

Hybrid Bill Petition

House of Lords
Session 2017-19
High Speed Rail (West Midlands – Crewe) Bill

Please do not include any images or graphics in your petition. There will be an opportunity to present these later if you give evidence to the committee.

Your petition does not need to be signed.

Expand the size of the text boxes as you need.

1. Petitioner information

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

*Staffordshire Wildlife Trust
The Wolseley Centre
Wolseley Bridge
Stafford
ST17 0WT*

Represented by Kate Dewey BSc MCIEEM, Senior Planning Officer

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...”.

Staffordshire Wildlife Trust (SWT) is a local nature conservation charity established in 1969 to further the protection and enhancement of wildlife and promote understanding, enjoyment and involvement in the natural world across Staffordshire. SWT has nearly 16,000 members and 700 volunteers, many of whom live and work in the area that will be affected by the construction and operation of the Authorised Works. SWT owns or manages 30 nature reserves across the county, totalling nearly 3800 acres, but works beyond these to promote its objectives throughout the county. SWT is a lead partner in a number of landscape scale nature conservation schemes which aim to restore and create wildlife habitat and promote opportunities for local communities to access wildlife. SWT also campaigns to promote and secure positive outcomes for wildlife through the planning system, and is recognised by local authorities across the region as a consultee on planning applications, strategic planning documents, and other matters affecting the area in which those whom it represents live. SWT has been actively engaged with HS2

Ltd and their representatives, regarding both Phase 1, Phase 2a and Phase 2b Bills. SWT is a member of the Trent-Sow Parklands and Cannock Chase AONB HS2 Group, working to protect and enhance the special character of this area affected by HS2 Phase 2a.

2. 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 on new matters.

1. SWT's interests relate to areas with the county of Staffordshire, that is Community Areas 1 to 4. SWT's interests and those of its members are injuriously affected by the Bill, to which SWT objects for reasons amongst others, hereinafter appearing.

Out-of-date and incomplete Local Wildlife Site data

2. While the Promoters have worked with Natural England to assess and identify new ancient woodlands and have these sites added to the national inventory, the same approach has not been applied to Local Wildlife Sites (LWS).
3. LWSs are non-statutory designated sites of county and district importance for wildlife. In Staffordshire they are named Sites of Biological Importance (SBI) and Biodiversity Alert Sites (BAS) respectively. They underpin local ecological networks, support and link statutory designated wildlife sites and make an important contribution to national and local biodiversity targets for priority habitats and species. As with ancient woodlands, the mapping of LWS is not comprehensive and so new sites are regularly found in previously un-surveyed areas. Many existing LWS also have out-of-date data, i.e. they have not been reviewed within the last 10 years.
4. Valuation in the ES of existing LWS and newly discovered high-value habitats has not been accurate in many cases, leading us to doubt that even the precautionary approach to valuation accurately reflects what is to be impacted, and therefore the level of impacts and the mitigation/ compensation required. Undesignated habitats are also less likely to have a bespoke Environmental Site Management Plan

prepared within the detailed scheme design, meaning they could miss out on adequate mitigation.

5. Currently, the majority of LWS adversely impacted by the scheme have survey data over 10 years old, with several having data over 20 years old. Their status or boundaries are therefore likely to change upon re-assessment. A large number of habitats and species populations have also been identified by the Promoters as being of county and district value and have potential to be designated as LWS if assessed against the Staffordshire LWS criteria. There are also many Important hedgerows, sites identified in the ES as local value, and possibly other sites that have not been valued in areas still to be surveyed, that could also meet LWS criteria. We estimate at least 50 undesignated areas merit LWS assessment.
6. Following surveys carried out by SWT on sites impacted by the Scheme, several existing LWS have had their designation value increased and/or boundaries extended, and a number of new sites have been designated. Some of these sites were either under-valued or not valued at all in the ESs. We expect further LWS to change and new sites to be designated every year as SWT carries out assessments, but we have limited capacity to do this per year.
7. This shows that the Promoters' baseline for LWS and potential new LWS is inaccurate. Therefore the impacts to these sites cannot be properly assessed, or avoidance and mitigation effectively planned. In order for fully accurate information on LWS to be included in the scheme design, these sites must be assessed by HS2 as soon as possible.
8. SWT requests that the Promoter assesses against the current LWS criteria for Staffordshire: all LWS with data older than 10 years; all habitats identified as having district value or higher, and any other sites where SWT or others have evidence of potential LWS value, where these are to be impacted by the proposed scheme. Alternatively, we request that the Promotor provides funds and relevant information to allow SWT's experienced surveyors to carry out this work. The data must be provided to the Staffordshire Local Wildlife Sites Grading Committee for consideration. Where sites meet the LWS criteria, the impacts to, and mitigation required for these LWSs must be updated.

