



Date: 13/01/2022
Your Ref: A57 Link Roads
Interested Party Ref: 20029663
National Trust (Kim Miller – Planning Adviser)

Written Representation

National Trust response to the A57 Link Roads Development Consent Order application

Summary

National Trust is a conservation charity with a membership of more than 5 million people. Within the Peak District National Park, we own and manages a wide range of landscapes and their related flora and fauna. Much of this land is designated at national and international level for its ecological importance.

National Trust owns large areas of land on either side of the A57 Snake Pass as it travels through the Peak District National Park. As well as passing through highly designated land, this road is essential to our operation. The Snake Pass is a challenging road on which accidents occur, parts of which are also subject to land stability issues.

While we do not object in principle to the scheme, we have significant concerns about the additional traffic that it will generate through the Peak District – particularly on the Snake Pass – and the associated road safety and environmental issues.

We are concerned about the modelled increase in accident risk on the Snake Pass. This, and ongoing land stability issues, pose a risk to the operations of National Trust staff and tenants.

We are concerned about detrimental effects on the biodiversity of the Peak District as a result of worsening air quality along the Snake Pass, which passes through designated sites.

We believe that the applicant should be proposing traffic restraint measures to disincentivise cross-park traffic on the A57, and to ameliorate its impacts. We are also keen to see ecological mitigation and enhancement close to the impacted roads to help to ensure that habitat restoration work continues to move in the right direction.

National Trust
Hardwick Consultancy Office
The Croft, Doe Lea
Chesterfield
Derbyshire S44 5QJ
Tel: [REDACTED]
Fax: [REDACTED]

President: HRH The Prince of Wales
Director for the Midlands and East: Paul Forecast
Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

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1 Introduction

- 1.1 National Trust is a conservation charity with a membership of more than 5 million people. We are responding to the A57 Link Roads Development Consent Order (DCO) application principally because of the impacts that it may have on our assets and operations within the Peak District National Park. We do not object in principle to the promotion of a scheme to address localised road issues while also improving journey reliability between Manchester and Sheffield. However we have some significant concerns about the impacts of the current scheme on traffic levels, associated road safety and environmental issues on the A57 Snake Pass and adjacent land.
- 1.2 The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. Section 4 of the National Trust Act 1907 defines the purpose of the National Trust as ‘The permanent preservation for the benefit of the nation of lands and tenements (including buildings) of beauty or historic interest and as regards lands for the preservation (so far as practicable) of their natural aspect features and animal and plant life’. The Act also enables the National Trust to declare land inalienable, meaning that such land cannot be sold or mortgaged and once declared cannot be reversed.
- 1.3 Within the Peak District National Park, we own and manage a wide range of landscapes and their related flora and fauna, from open moorland, limestone gorges, edges and cloughs to enclosed farmland. In total we own or manage in partnership over 18,000 hectares, which constitutes 13% of the area of the National Park. We also hold covenants over other land in the National Park. A map showing National Trust ownership in the area around the A57 is provided in Appendix 1 of this Written Representation. We are focusing our response primarily on potential impacts on National Trust land and operations.
- 1.4 The A57 Snake Pass is vital to our operation, providing access for land management, farming and recreation to the large areas of land that we own on either side of the road. National Trust’s farm tenants, and our staff, use vehicle access points along the road to gain access to the land that they farm and manage, as well as their homes. There are also numerous footpaths across National Trust land with access points along the A57. A map showing the locations of the vehicle and pedestrian access points along the A57 Snake Pass that are most relevant to our operations can be found in Appendix 3.
- 1.5 The Snake Pass is a challenging road on which accidents occur, as is evidenced by the Applicant’s Transport Assessment. Parts of the road are also subject to land stability issues, including areas known to the National Trust that are subject to active monitoring. The implications of the scheme for road safety are discussed further in section 3 of our Written Representation.
- 1.6 Much of the land that we own or manage is of international importance for biodiversity and is designated as a Site of Special Scientific Interest, Special Protection Area, and Special Area of Conservation. These important habitats are discussed further in section 4 of our Written

Representation. A map showing designated land in the area around the A57 can be found in Appendix 2.

