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## Woodland Trust Submission to Independent Review on High Speed 2

### 1. Summary

- 1.1. The environmental harm of the project is huge and must be taken into account as part of the review; benefits viewed on their own will not give an accurate picture of environmental costs.
- 1.2. The evidence regarding the most likely environmental costs of HS2 has grown substantially since initial cost-benefit assessments and decisions were made and this full evidence must be fully taken into account by any review.
- 1.3. Failure to consider the actual impact on the environment early enough in the project, despite direction to do so by the Government's statutory bodies and experts, has added to the costs. Poor planning must not be used as justification to damage the environment now on cost grounds.
- 1.4. HS2 is causing the largest loss of irreplaceable ancient woodland the Woodland Trust has ever seen.
- 1.5. The UK has set a target of 'net zero' carbon emissions by 2050, which is enshrined in the Climate Change Act. Removing ancient woodland is contrary to this target and will contribute to carbon release.
- 1.6. It is impossible for the project to achieve no net loss of biodiversity if irreplaceable habitat is removed. This was made clear in Natural England's review of HS2 Ltd.'s 'no net loss in biodiversity' metric<sup>1</sup>.
- 1.7. The Government's forestry policy document, the 25 Year Plan for the Environment, the Conservative Party manifesto, Natural England's standing advice on Ancient Woodland and the changes to the National Planning Policy Framework all clearly indicate the Government's stated commitment to protecting the environment and improving the protection of ancient woodland. The proposed scheme is in direct and strong opposition to this commitment.

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<sup>1</sup> <https://www.gov.uk/government/publications/review-of-hs2-ltds-no-net-loss-in-biodiversity-metric>

- 1.8. HS2 should be setting the “green standard” for infrastructure schemes and the government must be seen to be applying the “wholly exceptional test” to its own projects if the proposed wording of the National Planning Policy Framework is to be effectively adopted by other developers.

## 2. Introduction

- 2.1. The Woodland Trust is the largest woodland conservation charity in the UK and a leading voice in bringing to the attention of government, land owners and the general public the state of the UK’s trees and woodland and their value to both present and future generations. We champion and deliver the most dynamic solutions to protect and revitalise our natural environment – the restoration and recreation of wooded landscapes on a national scale, for the benefit of people and of wildlife in the short and long term.
- 2.2. We campaign to ensure that laws governing environmental protection are enforced and that the government is held to account on environmental pledges. We also campaign vigorously with the support of local communities, to prevent any further destruction of remaining ancient woods and ancient and veteran trees.
- 2.3. As a means of ensuring the further protection of the UK’s natural environment, we have built up an estate of our own managed woodland covering over 73 square miles across the UK, of which a third is irreplaceable ancient woodland. With a supporter base of half a million we were the first and remain the most significant contributor to woodland protection, restoration and creation in the UK. We are experts in a natural resource that has the potential to transform the UK’s natural environment, is critical to tackling climate change, and ensure its (and our) continued survival.
- 2.4. The Trust is a petitioner on both Phase 1 and Phase 2a of HS2, and has responded to all published consultations on Phase 2b.

## 3. Impact on Ancient Woodland

- 3.1. Ancient woodland is woodland that has existed since at least 1600AD. Some ancient woods may even link back to the original wildwood that covered the UK around 10,000 years ago, after the last Ice Age. Because they have developed over such long timescales, ancient woods have unique features such as relatively undisturbed soils and communities of plants and animals that depend on the stable conditions ancient woodland provides, many of which are rare and vulnerable.
- 3.2. Ancient woodland is the product of centuries of habitat continuity and undisturbed soils, and therefore an irreplaceable resource. As such, its loss cannot be compensated for by creating new woodland or moving ancient woodland soils – an irreplaceable habitat cannot, by definition, be replaced. HS2 Ltd. recognises this, but has not done enough to identify and subsequently avoid the ancient woodland in the path of the current route.

3.3. The history of trees, woods and forests is inextricably linked with our own story, and they have shaped us as much as we have shaped them. They are the backdrop to countless legends and fairy tales, and the inspiration for some of our oldest traditions. They are central to our sense of who we are, our sense of place, and our sense of national identity. They should be protected in the same way we protect listed buildings and great works of art.

#### **3.4. Direct Impacts**

3.4.1. At the time of writing, the entire scheme **directly** affects 63 ancient woodlands, with loss of around 57 hectares (ha) (approximately 85 football pitches).

