

From: [Zoe Channon](#)
To: [M25 Junction 10](#)
Cc: [James Adler](#); [Mike Waite](#)
Subject: M25Junction/ExQ2 - Surrey Wildlife Trust
Date: 28 February 2020 11:09:15
Attachments: [image001.png](#)

Please find below the Surrey Wildlife Trust responses to ExA Q2

2.4.7 Please comment on the matters raised by the RHS in its and the Baker Consultants submissions [REP1-043 and REP3-044] in regard to the potential air quality impacts of the Proposed Development on the Thames Basin Heaths SPA. In particular please comment on whether in your view:

- a) the consideration of alternatives has been fully and properly addressed by the Applicant as required by the Habitats Regulations;
SWT Comment - Insofar as the Scheme originally had several alternatives for achieving its objective (ie. improving safety performance at the junction), it then follows that alternatives were adequately considered. The Scheme is irrelevant elsewhere.
- b) the Applicant has adequately modelled the nitrogen deposition levels for both the scheme alone and in-combination with other plans and projects (having regard to the Applicant's comments on responses to the ExA's FWQ 1.4.3 in [REP3-008])
SWT Comment - No comment.
- c) ammonia should be included in the assessment of nitrogen deposition;
SWT Comment - No comment.
- d) In contending that the nitrogen deposition would only affect the woodland buffer element of the SPA and not areas of heathland the Applicant has correctly applied the tests required in the Habitats Regulations and Birds Directive.
SWT Comment – It is for Natural England to assess this element.
- e) Is restoring the woodland buffer to heathland necessary to achieve or maintain the SPA in favourable conservation status?
SWT Comment - It is for Natural England to assess this element.
- f) If so, how have you accounted for the future impacts of nitrogen deposition on areas within the SPA that would become heathland rather than woodland, or would become any other habitat that would be of importance for any of the bird species for which the SPA has been designated?
SWT Comment - An increase in heathland area has been shown on this site to increase the SPA bird population.

2.15.5 Further to the Applicant's response to the ExA's first written question 1.15.1 [REP2-013], the revised dDCO [REP2-002] has removed some activities from those not encompassed within the definition of commence. Nevertheless, a number of activities such as site clearance and the receipt and erection of construction plant and equipment remain outside the definition of commence. As such, these activities could take place outside the controls of the approved CEMP and the various management plans and method statements required by the CEMP. Please comment on this and indicate which, if any, activities that are currently excluded from the definition of 'commence' you consider should be included.

SWT Comment – It is for Natural England to assess this element.

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