

**Application by Highways England for M54 to M6 Link Road
Response to the Applicants 8.20 Review of Woodland Mapping, Impact Assessment and
Compensation – Revised Design - Issued on 12 Jan 2021**

**Response Deadline 5 20th Jan 2021
Responses From: Allow Ltd**

1. On behalf of Allow Ltd, we have reviewed the revised design mapping exercise undertaken by the Applicant, within their Review of Woodland Mapping, Impact Assessment and Compensation – Revised Design (TN8.20), as part Examination Deadline 4. Whilst we have not undertaken a full appraisal of the Applicants Revised Design, we note the following from our initial review.
2. Our understanding of the intention of the 8.20 Technical Note produced by the Applicant is to accurately explain how their revised design has taken into account woodland *'likely to be damaged during site clearance through the compaction of soils'* and *'also likely to be subject to increased wind, rain, sunlight and temperature extremes, due to the change in the location of the woodland edge and the protection, or lack of, that the woodland edge provides to the woodland interior'*. They note for *'wherever construction works encroach within 5m of woodland, that particular area of woodland within 5 m of the construction works is assumed to be damaged or lost and therefore requires compensation'*.
3. TN8.20 produced by the Applicant does not provide us with adequate reasoning for the level of woodland mitigation proposed across the scheme and we consider the 5 meter buffer strips to have been applied in an excessive manner, not consistent with application of the revised design described in the body of their document.
4. Appendix A of TN8.20 shows there has been an inaccurate application of buffers to several areas, including woodland being clear felled, land comprising tarmacked pavements, open grassland and land comprising other non-woodland habitats, examples of which are evidenced at Appendix 1 of this document. This is not in accordance with the aforementioned methodology for the buffer mitigating potential losses along edges of remaining woodland. The inclusion of other non-woodland habitats is not mentioned in the body of TN8.20, but only in the Appendix table.

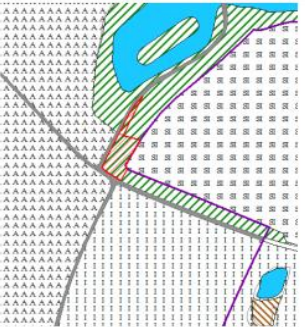


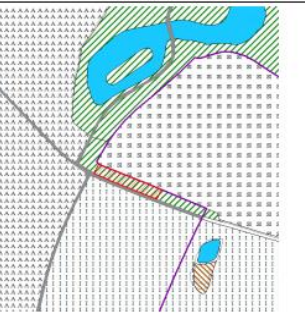


5. The areas clear felled (for the avoidance of doubt, they no longer adjoin any woodland being retained), such as ID 4, 6, and 9, will not leave an unprotected woodland interior through loss of a woodland edge, as no area of woodland is proposed to remain in these locations, which might need to be mitigated against.
6. Where woodland areas lost adjoin areas of tarmacked pavement, stone tracks and open farmland, it is erroneous to apply buffers, as the woodland is proposed to be completely cleared, therefore there are no trees present that could suffer any damage. The reasoning for the 5m buffer referred to Root Protection Areas, however the absence of any trees in the buffer area will in turn mean absence of roots and consequently no reasoning to include such areas as buffers for mitigation from damage to tree roots.
7. In addition to the Applicant's mapping of 'Woodland within 5 m of woodland lost' (orange hatch), the Applicant has also mapped 'Other habitats (non-woodland) within 5m of woodland lost' (purple hatch). Allow Ltd consider the purple hatching to be erroneous as many of the 'Other habitats', mapped at Appendix A of TN8.20, are not habitats which will be negatively impacted through the loss of neighbouring woodland, and they include mown grass verges, productive agricultural land and stone tracks. This is repeated multiple times across the scheme illustrated in TN8.20 and totals 2.88 ha, a significant area.
8. The use of multiple polygons on a desk-top mapping exercise has resulted in duplication of areas, for example to the southern end of Lower Pool at ID 17 and 19 on the table in TN8.20, adjoining areas of woodland will be felled but overlapping areas of buffer have been allowed around the exterior of each polygon as they have been assessed in isolation.