3.4.2. Direct impacts mean that some or the entire footprint of the ancient woodland would be destroyed. The largest single loss is 5.5ha from Whitmore Wood on Phase 2a of the scheme. A full list of the woods impacted is in the appendix (see 10.1).

3.4.3. There are at least seven more woodlands on Phase 2b that had been erroneously omitted from the Ancient Woodland Inventory (AWI) and are facing direct impacts. Therefore, the Trust expects the actual number and area of ancient woodlands affected to increase as more details are published.

3.4.4. Destruction of ancient woodland irreparably reduces biodiversity and releases carbon. Some of the UK's rarest plants and animals are only found in ancient woodland. No other habitat can support them.

#### **3.5. Indirect Impacts**

3.5.1. Ancient woodlands are also **indirectly** affected by the scheme and this indirect impact can be significant in both ecological and carbon terms. Development adjacent to woodland can cause indirect effects such as changes to drainage, increase in pollution risk (including dust, ammonia and nitrous oxide (NO<sub>x</sub>) depositions), impacts on tree roots and changes to noise and lighting; all of which can have a deleterious effect on the health and functioning of a woodland ecosystem, even if the activities are temporary.

3.5.2. Based on current information we calculate that there are 45 ancient woodlands in this category. A full list of these woods is in the appendix (see 10.2).

3.5.3. High Speed 2 Ltd has refused to recognise the indirect impact of the scheme on ancient woodlands despite clear scientific evidence and advice from ourselves, the Government's statutory bodies, and other environmental experts (see below); and so this negative impact on the environment is not addressed or accounted for in any of the published Environmental Statements for the scheme. This should be rectified as part of any review of the project.

3.5.4. Keepers of Time<sup>2</sup>, A Statement of Policy for England’s Ancient and Native Woodland, recognises a number of threats to ancient woodland, with specific reference to indirect threats posed by development pressures: *“There are still occasions where native and ancient woodland is threatened by development, and many woods suffer attrition through incursions at their boundaries. Even if the woodland itself is protected, it can suffer serious disturbance where houses or roads are built right up to its margins, both directly from the impact of development, or indirectly through changes to drainage.”*

3.5.5. Natural England’s (NE) standing advice for Ancient Woodland<sup>3</sup> contains a detailed checklist of indirect impacts and the Trust considers that HS2 Ltd. should have given this more weight when assessing the impacts of the scheme on ancient woodland.

3.5.6. Documents produced by NE and seen by the Trust clearly state that NE does not consider that HS2 Ltd. has adequately assessed the indirect impacts of HS2 on ancient woodland (see Appendix 10.3).

#### 4. Ancient and Veteran Trees outside of woodland

4.1. Ancient and Veteran trees outside of woodland are important irreplaceable habitats in their own right and last year’s changes to the NPPF in England reflect this fact, giving them the same level of protection as ancient woodlands.

4.1.1. An ancient tree is a tree that is remarkably old for its species – this can vary dramatically depending on the species. All ancient trees are also known as veterans. Ancient trees are a rarity and represent a scarce and unique habitat with its own characteristic biodiversity. The UK is thought to contain the highest proportion of ancient trees in Northern Europe.

4.1.2. Veteran trees are trees which have features of ancientness but at a younger age. These features include branches breakouts, hollow trunks, cavities, deadwood and other habitat features that are associated with ancient trees.

4.2. Ancient and veteran trees are often the most valuable trees in the UK landscape; they are trees that have survived wars and the industrial revolution. In addition to providing all the ecosystem benefits of younger trees, they have special qualities such as size, age, rarity or condition that contribute additional biodiversity, cultural, historic or aesthetic values to the landscape. They possess unique heritage and cultural significance at local, national and international levels.

4.3. The HS2 scheme destroys over 40 ancient and veteran trees that we are aware of, but as the numbers of trees outside woods affected on Phase 2b are not currently known, we expect this number to increase. Of most concern are those trees that are being lost to

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<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/778106/KeepersofTimeanw-policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778106/KeepersofTimeanw-policy.pdf)

<sup>3</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

temporary works, such as haul routes, footpath diversions and construction compounds. No irreplaceable habitat should ever be lost to temporary works.