2 Impact of traffic increase on the Peak District National Park

- 2.1 National Trust is concerned about potential traffic increases on roads within the Peak District National Park as a result of the A57 Link Roads DCO, in particular a modelled 38% increase in daily flow on the A57 with associated impacts on the statutory purposes and Special Qualities of the Peak District National Park.
- 2.2 One of the stated aims of the scheme is to improve the reliability of journey times between Manchester and Sheffield (although not speed per se), with the focus being on the A57-A628 trunk road route (see Transport Assessment Report Executive Summary and paragraphs 1.2.1, 1.4.4 and 1.5.11). A key, problematic ramification of the scheme is therefore that it will also more significantly increase traffic on the A57 Sheffield Road and Snake Pass – a predominantly two-way single carriageway road that is not part of the Strategic Road Network and is therefore managed by Derbyshire County Council rather than the scheme promoter National Highways. This often winding road passes through sensitive landscapes and ecosystems of the Peak District.
- 2.3 The Special Qualities of the Peak District as outlined in the National Park Management Plan 2018-23 are:
1. Beautiful views created by contrasting landscapes and dramatic geology
 2. Internationally important and locally distinctive wildlife and habitats
 3. Undeveloped places of tranquillity and dark night skies within reach of millions
 4. Landscapes that tell a story of thousands of years of people, farming and industry
 5. Characteristic settlements with strong communities and traditions
 6. An inspiring space for escape, adventure, discovery and quiet reflection
 7. Vital benefits for millions of people that flow beyond the landscape boundary
- 2.4 These qualities and the potential for impacts on them are broad and interconnected – for example the quality of landscapes and their embedded heritage features resulting from their remote, scenic and aural characteristics and people’s ability to access and enjoy them – and these may not all be easily captured and reflected within the framework of an Environmental Impact Assessment.
- 2.5 Additional traffic will result in additional noise, visual disturbance, air pollution, and potentially additional recreational pressures such as parking, footfall, litter and fire risk in areas adjacent to the A57. It may also make crossing the road more difficult for both pedestrians and wildlife, potentially increasing collision risk.

2.6 By looking at the A57 roadside area around the entrance to the Pennine Way we can see the way in which these factors can erode the Special Qualities of the National Park, for example through unmanaged vehicle parking and associated land erosion (in this case necessitating ad hoc extensions to hard standings and double yellow lining) at a highly prominent position in the landscape. Fast moving vehicles on this section of road are also an existing issue.



Impact of A57 roadside parking around entrance to Pennine Way

2.7 The National Policy Statement for National Networks (NPS) states that ‘Great weight should be given to conserving landscape and scenic beauty in nationally designated areas’ (NPS paragraph 5.150). Importantly it states that ‘Planning of the Strategic Road Network should encourage routes that avoid National Parks...’ (NPS, paragraph 5.152), going on to state that ‘The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them’ (NPS, paragraph 5.154).

2.8 We are concerned therefore that the A57 Link Roads DCO application will not only result in a significant increase in traffic through the National Park, but also a very significant traffic increase on an already problematic road that does not form part of the Strategic Road Network. This is further discussed in section 3 of our Written Representation.

3 Road safety and condition on the A57 Snake Pass

3.1 National Trust is concerned about the modelled increase in accident risk on the A57 Snake Pass. This, and ongoing land stability issues, pose a risk to the operations of National Trust staff and tenants. We believe that increased traffic on the road, including use by Heavy Goods Vehicles (HGVs), may exacerbate issues associated with inappropriate vehicle speeds and poor road conditions, creating potential for more frequent collisions and road closures.

3.2 In section 1 of this Written Representation we briefly described the importance of the A57 Snake Pass for the operations of the National Trust, its tenants and recreational access points. Maps showing our land ownership around the A57, designated land, and vehicle and pedestrian access points that we rely on can be found in Appendices 1, 2 and 3. We are aware that Derbyshire County Council has recently commenced monitoring areas of land instability that affect the Snake Pass (including National Trust land). While we understand that the landslip area is extensive and unlikely therefore to be impacted by increased vehicle numbers on the road, it is

continuing and we are uncertain about the severity and progression of the issue. If closures for repair and maintenance of the road are likely to become more frequent and prolonged in future then the knock on effects for alternative routes including the A628 may need to be considered.

