

National Infrastructure Planning Temple Quay House 2 The Square Bristol BS1 6PN

24th June 2019

Reference: Rule 8 letter for the M42 Junction 6 Improvements – Woodland Trust Examination Questions

Dear Mr Cullingford,

The Woodland Trust would like to take the opportunity to respond to the questions posed by the Planning Inspectorate in relation to the M42 Junction 6 Improvements Development Consent Order application. The Trust's responses are as follows:

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1.7.25: The Applicant, NE and the Woodland Trust are asked how the success of the new woodland planting and translocation of ancient woodland soils and habitat might be affected by the proposed area being adjacent to the eastern boundary of the M42 motorway and new slip road?

It is unlikely that the translocated soils will be further impacted by the proposed development, as it is the Trust's opinion that the damage to the ancient woodland has already occurred and many of the characteristics of the soil will have already been lost or harmed. One of the key issues that arise where areas of woodland and new planting are sited next to roads or motorways is the inevitable impact from high levels of nitrous oxide and other pollutants by motorway traffic¹. Such vehicle emissions can impact on vegetation both directly through deposition into the surrounding habitat, or indirectly by atmospheric chemical reactions². Where new areas of planting are established, increasing nitrogen can alter the outcome of competitive interactions, changing the character of woodland vegetation³ and affecting species composition.

¹NEGTAP. (2001) Transboundary air pollution: acidification, eutrophication and ground level ozone in the UK. Report of the National Expert Group on Transboundary Air Pollution (NEGTAP) for the UK Department for Environment, Food and Rural Affairs, Scottish Executive, the National Assembly for Wales and the Department of the Environment for Northern Ireland. CEH, Edinburgh

² World Health Organisation (2001): Chapter 11 Effects of nitrogen containing air pollutants: critical levels. Air Quality Guidelines for Europe (2nd Edition), WHO Regional Publications, European Series, No 91. Pg. 1.

³ Sheate, W. R. & Taylor, R. M. (1990) The effect of motorway development on adjacent woodland. Journal of Environmental Management, 31, pp. 261-267

1.7.30: There appears to be little scope to provide effective buffer strips to Asbury's Copse alongside the southern slip roads so as to avoid root damage and to help protect the remaining ancient woodland from damaging edge effects, including chemical run off, air pollution, noise pollution, light pollution and litter. The ExA would welcome comments from the Applicant, NE and the Woodland Trust about this.

Whilst the Woodland Trust acknowledges that the existing M42 will have resulted in detrimental impact to the ancient woodland, the junction improvements will result in further impacts and direct loss. With the loss of the current edges of the ancient woodland, the core of the woodland – which is typically the most sensitive – and other previously less exposed areas will now be further exposed to the external adverse impacts, as listed above. As it is apparent that the remaining areas of ancient woodland could not be buffered, the Trust remains opposed to this scheme. If ancient woodland is to be lost, then it may be the case that the applicant considers undertaking specialised planting design and careful species selection at the new woodland edge so that impacts to the core of the woodland are lessened.

If you have any questions regarding the Woodland Trust's answers to the above, please do not hesitate to get in touch.

Yours sincerely,

Nicole Hillier Campaigner – Ancient Woodland