

**A30 Chiverton to Carland Cross  
TR010026**

**STATEMENT TO INFORM AN  
APPROPRIATE ASSESSMENT  
APPENDIX 8 KEY CORRESPONDENCE  
WITH NATURAL ENGLAND RELATING  
TO THE HRA**

Planning Act 2008

APFP Regulation 5(2)(g)  
Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

Volume 6

August 2018



Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

**A30 Chiverton to Carland Cross  
Development Consent Order 201[x]**

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**STATEMENT TO INFORM AN APPROPRIATE ASSESSMENT  
APPENDIX 8 KEY CORRESPONDENCE WITH NATURAL ENGLAND  
RELATING TO THE HRA**

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<b>Regulation Number:</b>	Regulation 5(2)(g)
<b>Planning Inspectorate Scheme Reference</b>	TR010026
<b>Application Document Reference</b>	6.5
<b>Author:</b>	A30 Chiverton to Carland Cross Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
C01	August 2018	Application Issue



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## 8 Key correspondence and liaison with Natural England relating to HRA

- 8.1.1 This appendix includes copies of all key emails, meeting minutes, and documents exchanged with Natural England through consultation, relating to the HRA. A summary of this correspondence is included within Table 9-1 of the **SIAA Statement to Inform an Appropriate Assessment Report** (Volume 6 Document Ref 6.5).

**From:** [Pippa Wood](#)  
**To:** [Jones, Laura LE \(NE\)](#); [Carter, Hazel \(NE\)](#)  
**Cc:** [Paul Clack](#); [Jessica Postance](#); [Chloe Delgery](#); [Eloise Arif](#)  
**Subject:** RE: A30 - Isolated Heathland area  
**Date:** 04 December 2017 16:37:41  
**Attachments:** [Appendix 8.5 National Vegetation Classification Survey Report of Heathland and Woodland.pdf](#)  
[image001.jpg](#)  
[image002.jpg](#)  
[image003.png](#)  
[HA551502-WSP-EBD-0000-RE-EN-00004 AIES P02.docx](#)  
[image005.jpg](#)  
**Importance:** High

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Thanks Laura,

The results from the NVC survey (draft report attached) conclude that this small heathland area is made up of

H4 *Ulex gallii* – *Agrostis curtisii* heath;  
H4a *Ulex gallii* – *Agrostis curtisii* heath, *Agrostis curtisii* – *Erica cinerea* sub-community, and  
H4c *Ulex gallii* – *Agrostis curtisii* heath, *Erica tetralix* sub-community.

Of these only H4 relates and is considered under the Annex I habitat ‘Temperate Atlantic wet heaths with *Erica ciliaris* and *Erica tetralix*’. However, as stated in Table 1.1.1 only those stands where *Erica ciliaris* is abundant are included in this Annex I type habitat (in Joint Nature Conservation Committee. 2007. Second Report by the UK under Article 17 on the implementation of the Habitats Directive from January 2001 to December 2006. Peterborough: JNCC. Available from: <http://jncc.defra.gov.uk/pdf/Article17/FCS2007-H4020-audit-Final.pdf>).

As the NVC report goes on to say only a small clump of a potential hybrid plant was found in the western section of this isolated heathland ‘The plant covered an extent of ground approximately 1 m by 1 m. The plant was growing at the edge of heathland habitat, close to a transition between heathland to scrub habitat.’ and concludes ‘Several stems within the clump of *Erica ciliaris* displayed whorls of four leaves whilst others displayed whorls of three leaves. The plant therefore displayed some characteristics of the hybrid with *Erica tetralix*. However, this would mean that both plants were present to hybridise.’

Based on this it wouldn’t appear to be included in this Annex I type habitat as 1) the plants are likely to be hybrids and 2) the likely hybrids are not considered abundant.

I did mention that we had heard that the invertebrate specialist was thinking the invertebrate population on this heath was of SSSI standard, but as I mentioned we have not seen this report to date and are these results indicative of SSSI status or just that this is a small isolated heathland within relative close proximity (in terms of insect flight) to a designated heathland SSSI and as such would expect to have a reasonable invertebrate population.

We can obviously update on inverts when we have reviewed the specialist report.

However, in terms of value we still wouldn’t consider this small area of heathland with only a clump of possible hybridised Dorset heath to be of the same ‘International’ value as the Newlyn Downs. Furthermore, as stated in the AIES (also attached) ‘The heathland fragment bisected by the Scheme located south of the existing A30 and south of Newlyn Downs SAC, is not considered to be ‘functionally linked’ supporting habitat to the SAC.’

If your team require any further information to inform their decision please let us know.

Regards

**Pippa Wood** | A30 Ecology Lead

**Arup**  
63 St Thomas Street, Bristol, BS1 6JZ  
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[www.arup.com](http://www.arup.com)

**Working on behalf of Highways England**

**Highways England customer contact centre**  
**0300 123 5000**

**[www.highways.gov.uk](http://www.highways.gov.uk)**

The A30 Chiverton to Carland Cross Improvement scheme is part of the Department for Transport Road Investment Programme, being delivered by Highways England, and is receiving a funding contribution of up to £8m from the European Regional Development Fund to support the development phase of the scheme.

**From:** [Jones, Laura LE \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Carter, Hazel \(NE\)](#)  
**Subject:** FW: A30 - Isolated Heathland area  
**Date:** 06 December 2017 14:57:01  
**Attachments:** [image004.jpg](#)  
[image005.jpg](#)  
[image006.jpg](#)  
[image007.png](#)

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Hi Pippa,

Thank you for sending the NVC survey results. I agree that there are only isolated areas of hybrid heath and it seems as if they are not abundant across the whole site. I have also contacted Jeremy Clitherow and he agrees that the heathland was not of SAC quality or functionally linked to Newlyn Downs. He agreed that the conclusion with the AIES is fine as it stands. He was not sure where the text came from in the meeting notes you had from WSP.

Do you have the area of the site? Even though its not regarded as particularly interesting heathland, I think its important that there is as little fragmentation and loss of habitat to the project. Is it possible to have a replacement area (maybe close by) so that it can count as No Net Loss? It may be pretty poor heathland but its important for such a big project to show no net loss and even develop net gain.

Having said this, it would be interesting to see what the invertebrate specialist comes up with. Please do send the report when you have it.

Hope that's enough info for now, but if you need anything from us at this stage, please let me know.

Kind regards,  
Laura

---

**From:** Jones, Laura LE (NE) [mailto:Laura.Jones@naturalengland.org.uk]

**Sent:** 16 April 2018 14:33

**To:** Pippa Wood

**Cc:** Newsome, Amanda (NE)

**Subject:** Air Quality advice

Hi Pippa,

Unfortunately I have not managed to get you direct contact with an air quality specialists but have managed to find out guidance regarding HRA Screening and the potential differences between DMRB and NE significance screening for road schemes.

A document is attached with details.

If you require specific queries regarding this please let me know and I can try and get answers to these, however our specialists are quite tied up at the moment so I cannot guarantee this.

Hope the information attached is helpful.

Many thanks

Laura

**Laura Jones**

Lead Advisor

Sustainable Development

Cornwall, Devon and Isles of Scilly Area Team

Natural England

Phone: 02080267476 Mobile: 07775 544994

I work part time (two days a week) so please let me know when you need a response to your email.

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

## Overview – an approach to the HRA of road traffic emissions

The assessment process is required under Part 6 of the Habitats Regulations.

There are four stages to assessment for European Sites. This guidance relates primarily to Stage 1 of the process and the scoping of a stage 2 appropriate assessment.

Under the Habitats Regulations, it is the competent authority who must carry out an appropriate assessment of any plan or project which is either not directly connected with or necessary to the management of an European Site and which is likely to have a significant effect on a European site. A competent authority should therefore decide for itself as to the likelihood of a significant effect on a site (stage 1 of Figure 1 above), but it is often the case that it may seek advice on this from Natural England (The Habitats Regulations define a 'competent authority' as including any Minister of the Crown, government department, statutory undertaker, public body of any description or persons holding public office, or any person exercising those functions (regulation 7(1)).

Furthermore, there is a statutory requirement for a competent authority to formally consult Natural England for the purposes of an appropriate assessment (stage 2). This is the only statutory input required from Natural England during the HRA process.

When specifically advising a competent authority at this screening stage of HRA as to whether the road traffic emissions associated with a plan or project are likely to have a significant effect on a European site, Natural England suggests the following sequential approach can be taken to quickly filter out those proposals posing no credible risk.

Firstly it considers the evidence about emission types and distance that emissions are likely to travel to identify whether a plan or project might pose a risk to a European site (**step 1**). If a proposal gives rise to emissions that are likely to reach a designated site, the screening assessment should, secondly, consider the sensitivity of the qualifying feature(s) at the designated site (**step 2**). Next, if the necessary information is available, establish the feature's location and its likely exposure to emissions (**step 3**) to confirm the presence or absence of a credible risk.

