# EXHIBIT LIST

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Petitioner: Staffordshire Wildlife Trust  
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Kate Dewy

By email only to k.dewey@staffs-wildlife.org.uk

6 July 2018

Dear Kate

HIGH SPEED RAIL (WEST MIDLANDS – CREWE) BILL – HOUSE OF COMMONS SELECT COMMITTEE:
PETITION HS2-P2A-000091 – STAFFORDSHIRE WILDLIFE TRUST (“SWT”)

I am writing to you in my capacity as the Director of Hybrid Bill Delivery at HS2 Ltd, which is acting on behalf of the Promoter of the High Speed Rail (West Midlands-Crewe) Bill (the Bill) currently before Parliament. I understand that SWT have a number of concerns about the impact of Phase 2A of HS2 (known as ‘the Proposed Scheme’) and have submitted a petition on that basis against the Bill in the House of Commons.

I understand you met with my colleagues on 29 June to discuss your petition issues. Following that meeting I am writing to clarify our position in relation to the issues you raised and the measures identified to address your concerns:

1. Local Wildlife Sites: Designation, Mapping and Adequacy of the Environmental Statement
2. Local Wildlife Site: Lion Lodge Covert
3. Local Wildlife Site: Lount Farm
4. Other Local Wildlife Sites discussed with SWT
5. Veteran Trees

1. Local Wildlife Sites and Adequacy of the Environmental Statement

In its petition and in discussion with us, SWT has raised concern over the potential value of existing wildlife sites, where these have not been surveyed in some time or are due to be designated. The Promoter contends that the Environmental Statement (ES) is a robust assessment of affected sites. The ecological impact assessment has taken account of guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM) and considers all ecological receptors which have the potential to be affected by the construction and/or operation of the Proposed Scheme. Baseline and ecological assessments have taken account of both desk based and field surveys, with surveys conducted ranging widely based on the species or habitat involved. Should new data from further baseline ecology surveys or revised formal designations arise, these would be reported and assessed where appropriate in a Supplementary Environmental Statement provided they were identified within the relevant survey period.

As explained in the Promoter’s Response Document, it is not possible to gain access to every survey site. However where baseline information is incomplete a precautionary approach to valuation has been used for these instances, to ensure that all likely impacts of the Proposed Scheme have been identified and adequate ecological mitigation is provided.
SWT have expressed concern that all potential Local Wildlife Sites (LWS) are designated in order for the first step of the mitigation hierarchy (avoidance) to be adequately considered and that the project may require further land to be taken in order to provide adequate environmental mitigation. The Promoter does not accept this is the case and contends that the precautionary approach means powers for sufficient mitigation have been included within the Bill (and the subsequent Additional Provision).

2. **Local Wildlife Site: Lion Lodge Covert**

The Promoter acknowledges that, according to the ecological assessment set out in the ES, there will be a residual effect due to the loss of 1.5ha of inland saltmarsh habitat at Lionlodge Covert LWS. SWT have suggested that they would like to see a bespoke solution proposed in order to compensate for the loss of this habitat. The Promoter agrees that an appropriate solution must be explored; we have been engaging with SWT to seek to identify off-site enhancement measures to compensate for the loss of this saltmarsh. We would like to continue this engagement to the mutual benefit of both parties. I am therefore pleased to offer SWT the following assurance:

“The Promoter will require the nominated undertaker consult with Staffordshire Wildlife Trust with a view to identifying off-site enhancement measures to compensate for the permanent loss of 1.5ha of inland saltmarsh habitat at Lionlodge Covert LWS as identified in the Environmental Statement accompanying the Bill.”

In this assurance, “the nominated undertaker” refers to the body or bodies appointed by the Secretary of State to carry out the powers conferred under the Bill to construct and maintain the scheme. The nominated undertaker may be HS2 Ltd, or it may be another body or bodies appointed to oversee the construction and operation of Phase 2A.

If accepted, the assurance set out above will be included in the Register of Undertakings and Assurances, which is held by the Department for Transport. Drafts of the Register will be published regularly during the passage of the Bill and it will be finalised after Royal Assent. A nominated undertaker will be contractually obliged to comply with all relevant undertakings and assurances set out in the Register. Further information on how the Secretary of State will ensure compliance with assurances made by HS2 Ltd is set out in HS2 Phase 2A Information Paper B5, Compliance with Undertakings and Assurances.

