

# The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust

**Matt Jackson**

# BBOWT AP4 Petition

Berkshire  
Buckinghamshire  
Oxfordshire



## Our Petition:

Your Petitioners request that such [an Ecology Review] Group is established as soon as is practicable, and that the method and detail of Biodiversity Metric calculations are published while all options are open to secure improved mitigation to, or appropriate compensation for, impacts on wildlife.

## Our request:

That the significant gap in biodiversity provision identified by HS2 is rectified.

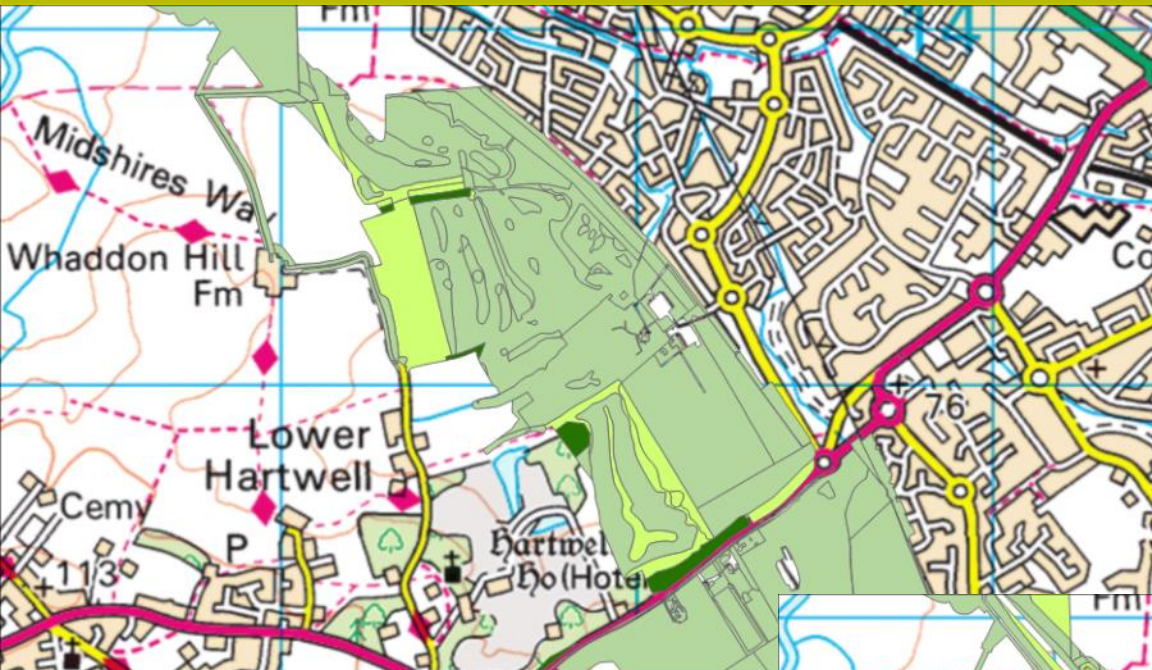
That the Biodiversity Metrics are subject to independent scrutiny.

On HS2 Ltd's own terms, the calculations identify a significant deficit in 'units' of biodiversity, with a shortage from the AP4 scheme of 1,066 units of habitat and over 110km of hedgerow. **Provision should be made for the scheme to address these acknowledged deficits.**

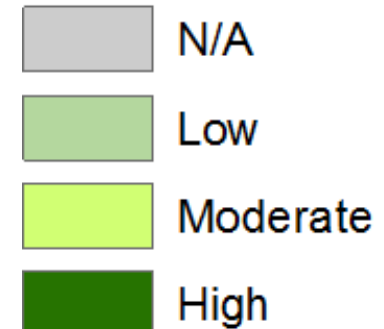
**It is not possible to replicate HS2 Ltd's calculations of the biodiversity value of a significant proportion of the areas affected by the proposals.** Their calculation is made up of 16,691 individual scores. For over 2000 of these scores the calculations appear to be incorrect.