Where there is the potential for interaction between a sensitive feature and emissions, ascertain either the predicted increase in flow of road traffic associated with the plan or project ('AADT flow') or the predicted process-contribution as a % of the pollution benchmark to act as a screening threshold alone (**step 4a**) and, where the threshold is not exceeded alone, in-combination (**step 4b & 4c**),. These steps inform a decision as to whether a more detailed 'appropriate assessment' is required. The requirement to specifically consider the risks of 'in-combination' effects is explained later. Together, these steps represent the "likely significant effect" or "screening" stage. If a proposal alone is above the likely significant effect thresholds, there is no need to also look for the risk of in-combination effects before proceeding to the appropriate assessment stage.

If the likelihood for significant effect cannot be ruled out, Natural England should advise the competent authority that an appropriate assessment is needed (**step 5**). This should focus on assessing more precisely the ecological impacts of the emissions on the site in view of its qualifying features and conservation objectives. It should take into account any detailed modelling that is or becomes available, the best available evidence as to ecological impacts, background levels and likelihood for future reductions. Natural England will be consulted by the competent authority for the purposes of the assessment and asked for its advice (**step 6**).

### Advice on Screening

- Step 1:** Check Distance Criteria and APIS introduction to air pollution
- Step 2:** Habitat sensitivity to that emission type (See Site Relevant Critical Load
- Step 3:** Where practicable, check the likely exposure of the site 's sensitive features to emissions
- Step 4:** Ascertain the process-contribution (either AADT flow or % of Critical Load/Level benchmark) from the plan or project
- Step 4a:** apply screening threshold (either 1000AADT or 1%) alone
- Step 4b/4c:** apply screening threshold in-combination

### Air Quality Significance Screening for Road Schemes – Differences in approach taken in air quality significance screening.

There are differences in the approach taken to air quality significance screening by Natural England and the Highways Agency in its Design Manual for Roads and Bridges (DMRB). To better understand the significance of the differences in screening approaches we undertook a theoretical exercise using the [DMRB Screening Model](#). Using average traffic flow and speed figures calculated from DfT datasets, we modelled whether the NOx outputs could result in a change of > 1% of critical/load level on different road types (motorway, dual A road, single A road, and rural road), under each of the DMRB scenarios. This suggested that, under certain scenarios, the DMRB methodology may screen out schemes where NE's approach would have screened them in.

Natural England advises that DMRB modelling was sufficiently similar to 1% of critical load (benchmark for nitrogen deposition) in some cases but not all.

The DMRB uses 5 criteria for screening. NE modelled these against our screening threshold of 1% CL and found that the following criteria exceeded the 1% CL (alone and in combination) i.e. they were not inconsequential even though DMRB approach would screen them out.

- Where there was a speed increase of 10km/h there was a change of > 1% critical loads/levels for all road types except minor roads.
- Where there was an HDV AADT increase of 200 there was change of > 1% critical loads/levels on all road types except motorways.

This suggested that, under these two scenarios above, the DMRB methodology may screen out schemes where NE's approach would have screened them in.

As a result of these findings, the air quality assessment of the A30 proposal needs to include further assessment where these 2 scenarios would have screened the road out as insignificant using the DMRB methodology, as well as when the 1000 AADT threshold has been exceeded when the road edges are within 200m of a protected site (see summary table below).

Table 1

<b>Road Type</b>	<b>Further assessment required:</b> (Schemes which may be incorrectly screened out for air quality impacts by HA DMRB approach because they do not trigger the screening thresholds listed below)	<b>Accept DMRB Approach:</b> (Schemes which are likely to be correctly screened out for air quality impacts by the HA DMRB approach because they do not trigger the screening thresholds listed below)
Dual A Roads	<ul style="list-style-type: none"> <li>• heavy duty vehicle flows (HDV) will change by 200 AADT or more</li> <li>• daily average speed will change by 10 km/hr or more</li> </ul>	<ul style="list-style-type: none"> <li>• daily traffic flows will change by 1000 AADT or more</li> </ul>

**Note 1:** The DMRB guidance is designed for motorways and trunk roads, which generally have very large volumes of traffic, and where an increase of 1000 AADT and/or 200 HDV would generally be considered negligible by the HA on the basis of traffic flows as opposed to emissions.

Another common screening criteria used in the industry is screening out further assessment of roads when:

- there are changes in traffic of <10% AADT outside of an Air Quality Management Area (AQMA),
- there are changes in traffic of <5% AADT inside an AQMA.

These figures originally came from DfT's WebTAG guidance, but were reiterated in the Environmental Protection UK (EPUK) 2010 guidance 'Development Control: Planning for Air Quality. This is often more conservative for roads with lower traffic flows, and is widely used.

**Note 2:** The calculations used in DMRB are based in old emission factors, and there have been several iterations of emission factors published since then. At this stage we cannot be certain whether this version of the DMRB screening model over-predicts or under-predicts emissions. There are particular problems with future year scenarios, where the fall off in NO<sub>x</sub> concentrations can be predicted to be larger than reality.

Therefore, whilst predicted concentrations in 2007/8 may have been broadly similar to real life concentrations, predicted concentrations in 2013 are likely to be incorrect.

Highways Agency has recently published an [Interim Advice Note 170/12](#) (November 2012) which provides advice on the use of alternative future NO<sub>x</sub> and NO<sub>2</sub> projections set out by the Department for Environment, Food and Rural Affairs (Defra) in April 2012, using gap analysis. The HA Long Term Gap Analysis Calculator can be used to calculate adjusted emissions for future years ([Link](#)). We should be aware of this issue and ensure that HA staff and others take account of the Defra 2012 emission factors by applying the IAN 170/12 in any modelling they undertake.

## Comparison of Natural England and Highways Agency Approach to Air Pollution Assessment

### Natural England

#### Stage 1 – Distance screening

Is the proposed development close to any designated site(s) upon which air emissions could have an adverse effect?

Based on distance criteria - for roads this is 200m from the edge of the road



Natural England  
NOT consulted.



#### Stage 2 – Significance screening stage

- is the proposal likely to have a significant effect on the site(s)?
- is the site(s) sensitive to air pollution?
- is the predicted exposure likely to have a significant effect on the designated site?

If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect alone or in combination irrespective of the background levels. Where the predicted contribution from the process is greater than 1%, consideration needs also to be given to the predicted environmental contribution (PEC). Where the PEC (background + process contribution) is less than 70% of the critical load/level then a conclusion of no likely significant effect can be reached, even if the process contribution is greater than 1%.

Natural England  
Consulted



#### Stage 3 – Detailed assessment

Does a more detailed assessment show the potential for adverse effects on the site(s)? Consider robustness of detailed modelling, precise feature location, in combination effects etc.

Various assessment criteria (pollution level as % of critical load), currently under review, but none yet defined for transport sector.

Natural England  
Consulted



#### Stage 4 – Potential mitigation

Are there effective mitigation measures that can be put into place to reduce any impact to an acceptable level?

4 Natural England  
Consulted

### Highways Agency

Highways Agency have a similar process for Stage 1 as natural England. See Paragraph 3.13 of DMRB Air Quality Advice Note.

Highways Agency ask are there any roads that are likely to be affected by the proposals? Affected roads are those that meet any of the following criteria:

- road alignment will change by 5 m or more; or
- daily traffic flows will change by 1,000 AADT or more; or
- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more; or
- daily average speed will change by 10 km/hr or more; or
- peak hour speed will change by 20 km/hr or more.

Annex F of the DMRB Air Quality Advice Note defines the methodology used for detailed assessment. It makes use of the DMRB Screening Method (Annex C of the DMRB Advice Note)

See Paragraph 3.40 – 3.45 of DMRB Air Quality Advice Note sections.

16/04/2018

**From:** Pippa Wood  
**To:** ["Jones, Laura LE \(NE\)"](#)  
**Cc:** [Newsome, Amanda \(NE\)](#); [James Bellinger](#)  
**Subject:** RE: Air Quality advice  
**Date:** 25 April 2018 16:40:55

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Thank for this Laura,

I have one query/need for clarity form the AQ specialist:

Are NE saying in the information note provided that a change of less than 200 HGVs needs to be assessed? It doesn't specifically state this in the document but it does not state what the difference is between NE guidance and DMRB? At present we can't see any difference.

Cheers

Pippa

**From:** [Jones, Laura LE \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Newsome, Amanda \(NE\)](#)  
**Subject:** RE: Air Quality advice  
**Date:** 02 May 2018 14:34:24

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Hi Pippa,

I have checked with our Air Quality specialist and yes we are saying that less than 200HGV needs assessing.