SWT have also requested that the Great Haywood Viaduct be extended in order to provide the opportunity for potential restoration of the saltmarsh habitat. SWT accepts the view of the Promoter that construction of a viaduct rather than an embankment would not significantly reduce the environmental impact at the saltmarsh and acknowledges that attempts to recreate a saltmarsh post-construction would be somewhat experimental and perhaps not sure of success.

The Promoter considers that the Great Haywood Viaduct would need to be extended by 590 metres in order to avoid the Lion Lodge saltmarsh. A single viaduct option would not be feasible, requiring a small central embankment to be retained in order to support two, shorter-span viaducts. This has an indicative cost of £10.5m. It is considered that this could also require piling in close proximity to the Tixall Fault and saline spring and that further vehicle movements may be required for off-site disposal of material as it will not be used for the proposed embankment. Taking these factors into account, the Promoter does not consider that the extension of the viaduct would be a proportionate response to

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1 A copy can be found at [https://www.gov.uk/government/publications/understanding-the-hybrid-bill-hs2-phase-2a-information-papers](https://www.gov.uk/government/publications/understanding-the-hybrid-bill-hs2-phase-2a-information-papers)
this concern and has proposed to consider opportunities of offsite compensation in order to reduce the reported effects.

3. **Local Wildlife Site: Lount Farm**

SWT have requested that the Promoter consider the feasibility of extending the Moreton Brook Viaduct in order to avoid the impacts on Lount Farm LWS, by replacing the embankment included on the Proposed Scheme. While SWT accepts that this may not reduce the significant environmental impacts at this site, you have suggested this could facilitate habitat replacement in situ at the existing LWS.

As set out in the Promoter's Response Document in relation to Lount Farm, the extension of the Moreton Brook Viaduct would not significantly reduce the reported environmental impacts. The Promoter considers this would require a lengthening of the viaduct by 695 metres and could cost £24m. As with a potential viaduct extension at Lionlodge Covert, this would be likely to require further vehicle movements on the local road network for disposal of material. The Promoter is also concerned that the low clearance at this location would make it difficult to access for maintenance purposes and introduces the risk of a bridge strike.

4. **Other Local Wildlife Sites discussed with SWT**

SWT have raised concerns over the reported construction impacts at a number of LWS in Staffordshire. As was outlined in the Promoter's Response Document, the ES is a reasonable worse-case assessment of predicted impacts and the assessment is based on a number of assumptions about design and construction practices. As set out in HS2 Phase 2a Information Paper E1: Control of Environmental Impacts, the Environmental Minimum Requirements (EMRs) will, among other things, require that “the nominated undertaker will ... further reduce any adverse environmental impacts caused by the Proposed Scheme, insofar as these mitigation measures do not add unreasonable costs to the project or unreasonable delays to the construction programme”. Please see the Information Paper for further detail on these controls.

Specific queries raised by SWT are addressed below:

**Finners Hill Hedgerows BAS**

SWT have asked whether an alternative access could be provided in order to avoid the use of Newlands Lane and reduce the impact on the Finners Hill Hedgerow. The Promoter can confirm that the hedgerow is within the land required to construct the Stockwell Heath embankment and is thus assumed to be lost when the embankment is constructed. As set out above, this impact may be reduced in line with HS2 Phase 2a Information Paper E1: Control of Environmental Impacts and the draft Code of Construction Practice. Where practicable this hedgerow is proposed to be translocated to the nearest suitable habitat creation area. As reported in the Community Area Report 1, Volume 2 of the ES, reinstatement of existing hedgerows in this area is expected to provide approximately 28.8km of hedgerow in addition to the mitigation described.

**Clifford's Wood SBI and AWI**

SWT has enquired whether a green underbridge would be included at this location. I can confirm that the Swynnerton Estate South underbridge within Lodge Covert, design requirements are specified to provide space sufficient space for the passage of wildlife, including bats. Planting at either end of the underbridge, connected to both retained and newly created habitats either side of the Proposed Scheme, would guide species through it. As reported in the ES, following implementation the adverse
effect on the bat assemblage between Lodge Covert and Birchwood would be reduced to a level which is not significant.

