

Petition template

The following pages provide the template to be used for petitions against the High Speed Rail (Crewe - Manchester) Bill.

A separate template will be made available for petitions against any Additional Provisions deposited by the Government in relation to this Bill. Please note that separate petitions need to be submitted should a petitioner wish to petition against both the Bill and an Additional Provision (i.e. objections cannot be stated on the same petition).

Before completing or submitting your petition, you are advised to read the guidance produced by the Private Bill Office on the petitioning process. All guidance can be found on the [Committee's website](#).

Content

Your petition should include:

- The names and details of the petitioner/s (and of their nominated representative, if appropriate)
- The petitioners' objections to the Bill
- What the petitioners want to be done to address their objections to the Bill.

You should fill in each of the text boxes in the sections below. The text boxes will expand to accommodate your text.

Your petition should only include text, and not any images. You will have an opportunity to present any photos, maps, diagrams etc in your evidence before the Committee.

The Committee is only able to consider aspects of the project proposed in the Bill which affect people in their private capacity, not fundamental principles involving broader issues such as whether the railway should be constructed at all. You should not, therefore, make political comments, raise general objections to the Bill or raise broad issues of policy in your petition. You should concentrate instead on the specific ways in which the Bill specially and directly affects you or those you represent.

Submission

You are advised to submit your petition by using the online portal if possible. The portal can be accessed here: <https://committees.parliament.uk/work/6779/petitioning-against-the-high-speed-rail-crewe-manchester-bill/>

Should you wish to submit your petition via email or post, you should fill in the template petition fields on the following pages and send your petition:

- By email – hs2committee@parliament.uk
- By post – Private Bill Office, House of Commons, London, SW1A 0AA

Payment

Once you have submitted your petition, you must pay a £20 administration fee. Petitions will not be heard by the Committee without the payment of the fee.

You can pay the required fee by:

- Bank transfer – to sort code 60-70-80 and account number 10022317. Please ensure that you quote your surname as a reference, so that we can identify received payments with received petition.
- Cheque – payable to 'HOC Administration 2' and posted to Private Bill Office, House of Commons, London, SW1A 0AA.

House of Commons

High Speed Rail (Crewe - Manchester) Bill

1. Terms and conditions

We need your consent to use your data and to keep you updated on the progress of your petition.

Your data

Your petition will be published on the UK Parliament's website. Please note this will include your name and address. We will store your data and a copy of your petition in the Private Bill Office and as a record in the Parliamentary Archives.

Communications

Your data is stored so that you can be invited to have your petition heard by the Committee.

Private Bill Office staff may contact any of the people named in the petition to verify the information provided. Those communications will be stored with the information you have given.

Your petition and communications regarding it may be shared between the Private Bill Offices.

If you have completed this form on behalf of an individual, group of individuals, on organisation or group of organisations, please ensure you have been authorised to do so.

For more information on how we handle your data, please see our [privacy notice](#).

Consent

☒ I give consent for my information to be used for the purposes set out above.

2. Petitioner information

In the box below, give the name and address of each individual, business or organisation submitting the petition.

Rachel Giles Ph.D.
Evidence and Planning Programme Manager

On behalf of:
Cheshire Wildlife Trust,
Bickley Hall Farm,
Bickley,
Malpas SY14 8EF

In the box below, give a description of the petitioners. For example, “We are the owners/tenants of the addresses above”; “My company has offices at the address above”; “Our organisation represents the interests of...”; “We are the parish council of...”.

Cheshire Wildlife Trust is the leading local environmental NGO operating in the area impacted by HS2 Phase 2b.

The Trust represents the interests of 17,000 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 Petition in the interests of protecting and improving habitats, species and the landscape within the Cheshire region.

3. Objections to the Bill

In the box below, write your objections to the Bill and why your property or other interests are **directly and specially affected**. Please number each paragraph.

Only objections outlined in this petition can be presented when giving evidence to the Committee. You will not be entitled to be heard by the Committee on new matters not included in your written petition.

Transparency

1. **Objection** There is a reprehensible lack of transparency regarding how HS2 Ltd have assessed the likely impacts to the natural environment in the Cheshire region. This lack of transparency would not be acceptable for other developments of a smaller size and impact. The obscurity makes it difficult for third parties to effectively communicate to decision makers where there are specific concerns.