Our guidance differed from DMRB in certain situations where our own investigations have highlighted potential issues with the DMRB methodology for us. One of those situations is a change of less than 200 HDVs for single and dual carriageway roads. DMRB would screen that scenario out as insignificant change, but our investigations have shown that is not necessarily the case and it may lead to a significant change ie >1% of CL. So to summarise, yes we do require further assessment where change in AADT for HDVs is <200 in this instance.

Also to let you know I am out of the office until 30<sup>th</sup> May. I am on leave now until 21<sup>st</sup> and then caught up in meetings until Wednesday 30<sup>th</sup>. If you need an urgent response please let Amanda Newsome know.

Many thanks  
Laura

**From:** [Pippa Wood](#)  
**To:** [Jones, Laura LE \(NE\)](#); [Newsome, Amanda \(NE\)](#); [Michael Baker](#); [David Grattan](#)  
**Cc:** [Eloise Arif](#); [Catherine Jones \(L\)](#); [Jan Morrow](#); [Chloe Delgery](#); [Jessica Postance](#); [Amanda Murdock](#); [James Bellinger](#)  
**Subject:** RE: Alignment justifications regarding the heathland a priority woodland [Filed 30 May 2018 08:33]  
**Date:** 22 May 2018 12:48:57  
**Attachments:** [image001.gif](#)  
[image002.png](#)  
[image005.jpg](#)

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Hi Laura,

Thank you for the conversation earlier. In summary:

Thank you for agreed date for face to face in Exeter at 10am to 1pm Wednesday 6<sup>th</sup> June.

This meeting will be to:

1. Discuss and agree the Statement of Common Grounds (SoCG), both matters agreed and disagreed,
2. Discuss and agree approach to HRA
3. Discuss and agree ecological design and mitigation

Based on this we (Arup) have agreed to provide 1. the Draft SoCG, 2. Outline to HRA approach, and 3. Information to inform on mitigation, at least a week ahead of meeting – being 30<sup>th</sup> May.

For the meeting we are likely to bring a planner and/or an EIA coordinator (to be confirmed) and possibly someone from air quality (depending on whether issues can be resolved prior relating to this, see para below). Therefore, at present assume up to 5 Arup staff and potentially up to 2 from Highways England.

Further to our discussion re the 200 HGV threshold. All other designated sites within 200m of the road network being assessed within the Traffic / Air Quality modelling either have a reduction in HGVs (up to – 400 HGV reduction) or no change (0) being predicted. As such, not sure if the 200 HGV threshold needs anymore discussion. The sites being taken forward in the HRA have predictions over 200 HGV increase as well as being over other DMRB thresholds; as such they are already being assessed.

Perhaps if you could pass on this information to the Air Quality team then perhaps no further discussion relating to A30 assessment is required??

Cheers

**Pippa Wood** | A30 Ecology Lead

**Arup**

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**Working on behalf of Highways England**

**Highways England customer contact centre**

**0300 123 5000**

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The A30 Chiverton to Carland Cross Improvement scheme is part of the Department for Transport Road Investment Programme, being delivered by Highways England, and is receiving a funding contribution of up to £8m from the European Regional Development Fund to support the development phase of the scheme.

**From:** [Jones, Laura LE \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Subject:** FW: Alignment justifications regarding the heathland a priority woodland  
**Date:** 29 May 2018 10:56:04  
**Attachments:** [image001.jpg](#)  
[image002.gif](#)  
[image003.png](#)

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Hi Pippa,  
I have checked with the air quality specialists and they are happy with the rational and methodology, so no further discussion is needed on this I think?  
It will be discussed nationally but from th4e A30 point of view I think we have bottomed it out.  
Thanks  
Laura

---

**From:** Wills, Mark (NE)  
**Sent:** 23 May 2018 15:13  
**To:** Zappala, Susan (NE) <[Susan.Zappala@naturalengland.org.uk](mailto:Susan.Zappala@naturalengland.org.uk)>; Jones, Laura LE (NE) <[Laura.Jones@naturalengland.org.uk](mailto:Laura.Jones@naturalengland.org.uk)>  
**Subject:** RE: Alignment justifications regarding the heathland a priority woodland

Hi Laura  
I'm not clear in my mind why there might be a reduction in HDVs (is that because they are adding a lane??), but accepting that is correct, given what has been stated below, it seems the 200 HDV threshold is not relevant for this particular scheme.  
Which is a bit of a result!  
Mark

---

**From:** Zappala, Susan (NE)  
**Sent:** 23 May 2018 14:36  
**To:** Jones, Laura LE (NE) <[Laura.Jones@naturalengland.org.uk](mailto:Laura.Jones@naturalengland.org.uk)>; Wills, Mark (NE) <[Mark.Wills@naturalengland.org.uk](mailto:Mark.Wills@naturalengland.org.uk)>  
**Cc:** Hall, Deborah (NE) <[deborah.hall@naturalengland.org.uk](mailto:deborah.hall@naturalengland.org.uk)>; McMullon, Chris (NE) <[Chris.McMullon@naturalengland.org.uk](mailto:Chris.McMullon@naturalengland.org.uk)>  
**Subject:** RE: Alignment justifications regarding the heathland a priority woodland

Cc for awareness and reduction in urgency

Hi Laura

If it's not an issue for the A30 then no problem with the below being used to adjust our advice.

This case has highlighted the national need to liaise with Highways England so we will need to keep an eye on this through the AQ National.

Kind regards

Susan

Susan Zappala  
Senior Specialist – Air Emissions and Ecotoxicology  
Specialist Services and Programmes  
Natural England

0208 026 1998  
0750 057 1995

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**From:** Jones, Laura LE (NE)  
**Sent:** 23 May 2018 10:11  
**To:** Zappala, Susan (NE) <[Susan.Zappala@naturalengland.org.uk](mailto:Susan.Zappala@naturalengland.org.uk)>; Wills, Mark (NE) <[Mark.Wills@naturalengland.org.uk](mailto:Mark.Wills@naturalengland.org.uk)>  
**Subject:** FW: Alignment justifications regarding the heathland a priority woodland

Hi Susan/ Mark,  
We have had confirmation from Arup regarding the threshold.  
Are you happy with this method?

Thanks  
Laura

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**From:** Pippa Wood [<mailto:pippa.wood@arup.com>]  
**Sent:** 22 May 2018 12:49  
**To:** Jones, Laura LE (NE) <[Laura.Jones@naturalengland.org.uk](mailto:Laura.Jones@naturalengland.org.uk)>; Newsome, Amanda (NE) <[Amanda.Newsome@naturalengland.org.uk](mailto:Amanda.Newsome@naturalengland.org.uk)>; Michael Baker <[Michael.Baker@arup.com](mailto:Michael.Baker@arup.com)>; David Grattan <[David.Grattan@arup.com](mailto:David.Grattan@arup.com)>  
**Cc:** Eloise Arif <[Eloise.Arif@arup.com](mailto:Eloise.Arif@arup.com)>; Catherine Jones (L) <[Catherine-L.Jones@arup.com](mailto:Catherine-L.Jones@arup.com)>; Ian Morrow <[Ian.Morrow@arup.com](mailto:Ian.Morrow@arup.com)>; Chloe Delgery <[Chloe.Delgery@arup.com](mailto:Chloe.Delgery@arup.com)>; Jessica Postance <[jessica.postance@arup.com](mailto:jessica.postance@arup.com)>; Amanda Murdock <[amanda.murdock@arup.com](mailto:amanda.murdock@arup.com)>; James Bellinger <[James.Bellinger@arup.com](mailto:James.Bellinger@arup.com)>  
**Subject:** RE: Alignment justifications regarding the heathland a priority woodland

Hi Laura,

Further to our discussion re the 200 HGV threshold. All other designated sites within 200m of the road network being assessed within the Traffic / Air Quality modelling either have a reduction in HGVs (up to – 400 HGV reduction) or no change (0) being predicted. As such, not sure if the 200 HGV threshold needs anymore discussion. The sites being taken forward in the HRA have predictions over 200 HGV increase as well as being over other DMRB thresholds; as such they are already being assessed.

Perhaps if you could pass on this information to the Air Quality team then perhaps no further discussion relating to A30 assessment is required??

