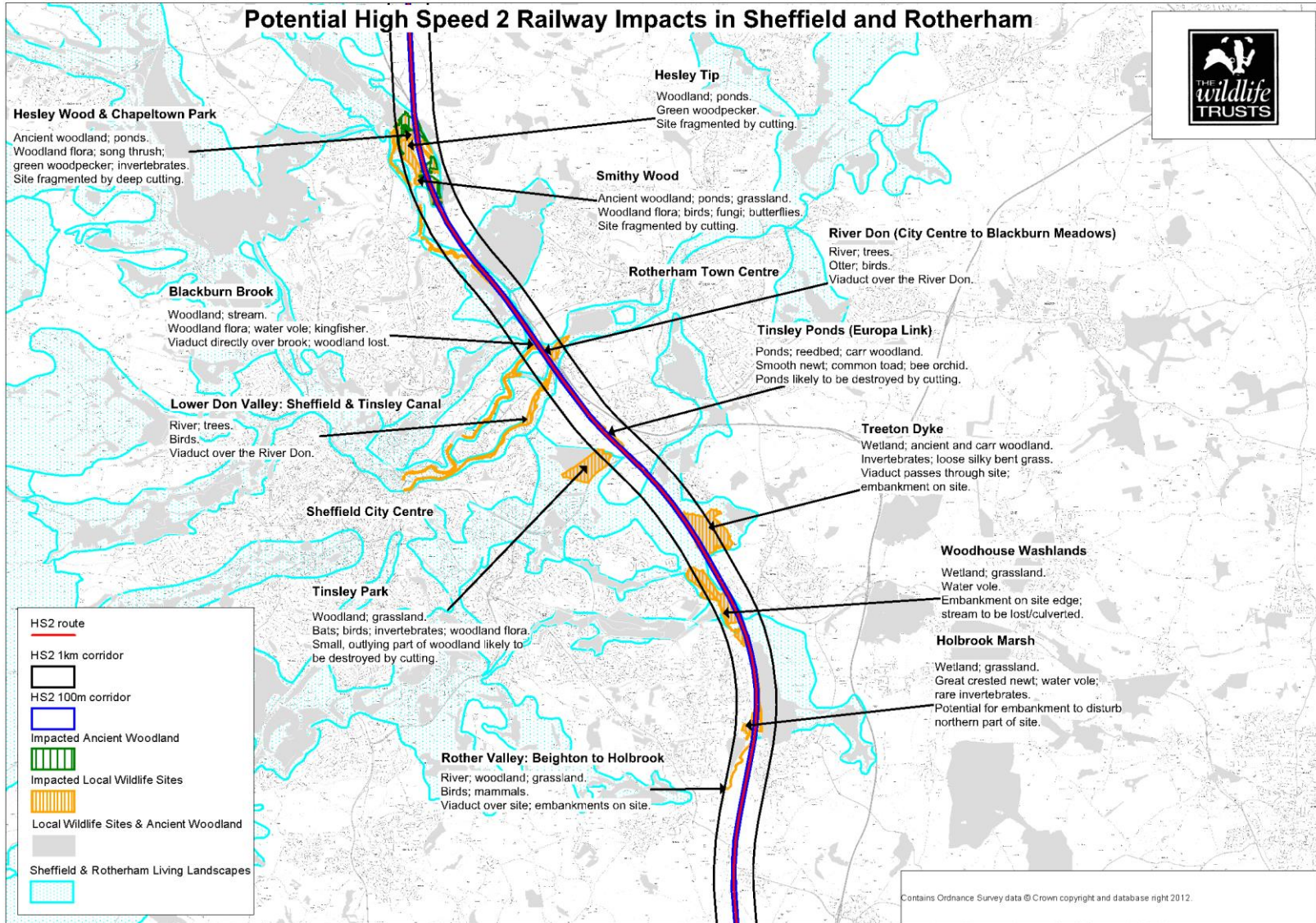
Appendix

Table 1 Local Wildlife Sites potentially impacted by HS2

LWS Site Name	Grid Ref	Key Features	Level of Impact
Holbrook Marsh	SK447816	Habitats: Wetland, grassland. Species: Great crested newts, water voles, nationally & locally rare wetland/mud invertebrates	100m boundary overlaps linear (north) part of site: potential for embankment to destroy this part of the site.
Rother Valley: Beighton to Holbrook	SK450828	Habitats: Flowing water, semi-natural woodland, semi-improved grassland.	1) Viaduct to be built over the floodplain of the River Rother - crosses the site. 2) Post-viaduct partially embanked route follows the route of this narrow linear site, potential for >50% destruction. (Survey data is not very up to date for this site)
Woodhouse Washlands (East)	SK439850	Habitats: Wetland, grassland. Species: Watervole	Site on the edge of a deep cutting, ponds likely to be destroyed or hydrology heavily disturbed by cutting.
Treeton Dike	SK437866	Habitats: Wetland, ancient woodland, wet woodland. Species: Invertebrates, Loose Silky-bent, moss.	Viaduct to be built over the floodplain of the River Rother - passes through part of the site. Also large embankments within site could destroy parts of the grassland.
Tinsley Park: Golf Course & Woods 1	SK414889	Habitats: Woodland, Grassland. Species: Bats, birds, invertebrates, ancient woodland flora.	Small outlying woodland part of reserve (Planted AWS) likely to be partially destroyed or heavily disturbed by cutting.
Tinsley Ponds (Europa Link)	SK410893	Habitats: Wetland ponds, reedbed, carr woodlands. Species: Smooth newt, common toad, bee orchid.	Site on the edge of a deep cutting, ponds likely to be destroyed or hydrology heavily disturbed by cutting.
Lower Don Valley: Sheffield & Tinsley Canal	SK397909	Habitats: flowing/standing water, trees. Species: Birds.	Viaduct to be built over the Sheffield & Tinsley Canal; shading may impact watercourse.

River Don: City Centre to Blackburn Meadows	SK395913	Habitats: flowing/standing water, trees. Species: Otter, birds.	Viaduct to be built over the River Don; shading may impact watercourse.
Blackburn Brook	SK380931	Habitats: Flowing water, woodland. Species: Ancient Woodland flora, water vole, kingfisher	Viaduct follows the line of the brook; shading likely to have high impact on this small watercourse. Small part of woodland likely to be removed.
Smithy Wood	SK367953	Habitats: Woodland, scrub, grassland. Species: Ancient Woodland flora, birds, fungi, butterflies	Cutting fragments woodland, destroying part of site.
Hesley Tip	SK362961	Habitats: Woodland, pond. Species: Green woodpecker	Cutting fragments woodland, destroying part of site.
Hesley Wood & Chapelton Park	SK361968	Habitats: Woodland, pond. Species: Ancient Woodland flora, song thrush, green woodpecker, invertebrates	Deep cutting fragments woodland, destroying part of site.

Figure 1



Notes

Working with other Wildlife Trusts