Biodiversity Net Gain (BNG)

2. **Objection** The Cheshire Wildlife Trust welcomes the commitment from HS2 Ltd. to achieve 10% Biodiversity Net Gain for Phase 2b; however, they urgently need to publish how they intend to account for biodiversity losses and gains. The current methodology (HS2>NNL metric for Phases 1 and 2a) is based upon a version of the Defra biodiversity metric that is approximately 10 years out of date and has now been superseded. Contemporary developments are required to apply a significantly more stringent assessment of biodiversity losses/gains than HS2 (i.e. the Defra 3.1 BNG metric). It is unacceptable that current industry standards are not being applied for Phases 1 and 2a and this must not be repeated for Phase 2b. The continued use of an untested biodiversity metric for Phase 2b would set a worrying precedent for future large infrastructure projects and potentially undermine our legal obligations under the United Nations Convention of Biological Diversity (CBD).
3. The use of an outdated, inaccurate biodiversity accounting methodology also seriously undermines HS2's ambition set out in their 2022 Environmental Sustainability Progress Report to deliver '*best practice*' or to be '*setting world-class standards wherever we can*'.
4. The Cheshire Wildlife Trust can demonstrate that, unless HS2 Ltd. adopt a version of the government's Defra BNG v3.1 metric, nature will be significantly undervalued, and consequently too little mitigation/compensation will be provided resulting in long-term permanent impacts to nature.

Impact on the core sites and linkages of the Cheshire region ecological network

5. **Objection** Developing a Nature Recovery Network to reconnect fragmented wildlife habitats underpins the Environment Act 2021 and is at the heart of the government's 25 Year Environment Plan, yet the proposals for HS2 in the Cheshire region appear to do the exact opposite by destroying core sites including 5 ha of irreplaceable ancient woodland and damaging or destroying 39 Local Wildlife Sites/Sites of Biological Importance (LWS/SBI), 12 potential Local Wildlife Sites (pLWS) and severing ecological connectivity along hundreds of hedgerows and small watercourses. The scale of these

losses is completely unprecedented in the Cheshire region, an area which has already lost much of its wildlife due to agricultural intensification and development.

6. Many of the impacts to the core sites for biodiversity, including ancient woodland are due to temporary works or utility realignment works which, in many cases, are wholly avoidable and therefore unacceptable.
7. The proposed compensation for these sites is either inadequate (when compared to current industry standards) or missing entirely, partly because HS2 have:
 - *failed to use the LWS/pLWS datasets provided to them (in September 2021)*
 - *not used a robust accounting mechanism (i.e. the current Defra metric 3.1) to inform the habitat creation measures for high value habitats .*
 - *not evaluated pLWS in the same manner as Staffordshire's Biodiversity Alert Sites in Phases 1 and 2a despite them being the exact equivalent, demonstrating an inconsistent approach along the route.*

Impact to Sean Hawkins Nature Reserve (pLWS) and the water vole population

8. **Objection** The realignment of a gas pipeline at Millington will result in the partial loss of Sean Hawkins Nature Reserve belonging to the Cheshire Wildlife Trust. It will also result in the loss of 0.2ha adjacent connecting ancient woodland in Millington Clough. The impacted area of the nature reserve supports M27 *Filipendula ulmaria* – *Angelica sylvestris* mire Priority Habitat as well as W6 *Alnus glutinosa-Urtica dioica* wet woodland Priority Habitat. Neither of these habitats were recorded by HS2 Ltd. which is particularly concerning.
9. Water voles have been recorded on Agden brook on the section where it runs through the nature reserve and further downstream adjacent to the reserve. As suitable habitat is present both upstream and downstream it is likely the population is using a much wider area than where they were recorded.
10. Water voles are one of the fastest disappearing mammals in the UK; the likely reasons for this include fragmentation and contraction of remaining populations due to habitat loss and habitat degradation. An unprecedented, rapid decline in the local water vole population is one of the most pressing conservation concerns in the Cheshire region at the moment.
11. There are no plans to mitigate or compensate for the partial loss of the nature reserve, the habitats it supports or the wider societal benefits it provides. There is no recognition that the remaining small area of the reserve will lose its functionality as land either side is directly impacted. None of these impacts are reported in the Environmental Statement or considered to be significant enough for compensatory measures to be provided.
12. Most concerning is the absence of any plans to trap, relocate or exclude the water vole population during the construction process. There are no plans to provide water vole mitigation, meaning the resilience of the population could be impacted potentially leading to their local extinction.
13. An area of wetland creation downstream has been planned post-construction but we believe this is to compensate for additional losses of wetland habitat in the wider area rather than to act as a receptor area for water voles during the construction process. It is also apparent that this area is already suitable for water voles (suitable habitat

present and species records from 2009), meaning no additional riparian water vole habitat will be created, despite the direct impacts.

4. What do you want to be done in response?

In the box below, tell us what you think should be done in response to your objections to the Bill. You do not have to complete this box if you do not want to.

You can include this information in your response to the section 'Objections to the Bill' if you prefer. Please number each paragraph.