Cheers

**Pippa Wood** | A30 Ecology Lead

**Arup**

Project title	A30 Chiverton to Carland Cross	Job number 256019
Meeting name and number		File reference
Location	Natural England, Sterling House, Exeter	Time and date 10:00 4 June 2018
Purpose of meeting	Natural England Statement of Common Grounds, including mitigation design and HRA approach	
Present	Pippa Wood (Arup) Michael Baker (Arup) Eloise Arif (Arup) Laura Jones (Natural England) David Hazelhurst (Natural England)	
Apologies		
Circulation	Those present Andy Luke (Arup), Peter Hulson (Arup), Jessica Postance (Arup)	

Action

## 1. Introduction

PW introduced the documents sent to NE by Arup, which included the Draft Statement of Common Grounds (SoCG) between Highways England and Natural England, a file note and figures summarising scheme ecological mitigation including a table of all multi-species crossings, and file notes summarising the proposed HRA approach.

MB introduced his role on the A30 (stakeholder, land, and DCO lead alongside David Grattan). MB queried whether those present have been through the DCO process before. LJ has experienced DCO during A30 Temple to Higher Carblake Improvement, but overall experience within NE Exeter office is not extensive. DH experienced DCO process during A30 Bodmin to Indian Queens Improvement.

## 2. DCO Process and Design Fix 3

MB introduced DCO timeline. PEIR consultation occurred in February 2018 and is now closed, currently embarking on SoCG process with Statutory Bodies. Engineering and assessment now at

Prepared by Eloise Arif

Date of circulation

Date of next meeting

# Minutes

Project title	Job number	Date of Meeting
A30 Chiverton to Carland Cross	256019	4 June 2018

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## Action

Design Fix which will be used for DCO application. Planning on submitting application at end of August 2018, followed by acceptance period, with examination starting around January 2019. There will be time between submission and examination to progress matters agreed within the SoCG.

No significant environmental issues have been highlighted by Cornwall Council. MB is currently undertaken more detailed consultation with landowners, due to minor changes since February consultation (e.g. moving a few ponds, lowering of alignment).

PW states there have been no changes since PEIR consultation that would have a negative impact on ecology. One relevant change includes the lowering of scheme alignment at Marazanvose which results in a benefit for ecology (green bridge lowered). Lowering of scheme alignment elsewhere has resulted in the movement of one badger crossing, but it is still within the 500m DMRB guidance.

### 3. HRA

PW states that WSP previously only considered Newlyn Downs SAC, due to being within 200m of scheme, but did not consider other designated sites that are within 200m of affected road network. Therefore, Arup are considering four further sites in addition to Newlyn Downs SAC, including Breney Common and Goss and Tregoss Moors SAC.

DH points out that Mid Cornwall Moors SSSI is an extension of the Goss and Tregoss Moors SSSI, which was designated in mid-2017. The original intention was to extend the SAC boundary at the same time but this didn't happen due to July referendum. PW queries whether the extension should be considered within the HRA since it was not made a cSAC or pSAC. All agreed not to be considered although up-to date botanical surveys should be used as well as considering Annex I species within the SSSI designations.

DH to send Arup info, particularly the up to date botanical/NVC surveys on Mid Cornwall Moors SSSI

(By 08/06/18)

PW explains that modelling showed nitrogen deposition to be less than current on Newlyn Downs SAC. Penhale Dunes SAC and Fal and Helford SAC screened out of appropriate assessment as traffic modelling shows traffic as same or as less than current in these areas.

PW explains that air quality modelling has shown that there is a potential for a significant effect in terms of NO<sub>x</sub> deposition for Breney Common and Goss and Tregoss Moors SAC within 0-10 metres of the road, which is equal to 0.2% of the entire designated site. Arup used the NVC from the A30 Bodmin to Indian Queens to

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assess whether any of this 0.2% consisted of Annex I habitats for which the site was designated and found that on the whole it was not. Only one area that was mapped as heathland habitat before the Bodmin to Indian Queens road was built is now an embankment verge and no longer Annex I habitat. DH has a full and more recent (2017) NVC survey data for the mid-Cornwall SSSI designation that he can send to Arup (Action as above).

According to DH, the new SSSI boundary may be within 0-10 metres of the road, and may be Annex I habitats. DH also mentions a HRA for a link road from St Austell near Penhale tip, which considered the larger SSSI boundary around Breney Common and Goss and Tregoss Moors SAC.

PW summarises that PINS has commented that construction mitigation should not be considered during screening and should instead be considered during appropriate assessment. PW's view is that design mitigation should be including in screening as it is integral to the scheme, and therefore the sites screened in for appropriate assessment are Newlyn Downs SAC (for construction mitigation and possible hydrological and sediment effects) and Breney Common and Goss and Tregoss Moors SAC (for air quality assessment as discussed above). NE agrees with this approach.

DH mentions that there is a power plant and a bio gas plant near Indian Queens at Fraddon, and there has also been an intensification of farmland in the area, all of which could contribute to higher nitrogen deposition on Breney Common and Goss and Tregoss Moors SAC. Therefore, DH queries whether these in-combination and background air quality effects have been considered during air quality modelling. PW and EA will check with air quality specialists within Arup, and can check the APIS website.

PW and EA to require Link Road HRA – possibly from CC.

PW and EA to query whether in combination effects from power plants and agriculture have been considered in air quality modelling, particular at Breney Common and Goss and Tregoss Moors SAC

## 4. Statement of Common Grounds

PW showed SoCG includes entirety of consultation between NE and Arup, as well as prior consultation between WSP and NE. LJ agrees that it is useful to include all of this in case teams change again.

### 4.1 Matters Outstanding

PW and LJ agree that there are no matters outstanding related to survey methodology.

#### 4.1.1 Designated Site Connectivity

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In PEIR consultation response, NE queried whether more connectivity could be created between designated sites. PW explains that no SSSIs are impacted by the scheme, and that it is not possible to push the redline boundary or S106 agreements to achieve connectivity, as most SSSIs are relatively far away (closest is Newlyn Downs SAC/SSSI which Arup have provided connectivity for through proposed heathland planting). PW also highlights that extensive planting throughout the scheme provides habitat connectivity along the route.

MB mentions that introducing any connectivity elsewhere would mean taking land from someone, and therefore has to be justified as mitigation for the scheme which is not possible in this situation.

NE agree with this approach and are happy to move from matters outstanding to matters agreed.

PW to move to matters agreed in SoCG

### 4.1.2 SAC Cattle Grazing Field

In PEIR consultation response, NE commented on possible effects to the conservation management of Newlyn Downs SAC through removal loss of the conservation grazing cattle's supplementary grazing fields. PW stated that Arup need to know which fields the cattle graze, and whether the area lost is significant enough to affect the objectives of the management of the SAC, therefore requiring this factor to be included in the HRA.

DH will look into this, once Arup forward email to DH showing area to be lost of that field.

Arup to forward area lost email.

(By 06/06/18 - Done)

DH to find out about cattle grazing field. And provide NE position on whether the area to be lost would affect the conservation management of the SAC.

(By 08/06/18)

### 4.1.3 Quarry Pond

During 22<sup>nd</sup> March 2018 bat meeting, Amanda Newsome (NE) commented that NE would like to see replacement quarry pond, despite quarry pond not being lost. Arup looked at introducing new quarry pond but engineers said it was not feasible, as it would be too difficult to create anything deep enough for like for like replacement. Due to gap identified in WSP bat surveys, Arup currently have an SM2 around the quarry pond and are awaiting bat results. Arup are therefore not planning on having a like for like replacement for the quarry pond, unless bat results indicate that this is a significant foraging area - TBC.

NE agree with this and are happy to move this to matters agreed, assuming bat results don't show this to be a high bat activity area.

DH mentioned that attenuation ponds created for A30 Bodmin to Indian Queens Improvement are now part of the features of interest

PW to move to matters agreed in SoCG

Arup to research attenuation pond

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<p>for the designated site in that area and therefore it may be useful for Arup to look into their design.</p> <p>MB says that land to replace that lost by landowner north of the quarry pond may be provided in open access land to field east of the quarry pond. NE do not see an issue with this.</p>	<p>design for A30 Bodmin to Indian Queens Improvement</p>
<p><b>4.2 SoCG – Matters Agreed</b></p>	
<p><b>4.2.1 Ecological and Protected Species Methodology</b></p> <p>NE agree with scoped out surveys, including water vole, great crested newt, and white clawed crayfish.</p> <p>Arup to update section 1.2.1 to clarify initial disagreement on bats and badger to ‘Natural England agrees with the text within the PEIR regarding protected species surveys, and those further detailed within specific consultation, particularly regarding bats and badger’.</p> <p>NE agree with reptile surveys, aquatic ecology surveys, and dormouse surveys.</p> <p>NE currently checking with otter specialist about Paul Chanin’s deviation from DMRB, and agreement is therefore TBC. LJ is fairly sure that NE will not have an issue with deviation but needs to confirm with specialist.</p> <p>NE ornithological specialist had questioned timing of nightjar surveys and scoping exercise. Arup currently redoing entire survey. NE agree with current statement within SoCG regarding nightjar.</p> <p>Lots of back and forth on bats between NE and WSP about landscape scale transects in particular. Arup have consulted with Amanda Newsome and Kat Walsh from NE on 22<sup>nd</sup> March 2018 on bat memo produced by Arup, and this resulted in agreement on methodology, excluding gaps identified. Arup currently conducting surveys to cover these gaps. NE agree that only section 1.3.6 is required in the SoCG for bats, and they are in agreement with this statement. Arup will also include section 1.3.5 regarding temperatures in ES. NE in agreement with everything assuming new bat results do not show anything different.</p> <p>MB says that draft licence application for protected species is usually included with the DCO application. PW says this cannot be done until surveys are finished. Draft licence application to therefore be submitted during examination. NE will notify licensing team to expect this. NE will be able to agree with licence ahead of examination if made available.</p>	<p>Arup to update SoCG 1.2.1 with agreement dated 04/06/2018</p> <p>NE otter specialist to confirm agreement with deviation</p> <p>PW to add in extra roost surveys into SoCG as well as extra activity surveys</p> <p>Arup will send draft licence application to NE prior to examination for consultation.</p>

