



## High Speed Rail, Phase 2b Crewe to Manchester - Western Leg Design Refinement

### Response from the Cheshire Wildlife Trust (December 2020)

#### Overview

The Cheshire Wildlife Trust represents the interests of 13,000 members, operating under a charitable objective to ‘..promote the conservation, protection and improvement of the physical and natural environment...’ (1962, last amended October 2016). It is within this charitable objective that we make this response to the consultation for the Western Leg Design Refinement, in the interests of protecting and improving habitats, species and the landscape within the Cheshire region.

It is our view that the specified refinements to the scheme that have been put forward in this consultation are likely to result in further unacceptable losses of wildlife in the Cheshire region.

#### Our concerns

In 2018 we highlighted that the region has already seen devastating impacts to wild places through changes in land use and development and that HS2 is set to compound these losses. We are particularly concerned about the fragmentation of vulnerable species populations and their habitats. It is clear that the proposed changes will result in significantly more fragmentation with potentially serious consequences for wildlife.

There are a number of specific issues directly related to the Western Leg Design Refinement (Crewe Northern connection, Crewe North Rolling Stock Depot and Manchester Airport refinements) we would like to raise which we have set out in our response. These focus on:

1. The lack of EIA and inadequate supporting information
2. Material stockpile sites and borrow pits not being reported
3. Loss of habitat – impacts on ecological connectivity and species
4. No apparent compensatory measures for the additional land-take
5. Site specific impacts

Without an Environmental Impact Assessment and spatial data (as provided for the WDES consultation) it is impossible for us to provide a full and fair response to the proposed changes to the scheme. The statements we make below are based upon our observations of changes to the scheme when compared to the 2018 spatial data.

We reserve the right to amend our comments when more information becomes available.

#### 1. The lack of EIA and inadequate supporting information

The proposed changes have been put forward for consultation without supporting information or any Environmental Impact Assessment (draft or otherwise). Respondents have no access to the

environmental information that HS2 have used to inform their new design. We urge HS2 to release data alongside any future consultations.

## **2. Material stockpile sites and borrow pits are not being reported**

We are concerned that the Design Refinement Consultation is highly misleading in that only 5 hectares of additional land-take have been reported and not the additional land required for three newly proposed borrow pits and at least four temporary stockpile sites.

The borrow pits MA02 A ,B and C lie adjacent to the Crewe Rolling Stock Depot, so the actual increased land-take in this locality is around 30 hectares and not the 5 hectares as reported.

The Design Refinement Consultation maps also show an additional temporary material stockpiling site adjacent to Davenport Green ancient woodland and three additional temporary material stockpile sites on semi-natural habitat adjacent to tributaries of the Bollin (south of Sunbank Lane) and at Bollinbrook.

It is unclear why these changes, (which total approximately 35 ha and are clearly visible on the maps provided for the consultation) have not been reported in the supporting text. These parcels support areas of semi-natural habitat so it is vital they are accounted for.

## **3. Loss of habitat – impacts on ecological connectivity and species**

Developing a Nature Recovery Network to reconnect wildlife habitats is at the heart of the government's 25 Year Environment Plan, yet the proposed changes to the Western Leg appear to undermine these efforts. The loss of fifteen ponds, seven areas of woodland, an area of ancient woodland, veteran trees, traditional orchard, marshy and semi-natural grassland and hundreds of metres of native hedgerow will undoubtedly lead to increased fragmentation of wildlife habitats and knock-on impacts to species. We set out the details of habitat loss in point 5 below.

Changes to the scheme mean that the width of the working footprint in the Crewe Rolling Stock Depot compound area is now increased to approximately one kilometre and in the Warmingham Moss area to approximately 380 metres. The increases width and height of the scheme will create a permanent barrier to many species and disrupt wildlife corridors and foraging routes for many others. In particular we are very concerned about the impact to local bat populations as there are already significant shortfalls the provision of foraging and commuting habitat such as hedgerows.

The environmental impact of extensive additional losses of farmland in the Rolling Stock Depot area must be properly assessed. We have particular concerns relating to the impact the refinements will have on breeding and overwintering birds, especially those that forage or nest in open habitats and are considered Priority species. We hope that HS2 Ltd. has undertaken the relevant surveys on the extensive areas of farmland that are required for the three MA02 borrowpits, A, B and C.