Transparency

14. Response We want to see HS2 clearly publish:

- *area figures for all habitat losses and gains for each community area clearly identifying where survey data is missing and where/what assumptions have been made.*
- *regular, transparent, evidence-based updates on progress towards achieving Biodiversity Net Gain.*
- *evidence why local criteria for evaluating species and habitats have not been used despite this commitment being set out in Paragraph 2.3.3 of Annex E of the ES methodology.*

15. The area information is partly provided in the ES but sits within approximately 12 different documents. There is no over-arching summary table and therefore the Cheshire Wildlife Trust has produced their own. This is unacceptable because the key information communicated by HS2 should be presented in an unambiguous format and widely available for fact-checking purposes.

16. Supporting datasets should be made available and referenced with a survey date and details of the ecologist. Where there are constraints such as missing data, or surveys undertaken out of season, these should be clearly communicated. HS2 rely very heavily on assumptions about land they haven't fully surveyed, however it is not usually possible for third parties to identify these land parcels or challenge the assumptions.

17. It is evident that industry good-practice principles are not being followed by HS2. This lack of transparency and ambiguous use of evaluation criteria and missing survey data means it is not currently possible for HS2 to demonstrate that evidence-based decisions have been taken.

Biodiversity Net Gain (BNG)

18. Response It is essential that a version of the Defra biodiversity net gain metric 3.1 and the associated good practice principles are utilised in HS2 Phase 2b because:

- *The 'No Net Loss' biodiversity accounting system devised by HS2 Ltd. and used on Phases 1 and 2a is neither evidence based or peer reviewed and therefore not fit for purpose.*
- *Delays in the habitat creation process will be accounted for if the current Defra 3.1 metric is used. The ES makes continued reference to the compensatory habitats being sufficient once they have matured, but new habitats will take many years to reach the same value as existing long-established habitats and this is not fully accounted for in the HS2 NNL metric*

- **Habitat created in advance of losses will be better incentivised if the current Defra 3.1 metric is used for accounting.** Habitat creation in advance of losses enables species to establish additional territories and may help prevent local extinctions by increasing resilience.
- **The strategic significance of land parcels such as non-statutory Local Wildlife Sites and ecological networks will be accounted for if the current Defra metric 3.1 is used.** The HS2 NNL metric does not attribute any weighting to strategically significant land parcels.
- **Individual trees and trees in hedgerows will be accounted for if the current Defra metric 3.1 is used.** The HS2 NNL metric does not attribute any value to these trees which is unacceptable.
- **Impacts to watercourses/fragmentation will be properly accounted for if the current Defra metric 3.1 is used.** The HS2 NNL metric does not account for quality, functionality or connectivity of watercourses and significantly underestimates their existing value. Notably the number or length of impacted watercourses is not reported for Phase 2b. These serious short-comings must be addressed.
- **Losses of semi-natural habitat are likely to be replaced by other semi-natural habitat of the same broad type rather than larger areas of less biodiverse habitat if the current Defra metric 3.1 is used for accounting.**

19. None of the above deficiencies are addressed in the Environmental Statement for Phase 2b (or for Phases 1 and 2a). These issues have led to grave concerns from a range of organisations (including Local Planning Authorities) and a widespread scepticism around the predicted losses/gains of biodiversity that HS2 Ltd. are actively communicating

Impact on the core sites and linkages of the Cheshire region ecological network

- 20. Response** We ask that HS2 use up-to-date datasets to inform the design of the scheme and the levels of compensation required (i.e. to follow the mitigation hierarchy). Updated Local Wildlife Site data and potential Local Wildlife Site data were provided to HS2 in September 2021 but this has not been incorporated into the Environmental Statement or used to inform compensation. This is unacceptable and must be remedied.
- 21.** The three Local Wildlife Sites (LWS) listed below have not been recognised by HS2 and the compensatory habitat proposed is a fraction of what is acceptable under current industry requirements.
- **Birkin Brook grassland LWS (SJ 7582 8445)** designated in 2020. There will be a loss of approximately 8.29 ha of neutral grassland. The Defra biodiversity net gain metric 3.1 should be used to inform the level of compensation, this is likely to be substantially more than the area currently proposed.
 - **Sugar Brook grassland LWS (SJ 775 831)** designated in 2020. There will be a loss of approximately 9.42 ha of neutral grassland. The Defra biodiversity net gain metric 3.1 should be used to inform the level of compensation, this is likely to be substantially more than the area currently proposed.

