



## **HIGH SPEED 2 POSITION STATEMENT**

### **1. London Wildlife Trust are concerned about the adverse and irrecoverable impact on wildlife**

- In London, the route could affect at least 18 wildlife sites between Euston and the Colne Valley, before it enters Buckinghamshire. These include the Mid-Colne Site of Special Scientific Interest (an area of wetlands), Perivale Wood, and Brackenbury Cutting (see appended list of sites). Whilst the route in London would mostly run alongside an existing railway corridor (between North Acton and West Ruislip) it is likely to result in the loss of and damage to habitats, as well as cause disturbance to populations of important species, especially bats and birds.
- Further wildlife sites could be affected by the options laid out for the links to Heathrow; most of these involve extensive tunnelling from the main routes.
- Outside London, over 70 important wildlife sites are likely to be affected by the HS2 route, including 10 SSSIs, 61 ancient woodlands, and 25 river corridors.
- It is not just habitat loss that concerns us. Our vision is for *A Living Landscape* where core areas of high quality habitat are restored, recreated and reconnected. HS2 will disrupt natural processes by altering the hydrology and, by dissecting the landscape and fragmenting already isolated patches of habitat, reduce the ability of wildlife to respond. The proposed route cuts across at least three areas that the Wildlife Trusts, and partners, have identified as important for enhancing our natural environment for the future.
- The Appraisal of Sustainability appears flawed. It underestimates the wildlife impacts, and does not give any details of proposed mitigation or compensation.

### **2. We remain to be convinced that HS2 meets the principles of sustainable development and transport systems**

- We fully support the need to move towards a low carbon economy as part of the ambition to achieve sustainable development. We recognise that an efficient and sustainable transport network is an integral component of sustainable development which should support a sustainable UK economy.
- The principles of sustainable development must not be achieved at the expense of biodiversity and the natural environment.

### **3. We question the environmental gains of HS2**

- We expect any high speed rail proposal would be able to demonstrate a sizeable reduction in carbon dioxide emissions from transport. According to the Government's own published data the likely range of change in carbon dioxide output would be "*a change in average annual emissions in a range from -0.41 to +0.44 million tonnes, equivalent to just +/-0.3 per cent of current annual transport emissions*". This is without including the carbon costs of constructing the new line and associated infrastructure.

- We believe that the environmental case for the current proposals has not been made. The environmental benefits have not been established and articulated and, in our view, seriously weaken the case for the line.

#### 4. London Wildlife Trust believe that the economic business case is still to be demonstrated

- Track construction will clearly result in substantial loss of land and associated impacts on habitats and species. However, the current HS2 Appraisal of Sustainability, does not include any financial provision or provide cost estimates for purchasing and managing compensatory habitat in mitigation for lost and/or impacted land. It therefore seems misleading for the report to recommend that HS2 has high value for money. The cost of securing and managing adequate compensatory habitat may be many millions of pounds. This is currently a hidden cost which, if included, would significantly undermine the economic argument.

#### 5. We believe that further investigations are required before the case for HS2 can be made

- The full impact the route will have on wildlife has not been recognised within the work done by HS2. Only the most elementary information on protected areas appear to have been collated. There has been no request for local and/or regional datasets from The Wildlife Trusts or other organisations.
- There has been an inadequate assessment of the overall impacts. Before pursuing the current proposed route, or any other high speed rail routes, the Government needs to complete a much more in-depth analysis of the impact of a new rail link.

### Appendix 1; *Wildlife sites in London on or adjacent to the preferred route*

<b>Mid-Colne Valley (M)</b>	viaduct over (some land loss?)	open water, riparian habitats, woodland
<b>Mid Colne Valley (SSSI)</b>	viaduct over (some land loss?)	open water, riparian habitats, woodland
<b>Dew's Dell (B)</b>	adjacent to track	ex-quarry, oak-cherry scrub woodland, grassland
<b>Newyear's Green (B)</b>	adjacent to track	unimproved pasture, woodland
<b>Brackebury Railway Cutting (B)</b>	possible land loss	rough grassland, oak-birch woodland
<b>Ickenham Common (B)</b>	some direct land loss	meadow, pond, hedgerows
<b>Ickenham Marsh &amp; Freezeland Covert (B)</b>	adjacent to track	river and riparian habitats
<b>Yeading Brook (Roxbourne Pk-Ruislip Gdns) (B)</b>	adjacent to track	river and riparian habitats
<b>Grand Union Canal, Northolt (B)</b>	some direct land loss	canal
<b>railway land (Northolt to Acton) (B)</b>	direct land loss	grassland, scrub, secondary ash woodland
<b>green corridor (railway land sections in UDP)</b>	direct land loss	grassland, scrub, secondary ash woodland
<b>Perivale Wood LNR (M)</b>	adjacent to track	ancient woodland, hedges, pasture
<b>Brent River Park (North) (B)</b>	adjacent to track	river, grassland, parkland
<b>Hanger Lane Roundabout (L)</b>	adjacent to track	rough grassland, scrub, formal shrubberies
<b>The Guinness Mounds (B)</b>	adjacent to track	grassland, trees (created habitat)
<b>Acton Cemetery (L)</b>	under tunnel	grassland, trees (formal cemetery)
<b>Old Oak Common Sidings birch woodland (B)</b>	under tunnel	pioneer birch woodland
<b>St Mary's Cemetery (B)</b>	under tunnel	grassland, trees (formal cemetery)
<b>Kensal Green Cemetery (M)</b>	under tunnel	grassland, scrub, woodland (informal cemetery)

M = Metropolitan, B = Borough, L = Local Sites of Nature Conservation Importance