

Angling Trust Response to HS2 Environmental Statement

The Angling Trust is the recognised representative body for angling in England with over 17,000 individual members and 1,400 member clubs who represent a further 300,000 anglers many of whom will be impacted by this development. We work with many local and national partners to deliver recreational angling opportunities and to enhance wildlife in the aquatic environment.

There are approximately 3 million anglers in England & Wales generating £3 Billion a year to the economy.

The comments in the HS2 ES about impacts on angling and the aquatic environment are very limited and not at all accurate as to the true impacts, ecological, environmental and economic, on this important wildlife and recreational facility across all areas where HS2 is proposed.

Angling Trust draws your attention to the duty to conserve biodiversity at S 40 (1), (2) and (3) of the Natural Environment and Rural Communities Act 2006 (NERCA) as below:

(1) Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

(2) In complying with subsection (1), a Minister of the Crown, government department or the National Assembly for Wales must in particular have regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992.

(3) Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

No proper or adequate account of biodiversity has been taken and there is no indication at all of the way in which the Minister has observed the particular duty at s 40 (2).

Within the short time period to respond to the consultations it has not been possible to assess the impacts across such a wide area as proposed by HS2 but would single out the Colne Valley as one example where the impacts have been assessed by the Colne Valley Angling Consultative (CVAC), such impacts will be similar across the proposed route of HS2 and we fully support their conclusions that there should be a specific package of compensation and mitigation for angling clubs and fisheries commensurate with the scale and nature of these impacts on the environment and economy across the whole route of HS2.

Colne Valley Angling Consultative response:

There are a number of recreational fisheries directly impacted by the route of HS2 which are totally ignored in the statement; Savay, Korda, Harefield No 1 and No 2 lakes, Long Pond, Harefield Moor Lake, Broadwater and the River Colne. Neither CVAC nor any of the fisheries has been asked for opinions, been circulated with any information or involved by HS2 in its community consultation processes. HS2 has relied on each part of the community accessing its website and working its way through interminable documents to discover the likely impacts of HS2 for itself. This is not sufficient to comply with the legal duty of the Minister and there are more details, below.

CVAC has attempted to direct members to useful parts of the documentation but whereas HS2 is staffed by full time employees, most fisheries in the Valley are administered by willing volunteers in their own free time. This obviously limits the ability of many individuals with responsibilities for fisheries to find and respond with any level of knowledge to the complex documents published by HS2

These fisheries form an integral part of the angling offered throughout the Colne Valley and many fishing clubs, syndicates and individual anglers will be directly affected by the route of HS2. These clubs promote biodiversity by regular water maintenance programmes, using only sustainable materials and breeding fish stock in natural waters to avoid aquatic diseases. The proposed route will destroy all of these sustainable programmes and there is no evidence in the consultation documents of a suitably balanced approach. Economically the impact will also be felt by angling retailers throughout the valley of which there are at least seven who will be directly affected by the reduction in angling opportunities long term and more importantly by the short terms impacts of the construction phase.

The Colne Valley and its waters are an important factor in the prevention of social exclusion. It is now well established that angling is successful as part of a programme aiming at reductions in youth crime and social exclusion. Children from deprived families make use of Colne Valley fisheries and the facilities local anglers and organisations have grouped together to provide. This is completely overlooked in the consultation. We have in this respect attached the report produced by "substance" (www.substance.coop) containing Big Lottery funded research in confirmation of these points. Given that both Get Hooked on Fishing and Angling Projects, the two organisations working through angling with social exclusion problems, are situated in the Colne Valley and make use of its angling facilities, we would have expected to see some reference to that and to the work anglers do locally,

We are not here talking about just a few anglers but perhaps as many as 5000 individuals and a local economic input of as much as £5,000,000.00. This angling activity supports many local jobs in the immediate surroundings and local towns and villages in the Valley.

In the long term both jobs and the viability of angling retailers and clubs in the locality will be affected. In the short term angling opportunities will be lost and the impact on retailers already suffering from the effects of the economic downturn and successive poor weather in recent years will be put under increased pressure as retail sales in the valley are further reduced by these works deterring visiting anglers as well as

resident anglers from enjoying their fishing in the valley. The clubs directly affected will suffer reduced membership and cashflows, which will inhibit their ability to continue to invest in the habitats and facilities on which their membership offer depends.

