

FAO Lindsey Spinks

Bioscan (UK) Ltd
The Old Parlour
Little Baldon Farm
Little Baldon
Oxford
OX44 9PU

Tel: +44 (0) 1865 341321
bioscan@bioscanuk.com
www.bioscanuk.com

11th February 2022

Dear Lindsey

LEATHER LANE TREES & HS2

Thank you for asking for my opinion on the matters concerning the threat posed by HS2 works to important habitat features for bats at the above site.

Bioscan is a specialist ecological consultancy with long experience (since 1984) of ecological surveys and assessments for bats and other wildlife in relation to development projects. The bulk of our work is for the commercial development sector, including national infrastructure projects.

Having reviewed the ecological information, we agree that there can be little doubt that the tree line along Leather Lane is important for local bat populations – indeed that importance is likely to have increased in the wake of removal of alternative landscape-scale bat commuting conduits over the last year in connection with the HS2 project. This information includes recordings from static bat detectors that we can corroborate confirm the presence of the rare barbastelle bat. No known maternity colonies of this species exist in the South Bucks locality and therefore the presence of this species is highly significant.

There is thus a clear risk of the substantive removal of the commuting corridor offered by Leather Lane having a regionally significant impact on bat populations.

This risk translates to a compunction for works to be re-appraised in the light of the mitigation hierarchy, and for efforts to be pursued to avoid, minimise or compensate the likely impacts that will arise. In the absence of more detailed information about how the commuting conduit relates to local roosts, including of the rare barbastelle, a precautionary approach is required. That compunction applies regardless of the fact that the project has the appropriate legal and regulatory consents. It is not unprecedented that environmental matters arise during construction that require to be dealt with by reactive design changes. Indeed that is no more than responsible practice.

In this situation, whilst it is disappointing that efforts have had to be made not by HS2 Ltd, but by concerned third parties, to explore less damaging alternatives, the factual position is that less damaging alternatives have been identified as detailed in your submissions. Furthermore, engineering expertise has been brought to bear to ensure that these are practical and viable.

There are thus compelling reasons why this alternative needs to be looked at seriously and indeed potential grounds for challenge if it is not. I therefore lend my support to your request for Government to intervene to ensure appropriate alternatives are adopted in the interests of minimising environmental harms from this project.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Woodfield', written in a cursive style.

Dominic Woodfield CEcol CEnv MCIEEM
Managing Director