## **4. No apparent compensatory measures for the additional land-take**

The HS2 Environmental Policy states:

*'In order to guide and manage our potential environmental impacts, we will seek to:*

- *achieve no net loss in biodiversity, reducing impacts on species and creating and enhancing habitats;*

Despite these policy commitments there is no evidence of additional creation or enhancement measures specifically related to the proposed changes to the scheme. Furthermore although assurances were given to the Wildlife Trusts in 2018 and 2020 we have not seen any reporting against the no net loss calculation for Phase 2b.

We hope that despite an apparent lack of compensation for the habitats lost in these Western Leg refinements, there will in fact be compensation forthcoming. We would welcome greater transparency on this.

## **5. Site specific impacts**

The scheme refinements will directly impact five locally designated sites including one ancient woodland and at least two veteran trees. It will also directly impact five potential Local Wildlife Sites (pLWS) which are sites likely to support priority habitat and species but have not been assessed against the selection criteria. These sites should be given the same consideration as locally designated sites. Ancient woodland and ancient trees are irreplaceable habitats and their loss should only be allowed for wholly exceptional reasons and a where a suitable compensation strategy exists. Local sites directly impacted by the refinements are listed in table 1.

Indirect impacts due to construction activities on adjacent land may also occur on Mossbridge Marsh LWS, River Dane Bostock LWS and Spring Plantation LWS.

The scheme refinements may also impact Wimboldsley Wood SSSI due to possible hydrological changes caused by the construction work. SSSIs are protected under the Wildlife and Countryside Act 1981

In addition to the designated sites the refinements will also directly impact 14 areas of semi-natural habitat, some of which may be Priority habitat or support Priority species. These are:

1. Woodland at Stanthorne Farm
2. Trees and hedgerows at Shropshire Union Canal viaduct north satellite compound
3. A tributary to the River Wheelock, woodland, individual trees and hedgerows at Borrow pit MA02 C
4. Stove wood – refinements result in a complete loss of this woodland
5. Pond near Wimboldsley Grange
6. Woodland SE Wimboldsley Hall – further losses
7. Pond near Rose Cottage Wimboldsley
8. Two parcels of woodland and 2 ponds at Borrow pit MA002 B
9. Woodland and 2 ponds at Yewtree farm Wimboldsley
10. Three ponds near Yewtree farm at Borrow pit MA002 A
11. Pond SE Parkfield near Minshull Vernon
12. Four Ponds near Coppenhall Junction
13. One pond Moss lane satellite compound
14. Extensive lengths of native hedgerow, moss rooms, and probably peat soils at Warmingham Moss

As referred to above there is no evidence of measures to compensate for these losses.

**We hope that the forthcoming Environmental Statement on HS2 Phase 2b will address our very serious concerns and provide evidence that:**

- a) the survey work to underpin its conclusions has been undertaken;**
- b) the mitigation hierarchy has been followed;**
- c) fragmentation of habitats has been addressed;**

**These are fundamental to the scheme so that significant impacts and impacts on protected and priority species/habitats can be addressed and gains in biodiversity can be achieved. We also hope that HS2 can demonstrate it can meet its environmental commitments as set out in its Environmental Policy. This is certainly not the case at this current time.**

