An HS2 spokesperson said: "HS2 strives to reduce our impact on the environment, however some trees on Leather Lane are directly in the path of where the new railway will be built. From the outset, we have sought to reduce the number of trees that need to be removed, and across phase one we are planting up to 7m trees and will leave behind 30% more wildlife habitats than exist now. There is no evidence of bat roosts in the affected trees."

18th August 2022

Dear Editor

I write in response to HS2's assertions, as quoted in the Guardian Angel article of Saturday 26th July, regarding the campaigner Carol-Anne O'Callaghan.

We see that HS2 are lacking candour and misleading in their response.

HS2 state that some of the trees in question are in the direct path of the route. The remaining 87 veteran oak trees that the Campaign are seeking to protect are not, in fact, in the path of the HS2 route at all

The remaining trees are under threat from the over bridge which will take Leather Lane, an ancient Holloway, over the track. HS2 wants to build the bridge to the South of Leather Lane where the wildlife corridor lies. The Campaign has employed an experienced Engineer to come up with a design which would take the over bridge to the North and save ALL remaining trees. HS2 and their sub contactors are obliged by law to apply the Mitigation Hierarchy – this requires them to AVOID harm if possible.

The 9 trees in the path of the Track were dispensed with last July, in the height of summer. Intervention from the Campaign delayed felling so that EKFB could discuss "Mitigation" with Bucks Council. The brash from the felled trees was pushed back in line to form a "hedge" to fill the gap in the corridor as mitigation for the loss of the trees. That "hedge" was woefully inadequate as Carol-Anne has proved and has since disintegrated to nothing. The Campaign and Bucks Council have pushed for more permanent mitigation but nothing has happened.

HS2 took no steps whatsoever to conduct surveys or reduce the number of trees felled. This has been the case along the line from London to Birmingham where only 42% of surveys have been carried out.

HS2 are also detracting from the fact that their felling of the bat corridor at Leather Lane is already having an impact on the species of bats that are using it to forage and reach their roosts.

The basis of the Campaign from the outset is that felling of the oak trees is fragmenting the corridor which has an impact on the ability of bats to forage and reach their roosts. This includes the endangered Barbastelle bat.

Our lead Ecologist, Dominic Woodfield, has advised HS2 and EKFB that, on any analysis, there must be a barbastelle roost or colony nearby and the only one known in South Bucks.

EKFB were reminded that HS2 had produced bad baseline surveys and so the Environmental Statement was flawed. Consequently, there was an obligation to first achieve absolute minimum tree loss from the crucial flight line, regardless of what was proposed in mitigation and compensation.

The importance of Leather Lane for bats was not recognised in Environmental Statement. HS2 must consider less damaging alternatives to the Bill design which results in substantial loss of important flight corridor. They must reduce this impact in accordance with the Mitigation Hierarchy and statutory duty under the NERC Act in order to protect biodiversity.

This means that the campaign's option for an over bridge must be considered and adopted if it presents a reasonable and practical alternative that is less damaging.

HS2 have previously given the presence of woodland to the North as an excuse to build to the South. There is, in fact, no woodland to the North. It is no more than a flint pit and outside of the Act limits, so this argument is baseless.

As for the planting of 7m trees, HS2 seem mighty scared of allowing verification of how many they are sticking in the ground and how many survive and I hardly think dry ponds are credible as new "wildlife habitats" either.

All in all, it is clear that this brutal project has little care for the environment and is destroying far more than necessary. It is down to lay people such as Carol-Anne that this is being made public and that this project is being held to account.

Yours Faithfully

Lindsey Spinks
Lawyers for Nature

www.lawyersfornature.com