Known Local Wildlife Sites - Impacts and Mitigation

9. SWT is concerned about the extent of impacts the railway, as proposed, will have on LWS, some of which are also Ancient Woodland Inventory (AWI) sites. We consider that these impacts on a significant proportion of wildlife assets in Staffordshire will have a direct effect on our interests relating to the protection and enhancement of wildlife species and habitats.
10. We request that further avoidance, mitigation and compensation is provided. We seek an assurance that SWT and the relevant local authority will be notified before any work within 100m of a LWS.

Lount Farm SBI (CA1 and CA2)

11. This LWS has not been re-assessed against the LWS criteria since 2006. The ES reports areas of similar marshy / diverse meadow grassland adjacent to the site, and these may warrant inclusion in the SBI. The area also supports an up to regional value bat assemblage, a county value water vole population, up to county value barn owl pair as well as notable fish and bird assemblages.
12. As an historic water meadow with potentially unique hydrology, the wet grasslands at this site may be irreplaceable, and HS2 should assess whether this is the case. They may also qualify as an Annex 1 habitat.
13. Due to its high value, we request the habitats in this area be assessed against current grassland SSSI criteria in collaboration with Natural England.

Irreplaceable Habitats

14. The National Planning Policy Framework February 2019 provides this definition-
'Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen. '
15. Currently, the Promoter has only assessed ancient woodland and veteran trees as irreplaceable habitats. The location and extent of all types of irreplaceable habitats

impacted by the proposed scheme have not been identified. We consider that ancient hedgerows with distinctive character/ structure such as historic hedge-banked sunken lanes should be considered irreplaceable within a human lifetime. Grasslands and wetlands that have established over long time periods due to particular soil, hydrology or management, and that contain historic features such as water meadows and ridge and furrow patterns are also likely to be irreplaceable.

16. SWT request that the Promoters as soon as possible assess, identify and map all irreplaceable habitats likely to be impacted by the proposed scheme, working with Natural England to help define these. The Scheme design must be amended as far as possible to avoid and minimise impacts, especially temporary ones, and include bespoke mitigation for each feature.

Priority Birds

17. Many impacts to birds, especially farmland and wetland bird assemblages, are not specifically mitigated. Temporary habitat loss and disruption of breeding and wintering activity is of particular concern. Over the whole scheme, impacts to birds will be more significant than the individual value of each assemblage.
18. We request that mitigation for birds, as they are mobile and have varying needs throughout the year, is brought together in a Priority Birds Mitigation Strategy, showing how temporary and permanent habitat will conserve and enhance populations.

3. 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. You do not have to complete this box if you do not want to.

The committee cannot reject the Bill outright or propose amendments which conflict with the principle of the Bill. But it can require changes to the Government's plans in response to petitioners' concerns which can take the form of amendments to the Bill or commitments by HS2 Ltd.

You can include this information in your response to section 2 'Objections to the Bill' if you prefer. Please number each paragraph.

Information included in section two.

Next steps

Once you have completed your petition template please save it and go to our website to submit it during the petitioning period. Alternatively, you can either email it to hlprivatebills@parliament.uk; post it to the Private Bill Office, House of Lords, London SW1A 0AA; or call 020 7219 3231 to arrange a time to deliver it in person.

If you plan to submit your petition by post, email, or in person, please also complete the contact sheet and terms and conditions below.

Individual's details

First name(s)

Katherine Laura

Last name

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Check this box to receive updates from the High Speed Rail (West Midlands - Crewe) Bill Committee?

Phone

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Who should be contacted about this petition?

Individual above

Another contact

If another contact, complete the 'main contact's details' section.

Main contact's details

First name(s)

Last name

Address line 1

Address line 2

Post Code

Country

Email

Check this box to receive updates from the High Speed Rail (West Midlands to Crewe) Bill Committee?

Phone

Terms and conditions

Personal information

A copy of this petition and information provided in the online form will be:

- kept in the Private Bill Office and as a record in the Parliamentary Archives.
- sent to the Department for Transport and High Speed Two (HS2) Limited after the petition has been received by the Private Bill Office.

We will publish your petition on UK Parliament's website. This will include your name and address.

The personal information you have provided may be kept in a database by the Private Bill Offices of both Houses.

The Privacy Notice relating to personal data processed by the House of Lords Administration can be found here:

<https://www.parliament.uk/documents/foi/House-of-Lords-FOI/HL%20Privacy%20Notice%20for%20Members%20of%20the%20Public%20v1.0.pdf>

Communications

Private Bill Office staff may call or email any of the people named in the petition to verify the information provided.

Communications may be stored in databases to keep track of information you have given or received. This information may be shared between the Private Bill Offices.

Confirmation

The information you have provided in the petition and online form is accurate.

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

Yes

Check this box if you agree to the terms and conditions