Nationally, the 47 Wildlife Trust are working together to encourage HS2 Ltd to make decisions based on the best available environmental evidence. Our initial analysis shows that more than 200 important wildlife sites lie within a one kilometre corridor along the route and could suffer as a result. We are now working on a more detailed analysis of the likely impact of the scheme. We are also encouraging the government to form an 'Environment Forum' where views and concerns can be shared.

The need

The government has shifted its argument from the need for faster travel, to one of capacity. However, a recent report by the Tax Payers Alliance⁷ highlights the use of old and flawed data in the passenger demand forecasts. The report also highlighted Network Rail's own figures showing that the West Coast Main Line is the least crowded long distance route to London, suggesting building the proposed HS2 route will not alleviate the routes most requiring additional capacity. The 51m group of Local Authorities who are against HS2 have suggested alternatives⁸ to improving capacity.

The Tax Payers Alliance report also highlights figures from the TPA and DfT showing that many cities and towns will have a reduced service on existing routes to London. For example, trains from Sheffield City Centre will be reduced from 2 to 1 per hour and will be slower.

Current fastest journey times between Sheffield and London are being cut by seven minutes to two hours from December 9th as trains operate at 125 mph on parts of the route for the first time as a result of £70m improvements. David Horne, Managing Director of Network Rail also said electrification, which will bring even faster journey was "around the corner". With these faster train times, is HS2 justified?

The economic case

The projected project cost has increased from £32 billion (2010) to £50 billion in 2013 (£42.5 billion for infrastructure and £7.5 billion for rolling stock). A recent report by the Institute of Economic Affairs⁹ estimate costs could be as high as £80 billion if costs for mitigation (including 'buying off opposition') and additional linking infrastructure projects required are included. Several reputable reports (e.g. from the new economics forum¹⁰) argue HS2 is not the best way to spend £50 billion on improving transport in the UK.

⁷ <http://www.taxpayersalliance.com/page/5>

⁸ <http://www.51m.co.uk/key-info/reports/>

⁹ <http://www.iea.org.uk/publications/research/the-high-speed-gravy-train-special-interests-transport-policy-and-government-s>

¹⁰ <http://www.neweconomics.org/blog/entry/is-hs2-really-the-best-way-to-spend-33bn>

Public Accounts Committee (a group of MPs) said in September that the DofT was failing to present a 'convincing strategic case' and instead the case was based on 'fragile numbers, out-of-date data and assumptions which do not reflect real life". The committee said there was no evidence the line would help the growth of regional cities and instead would draw even more business to London.