## 5. Wood Pasture

- 5.1. Wood pasture and parkland is important historically and culturally. They may derive from medieval hunting forests, or from wooded commons. Others are designed landscapes, often associated with big estates dating from the 16th century. The UK has internationally important concentrations of ancient trees. Many of these are in wood pasture and parkland settings. Wood pasture is a category of ancient woodland and recognised by Natural England as an irreplaceable habitat.
- 5.2. The proposed scheme will cause the direct loss of over 30ha of wood pasture. Phase 2b is particularly destructive of this habitat. HS2 Ltd. has not recognised this impact in any of the published Environmental Statements. Its loss cannot be mitigated and it cannot be recreated. For such a large project to have not accounted for this loss is a serious omission.

## 6. Inadequate Identification by HS2 of Ancient Woodland impacted by HS2 route

- 6.1. At the beginning of the project, HS2 Ltd. was tasked by NE with identifying all ancient woodland impacted by the route, including ancient woodland not currently on the AWI. The evidence indicates that they have not done this and therefore it is vital that costs of not identifying these woodlands early in the design process are fully taken into account.
- 6.2. A Freedom of Information request subsequently indicated that NE was told by HS2 in February 2014 that they had looked for additional ancient woodlands but did not identify a single one. NE at the time noted that they found this “*highly dubious*” (see Appendix).
- 6.3. The Trust undertook our own assessment starting in 2013, with the result of the number of ancient woodlands directly affected by Phase 1 almost doubling.
- 6.4. Had all ancient woodland been identified and treated as being of national importance from inception, the design of the scheme would have been fundamentally different and the implications of avoiding irreplaceable habitat would have been addressed at a much earlier stage of the design and planning process.
- 6.5. The piecemeal approach to identifying ancient woodland has meant that the Trust and other petitioners have had to ask for changes to the scheme years after the original designs were drawn up, which is then seen as adding additional costs.
- 6.6. If the impact on ancient woodland was properly assessed by HS2 Ltd. when they were originally asked to do this, the true costs of the project with regard to this particular impact on the environment would have been known. Instead we find ourselves in a position where the true costs are becoming apparent a decade after the inception of the scheme, but this is being interpreted as environmental concerns pushing the costs up.
- 6.7. The unfortunate progression of this situation is that environmental asks are then denied on the basis that they add too much cost to the project.

- 6.8. Avoidance of ancient woodland is not a new ask. It is not something that HS2 Ltd. was unaware of. However, it is something that they failed to carry out with due diligence and as such the actual cost of the scheme with respect to ancient woodland will have been woefully underreported.
- 6.9. The Trust and others petitioning on environmental impacts are placed in the unenviable position of being portrayed as unreasonable when we ask for changes to the scheme that should have been built in from day one.

## 7. Net Loss to Biodiversity

- 7.1. A nationally important project promoted by Government such as High Speed 2 should be adopting the very best practice in relation to its impacts on ancient woodland and other ecologically important sites.
- 7.2. To achieve best practice there should be no net loss in biodiversity terms. Any project that adversely affects ancient woodland will inevitably result in a net loss of biodiversity as ancient woodland is irreplaceable, and no amount of moving ancient woodland soils (translocation) or planting new trees can mitigate or compensate for that loss.
- 7.3. HS2 Ltd. set itself the aim of no net loss to biodiversity. Because ancient woodland is irreplaceable, the only way this objective could be achieved is by avoiding any loss to ancient woodland whatsoever.
- 7.4. Even if the impact on ancient woodland is ignored, the current scheme is not achieving no net loss to biodiversity, with the No Net Loss (NNL) calculations for both Phase 1 and Phase 2a showing significant deficits, particularly with respect to woodland.
- 7.5. There is no clear plan by HS2 Ltd. to address these losses and the Trust suggests that the costs associated with rectifying these deficits have not been accounted for.

## 8. Climate Change

- 8.1. The UK has set a target of 'net zero' carbon emissions by 2050, which is enshrined in the Climate Change Act. The Committee on Climate Change (the CCC) is an independent, statutory body established under the Climate Change Act 2008 to advise Government on achieving 'net zero'.
- 8.2. The CCC advice is clear that both protection of and substantial expansion of existing woodland cover is required to meet the Government's legal commitment.
- 8.3. Ancient woodlands are one of our most important and irreplaceable nature based solutions to climate change. As well as acting as large existing carbon sinks, the biodiversity contained within ancient woodlands (species, genetic diversity, ecosystem relationships) is a fundamental insurance policy to support the ability of the UK's woodland cover to adapt to a changing climate. Removing ancient woodland is contrary to achieving the target of net zero.