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<p>PW explains badger mitigation crossings and fencing. Justification for lack of bait marking is the extensive number of crossings, and a crossing for each main sett. Natural England agree with statement for badgers in SoCG and emphasise again that above justification for lack of bait marking is required for badger licence application.</p> <p>The licence team within NE will be consulted with regarding the suitability of a project wide licence for badger.</p>	<p>NE to notify licensing team.</p> <p>PW to include bait-marking justification in Draft licence</p> <p>Arup to consult with NE licence team about project wide badger licence</p>
<p><b>4.2.2 Ecological Assessment Methodology</b></p> <p>Defra biodiversity metric will not be used for net gain habitat calculations. PW will carry out a full habitat assessment instead. NE agree with Arup's alternative as described in consultation and SoCG.</p>	
<p><b>4.2.3 Designated Sites</b></p> <p>Designated sites have been covered in matters outstanding (as above), and grazing field TBC as above.</p>	
<p><b>4.2.4 Potential Ecological Effects</b></p> <p>PW explains the priority woodland holding objection from the Woodland Trust. NE agree that woodland is not an ancient woodland. Arup produced alignment justification note for this area. NE queried whether these trees could be translocated to another area – <u>Arup to move to matters outstanding</u>, subject to client agreement. If agreed to go into DCO, translocation will come under enhancement. DH queried whether the cost could be covered by EDF, but PW and MB explained that the projects are mutually exclusive. This issue will be moved to matters outstanding until client agrees, then can be moved into matters agreed.</p> <p>Alignment justification for priority heathland area is that the north alignment option goes through/closer to SAC and south alignment option goes through archaeology. DH says he agrees with the alignment justification and that it is better than the alternatives, but however disagrees with NE's previous comments that the heathland fragment is too small for SSSI designation, as he says designations are now done on a landscape scale. DH agrees with Arup's approach in replanting/linking the SAC. DH suggested harvest seed from Newlyn Downs SAC, and translocate heather from lost heathland for new heathland planting. As above, Arup will move to matters outstanding pending confirmation from client and landscape architects.</p> <p>PW to reword SoCG for sections 4.2.2 and 4.2.3 – loss of heathland will need to compensated more than 1:1 and translocation and/or</p>	<p>Arup to move issue to matters outstanding, pending confirmation from client and landscape team about translocating trees</p> <p>Arup to move issue to matters outstanding, pending confirmation from client and landscape team about translocating heather</p>

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seeding from nearby heathland should be considered during heathland creation. Keep in matters agreed, dated 04/06/2018.	PW will combine 4.2.1 and 4.2.4
Quarry ponds to be moved from matters outstanding to matters agreed as above.	
<b>4.2.5 Ecological Design, Mitigation and Enhancement</b>	
NE agree with habitat manipulation and creation for reptiles.	
NE agree with standard construction mitigation and safe places of refuge is sufficient for amphibians.	
NE agree with 10 proposed bat underpasses. Arup to reword – NE agree that lighting is suitable and is now in scheme.	
NE agree with badger mitigation	PW to reword
NE agree with otter mitigation	
<b>4.2.6 Habitat Regulations Assessment</b>	
HRA covered in matters outstanding (as above) and can be moved to agreed as above.	
<b>4.2.7 Air Quality</b>	
NE agree with air quality. PW to re-word and clarify	
<b>4.2.8 Designated Landscapes and Landscape Character</b>	
PW to reword section 8.1 to ensure it makes sense and consistent with response from NE (as provided in email). NE agree with methodology and justification for AONB and landscape assessment.	PW to reword
<b>4.2.9 Landscape and Visual Impacts</b>	
PW to reword section 8.2 to ensure it makes sense and consistent with response from NE (as provided in email). NE have said in PEIR consultation response have said to use LCAs. PW to check and reword for clarification. NE's landscape specialists had checked and were happy with everything.	PW to check and reword to provide clarification
<b>4.2.10 Water Quality</b>	
NE agree with approach as set out in the SoCG and that can be dated agreed at this meeting.	PW to check and reword to provide clarification
<b>4.2.11 Hydrology</b>	
NE agree with approach as set out in the SoCG and that can be dated agreed at this meeting.	

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## Action

LJ suggested adding in green infrastructure approach under hydrology, as well as public access land (CROW) – link more to landscape work and mention green infrastructure.

### 4.2.12 **Climate Change Adaptation**

PW to update with green infrastructure

NE agree with approach as set out in the SoCG and that can be dated agreed at this meeting.

### 5. **Closing Comments**

MB queried who would sign SoCG and whether NE happy for draft SoCG to go in to application.

LJ to check who will sign the SoCG and whether NE are happy for a draft to go in for application

**From:** [Pippa Wood](#)  
**To:** [Hazlehurst, David \(NE\)](#); [Jones, Laura LE \(NE\)](#)  
**Cc:** [Newsome, Amanda \(NE\)](#); [Eloise Arif](#); [Peter Hulson](#); [Andy Luke](#)  
**Subject:** FW: A30 Natural England PEIR Consultation [Filed 06 Jun 2018 16:22]  
**Date:** 06 June 2018 12:16:45  
**Attachments:** [image001.png](#)  
[04-06-2018 NE SoCG Meeting.docx](#)  
[image005.jpg](#)  
[image006.jpg](#)  
[image007.jpg](#)  
**Importance:** High

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Hi David and Laura,

Firstly, thank you for the meeting on Monday, our joint efforts are clear represented in the SoCG.

Please find the meeting notes attached.

Within here are the following ACTIONS for Natural England – if possible, as we have only a couple of weeks to complete the HRA, please could you provide the information as agree by the **end of the week 08/06/18** ??

1. Please send through the ecological (NVC, Inverts??) survey information and associated citations for the Mid-Cornwall SSSI as discussed. We require this to be included within the HRA, without we will have to proceed with c. 18 year data as conducted for the Bodmin to Indian Queens section.
2. Please could you provide information and decision relating to the cattle grazing and part loss of grazing field due to the scheme, for inclusion within the HRA. The email attached below shows the area to be lost for reference.
3. Please could you confirm with mammal specialist that Paul Cannin's deviation from DMRB otter guidance is acceptable in light of otter populations in Cornwall and his knowledge (as provided in email below).

We will send out an up-dated Draft SoCG when we have updated as discussed and captured in meeting notes. If there are any additions and/or amendments relating to the meeting notes please let us know.

Thanks again,

Regards

**Pippa Wood** | A30 Ecology Lead

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The A30 Chiverton to Carland Cross Improvement scheme is part of the Department for Transport Road Investment Programme, being delivered by Highways England, and is receiving a funding contribution of up to £8m from the European Regional Development Fund to support the development phase of the scheme.

---

**From:** Pippa Wood

**Sent:** 23 May 2018 18:17

**To:** 'Jones, Laura LE (NE)' <Laura.Jones@naturalengland.org.uk>

**Cc:** Newsome, Amanda (NE) <Amanda.Newsome@naturalengland.org.uk>; Ben Oakman <Ben.Oakman@arup.com>; Eloise Arif <Eloise.Arif@arup.com>

**Subject:** FW: A30 Natural England PEIR Consultation

Hi Laura,

Just trying to tie up some requests from Natural England from the DAS consultation and in the Consultation Response to the PEIR to ensure they are captured within the Statement of Common Grounds (SoCG) to reduce NEs response time at a later date and need for presence in a hearing. The Draft SoCG to follow next week as discussed.