Rachel Giles

11/12/20

**Table 1: Locally designated sites affected by the refinements to the scheme**

Area	Site	Status	Impact	Constituency	Proposed Works	Habitat or species likely to be affected	Recommendations
MA01	Mossbridge Marsh	pLWS	Direct	Crewe and Nantwich, CE	The majority of the site to be directly impacted by HS2. An area of mitigation habitat is to be created on part of the site. This is inappropriate as the area is already a valuable habitat and may possibly lose value under the proposals.	The area of this site affected by HS2 contains marshy grassland and rush pasture and ditches. Grass snake has been recorded on adjacent land  Landowner has reported lapwing, common snipe, tawny owl, barn owl, ringlet, several dragonfly species. A CWT surveyor heard lapwing in the area in the winter. CWT surveyors also recorded several bird species including singing dunnock (amber listed) and yellowhammer (red listed).	Inappropriate siting of mitigation habitat which should be moved to a less sensitive area. Reptile surveys and farmland/wetland bird surveys should be undertaken. Records for lesser silver diving beetle in the vicinity (according to HS2). CWT would expect surveys for aquatic invertebrates for the ditches and swamp areas. The land may also be of terrestrial invertebrates.
MA01	Burnt Covert	pLWS	Direct	Eddisbury, CE	Work planned for the entirety of the surrounding land. Some works planned in the woodland.	Loss of habitat likely. May cause disturbance and hydrological damage to the remaining habitat.	Work should be outside of bird nesting season. Root protection zones should be incorporated.
MA01	Larch Wood	pLWS	Direct	Eddisbury, CE	Work planned for the surrounding land. Some works planned in the woodland.	Loss of habitat likely. May cause disturbance and hydrological damage to the remaining habitat.	Work should be outside of bird nesting season. Root protection zones should be incorporated
MA02	Shropshire Union Canal (Middlewich branch)	LWS	Direct	Eddisbury, CWAC	The canal is being crossed by three viaducts. Embankments will be constructed.	Canal-side vegetation will be affected by the works. The site is designated for neutral grassland, wildlife corridor, accessible natural greenspace and vascular plants (yellow vetch- nationally scarce species, stone parsley, water avens both locally scarce).	Botanical surveys should be carried out adjacent to the Trent and Mersey Canal and in the area of proposed works in the north. Nationally scarce and locally scarce plant species may be present in these areas.
MA02	Bostock Road Orchards	LWS	Direct	Eddisbury, CWAC	Revised scheme results in a loss of this site.	There will be a complete loss of the traditional orchard	Orchard planting should be carried out to compensate for the loss.
MA02	Greenhayes Farm Rush	pLWS	Direct	Eddisbury, CWAC	Part of the site lies within the revised construction footprint	Adjacent to Greenhayes Farm orchard, likely marshy grassland with rushes including jointed rush and meadow buttercup.	To minimise damage to the marshy grassland and adjacent traditional orchard it would be desirable to restrict the construction route to the current track
MA02	Bank Hall Farm Flush	pLWS	Direct	Eddisbury, CWAC	The site lies partly under a temporary material stockpile area and partly under a satellite storage compound. Extent of losses has increased since the WDES.	Flush with bur reed, brooklime, jointed rush, celery-leaved buttercup and reedmace which may meet the LWS criteria.	Survey should be undertaken of the flush to assess whether it is priority habitat.
MA02	Veteran Ash, Bank Farm, Bostock	LWS	Direct	Eddisbury, CWAC	Revised scheme will result in loss of this veteran tree	Veteran Ash	Avoid this irreplaceable habitat
MA02	Bull's Wood and Grassland	AW/ LWS	Direct	Eddisbury, CWAC	Part of Bull's Wood ancient woodland and grassland LWS is in the land required for the revised scheme. A new temporary storage compound will be created immediately adjacent to the site, in the vicinity of a veteran tree.	Bull's Wood is sycamore dominated but with a bluebell understorey. Yellow archangel and dog's mercury also present. Other species such as wood false-brome, wood avens, red campion, remote sedge, ground ivy. Part of the woodland will be lost as set out at the WDES stage. No further losses of woodland due to the refinements.	The species-rich grassland should not have woodland planted upon it. Root protection zones should be incorporated around the woodland and the veteran tree

Area	Site	Status	Impact	Constituency	Proposed Works	Habitat or species likely to be affected	Recommendations
					Woodland habitat creation is planned on the species rich grassland to the north of Bull's Wood.	The grassland supports bird's-foot trefoil, knapweed, meadow vetchling, tormentil, common sorrel, jointed rush. LBAP ringlet also present in the grassland. A veteran ash is present on the site	
MA06	Davenport Green wood (Timperley Brook)	SBI/A W	Direct	Manchester, Stockport Altrincham and Sale, Trafford	<p>The east of the site will be destroyed with the creation of Manchester Airport High Speed Station.</p> <p>Wetland habitat creation is proposed alongside the river.</p> <p>A temporary storage compound will be created immediately adjacent to the site</p>	<p>Further losses of the ancient woodland are planned. Ancient woodland is irreplaceable habitat.</p> <p>The storage compound may cause hydrological damage to the remaining woodland and root compaction.</p>	<p>Compensation for the loss of any ancient woodland should be carried out according to an ancient woodland compensation strategy.</p> <p>Root protection zones should be incorporated around the woodland.</p> <p>The habitat along the river is already likely to be ecologically important. Unless it is being destroyed by the proposed works habitat creation should not be carried out here. Habitat creation on already existing priority habitat cannot be counted in the compensation figures.</p>

**Table 2: Impact on SSSIs**

Area	Site	Status	Impact	Constituency	Proposed Works	Habitat or species likely to be affected	Recommendations
MA02	Wimboldsley Wood	SSSI	Adjacent	Eddisbury, CWAC	Approx. 240m west of the land identified for the revised scheme	Wet woodland, unimproved grassland, open water, brackish marsh	Any drainage into the woodland, or impacts on the water table have the potential to impact saliferous springs and Brackish marsh within woodland