## 9. Conclusion

- 9.1. The full environmental costs of the project were not adequately explored at the inception of the project and have therefore not been adequately accounted for in proposals and decisions. It is therefore vital that this review includes this full and latest evidence base, rather than continuing to ignore it.
- 9.2. These omissions have led to petitioners' requests for changes to the scheme to reduce environmental impact to be viewed as "aspirational asks" instead of fundamental common sense solutions that should have been costed into the project at the beginning.
- 9.3. The time needed to design the mitigation and compensation was underestimated and therefore has caused huge slippages in the predicted timetable, which equals further increased costs.
- 9.4. Ancient woodland has existed for centuries; it is not a new phenomenon. HS2 Ltd. was asked by NE to take account of its presence and to avoid it in the early stage of the scheme being promoted. HS2 Ltd. did not do this and as a result the Woodland Trust has had to campaign and petition to get them to do what they were requested to do years ago by the statutory body responsible for protecting ancient woodland. Much to our disappointment, this has only been partially successful.
- 9.5. Had HS2 Ltd. competently undertaken this initial assessment, avoidance of ancient woodland could have been considered at the early design stage. This would have ensured associated costs were adequately assessed and accounted for then, rather than appearing to be a luxurious add-on requested by environmental campaigners.
- 9.6. At the time of writing this submission, works are continuing around South Cubbington Wood, which stands to lose 2ha of ancient woodland to the scheme this October. This woodland can never be replaced and as such works should cease until the outcome of this review is known.
- 9.7. Despite Grant Shapps' announcement on 16 September that works in ancient woodland were to be halted, this does not appear to apply to all ancient woodlands, and eleven appear to be under threat this autumn (see letter dated 16 September 2019 from HS2 Ltd. in Appendix 10.5).
- 9.8. To lose irreplaceable habitat while there is any doubt about whether this scheme will progress in its current form is an act of environmental vandalism. It may cost the scheme more to delay works until the outcome of the review is known, but no amount of money can ever replace what will be lost.
- 9.9. The scheme will not achieve no net loss of biodiversity and even HS2 Ltd.'s own calculations show it is falling short on this aspiration for habitats considered as replaceable. It is not clear whether the costs of achieving this aim have been adequately explored or factored into the current totals. They should be.

- 9.10. Furthermore, to remove mature woodland, with so much carbon locked in the wood and soil, when the government has declared a climate emergency is counterintuitive, and sends a conflicting message to the public.
- 9.11. HS2 should be setting the standard to which all other projects aspire. At present it is not achieving this. The Trust respectfully requests that the Review Panel fully considers the costs of the impact on the environment and does not recommend measures that will see environmental costs increasing further to reduce economic ones.



## 10. Appendix

### 10.1. Directly Affected Ancient Woods

Name of Wood	Grid Reference	Phase
Battlesford Wood	TQ040889	1
Pinnocks Wood	TQ060864	1
Jones' Hill wood	SP887044	1
Sheephouse Wood	SP6993023166	1
Decoypond Wood	SP695239	1
Unnamed near Decoypond Wood 1	SP691243	1
Unnamed near Decoypond Wood 2	SP691242	1
Unnamed near Decoypond Wood 3	SP693239	1
Mossy Corner Spinney	SP616343	1
Halse Copse	SP574417	1
Fox Covert (Glyn Davis Wood)	SP462536	1
Long Itchington Wood	SP388627	1
Burnt Firs	SP374652	1
South Cubbington	SP351686	1
Crackley	SP289742	1
Birches Wood	SP289742	1
Roughknowles	SP288748	1
Broadwells	SP280752	1
Little Pools	SP267758	1
Un-named Wood near Stoneleigh	SP323725	1
Blackwaste Wood	SP271757	1
Sych Wood	SP200929	1

