



Bedfordshire Cambridgeshire Northamptonshire

Last year, HS2 Ltd consulted on their 55,000 page Environmental Statement for Phase 1. Below is a summary of our response.

Our concerns are:

Lack of survey data

Landowners are understandably angry about the HS2 scheme as many have not given permission for ecological surveys to be carried out on their land - without these surveys taking place there are huge gaps in the governments understanding of the environmental impacts that HS2 may have. We are pleased to see that where there are gaps that the Government has adopted a Precautionary Principle approach assuming a worst case scenario however the Trust feels that the Environmental Statement needs to set out more clearly where this approach has been adopted. Surveys also only provide a snapshot in time and, particularly for species, will need regularly updating to provide a better picture of changes that may occur up to the point of construction.

A gain for biodiversity, rather than no net loss

National Policy, as set out in the [Natural Environment White Paper](#) and the [National Planning Policy Framework](#), indicates that development must aim for a net gain in biodiversity. The Trust is disappointed however to see that the Government is fixated on the outdated principle of no net loss period (up to 10 years for grassland and 50 years for woodland), and would strongly argue that HS2 should aim to provide a net gain in biodiversity, given the scale and timeframe of the operation and the uncertainty of some of the overall impacts such as disturbance and cumulative effects.

Fragmentation and cumulative impacts

The construction of HS2 will cause the loss of ponds, field margins, ditches and considerable lengths of hedgerow, that all combine to create habitat networks between larger wildlife areas. Overall there will be increased fragmentation and loss of connectivity within the landscape, as well as a loss of large areas of improved grassland. These cumulative impacts are especially important when considering the impact to wildlife conservation at the landscape scale especially as the HS2 route nationally cuts through a large number of Wildlife Trust [Living Landscape Schemes](#). The Trust acknowledges that the Environmental Statement has begun to explore this issue, and welcomes the new links both above and below the track bed and the concept of creating linear areas of habitat alongside the railway to link up green bridges and tunnels, but would like to see more detailed proposals.

Monitoring

The Trust welcomes the clear commitment to long-term monitoring of the effects of the scheme on biodiversity, but would like to see more details on how this will be taken forward and how monitoring will help inform and adjust future management.

Habitat and species compensation measures

It is the Trust's view that the HS2 scheme should achieve a net gain for biodiversity however the approach by the government to purely compensate the loss of habitat like-for-like is at best unambitious. What the government should be doing in order to combat both habitat loss and fragmentation is to provide compensatory habitat at a landscape scale. It is the Trusts view that this should be done by creating a ribbon of naturalistic landscape around HS2 route. This should focus around the areas of existing biodiversity value, extending and linking with existing wildlife corridors adopting the principles of the 'bigger, better, joined-up' approach outlined in both the [Lawton Review](#) and the Natural Environment White Paper.

Some improvements and concessions for wildlife have been made in this document. The Trust welcomes the concept of creating linear areas of wildlife habitat alongside the railway to link up green bridges and tunnels, but would like to see more detailed proposals.