- 3.3 Traffic modelling reported in application document 7.4 Transport Assessment Report (TA) predicts that the scheme will result in an increase in traffic on the A57 Sheffield Road within the Wider Route Network of 38% (TA, Table 7.2). In terms of road safety, the most significant negative impacts of the scheme are found to be on the A57 Snake Pass and the A628 where there is a forecast growth in accident numbers (TA, paragraph 7.2.9). On the A57 Snake Pass, a road that is already known to have a high accident rate, there is a modelled increase of 160 accidents over the 60-year appraisal period exceeding the total impact across the rest of the network combined (TA, paragraph 7.2.13). This leads to the following statement within the TA:

7.2.14 As Snake Pass is an identified accident issue which will see flow increased as a result of the scheme, measures should be pursued to minimise these negative impacts.

- 3.4 The NPS for National Networks states that 'New highways developments provide an opportunity to make significant safety improvements' (NPS, paragraph 4.60). It goes on to state that 'Applicants will wish to show that they have taken all steps that are reasonably required to: ... contribute to an overall reduction in road casualties' (NPS, paragraph 4.64) and that 'The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to: - minimise the risk of road casualties arising from the scheme; and - contribute to an overall improvement in the safety of the Strategic Road Network' (NPS, paragraph 4.66).
- 3.5 We are aware of no road safety measures for the A57 Snake Pass in association within the DCO application. National Trust believes that there are a number of options for traffic restraint measures that could mitigate road safety effects by reducing traffic numbers and/or speeds on the Snake Pass. These are further discussed in section 5 of our Written Representation.
- 3.6 Before discussing traffic restraint measures it is useful to also consider the potential for modal shift. Within the Examining Authority's First Written Questions (no. 3.10) the Applicant has been asked whether any allowance has been made in the modelling for modal shift resultant from other Transport and Works Order Schemes including new passing facilities for the Hope Valley Rail Line approved in February 2018. The Hope Valley Line is the main railway link between Manchester and Sheffield and is discussed within section 3.4 of the Applicant's TA. According to the TA, the Trans-Pennine Express provides the fastest city-city service with an average journey time of 53 minutes. Since publication of the TA, the Government has published its Integrated Rail Plan for the North and Midlands (IRP) in November 2021, and improvements to the Hope Valley Line are addressed on pages 16 and 109-111. Approved works to improve the Hope Valley Line are already underway, including line speed and capacity works, a passing loop at Bamford and improvements at Dore and Totley station (see IRP, paragraph 3.93). According to the IRP, additional improvements could result in rail journey times of between 30 and 35 minutes between Manchester and Sheffield with potential to support up to four trains an hour (IRP, paragraph 3.91) subject to careful design and resolution of technical and capacity issues (IRP, paragraphs 3.94-3.96).

3.7 The Hope Valley Line follows a similar corridor to the A57 Snake Pass and serves a number of Peak District settlements including Hathersage and Edale. While it is not possible at this stage to comment on the acceptability of any future rail proposals, there appears to be scope for a modal shift towards rail travel for journeys between settlements which we believe further improves the case for traffic restraint on the A57 Snake Pass.

4 Air quality and biodiversity impacts in the context of moorland restoration

4.1 We are concerned about detrimental effects on the biodiversity of the Peak District National Park as a result of worsening air quality along the Snake Pass, which passes through a number of nationally and internationally designated sites. We would wish the applicant to carefully consider and address this issue.

4.2 As we briefly outlined in section 1 of this Written Representation, National Trust owns large areas of land in the Peak District National Park that are of national and international importance for biodiversity and are designated as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), and Special Area of Conservation (SAC). A map showing designated sites around the A57 in relation to National Trust land ownership can be found in Appendix 2. The Natural England SSSI citation for the Dark Peak states that ‘The combination of plateaux blanket mires; wet and dry heaths and acid grasslands, together with associated flushes and mires on moorland slopes, represents an extensive tract of semi-natural upland vegetation typical of and including the full range of moorland vegetation of the South Pennines’ (Natural England SSSI citation 1003028: Dark Peak). It goes on to state that ‘As a result of high levels of atmospheric pollution, the blanket mires of the Dark Peak are poor in bog and other mosses sensitive to pollution’.

