Bat Conservation Trust

Phase 2B High Speed Rail 2 (Crewe – Manchester) consultation – March 2022

The Bat Conservation Trust (BCT) is the leading non-governmental organisation in the United Kingdom solely devoted to the conservation of bats and the landscapes on which they rely. Our vision is of a world rich in wildlife where bats and people thrive together. While we recognise the need for improved and sustainable public transport systems, this should not be done at the expense of our natural heritage. The first official IUCN Red List for British Mammals was published in 2020 and showed that four of the 11 mammal species native to Britain classified as being at imminent risk of extinction are bats. Many of these bat species are highly dependent on woodland and veteran trees.

At BCT we know that wildlife protection can be balanced alongside economic and social priorities, including major infrastructure and development projects. HS2 could be an exemplar of how this can be achieved, not only of civil engineering but also of managing and successfully avoiding, mitigating and (as a last resort) adequately compensating for any adverse impacts on the natural environment and providing enhancements that are well-managed and secure in the long-term.

With regard Phase 2B, BCT is concerned at the loss of significant amounts of vital habitat to support biodiversity. Of greatest concern are losses and impacts on ancient woodland, loss of hedgerows and impacts on water courses. Whilst this physical loss of habitat is acknowledged in the Environmental Statement, we cannot see evidence of the consideration of impact on bats and other species, nor an assessment of significance.

In 2021, the Prime Minister called on world leaders to agree to stop nature's decline by 2030. Continuing the proposed trajectory for HS2 will impact negatively on this ambition.

Ancient woodland and veteran trees Despite some consideration of impacts on ancient woodland during the route selection process, the amount of impact on an irreplaceable habitat remains at a wholly unacceptable level. We understand that 18 ancient woodlands are being directly impacted and a further 15 are likely to be impacted due to being in close proximity to the works. The reason this level of loss is wholly unacceptable is apparent in the fact that it is an irreplaceable habitat. Once it is gone it is gone and no amount of compensation has any bearing on this. But a habitat is vital not only in its own right but for the species it comprises and supports. In the case of ancient woodland, the niches that develop over their long history are home to specialist species for which these habitats are their lifeline. In the case of bats, all semi-natural woodland is important but ancient woodland is of particular value and significant importance to bats, in particular to our woodland obligate species. The importance is for all parts of their life cycle and needs. This will include roosting, commuting and foraging. Bats are long-lived animals that produce only one young per year so they are slow to recover from any impacts. Coupled with this is their faithfulness to their roosts, be that a single structure, or in the case of tree roosting bats, to an area of woodland. Ancient woodlands cannot simply be replicated through planting of trees, they are defined by their age and the range of species that inhabit and depend on them. The reason compensation for ancient woodlands does not work for the species that rely on this habitat is the time it would take for any compensation, such as planting of trees, to reach the level of maturity needed for roosting opportunities to be available and, vitally, the associated foraging opportunities supplied by the woodland. The time taken would be long beyond what the bat colonies supported by these woodlands would be able to withstand.

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Bat roosting boxes being provided do have a role if their placement is based on site-based knowledge of bat needs and creating extra roosting provision. However, they are not an adequate replication of the roosting opportunities lost, for instance in veteran trees or woodland interior microclimates, where the most vulnerable species are often found. Nor do they replace the loss of buildings that hosted roosts. Bat box provision also does nothing to provide any bats that might use them with their foraging needs.

These impacts are further compounded by the loss of hedgerows (see below).

We are also concerned by the lack of survey for ancient and veteran trees. Without knowledge of their whereabouts it is difficult to see how the process of avoidance and mitigation can taken place. Gaining this information is essential and would be required of even the most basic and low impact proposal. For HS2 to fail on this point is not acceptable.

Hedgerows These form vital networks in our nature denuded landscapes. They provide homes, shelter and food for a myriad of biodiversity. For bats they are a vital commuting link from roosting areas to places for foraging. They also offer sheltered habitats for foraging. The foraging value is especially important in species rich hedgerows. The loss of hedgerows in Phase 2B is high, with over 157 km being permanently lost. Of that approximately 100km is species rich hedgerow. This will result in the landscape for bats becoming severely fragmented and foraging opportunities significantly reduced. That could threaten the future viability of roosts where the core sustenance zone is affected. It is particularly impactful when the landscape is denuded in a linear fashion as, when it comes to connectivity, this forms a barrier that it is difficult for species to overcome. In combination with impacts on ancient woodland this will make the landscape for bats highly unsuitable for a protracted period of time. This impact will be reflected for a range of other biodiversity.

Water courses These can often be another important commuting route and source of foraging for bats. However, with multiple water courses being impacted this is a further unacceptable impact on bats and biodiversity.

Taken together, the cumulative impacts across the landscape would be devastating for bats and biodiversity across Phase 2B and beyond in this time of ecological crisis. This is particularly disappointing when this phase of HS2 is striving for net gain.

To quote Sir David Attenborough "It's surely our responsibility to do everything within our power to create a planet that provides a home not just for us, but for all life on Earth." If HS2 continues with its current plans it will be destroying irreplaceable homes for nature and impoverishing our natural heritage.