North Wood	SP190956	1
Walker's Spinney	SP183982	1
Unnamed copse of Drayton Lane	SK169002	1
Roundhill	SK157022	1
Rookery	SK152026	1
Little Lyntus	SK136127	1
Fulfen	SK148098	1
Ravenshaw	SK124135	1
Vicar's Coppice	SK1109213809	1
Big Lyntus	SK131129	1
John's Gorse & Hanch Wood	SK105142	1
Parkhall	SP162908	1
Flushing Covert to the west of Lionlodge Covert;	SJ982238	2a
Town Field Plantation within Ingestre Golf Course;	SJ979242	2a
The Grove (Yarlet Hill)	SJ913290	2a
Cliffords Wood	SJ836372	2a
Birch Wood	SJ870347	2a
Whitmore Wood	SJ791416	2a
Hey Sprink (wood southwest of)	SJ790422	2a
Barhill Wood	SJ764439	2a
Unnamed wood 2 between Whitmore and Hey Spink	SJ786423	2a
Unnamed wood near Wrinehill Wood	SJ755448	2a
Bulls Wood/Oak Clump	SJ684680	2b
Winnington Wood	SJ701755	2b

Leonards and Smokers Wood	SJ703760	2b
Coroners Wood	SJ701908	2b
Hancocks Bank (south)	SJ755845	2b
Brickhill Wood	SJ79098359	2b
Davenport Green Wood	SJ805860	2b
New Farm Wood	SK517453	2b
Watnall Coppice	SK507487	2b
Padley Wood	SK40826196	2b
Owlcoates Wood	SK448678	2b
Robinsons Lumb	SK465764	2b
High Wood	SK472781	2b
Nor Wood	SK476811	2b
Nicker Wood	SK47398490	2b
Hooton Cliff Wood	SK48979697	2b
Stables wood	SE492040	2b
Watchely Crag Wood	SE475068	2b
Howell Wood	SE437092	2b

## 10.2. Indirectly Affected Ancient Woodlands

Name of Wood	Grid Reference	Phase
Bayhurst Wood	TQ0674088938	1
Great Halings Wood	TQ031895	1
Little Halings Wood	TQ029898	1
Northmoor Hill	TQ034896	1
Juniper Wood	TQ025897	1

Bow Wood	SU980949	1
Weedon Hill Wood	SU933990	1
Stockings Wood	SP899016	1
Jenkins Wood	SP904021	1
Havenfield Wood		1
Oaken Corner/Castle Wood	SP908003	1
Rushmore	SP892041	1
Rowborough Copse	SP876092	1
Greatsea	SP713227	1
Finemere	SP715220	1
Romer	SP712229	1
Redhill Wood	SP508507	1
Thorpe Rough	SP400625	1
North Cubbington	SP354703	1
Weston Wood	SP354703	1
Blackwaste	SP272760	1
Big Poors Wood	SP265755	1
Kingswood	SP322729	1
Roger's Copice	SP182978	1
Weeford Park	SK141012	1
Rough Leasow	SK144031	1
Tomhay	SK115132	1
Westfield Covert	SK111165	2a
Pipe Wood	SK086196	2a

Tithebarn Covert	SK010231	2a
Ingestre Wood	SJ972246	2a
Swynnerton Old Park	SJ830399	2a
Unnamed Woodland to the West of Holly Wood	SJ7964445857	2a
Grafton's Wood	SJ759453	2a
Sunbank Wood	SJ79948412	2b
Arden House Wood	SJ77078371	2b
Rough Park	SK392181	2b
Birch Coppice	SK39251868	2b
Bulwell Wood	SK517463	2b
Pea Carr Wood	SK48258908	2b
Hickleton Springs Wood	SE47910612	2b
Asplin Wood	SK42962175	2b
Sellers Wood	SK52124542	2b
Starth Wood	SK51504737	2b
Eelhole Wood	SK51434781	2b

### 10.3. Indirect Impacts Inadequately assessed

Taken from a Natural England email dated 18 February 2014 14:11

4.2. Natural England advises that in addition to the direct loss of 32ha of ancient woodland from 19 sites, there will be wider indirect effects upon a greater number of woodlands due to disturbance, fragmentation and reduced connectivity to other similar habitats. **We advise that the ES does not provide adequate consideration of the direct and indirect impacts on ancient woodland as a result of the Proposed Scheme nor how this will be addressed.** The issues outlined below will need to be addressed within the Environmental Memorandum (EM), and Natural England would expect to be consulted on this. The EM should also provide details of survey work which has been undertaken so far, and that proposed, in order to inform specific mitigation measures.