4.3 The High Peak Moors exhibit some of the most extreme damage to sensitive blanket bog habitats seen in the UK. This is linked back to the pollution caused since the industrial revolution. Today most industrial pollution has ceased, although nitrogen deposition continues to be a key source impact. The National Trust has been investigating and delivering restoration of blanket bog, and associated habitats of the High Peak Moors, since the acquisition of Kinder Scout 40 years ago, working with partner organisations including Moors for the Future. The last 20 years has seen the biggest input of restoration effort and that pace is growing. The methods we use; gully blocking to restore water tables, revegetation of bare peat and diversification with Sphagnum moss are essential actions to bring the bog back into healthy, carbon capturing condition. In addition our woodland creation helps to buffer more sensitive habitats from the impacts of localised pollution. The map in Appendix 4 illustrates restoration work that has been carried out on the High Peak Moors.

4.4 However, despite the efforts of the last 20 years, restoration timescales are long, and a considerable amount more is needed before we reach the point of healthy blanket bog. We need to accelerate our rate of progress in light of the climate emergency, and we need to protect the work that has been done to date.

4.5 According to the Habitats Regulations Assessment Screening Report (HRA), projects can adversely affect a European Site by causing delays in, or interrupting, progress towards achieving the conservation objectives of the site. In relation to the European Sites close to the scheme, the

A57 was considered the only route to meet the traffic screening criteria for inclusion in the air quality assessment (HRA, paragraphs 4.1.2-4.1.3). It should however be noted that the outlook for the A628 is likely to be similarly negative.

- 4.6 The Affected Route Network (ARN) of the scheme includes sections of the A57 that pass through or adjacent to the Peak District Moors (South Pennine Moors Phase 1) SPA and the South Pennine Moors SAC. For the South Pennine Moors SAC, Qualifying Features are: European dry heaths; Blanket bogs; Old sessile oak woods with Ilex and Blechnum in the British Isles; North Atlantic wet heaths with Erica tetralix; and Transition mires and quaking bogs. The Conservation objectives of the SAC are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features. Vulnerabilities of the SAC include air pollution and air-borne pollutants.
- 4.7 The HRA assessors consider that the only potential source-impact pathway for significant effects is through an increase in atmospheric pollution via the ARN during operation (HRA, paragraph 5.1.2). According to transport modelling the scheme would result in an average increase in daily trips of up to 1172 in 2025 and 1432 in 2040 (HRA, Table 5.2 and Appendix C). This would result in increases in atmospheric pollution on the ARN which may result in localised air quality impacts, including an estimated increase in nitrogen deposition of 0.21 kg N/ha/yr. While this may not be considered to be 'significant' for the purposes of the HRA, it is a move in the wrong direction for a designated landscape that already significantly exceeds the lowest Critical Load of 5 kg N/ha/yr, exhibiting baseline levels of >30 kg N/ha/yr (See HRA, Tables 5.2, EIA Chapter 5 and associated Appendices). This clearly conflicts with the objectives of the SAC to restore levels of deposition of air pollutants to at or below the Critical Load, with a staged recovery target to transition to the next lower class of Critical Load exceedance (see HRA, Table 5.2, p29).
- 4.8 The HRA acknowledges that '... any further increase in nitrogen deposition could be considered to be harmful. However, the air quality impacts from the road will always be confined to the existing road corridor, i.e. the extent of habitat already affected by the road' (HRA, Table 5.2, p30).
- 4.9 The NPS for National Networks promotes a positive approach to mitigation and enhancement including the following: 'In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes' (NPS, paragraph 3.3). As well as assessing likely significant effects on designated sites of ecological importance as part of an Environmental Impact Assessment (NPS paragraph, 5.22), the NPS states that "The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests' (NPS, paragraph 5.23).
- 4.10 The need to protect the sensitive ecology of the High Peak Moors is one of a range of factors contributing to the National Trust's case that traffic restraint measures should be employed on the A57 Snake Pass – see section 5 of this Written Representation. In section 6 we also highlight

an opportunity for National Highways to take a positive approach to ecological mitigation and enhancement on a sensitive area of peat bog habitat adjacent to part of the A57 ARN.