Pipe Wood SBI and AWI

SWT have asked the Promoter to consider the greening of the diversion for footpath 38, near Pipe Wood, in order to allow for the movement of bats. As set out in the Promoter's Response Document, the requirement for a green bridge is not currently supported by the survey data gathered to date, or the assessment of the impacts of habitat fragmentation in this area. It is thought to be more likely that bats travel east from Pipe Wood, away from the Proposed Scheme, towards other large woodland blocks and river valley habitats. The Promoter can confirm that further bat surveys are planned for this area to further our understanding of how the area is utilised by bats.

Bishton (north of) BAS

SWT have asked whether an alternative route can be provided which avoids the loss of hedgerows. As explained to Staffordshire County Council, there are a lack of suitable roads to get access to this remote part of the route, the Promoter believes that it is appropriate at this stage of development of the scheme to seek sufficient powers in the Bill to ensure that construction and any operational maintenance works can be undertaken in this area. However the Promoter recognises the value of the hedgerows in this area and has already given the following assurance to Staffordshire County Council on 8 May 2018:

“14.(a) The Promoter will require the nominated undertaker to explore during detailed design of the Proposed Scheme and, if reasonably practicable, implement options for alternative traffic management measures which could be carried out within the existing highway boundary on Bishton Lane instead of the Bishton Lane Widening Works in order to seek to avoid or reduce the need for the Bishton Lane Widening Works and the associated permanent loss of approximately 3km of native species-rich hedgerows reported in paragraph 8.4.16 of the Community area report for CA2, Colwich to Yarlet, in Volume 2 of the Environmental Statement. As part of this the nominated undertaker will have regard to the volume of HS2 traffic proposed to use Bishton Lane during the construction and operation of the Proposed Scheme.

In this assurance: “Bishton Lane Widening Works” means the widening of a 1.5km section of Bishton Lane to 3.5m in width, with provision of passing bays, from The Hollies to Colwich Bridleway 23, with replacement hedgerow planting on both sides of Bishton Lane as set out in paragraph 2.2.11 of the Community area report for CA2, Colwich to Yarlet, in Volume 2 of the Environmental Statement.”

Poolhouse Wood SBI

SWT have requested that specific plans for wet woodland mitigation are included in the Promoter's woodland mitigation, reflecting the wet woodland which will be lost at Pool House wood. As set out in the Promoter's Response Document, in accordance with the Ecological Principles of Mitigation in the Scope Methodology Report Addendum a route-wide, integrated strategic approach has been developed to compensate for loss of woodland. The suitability and provision of wet woodland would be considered as part of the detailed design stage on a site specific basis, and detailed within the Ecological Management Plans.
5. **Veteran Trees**

In relation to impacts on veteran trees, the Promoter refers SWT to the response given in the Promoter’s Response Document, which references the assurances given to Staffordshire County Council on this issue. The Promoter understands this issue will be addressed by the Woodland Trust when they appear before the Select Committee.

I hope that the information set out above in relation to the issues raised in your petition to the House of Commons gives you the comfort required in order to withdraw your petition.

Petitions may be withdrawn by sending an email or letter to the Private Bill Office of the House of Commons informing the Clerk to the Select Committee that you wish to withdraw your petition.

If you have any queries please don’t hesitate to contact Amber Corfield, Petition Manager, on 020 7944 8683 and amber.corfield-moore@HS2.org.uk.

Yours sincerely

Oliver Bayne
Director, Hybrid Bill Delivery
High Speed Two (HS2) Limited

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2 Contact details can be found on the Select Committee website at [http://www.parliament.uk/business/committees/committees-a-z/commons-select/high-speed-rail-west-midlands-crewe-bill-select-committee-commons/contact-us-17-19/](http://www.parliament.uk/business/committees/committees-a-z/commons-select/high-speed-rail-west-midlands-crewe-bill-select-committee-commons/contact-us-17-19/)