

18th July 2023

Lower Thames Crossing
Planning Inspectorate Reference: TR010032

Summary of Written Representation by The Woodland Trust
(ref: 20035768)

Summary

The following information in this section is a summary of the Woodland Trust's Written Representation for the Lower Thames Crossing project submitted to the Planning Inspectorate and identified under reference: TR010032. The Woodland Trust has the following concerns regarding the proposed scheme:

1. Impact on ancient woodland

National Highways has provided two different figures for total loss of ancient woodland for this scheme, stating that either 6.92ha of ancient woodland would be lost or 7.62ha. While it is not clear why different totals of ancient woodland loss have been provided, the Trust considers that regardless of which figure is correct, both figures amount to an unacceptable loss of ancient woodland. The scheme would also have impact on a significant number of ancient woods through other indirect effects, including disturbance and pollution. The impact on ancient woodland is highly significant, nationally important and entirely unacceptable.

2. Impact on veteran trees

In total, the scheme is proposed to result in the loss or deterioration of 12 veteran trees. Six veteran trees will be subject direct loss and a further six veteran trees will be subject to deterioration. As with the ancient woodland impacts, the Trust considers the impacts on veteran trees to be highly significant and unacceptable. irreplaceable habitats to be entirely unacceptable.

3. Impacts on Trust's own Ashenbank Wood

The Trust's own Ashenbank Wood site will be both directly and indirectly affected by means of a diversion of National Cycle Route 177 (NCR177) through the northern section of the site. Ecological features in the form of over-mature and veteran trees and long-established woodland would be affected, as well archaeological / historical

features of significant interest. Engagement on this matter from National Highways has fallen well short and left the Trust in the dark on many of the associated issues.

4. Nitrogen pollution impacts

Ancient woodlands across the UK are being adversely impacted by increasing concentrations of airborne ammonia and deposition of nitrogen and the Lower Thames Crossing project will similarly have hugely significant nitrogen emissions. Increased nitrogen levels in ancient woodland lead to losses of biodiversity and impacts on ecosystem services that result in a degradation of the ecological integrity of ancient woodland sites. The Trust considers that all new development should be expected to account for impacts to ancient woodland using a 1% PC threshold and that wherever the PC threshold 1% of the critical load for ancient woodland, then the impacts on those sites will be significant as they would be subject to adverse impact and habitat deterioration. Clarification is required from National Highways on how many ancient woods will be subject to a PC threshold of greater than 1%.

5. Carbon emissions associated with the scheme

Climate change is the biggest long-term threat faced by our natural environment and ecosystems, and thus our own life support systems. The value of woodland in sequestering carbon emissions has been recognised by Government, yet further erosion of ancient and mature woodland by the Lower Thames Crossing project would further undermine the ability to meet its net zero obligations. The total net greenhouse gas emissions for the construction and 60-year operation of the scheme are proposed to be approximately 6.596 million tonnes of carbon dioxide equivalent. This proposed increase in greenhouse gas emissions is entirely unacceptable and is out of step with Government ambitions and commitments towards net zero targets. This project does not align with any of the Government's latest commitments on future road transport or achieving net zero.

6. Impact on other native woods and hedgerows

The losses of non-ancient woodland, scrub, and hedgerows represents a hugely significant loss of important habitat to the local area and will impact on irreplaceable habitats and local wildlife populations greatly. Further steps must be taken to reduce anticipated loss wherever possible. The Trust would appreciate clarity on whether Defra's biodiversity metrics have been applied in determining the level of compensation required for these losses.

7. Compensation

Compensation planting for the loss of 6.92ha of ancient woodland from this scheme appears to be 80.75ha, placing the compensation ratio of new planting to ancient woodland loss for the entire scheme at approximately 11.7:1. The Trust seeks a commitment that National Highways will increase the overall extent of compensation measures proposed beyond those currently proposed and to a ratio of 30:1. We consider that any additional compensation proposals should also include enhancement of existing ancient semi-natural woodland and request that National Highways produces an Ancient Woodland Strategy to fully detail the impacts of the scheme on ancient woods and the mitigation and compensation measures that would be implemented for each individual habitat.

8. Campaign actions

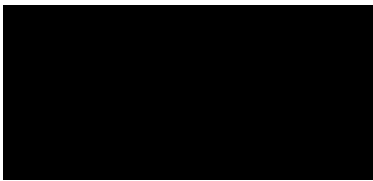
Thousands of people across the UK have taken action and submitted objections to National Highways' consultations on this scheme. Over the course of 2016-2023, 25,515 actions have been taken to object to the scheme, with the Trust's most recent online petition action being signed by 12,444 people, and in doing so calling on the Planning Inspectorate and Secretary of State for Transport to recognise that the Lower Thames Crossing scheme is unacceptable due to: negative impacts to ancient

woodland and veteran trees; the deeply troubling carbon impacts and nitrogen-based pollution; and the lack of transparency around the scheme.

9. Conclusion

National Highways must go further to avoid and minimise impacts on irreplaceable habitats. The losses are simply too great. The Trust considers that this road project, which is considered to have national significance, must be seeking to set the benchmark for future major infrastructure projects and development across the nation and demonstrating an example of best practice in developing a new road scheme while also ensuring the protection and enhancement of biodiversity. The project is far from achieving this.

Yours sincerely,



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