The approach taken to considering connectivity of habitats is markedly different from the standard Defra metric. **HS2 Ltd's approach to connectivity is based on professional judgement rather than developing a scientific, methodological approach. This over-emphasises the connectivity of created habitats running along the railway line (e.g. on embankments), whilst ignoring the severance impact of the line on existing habitats.**

# 'Connectivity' scores



## Legend



**Hs2 metric**

Increase in 500 units

**Defra method**





Decrease of 160 units



# 'Connectivity' scores



## Legend

-  N/A
-  Low
-  Moderate
-  High

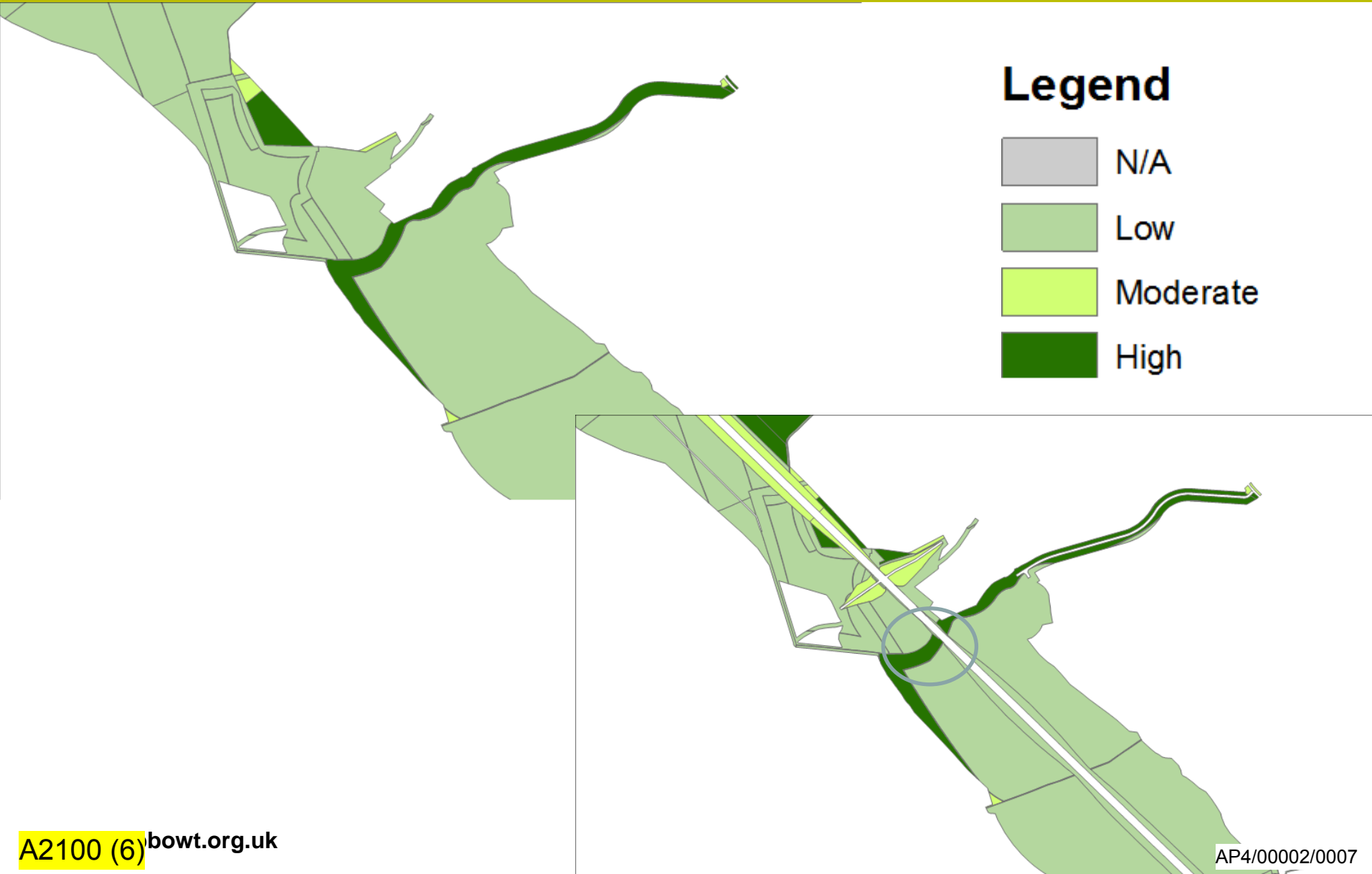
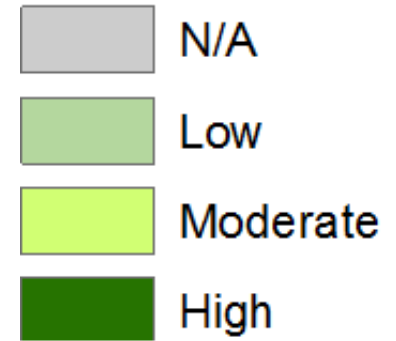