5 Traffic restraint measures on the A57 to mitigate the impacts of the scheme

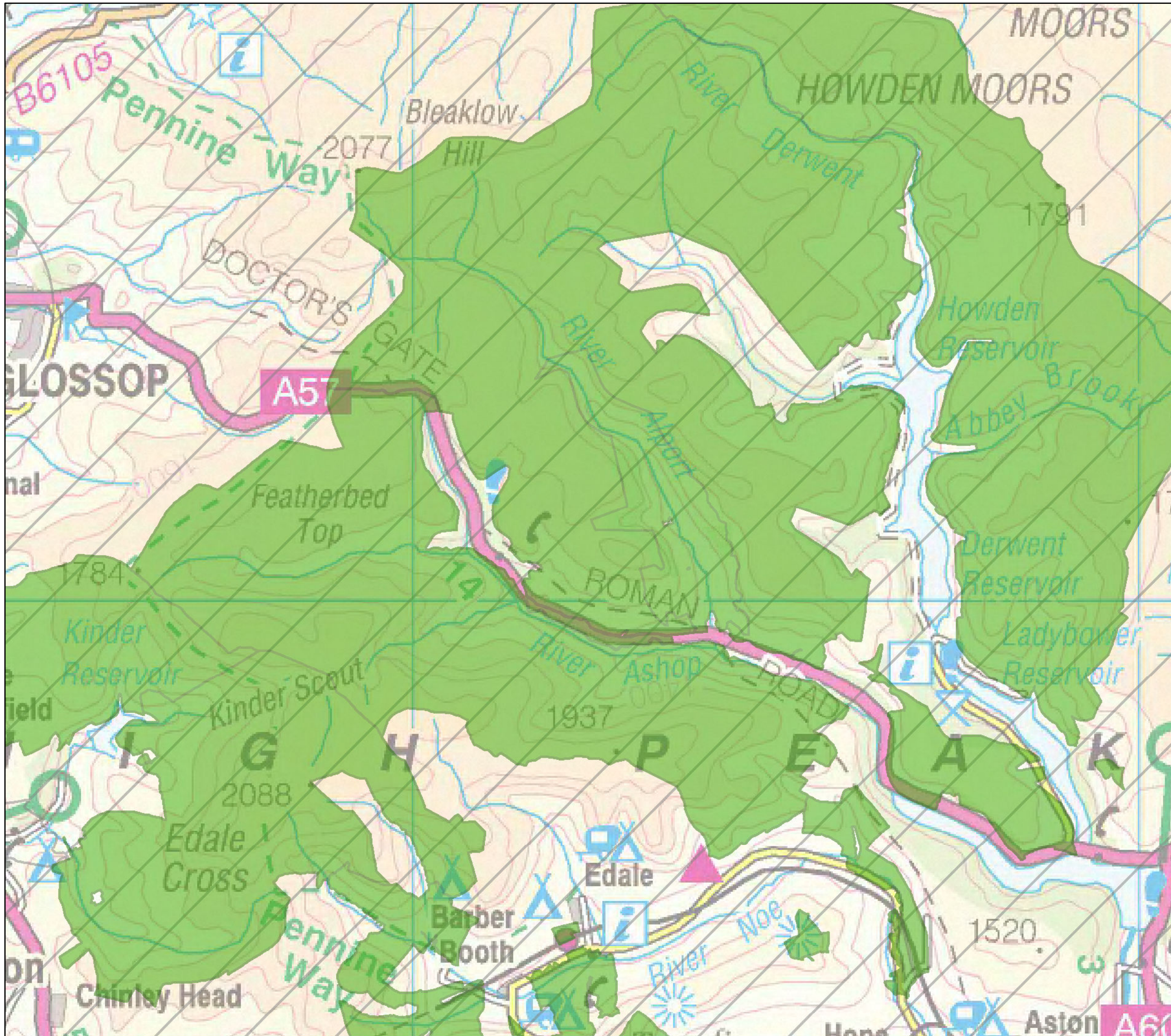
- 5.1 For the reasons contained in the preceding sections of our Written Representation, National Trust believes that the applicant should be proposing measures to disincentivise cross-park traffic on the A57 Snake Pass and to ameliorate its impacts. It is notable that while the proposed scheme relates to the Strategic Road Network, it is forecast to result in a greater traffic increase on the already constrained and problematic Snake Pass which is not part of the Strategic Road Network. This road is generally subject to a speed limit of 50mph, but with limited enforcement and with winding sections that may benefit from a lower speed limit.
- 5.2 Traffic restraint and technology measures that might be used in order to achieve traffic reduction and/or calming on the Snake Pass include road user charging, weight limits, reduction in speed limits and/or average speed checks. Such measures would have multiple interrelated benefits such as: reduced impacts on National Park purposes and qualities, reduced accident rates, improved air quality and a reduction in nitrogen deposition, subject to an appropriate design that minimises landscape/visual impacts.
- 5.3 National Highways' response to the suggestion of a road user charge within our Relevant Representation refers to an existing time-based charge on all HGVs and goes on to state that 'tolls and other forms of road user charging are matters for the UK Government' (9.5 Comments on Relevant Representations, RR-0620-6). While the NPS confirms this aspect of Government policy for the Strategic Road Network, charging on other roads is 'a matter for local and other traffic authorities' (see NPS, paragraph 3.26) and a collaboration between National Highways and Derbyshire County Council may not therefore be out of the question, should the County Council consider this appropriate. An alternative means of specifically controlling use of the road by HGVs could be to introduce a weight restriction.
- 5.4 The next option is a further reduction in speed limits and/or complementary average speed checks. We note that within National Highways' Deadline 1 response there is a commitment to collaborate with Derbyshire County Council to investigate what road safety measures could be introduced on the A57 Snake Road (9.5 Comments on Relevant Representations, p104, RR-0620). However, we are concerned that National Highways also states that any proposed improvements will not be included in the DCO for the scheme as this part of the A57 is not a National Highways road. We trust that the Examining Authority in discussion with the Applicant and Derbyshire County Council will determine whether improvements (or traffic restraint measures) to the A57 can be secured using planning conditions or obligations.
- 5.5 Finally, it is important to note that any fixed infrastructure associated with traffic restraint measures may itself have an adverse impact on the character and Special Qualities of the Peak District National Park. It is therefore important that any mitigation proposals should be sensitively designed, having regard to the Peak District National Park Authority's Transport Design Guide, and where possible replacing existing road hazard warning signs to reduce visual clutter.

