

THE WILDLIFE TRUSTS' POSITION STATEMENT



High Speed Rail 2 (HS2)

There are 47 Wildlife Trusts across the whole of the UK. Together, we are the UK's largest voluntary organisation dedicated to protecting wildlife and wild places whether in the country, in cities or at sea. We are supported by more than 800,000 members and manage around 2,300 nature reserves.

Summary

The Wildlife Trusts are convinced that:

- The principles of sustainable development, including the need for efficient and sustainable transport systems and the need to move to a low carbon economy, must not be achieved at the expense of the natural environment.
- The former Government's policy document on High Speed Rail (March 2010) significantly underestimated the impact of the proposed route on the natural environment.
- The current approach to assessing the least environmentally damaging route is seriously flawed, and that the environmental case for the current proposals lacks clarity.
- The Appraisal of Sustainability seriously underestimates the environmental mitigation and compensation costs and opportunities
- Before pursuing either the currently proposed route, or any other high speed rail routes, the Government needs to complete a much fuller and more in-depth analysis of the environmental impact of a new rail link.

1. Huge impact on wildlife

The current route proposed by HS2, from London to Birmingham, will destroy or irrecoverably damage a large number of important sites. Our own analysis indicates it will impact directly on two Wildlife Trust nature reserves, four SSSIs, ten ancient woodland sites and 53 Local Wildlife Sites or potential Local Wildlife Sites. **The former Government's policy document on High Speed Rail (March 2010) significantly underestimated the impact on the natural environment.**

It is not just high quality habitat loss that The Wildlife Trusts are concerned about. We have a vision for *A Living Landscape* where core areas of high quality habitat are restored, recreated and reconnected. Wildlife will increasingly need to move through the countryside, towns and cities in response to climate change. The high speed rail link 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

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Wildlife Trusts, and partners, have identified as important for enhancing our natural environment for the future.

The Appraisal of Sustainability summary that was issued with the proposal is flawed as it appears to grossly underestimate the wildlife impacts. In addition, it does not give any details of proposed mitigation or compensation, which could include green bridges, extensions of tunnels to avoid protected sites and significant habitat creation.

2. Sustainable development and transport systems

The Wildlife Trusts fully support the need to move towards a low carbon economy as part of the ambition to achieve sustainable development. The Wildlife Trusts 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, including the need for efficient and sustainable transport systems and the need to move to a low carbon economy, must not be achieved at the expense of the natural environment.

3. Environmental gain?

It had been hoped that 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 document (High Speed Rail Command Paper (March 2010)) 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.

The Wildlife Trusts 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.

Though the direct impact of the route on the natural environment could be severe, TWT also recognise that opportunities could exist to secure major investment in conservation action to create a Living Landscape by negotiating mitigation and compensations measures.

4. Economic business case misrepresented

Track construction will clearly result in substantial loss of land and associated impacts on habitats and species. However, the current Appraisal of Sustainability, produced by HS2 Limited, 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. Further investigation required

The Wildlife Trusts are also concerned that the impact the route will have on wildlife has not been recognised within the work done by HS2. It would appear that only the most elementary

information on protected areas has been collated. There has been no request for local and/or regional datasets from The Wildlife Trusts or other organisations.

The current approach to assessing the least environmentally damaging route is seriously flawed. 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.**

The Wildlife Trusts
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