# 'Connectivity' scores

Berkshire  
Buckinghamshire  
Oxfordshire



## Legend

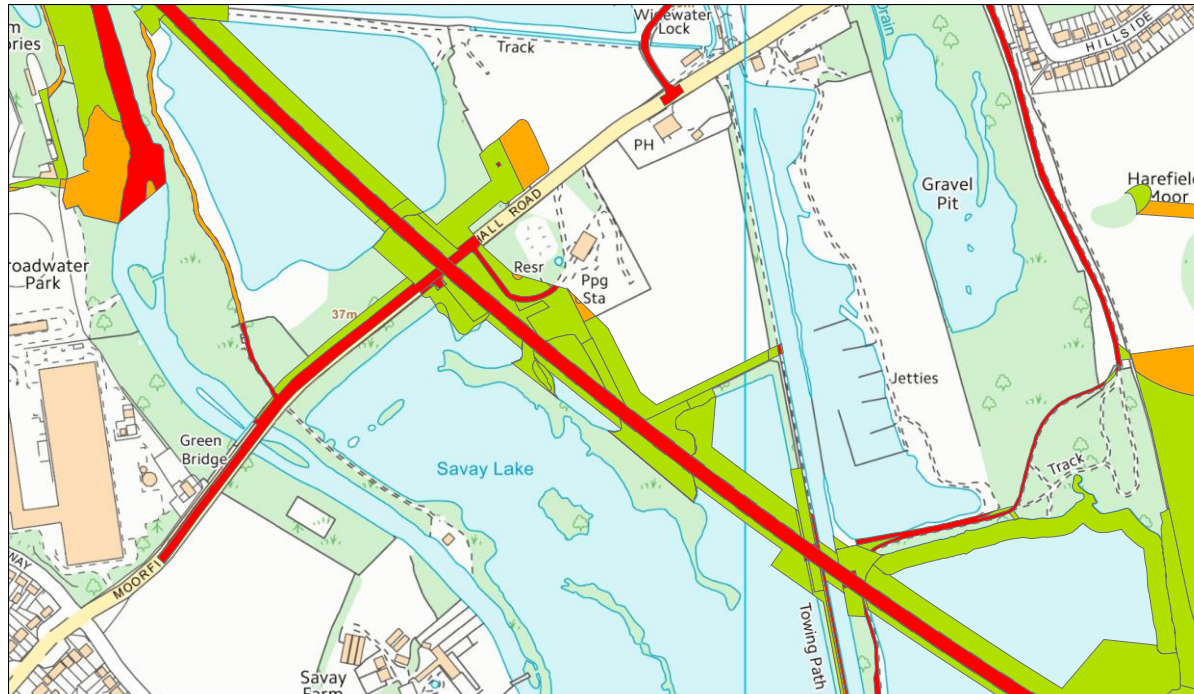


**Estimates of the time required to reach target condition for habitats are considerably optimistic, significantly reducing the amount of habitat creation required.** This approach is not consistent with the Environmental Audit Committee's recommendation to apply the precautionary principle to such instances.






In their assessment of hedgerows in particular, **HS2 Ltd's metric over-scores the condition of created hedgerows**, all of which are anticipated to achieve the highest possible score (species-rich hedges with trees), whilst scoring existing hedgerows at a much lower level.

The **metrics fail to consider easily quantifiable indirect impacts**. The result of which is that the apparent impact of the proposals is significantly underestimated.

# Indirect impacts



## Legend

-  N/A
-  None
-  Poor
-  Moderate
-  Good



# HS2 vs Defra approach

- Using HS2's approach to habitat connectivity they derive a deficit of c.1066 units
- We calculate that, if the Defra approach was used, the pre-construction figure would be 22,467 units. The value of the created habitat in the AP4 scheme would be 9,946 units.
- A shortfall of more than 12,000 units.