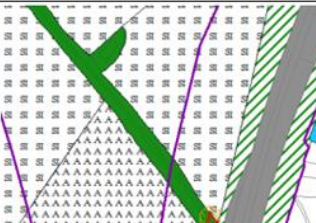


9. Conclusion

The Technical Note has failed to reassure us that the woodland mitigation has been correctly assessed by the Applicant. The inaccuracy of the information is shocking and misleading. It remains our view that the calculation of woodland losses across the scheme has been excessively miscalculated.

Appendix 1

5 Examples where the Revised Design has been applied erroneously – the first two are on land owned by Allow Ltd and the remainder other areas across the scheme

ID	Woodland reference	Narrative Red line – Site clearance area Green Hatch - Woodland	4. Direct loss of woodland within site clearance area (ha)	5. Woodland within 5 m of woodland lost (ha)	6. Other habitats within 5m of woodland lost (ha)	Outcome Green hatch – Woodland loss Orange hatch – Impact zone – Woodland within 5 m buffer Purple hatch – Impact zone - Other habitats (non-woodland) within 5 m buffer	Allow Position (Agree/Disagree)	Reasoning
17		<p>Appears to be young, recently planted trees, not all visible on aerials. Very thin strip marked to be lost in the north. 5m buffer should account for impacts to surrounding woodland. Unsurfaced tracks assumed to contain roots in RPA.</p> <p>Lower Pool SBI shown in turquoise outline.</p> 	<p>Within SBI 0.015</p> <p>Outside SBI 0.093</p>	<p>Within SBI 0.037</p> <p>Outside SBI 0.008</p>	<p>Within SBI 0</p> <p>Outside SBI 0.052</p>	<p>Area partly within Lower Pool SBI.</p> 	Disagree with impact zone identified/ application of 5m other habitats (non-woodland) buffer	<p>The purple buffer has been excessively applied to stone tracks and into an agricultural field, measured from where the canopy overhangs into the field and where no roots will be present following the proposed removal of the woodland area outside the SBI (see Appendix 2 Photomontage – images 1 - 4).</p> <p>A ditch is also present to the east side of the woodland so no roots extend beyond the woodland edge.</p>
26		<p>Appears to be line of trees and young, recently planted trees.</p> 	0.131	0.007	0.094		Disagree with impact zone identified/ application of 5m other habitats (non-woodland) buffer	<p>The purple buffer has been excessively applied to stone tracks and into an agricultural field, where no roots will be present following the proposed removal of the woodland area (see Appendix 2 Photomontage – images 5 - 7).</p>

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11		Largely area of woodland. Some grassed areas on the sight lines of the roundabout (westernmost edge of polygon) and on verge.	1.083	0.16	0.244		Disagree with impact zone identified/ application of 5m other habitats (non-woodland) buffer	The purple hatch buffer has been excessively applied to a tarmacked pavement, mown grass verge and into an agricultural field, where no roots will be present following the proposed removal of the woodland area.
31	 	Woodland in east of roundabout island, grassland, scrub and scattered trees appear to be present in the west. Woodland largely retained.	0.053	0.11	0.071		Disagree with impact zone identified/ application of 5m other habitats (non-woodland) buffer	The purple hatch buffer has been applied in addition to the orange hatch around the west side. This is considered to be excessive application of buffers. There is no woodland lost to the west side. Other habitat loss will have been accounted for elsewhere in other mitigation calculations, therefore this is a duplication.
35	 	Appears to be corner of woodland block. Loss polygon expanded to fully cover the tree it is located around.	0.009	0.014	0.004		Disagree with impact zone identified/ application of 5m other habitats (non-woodland) buffer	This is a single tree. Both purple and orange buffers have been excessively applied to a grassland field, which is clearly not woodland, immediately to the north of the single tree, in addition to a partially tarmacked and hard earth gateway and to Joss' Lane, a wide public bridleway Saredon 13. (see Appendix 2 Photomontage – image 8).

Appendix 2 – Photomontage

Images taken by Bagshaws LLP during site inspection on 15.01.21

1)

Woodland ID - 17
Looking east towards
Hilton Hall



2)

Woodland ID - 17
Looking west from
within the grassland
field



3)

Woodland ID - 17

Looking north from
within the
grassland field



4)

Woodland ID - 17

Looking south from
within the
grassland field



5)

Woodland ID - 26

Looking east
towards Hilton Hall



6)

Woodland ID - 26

Further along drive
looking east
towards Hilton Hall



7)

Woodland ID - 26

Looking east from
within the
grassland field



8)

Woodland ID - 35

Looking west from
the A460 layby