6 Opportunity for biodiversity mitigation and enhancement

- 6.1 In relation to the concerns raised in section 4 of our Written Representation, should the A57 DCO be granted consent National Trust is keen to see ecological mitigation and enhancement adjacent to the A57 Snake Pass and potentially also the A628, helping to ensure that habitat restoration continues to move in the right direction. Land owned by the National Trust adjacent to the A57 Snake Pass offers a potential receptor site for such measures and we would welcome the opportunity to engage more fully with the applicant.
- 6.2 We note National Highways willingness to engage in discussions about off-site enhancement opportunities (National Highways 9.5 Comments on Relevant Representations, RR-0620-7) along with an indication that any commitment to these enhancements will sit outside the DCO application. Whether or not written into the DCO application, we are looking for a commitment to habitat restoration measures on land that is close to the A57 and within its likely impact zone in terms of nitrogen deposition.
- 6.3 The map in Appendix 5 illustrates an area close to the A57 Snake Pass where some moorland restoration work has been carried out in the form of gully blocking and the planting of Sphagnum Moss plugs, but where significant issues persist. Photographs of peat erosion issues and restoration works in this area are also provided in Appendix 6. To date, owing to the need to spread scarce resources, Sphagnum Moss plugs have only been established in the pale green shaded area at a very low density of 1,150 plants per hectare. There is therefore an opportunity to significantly contribute to the diversity of bog forming vegetation in this area through additional planting of Sphagnum Moss plugs (aspirationally – to a density of 10,000 plugs per hectare, i.e. 1 plug per square metre) in the shaded area and other areas of bog immediately adjacent to the A57 road corridor.