- **Bank Hall Farm Flush grassland LWS** (SJ 6836 6789) designated in 2020. There will be a loss of approximately 5.02 ha of neutral and marshy grassland. The Defra biodiversity net gain metric 3.1 should be used to inform the level of compensation, this is likely to be substantially more than the area currently proposed.
22. We want HS2 Ltd. to comply with industry best-practice and use a separate Defra biodiversity metric to calculate the minimum floor of bespoke compensation for ancient woodland, LWS/SBI, pLWS and Priority Habitat. Using a biodiversity metric simply as an over-arching accounting tool misses the intended purpose of Biodiversity Net Gain. It is unacceptable that habitat creation to compensate for impacts to high value sites/habitats are not meeting current industry requirements and furthermore the pre-existing biodiversity value of the ancient woodland compensation sites is not accounted for.
 23. We ask that HS2 Ltd. undertake soil translocation when Local Wildlife Sites and Priority Habitat are impacted so that important flora and fauna is retained as far as practicable. HS2 are destroying approximately 7% of all Cheshire's neutral grassland along with genetic diversity unique to the local area. It is important to salvage as much as possible of this irreplaceable genetic resource.
 24. Potential Local Wildlife Sites (pLWS) are highly likely to support Priority Habitat and should be treated in the same way as Local Wildlife Sites, just as Biodiversity Alert Sites were treated in Phases 1 and 2a. Twelve pLWS are directly impacted by the scheme and a further 9 lie immediately adjacent and may be impacted indirectly through disturbance, fragmentation, lighting and hydrology changes. HS2 Ltd. have this information but have chosen not to use it and consequently most of these sites do not have any associated compensation.

Impact to Sean Hawkins Nature Reserve (pLWS) and the water vole population

25. **Response.** If the impacts to the nature reserve cannot be avoided CWT would like to see HS2 Ltd fully compensate for the losses of the fen, wet woodland and broadleaved woodland. The area of compensatory habitats required should be calculated by using the Defra Biodiversity Net Gain metric to ensure a 10% Biodiversity Net Gain is achieved. The areas of compensatory habitat should be publicly accessible to ensure wider benefits to society can be achieved.
26. We would like to see HS2 put forward a water vole mitigation strategy for the Millington area. This should ensure there is at least an equivalent area of **additional** adjacent compensatory riparian habitat established in advance of the losses. Following establishment water voles should be displaced or translocated into the new habitat so that the population is supported during the construction process.
27. Given the precarious status of water voles in Cheshire and the additional impacts to a second population from the construction and operation of Phase 2a, we would also like to see HS2 Ltd. support a Cheshire water vole conservation project. The nature of the project could be determined by HS2 Ltd in partnership with Natural England, Cheshire East Council and the Cheshire Wildlife Trust.



5. Petitioner details

Organisation/group name (if relevant)

Cheshire Wildlife Trust

First name(s)

Last name

Address line 1

Bickley Hall Farm, Bickley,

Address line 2

Malpas

Post code

SY14 8EF

County

Cheshire

Email

rgiles@cheshirewt.org.uk

Phone (landline or mobile)

01948 820728

Who should be contacted about this petition?

- ☒ Individual above
- ☐ Another contact (for example, Roll A Agent or other representative)

If another contact, complete the 'Main contact's details' section below.

6. Main contact's details

First name(s)

Rachel

Last name

Giles

Address line 1

Bickley Hall Farm, Bickley

Address line 2

Malpas

Post code

SY14 8EF

County

Cheshire

Email

rgiles@cheshirewt.org.uk

Phone (landline or mobile)

01948 820728

7. Next steps

Once you have completed your petition template, please save it.

After doing so, please visit the Committee's webpage on the link below and follow the instructions to submit your petition through the dedicated online portal.

<https://committees.parliament.uk/work/6779/petitioning-against-the-high-speed-rail-crewe-manchester-bill/>

Alternatively, you can email your petition to hs2committee@parliament.uk or submit your petition by post to: Private Bill Office, House of Commons, London, SW1A 0AA.

Please pay the £20 administration fee within 2 working days of submitting your petition. Payment should be made by bank transfer (sort code 60-70-80 and account number 10022317, **quoting your surname as a reference**) or cheque payable to "HOC Administration 2". Cheques should be posted to Private Bill Office, House of Commons, London, SW1A 0AA.

Once your petition has been received and accepted, it will be sent to the Bill's promoter (HS2 Ltd, on behalf of the Secretary of State for Transport) and published online on the Committee's website. Copies of petitions submitted in hard copy (i.e. delivered by post or in person) will also be kept in the Private Bill Office and then as a record in the Parliamentary Archives.

Petitions sent to the Bill's promoter will include all personal information provided by the petitioner/s. Petitions published online will include only the name and address of the petitioner/s. More detailed personal information, provided in Sections 5 and 6, will be removed before publication.