As such please see comments as below:

1. Natural England stated they would want to see the justification of survey guidance deviation to decide if they agree / will accept the deviation from standard DMRB methodology by Paul Chanin, who reduced the search buffer from the recommended 500m to 250m, and instead assumed presence throughout and focussed survey on identifying breeding and resting places.

Please see Justification as provided below (taken from the Otter Report by Paul Chanin) and **confirm Natural England's position on deviation from DMRB for the SoCG.**

*At present, there are no nationally agreed protocols for surveying for otters in connection with development. The Design Manual for Roads and Bridges (DMRB) Volume 10: Section 4, Part 4 Nature*

*Conservation Advice in Relation to Otters," London, 2001 published by the Highways Agency provides*

*guidelines for trunk roads and motorways but has not been updated for some time and was written at a*

*time when the otter population was at a much earlier stage in its recovery. Today, in many parts of the UK,*

*including the whole of southwest England, otters have recolonised their original range and the need to*

*establish whether otters are present or not is redundant.*

*Otters have been present on the Fal and St Austell Catchment Area since the first National Survey of Otters*

*in England (Lenton et al., 1981). During the fourth survey, 2000-2002, (Crawford, 2003) they were recorded*

*at 80% of the 46 sites searched within the catchment which compares with the 80% positive sites (out of*

*158) throughout Cornwall during the fifth national survey, 2009-10, (Crawford, 2010). Five spot checks on*

*the small North Coast Streams west of the Camel and north of Truro were also positive in 2009-10 (Crawford, 2010).*

*In an investigation into otter road casualties on roads in Highways Agency Area 1, Chanin (2000) reported*

*that there was a disproportionate number along the watershed between the catchments of the Camel and*

*Fowey and between the North Coast Streams and the Fal catchment. Several of these had occurred on the*

*section between Carland Cross and Chiverton (Chanin, 2000). There have been more since (information*

*supplied by the Environment Agency). It was also noted that, at some of the Cornwall watershed sites,*

multiple casualties had occurred. There are very few culverts along this stretch of road and most otters have been killed while moving between catchments, not while moving along a watercourse. Chanin (2000) pointed out that river catchments in west Cornwall are relatively small in relation to otter home ranges, so the animals are likely to move between them more frequently. Since such movements are likely to be across the A30, the small otter population in this area is particularly vulnerable to losses on the road. Given these data, it must be assumed that, as throughout the rest of the Southwest region, all streams in the area are actively used by otters. The evidence from national surveys and the frequency of road casualties demonstrates clearly that the otter population has been well established in this area for some time. It is more difficult to find signs of otters on small streams than large and there is no benefit in carrying out spraint surveys in an area like this since absence of signs does not mean absence of otters. All water courses, and most water bodies, in southwest England will be used by otters to a greater or lesser extent. Accordingly, otter signs were recorded when found but survey effort was concentrated on finding resting sites and breeding sites.

-  
Since otters use several different resting sites within their home range and frequently change between them (Green et al. 1984), disturbance caused by development will not have a major impact on them. Nevertheless, it is an offence to damage or disturb an otter resting site. Accordingly, surveys were concentrated in a buffer zone 250m from the A30. To allow for possible small changes in road alignment, water courses within 100m of the 250m buffer were also checked where possible. Searches were confined to water courses and ponds which were surveyed from the water, where it was safe and practical to do so, from the bank where not. Tunnels, cavities or shelter large enough to conceal an otter were checked for the presence of signs at the entrance.

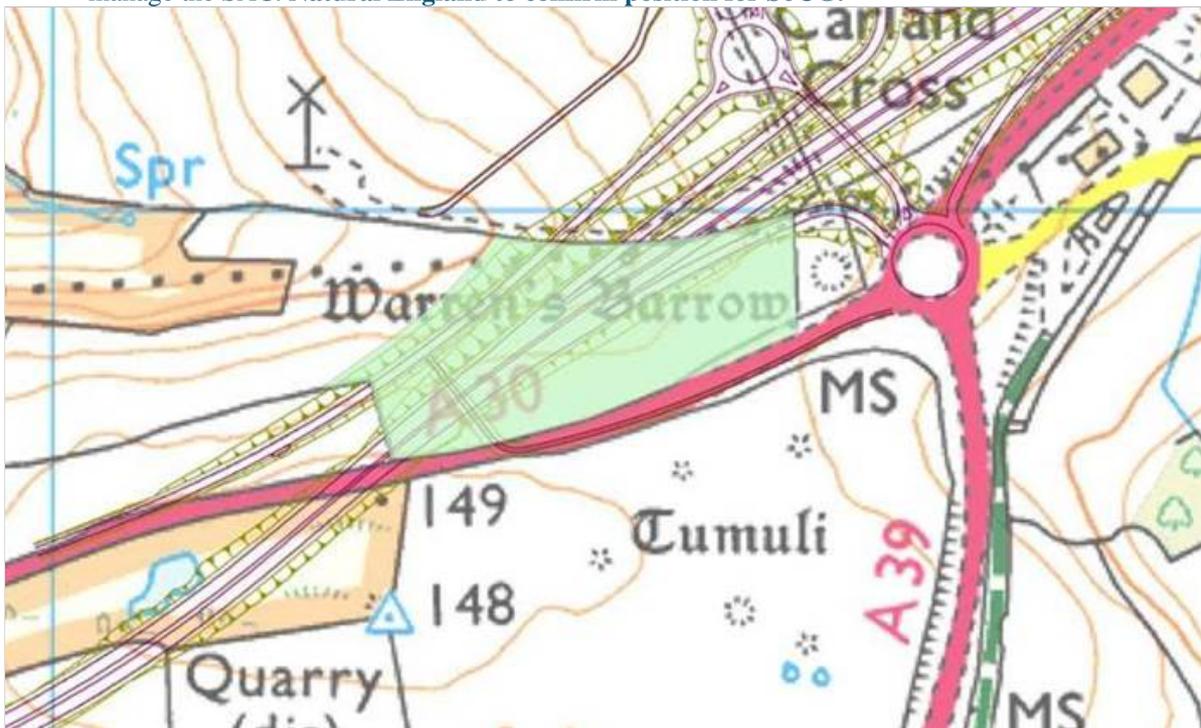
The small size of streams in this area means that fish will not be very numerous within them. However, ponds and lakes, particularly if they are stocked, may have sufficiently high densities and numbers of fish to be suitable as breeding sites. Surveys were therefore confined to these. In order to obtain an overview of potential sites within the area all ponds within 500m of the route were surveyed and assessment made of their suitability based on the presence of adequate dense concealing cover, suitable den sites and extent of anthropogenic disturbance. A few ponds just beyond this buffer were also surveyed to allow for changes in road alignment or if they were larger than average. Evidence for use as breeding sites was based on indicators identified by Liles. As breeding sites are only used for a few months each year (or every other year) absence of signs does not mean that they are not used for this purpose.

2. The land between scheme and Newlyn Downs SAC provides important back up grazing for cattle

which graze the SAC (which are used for the conservation management of the SAC). Natural England request that the scheme does not constrain the land manager's ability to manage the SAC.

The potential grazing area to be lost due to the scheme is show below and amounts to **approximately 2.67 hectares** (26677.09043m<sup>2</sup>).

Nature England to confirm this is a field used by the conservation grazing cattle and whether they consider this area of grazing lost to be significant as to constrain the land manager's ability to manage the SAC. **Natural England to confirm position for SoCG.**



3. Natural England's LVIA requests (in black) as provided in the Consultation Response (07/02/2018) with Arup's responses provided below (in red). **Please can you provide Natural England position to capture within the SoCGs.**

#### **Designated Landscapes and Landscape Character Nationally Designated Landscapes**

The PEIR confirms the St Agnes section of the Cornwall Area of Outstanding Natural Beauty (AONB) lies approximately 5km north west of the A30. Consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation, as well as the content of the relevant management plan.

The Cornwall AONB unit and the Landscape Officer at CC have both stated that they do not require effects on the AONB to be assessed (see response to EIA Scoping by Cornwall Area of Outstanding Natural Beauty [AONB] Unit within Environmental Impact Assessment Scoping Report, Appendix A: Comments on Scoping for Environmental Study Report, p168). For completeness, however, we are assessing the indirect landscape effects on this designation, as well as including a representative viewpoint from St Agnes Beacon. All effects (landscape and visual) on the AONB are assessed as neutral and insignificant.

#### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. Full assessment should also be made of the potential impacts of the development on local landscape character using landscape assessment methodologies. The road corridor is known to support important archaeological features which are prominent in the local landscape. These landscape features will require particular consideration.

The Landscape Officer at Cornwall Council has advised that the finest grain of landscape character assessment available, the Landscape Description Units (LDU's) are inappropriate for use in assessing this Scheme. They have therefore requested that the Landscape Character Areas (LCA's) are used instead (agreed on 9<sup>th</sup> August 2017). Four LCA's are therefore included in the landscape assessment of effects.