#### 10.4. Internal Email from Natural England regarding identification of ancient woodland by HS2 Ltd.

From: Goldberg, Emma (NE)

Sent: 18 February 2014 15:18

To: Smith, Chris H (NE); Reid, Christine (NE)

Subject: RE: HS2 Phase 1 ES response - Ancient Woodland

Hi Chris,

I'm afraid that neither of us can dial into a call on Thursday morning. We are at an Ash dieback workshop in Cumbria. To be honest, this is a bit last-minute – I've got the rest of today to finish another piece of work, and I'm out of the office tomorrow. I can't really respond to this in the time you've given, and Chris is on leave today and tomorrow.

Briefly – we are aware that the Woodland Trust has identified a few sites that they believe are ancient. We are going to assess their work to ensure that we agree that they are assessing to the same standard as we have set in the South East revision (including the Chilterns). However, I find it highly dubious that the HS2 didn't find any sites at all. It would be sensible if they wanted to provide us with some funding to undertake the revision of the AWI along the entire route, which we could project manage and let out (not to the woodland trust). However, I expect this isn't likely, and would also be time consuming.

So we can verify the woodland trust sites in due course, and let them know what we think. This, however, takes up my time (or actually the time of my volunteer), so cannot be delivered immediately.

We'd need to put the time into looking at what information they've given on Veteran Trees, preferably also asking for input from Suzanne Perry. We'd need to spend some time looking at the proposals they've made on the compensation planting, but please emphasise that ancient woodland is in a category outside what Defra can put into their calculator for offsetting, because ancient woodland cannot be replaced.

Thanks

Emma

## 10.5. Letter from HS2 dated 16 September 2019 regarding translocation of ancient woodlands

LM ref: 1EW04-LMJ-EV-NTE-N000-054001

16 September 2019

Dear Luci,

### RE: HS2 WP41 & WP42 Ancient Woodland soil translocation

Further to the Ancient Woodland Soil Translocation presentation held on 28 August 2019, I am writing to notify you that LM-JV and its contractors will be commencing the construction of ecological mitigation sites and undertaking the clearance and soil translocation of Ancient Woodlands at the following sites.

*Table 1 Location soil translocation works - Ancient Woodland*

Eco mitigation cluster	Ancient Woodland	Location of activities	
		X	Y
Burnt Firs	Burnt Firs Wood	437441.77	265231.14
Cubbington	South Cubbington Wood	435170.32	268518.60
Ashow Road	Un-named woodland nr Stoneleigh Wood	432016.48	272335.22
Kenilworth	Crackley Wood North	429084.16	274441.75
	Birches Wood	428852.66	274595.21
	Roughknowles Wood	428731.63	274860.95
	Broadwells Wood	428136.84	274998.54
Bodysmoor Heath South	North Wood	419123.12	295881.06
Drayton Lane	Un-named Copse off Drayton Lane	416948.34	300271.70
	Rookery Wood	415389.28	302600.03
Fulfen	Fulfen Wood	414660.39	309716.21

The works will be undertaken by LMJV and its subcontractors. Works at individual sites will commence in late September 2019 with preparatory works including establishment of site

compounds and haul roads, construction of ecological mitigation sites, and survey work and setting out within the Ancient Woodland. Clearance works and soil translocation are then programmed to commence at the beginning of October 2019 and will continue to early 2020.

The methods of work will be in line with the presentation of works by LM-JV and its contractors to the Woodland Trust 28<sup>th</sup> August 2019.

### **Managing Environmental Impacts**

All works will be carried out in accordance with the Ecological Site Management Plan which have previously been issued to the Woodland Trust for consultation and the relevant Ancient Woodland Translocation strategy.

Where Invasive Non-Native Species have been identified a Biosecurity Management Plan will be implemented to prevent the spread of INNS during work activities.

Noise, dust, light and vibration impacts will be managed in line with an approved construction Environmental Management Plan for the work area. All vehicles and equipment used on-site will be required to meet the HS2 low emissions criteria.

An Ecological Clerk of Works and a Soil Scientist with relevant and appropriate accreditation will monitor the works. Site controls, including dust suppression, will be implemented as and when required to ensure there is no additional impact on the adjacent, retained areas of Ancient Woodland.

If you have any queries on the above or require any further details please do not hesitate to contact me.

Yours faithfully

**Stephanie Boocock**

Ecology Manager (Area North)

High Speed Two (HS2) Limited