Fishing clubs and syndicates immediately affected will include the day ticket sales, annual membership fees and syndicate rotas on Savay, the British Carp Study Group fishery on Korda, Long Pond and the Colne bank on Broadwater, the club fishery, held by Gerrards Cross AC Rovers on Broadwater and the River Colne and the fishing in Harefield No 1 and No2 pits controlled by Harrow Angling Society. The value of fish stocks in these water bodies probably exceeds £2 million GBP and is unlikely to be recoverable by the angling organisations affected. The lack of anglers will also be severely felt by local eating and hostelry establishments.

The impact of the route and the construction phase will severely damage the integrity of the Colne Valley Regional Park, a major recreational facility for the local inhabitants and those, particularly, of West London. In fact the impact on the Regional Park will be huge in terms of footpaths, views, biodiversity, recreation, noise, traffic, landscape change etc. Land within the Park will be required for a lot more than “two and a half years” during construction and there will be a huge amount of land permanently taken, the ability of this land and adjacent land, to deliver the objectives of the Regional Park will be permanently lost. To describe this as “not significant” defies belief!

We would expect HS2 to seek a Community Impact Assessment from each of the fisheries/clubs directly affected and from each of the angling retailers within 20 miles of the development as well as the businesses most likely to be affected and dependent for a large part of their business on anglers, visiting and local. Any failure to do so may be used as grounds for lodging complaints to the Department of Transport that this consultation process was flawed and should be repeated.

Just as the social costs of this development have been ignored in these documents so has the potential for environmental damage to these specific and to neighbouring fisheries and water bodies. The bird life on Broadwater Lake, a SSSI designated for its variety of and importance to overwintering waders, will be subject to massive disturbance during the construction phase and once the trains start running, although in the Statement this impact is denied. It must be doubtful if its status as a SSI can even be maintained post the development. This would be an impact at National and International level on some of the species using this site.

The importation of large numbers of construction workers may result in an increased level of poaching of fish from these and other waters, a particular problem with foreign nationals, which has been experienced across the country to a greater or lesser degree with recent arrivals to this country not recognising the ownership of fish in still waters or the national Environment Agency bylaws preventing fish removal for food. Contactors employed by HS2 will need to ensure that foreign national employed on the contract are briefed as to local custom and practice regarding fisheries and HS2 needs to consider providing funding to enable Angling Trust to employ more liaison officers under its Building Bridges scheme which aims

to communicate with and educate recent arrivals to this country about fishing law and practice.

The dangers to fish and their environments from construction are ignored in the Assessment with no mention of the potential for; disturbance of silts, possibly containing pollutants, in the lakes, risks of water contamination brought about by the infill processes, de-oxygenation of waters, damage to the invertebrate structures on which fish, bats, birds and other wildlife depends, importation of non-native materials to water courses for construction purposes, noise and vibration during and post construction effecting successful spawning of fish, breeding and feeding of birds.

The piles, and the construction surrounding them, supporting the Colne Valley viaduct may act as a barrier to groundwater, potentially creating a steeper gradient between the upstream and downstream sites. This may result in lake levels being impacted and possibly river flows on the R. Colne, which in turn could lead to ecology issues especially in the Broadwater SSSI and prevent the river ever reaching good ecological status under the Water Framework Directive. Furthermore, it is overlooked that the water table in this area is extremely high at all times, not simply in the current conditions. There are various Groundwater Protection Zones and it is by no means clear that the location of these has been looked at. The same issues arose in respect of compounds for the project to widen the M25 and GPZs had a decisive effect on their re-siting. Surely, it is better to deal with this in advance than by ploughing on and having to vacate or re-site later?

HS2 should be required to appoint independent fishery specialists to monitor water quality at every lake affected by the construction phase to ensure that dissolved oxygen is not depleted by its actions or by disturbance of sediments.

Environmental monitoring of fish, invertebrates, amphibians and birds should be conducted throughout the construction phase to limit the long term damage to the important wildlife populations within this part of the valley and in any event, would be required pursuant to the S. 40 NERCA duty.

You will be receiving responses direct from many of our member clubs and these comments should be considered with those as a combined response from a wide and diverse community of local interest groups.

As a consequence of these comments and the impacts on such a wide community group, the Colne Valley Anglers Consultative expects that there should be a specific package of compensation and mitigation for angling clubs and fisheries commensurate with the scale and nature of these impacts on the environment and economy.