Natural England supports the publication Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area.

The assessment will be undertaken with reference to GLVIA3 and to DMRB IAN 135/10 Landscape and Visual Effects Assessment. This was agreed to by Cornwall Council on 9<sup>th</sup> August 2017. An assessment of cumulative effects will also be carried out.

All other queries should be more generic and require less specialist information, and as such we should be able to discuss in the meeting.

Kind Regards

**Pippa Wood** | A30 Ecology Lead

**Arup**

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The A30 Chiverton to Carland Cross Improvement scheme is part of the Department for Transport Road Investment Programme, being delivered by Highways England, and is receiving a funding contribution of up to £8m from the European Regional Development Fund to support the development phase of the scheme.

---

**From:** Hazlehurst, David (NE)

**Sent:** 19 June 2018 14:49

**To:** 'pipa.wood@arup.com' <pipa.wood@arup.com>

**Cc:** Newsome, Amanda (NE) <Amanda.Nesome@naturalengland.org.uk>;

'Eloise.Arif@arup.comAndy' <Eloise.Arif@arup.comAndy>; 'Luke@arup.com' <Luke@arup.com>;

Jones, Laura LE (NE) <Laura.Jones@naturalengland.org.uk>

**Subject:** Actions from A30 meeting

Hi Pippa

As discussed please find attached a copy of the agreement map for the land at Newlyn Downs and a copy of Section 3 which describes the management for each option.

The area in question is currently under HK2 which you can see has been specifically included in the agreement to provide 'backup' grazing for the SAC/SSSI as described in the Indicator of Success. So if this area was lost to the road scheme it would certainly affect the ability of the agreement holder to manage the SAC and ultimately this would have a knock on impact on the sites designation.

I am currently locating the other information you require and will send this by separate email.

Can you confirm that this answers question 2 below ?

Regards

David

-----  
David Hazlehurst  
Team Leader  
Area 12 East Cornwall Team  
Natural England, Polwhele, Truro. TR4 9AD

Tel: 07980 863092 or 02080 256040

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations**

**From:** [Hazlehurst, David \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Newsome, Amanda \(NE\)](#); [Jones, Laura LE \(NE\)](#); [Eloise Arif](#); [Andy Luke](#)  
**Subject:** Actions from A30 meeting  
**Date:** 19 June 2018 16:20:59  
**Attachments:** [Goss & Tregoss Moor, east NVC map.pdf](#)  
[Goss & Tregoss Moor, west NVC map.pdf](#)  
[Mid Cornwall Moors SummaryExt&Del Map.pdf](#)

---

Hi Pippa

Please find attached the most up to date NVC data for Goss Moor an a location map for the new SSSI. I will send the supporting information by separate email.

If you require any more detailed boundary maps or further information please let me know.

Regards

David  
-----

David Hazlehurst  
Team Leader  
Area 12 East Cornwall Team  
Natural England, Polwhele, Truro. TR4 9AD

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---

**From:** [Hazlehurst, David \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Jones, Laura LE \(NE\)](#); [Newsome, Amanda \(NE\)](#); [Eloise Arif](#); [Peter Hulson](#); [Andy Luke](#)  
**Subject:** Actions from A30 meeting  
**Date:** 19 June 2018 17:16:45  
**Attachments:** [Mid Cornwall Moors notification document 23 Feb 2017.pdf](#)  
[Mid Cornwall Moors supporting information 23 Feb 2017.pdf](#)  
[Mid Cornwall Moors FCT working final version.pdf](#)

---

Hi Pippa

Final email comprising of the Supporting Information document, Notification document and latest Favourable Condition Tables.

Regards

David

-----

David Hazlehurst  
Team Leader  
Area 12 East Cornwall Team  
Natural England, Polwhele, Truro. TR4 9AD

Tel: 07980 863092 or 02080 256040

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

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**From:** [James Humphreys](#)  
**To:** [Eloise Arif](#)  
**Subject:** RE: A30 Chiverton to Carland Cross Grazing field  
**Date:** 20 June 2018 11:57:37  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[20180620\\_115227.pdf](#)

---

Dear Eloise

Thank you for your e-mail. The land which we are proposing to convert from arable to pasture is shown hatched red on the attached plan.

Kind regards

James

James Humphreys MRICS  
Director  
Savills  
Trewithen Estate Office  
Grampound Road  
Truro  
Cornwall TR2 4DD  
Phone 01726 883647  
Fax 01726 882301

e [jwh@trewithenestate.co.uk](mailto:jwh@trewithenestate.co.uk)  
w [www.savills.co.uk](http://www.savills.co.uk)

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**From:** Eloise Arif <Eloise.Arif@arup.com>  
**Sent:** 20 June 2018 11:49  
**To:** [jwh@trewithenestate.co.uk](mailto:jwh@trewithenestate.co.uk)  
**Cc:** Pippa Wood <pippa.wood@arup.com>; Michael Baker <Michael.Baker@arup.com>;  
Josh.Hodder@highwaysengland.co.uk  
**Subject:** A30 Chiverton to Carland Cross Grazing field

Dear James,

You just spoke with my colleague Pippa about the cows that currently graze Newlyn Downs SAC and adjacent fields.

You had mentioned that there were a few other fields that you were considering turning into arable, and as such would be suitable for the grazing cows. In order for us to progress conversations with Highways England, please could you confirm that these are the fields you had in mind, and if not are you able to mark up which are the correct fields:



Many thanks and kind regards,

**Eloise Arif** | A30 Graduate Ecologist

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Imagery ©2018 Google, Map data ©2018 Google 200 m

**From:** [Hazlehurst, David \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Newsome, Amanda \(NE\)](#); [Jones, Laura LE \(NE\)](#); [Eloise Arif](#); [Andy Luke](#)  
**Subject:** Actions from A30 meeting  
**Date:** 20 June 2018 12:12:44  
**Attachments:** [Mid Cornwall Moors Unit Map1.pdf](#)  
[Mid Cornwall Moors Unit Map2.pdf](#)  
[Mid Cornwall Moors Unit Map3.pdf](#)  
[Mid Cornwall Moors Unit Map4.pdf](#)  
[Mid Cornwall Moors Unit Map5.pdf](#)  
[Mid Cornwall Moors Unit Map6.pdf](#)  
[Mid Cornwall Moors Unit Map7.pdf](#)  
[Mid Cornwall Moors Unit Map8.pdf](#)  
[Mid Cornwall Moors Unit Map9.pdf](#)  
[Mid Cornwall Moors Unit Map10.pdf](#)  
[Mid Cornwall Moors Unit Map11.pdf](#)

---

Hi Pippa

Site unit maps attached.

David

---

**From:** Hazlehurst, David (NE)  
**Sent:** 20 June 2018 10:45  
**To:** 'Pippa Wood' <pippa.wood@arup.com>  
**Cc:** Newsome, Amanda (NE) <Amanda.Newsone@naturalengland.org.uk>; Jones, Laura LE (NE) <Laura.Jones@naturalengland.org.uk>; Eloise Arif <Eloise.Arif@arup.com>; Andy Luke <Andy.Luke@arup.com>  
**Subject:** RE: Actions from A30 meeting

Hi Pippa

I will send you a copy of the figures from the Supporting Information document that I sent you yesterday.

These will include:

1. A set of more detailed site unit maps;
2. A marsh fritillary distribution and habitat map; and
3. An excel table summarising the distribution of habitats within each unit

The features found in each unit are listed in the Favourable Condition Tables which I sent to you yesterday.

Regarding the GIS layers for the NVC data – it will be possible to do this but I will need to clarify how long it is going to take to sort out.

Regarding the verge within the SSSI north of the A30 this is probably a mapping error – I will try to clarify this later today.

Regards

David

**From:** [Jones, Laura LE \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Hazlehurst, David \(NE\)](#); [Eloise Arif](#)  
**Subject:** A30 HRA Approach note for discussion  
**Date:** 25 June 2018 14:15:03  
**Attachments:** [image001.jpg](#)

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Hi Pippa,

Today I have received further comment from our air quality specialists which highlights the use criteria within the assessment.

Basically in Natural England's view the methodology (ie DMRB criteria) is not Habs Regs compliant and doesn't follow the methodology we recommend for air quality assessment on roads. The assessment undertaken by yourselves follows the DMRB criteria rigidly.

That said, we likely agree with the ultimate conclusions of the HRA. It is our understanding that none of those designated sites screened out as no LSE have been done so based in part on the two DMRB criteria we believe may not be sufficiently precautionary (ie <200 HDV vehicles or <10kmh average speed increase), but this should be stated in the assessment document. The assessment should acknowledge the advice we have already provided regarding certain of the DMRB criteria not being sufficiently precautionary to be Habs Regs compliant in certain situations based on our evidence, just in case of challenge.

Also regarding Brenet common. I understand from the report you outline that looking at aerial photography the vegetation has significantly changed. If at all possible its important to ground truth this and confirm with photographs or survey and recorded within the assessment, again in case of challenge.

If you have any further comment please let me know.

Regards,  
Laura

**Laura Jones**

Lead Advisor  
Sustainable Development  
Cornwall, Devon and Isles of Scilly Area Team  
Natural England

Phone: 02080267476 Mobile: 07775 544994

I work part time (two days a week) so please let me know when you need a response to your email.

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

---

**From:** Pippa Wood [<mailto:pippa.wood@arup.com>]  
**Sent:** 30 May 2018 15:27  
**To:** Jones, Laura LE (NE) <[Laura.Jones@naturalengland.org.uk](mailto:Laura.Jones@naturalengland.org.uk)>; Carter, Hazel (NE) <[Hazel.Carter@naturalengland.org.uk](mailto:Hazel.Carter@naturalengland.org.uk)>

**Cc:** Newsome, Amanda (NE) <[Amanda.Newsome@naturalengland.org.uk](mailto:Amanda.Newsome@naturalengland.org.uk)>; Eloise Arif <[Eloise.Arif@arup.com](mailto:Eloise.Arif@arup.com)>; Hazlehurst, David (NE) <[David.Hazlehurst@naturalengland.org.uk](mailto:David.Hazlehurst@naturalengland.org.uk)>; Michael Baker <[Michael.Baker@arup.com](mailto:Michael.Baker@arup.com)>; Andy Luke <[Andy.Luke@arup.com](mailto:Andy.Luke@arup.com)>; James Bellinger <[James.Bellinger@arup.com](mailto:James.Bellinger@arup.com)>

**Subject:** A30 HRA Approach note for discussion

**Importance:** High

Hi Laura,

As discussed please find the Technical Note we have produced to inform Natural England of the approach proposed to for the A30 Chiverton to Carland Cross HRA.

This has been produced as the approach and European Sites being considered has changed since WSP AIES / HRA produced in June 2016 (which had previously been reviewed by NE).

The main change is the inclusion of European Sites relating to the Affected Road Network (ARN).

The approach in terms of determining the likelihood of significant effects is presented along with the ecological assessment to determine potential effects on the integrity of the sites.

I will be able to talk you through this document on Monday, and will bring some supporting figures etc.

Mitigation note to follow (thought best to send separately).

Kind Regards

**Pippa Wood** | A30 Ecology Lead

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**From:** [Pippa Wood](#)  
**To:** [Jones, Laura LE \(NE\)](#)  
**Cc:** [Hazlehurst, David \(NE\)](#); [Eloise Arif](#); [James Bellinger](#); [Peter Hulson](#); [Michael Baker](#)  
**Subject:** RE: A30 HRA Approach note for discussion  
**Date:** 26 June 2018 10:41:11  
**Attachments:** [image001.jpg](#)

---

Cheers Laura,

Hopefully both of these comments can now be addressed, in that all other designated sites within 200m of the network are predicted to either reduce in HDVs or stay very similar, therefore even if we were to use NE's <200 HDV figure (wherever that is set) we still would be assessing the same designated sites as currently.

The second point hopefully can be dealt with the new NVC data as provided by David. I think there was some gaps in the NVC data on the verges in question, and will check in with team here and David as whether we came to a conclusion on if this data exists.

I think for DCO it may be difficult to do a ground truthing exercise, but it maybe something that can be obtained for examination.

Regards

Pippa

**From:** [Pippa Wood](#)  
**To:** [Jones, Laura LE \(NE\)](#); [Hazlehurst, David \(NE\)](#)  
**Cc:** [Eloise Arif](#); [James Bellinger](#); [Peter Hulson](#); [Michael Baker](#); [Wills, Mark \(NE\)](#); [Andy Luke](#); [Jessica Postance](#); [Amanda Murdock](#)  
**Subject:** RE: A30 HRA Approach note for discussion  
**Date:** 26 June 2018 15:37:06  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
**Importance:** High

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Hi David,

Have you had any luck getting the GIS files for the mid Cornwall SSSI NVC and Marsh Fritillary map?

We will have a cut-off date for the end of the week to be able to include this data into the HRA, as unfortunately the PDFs are not high clear in the locations we require to be able to make judgements and calculations.

Failing being able to have the GIS we will have to revert to the Bodmin to Indian Queens original survey data (c. 18 years ago).

Please could you let us know how you're getting with finding the files.

I have attached a file share link as below to transfer the files. Another option would be if ERCISS have the data??

<https://arup.sharefile.com/r-rb4bcb04656f4f088>

Cheers

**Pippa Wood** | A30 Ecology Lead

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**From:** [Stratton, Naomi \(NE\)](#)  
**To:** [Pippa Wood](#)  
**Cc:** [Hazlehurst, David \(NE\)](#); [Pipkin, Rhiannon \(NE\)](#); [Jones, Laura LE \(NE\)](#); [Eloise Arif](#); [Peter Hulson](#); [Michael Baker](#); [Wills, Mark \(NE\)](#); [Andy Luke](#); [Jessica Postance](#); [Amanda Murdock](#)  
**Subject:** Mid Cornwall Moors SSSI - habitat data [Filed 05 Jul 2018 15:07]  
**Date:** 28 June 2018 18:35:01  
**Attachments:** [Mid\\_Cornwall\\_Moors\\_SSSI\\_habitat.zip](#)

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Dear Pippa,

I'm sorry for the delay in getting this data to you, but it has taken some time to determine the 'ownership' of the data that we have and what it is possible for us to release.

I've included with this email the NVC survey data that we have available for the area that helped to inform the Mid Cornwall Moors designation. Please see the attached zip-file, which includes NVC survey data commissioned by Natural England and non-NVC data submitted by Highways England. Please note that these data have been collected over a range of years. If you suspect that any of the land in question may have undergone a habitat change since these surveys were carried out, we would suggest ground-truthing the site.

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I'm not been able to include the marsh fritillary data, as these were largely provided to us by the Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS) in 2015, specifically to inform the Mid Cornwall Moors SSSI designation. I would suggest that it's best to put a request directly into ERCCIS and/or the Cornwall Biodiversity Network for marsh fritillary data covering the area. This will also ensure that any data you have are the most up to date available, therefore strengthening the project application.

The pdf maps of the NVC data and marsh fritillary distribution already shared with Arup were part of the SSSI consultation and are freely available, at their current resolution, to all members of the public.

For guidance on future data requests from Natural England, please see <https://www.gov.uk/guidance/how-to-access-natural-englands-maps-and-data>

I am away on leave for a few days, but if you would like to urgently discuss any aspect of this, then my team leader, Rhiannon Pipkin, would be happy to answer any queries. She can be reached on 07887 633 525 (Tuesday – Friday), and has also been cc'd into this response so that you have her email.

Yours sincerely,  
Naomi

**Naomi Stratton**

**Lead Adviser, West Cornwall & the Isles of Scilly**

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Polwhele  
Truro  
Cornwall  
TR4 9AD

Mob: 07901 116 265

Jabber: 020802 68234

Email: [naomi.stratton@naturalengland.org.uk](mailto:naomi.stratton@naturalengland.org.uk)

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In an effort to reduce Natural England carbon footprint, I will, wherever possible avoid travel to meetings and attend via audio video or web conferencing.

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Date: 07 August 2018  
Our ref: 253535



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T 0300 060 3900

**BY EMAIL ONLY:**

A30ChivertontoCarlandCross@highwaysengland.co.uk

Dear Sir/madam,

**Planning consultation:** A30 Chiverton to Carland Cross: Statement to Inform an Appropriate Assessment Report (HA551502-ARP-ERD-SW-RP-LE000012)

**Location:** Chiverton to Carland Cross, Cornwall

Thank you for your consultation on the above dated and received by Natural England on 23 July 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**No objection**

Natural England notes that the Statement to Inform an Appropriate Assessment Report has not been produced by the competent authority, but by the applicant. It will be the competent authority's responsibility to produce the HRA. We provide the advice enclosed on the assumption that the authority intends to adopt this HRA to fulfil its duty as competent authority.

The Statement to Inform an Appropriate Assessment Report concludes that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any permission given.

No further information has been given regarding the application so this letter only relates to the provisions of the Habitat Regulations. If you have any queries relating to any other queries regarding this application or the advice in this letter please contact me on 02080267476.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Yours sincerely

Laura Jones  
Lead Adviser  
Devon, Cornwall and Isles of Scilly Team

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.