Appendix 1

National Trust ownership and A57



High Peak Estate
 Edale End
 Hope
 Derbyshire S33 6RF

National Trust

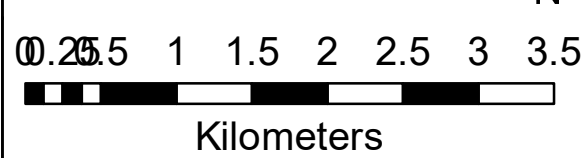
National Trust ownership and A57

Legend

- NT ownership
- PDNPA area

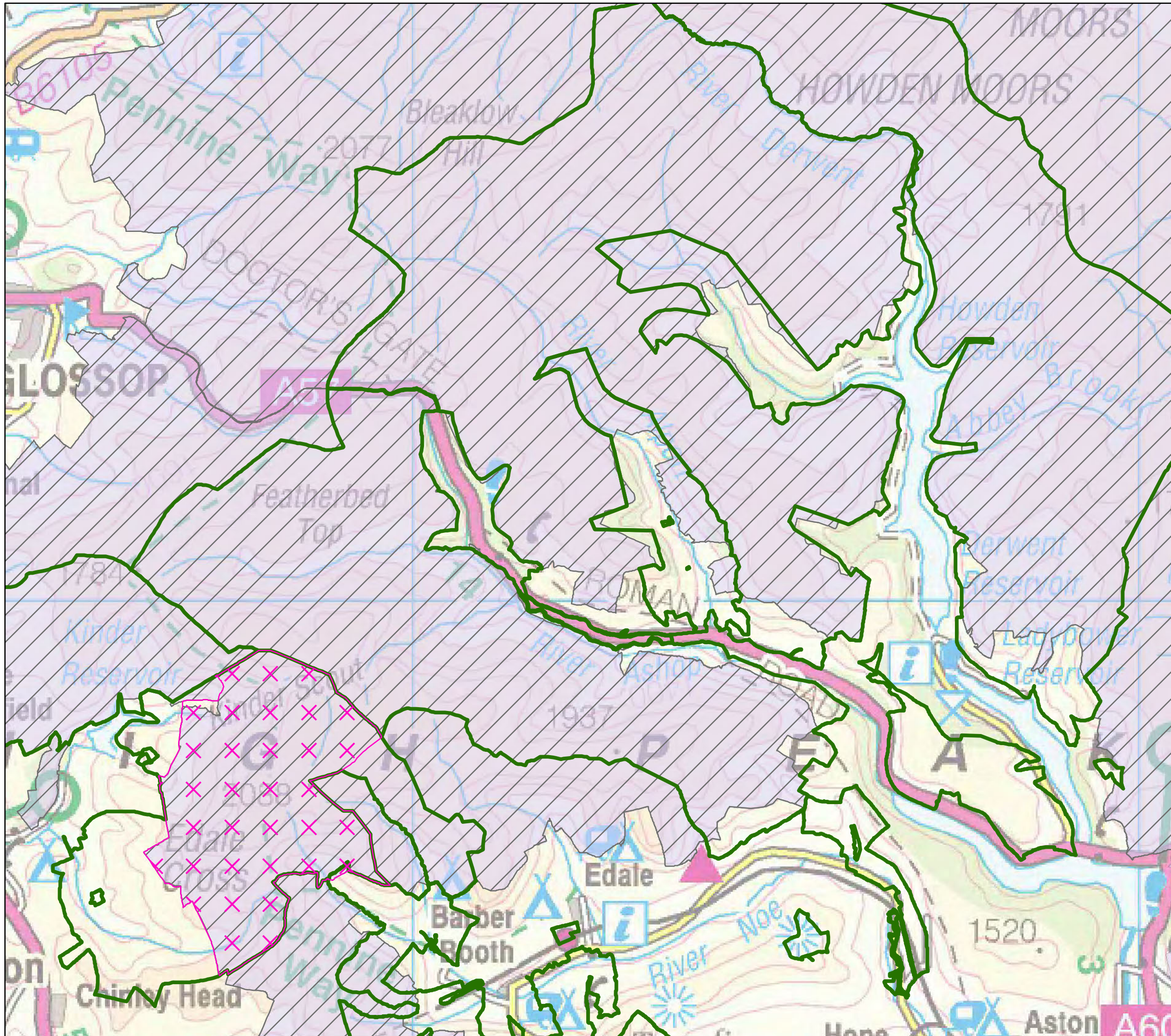
Drawing by: CW Date: 14/12/2021

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Appendix 2

Designated land adjacent to A57 (SSSI, SAC, SPA, NNR)







High Peak Estate
 Edale End
 Hope
 Derbyshire S33 6RF

National Trust

Designated Land adjacent to A57 (SSSI, SAC, SPA, NNR)

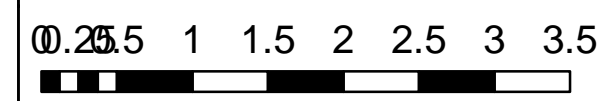
Legend

-  Kinder_NNR
-  NT ownership
-  DarkPeak_SSSI
-  South Pennine Moors SAC & SPA

Drawing by: CW

Date: 14/12/2021

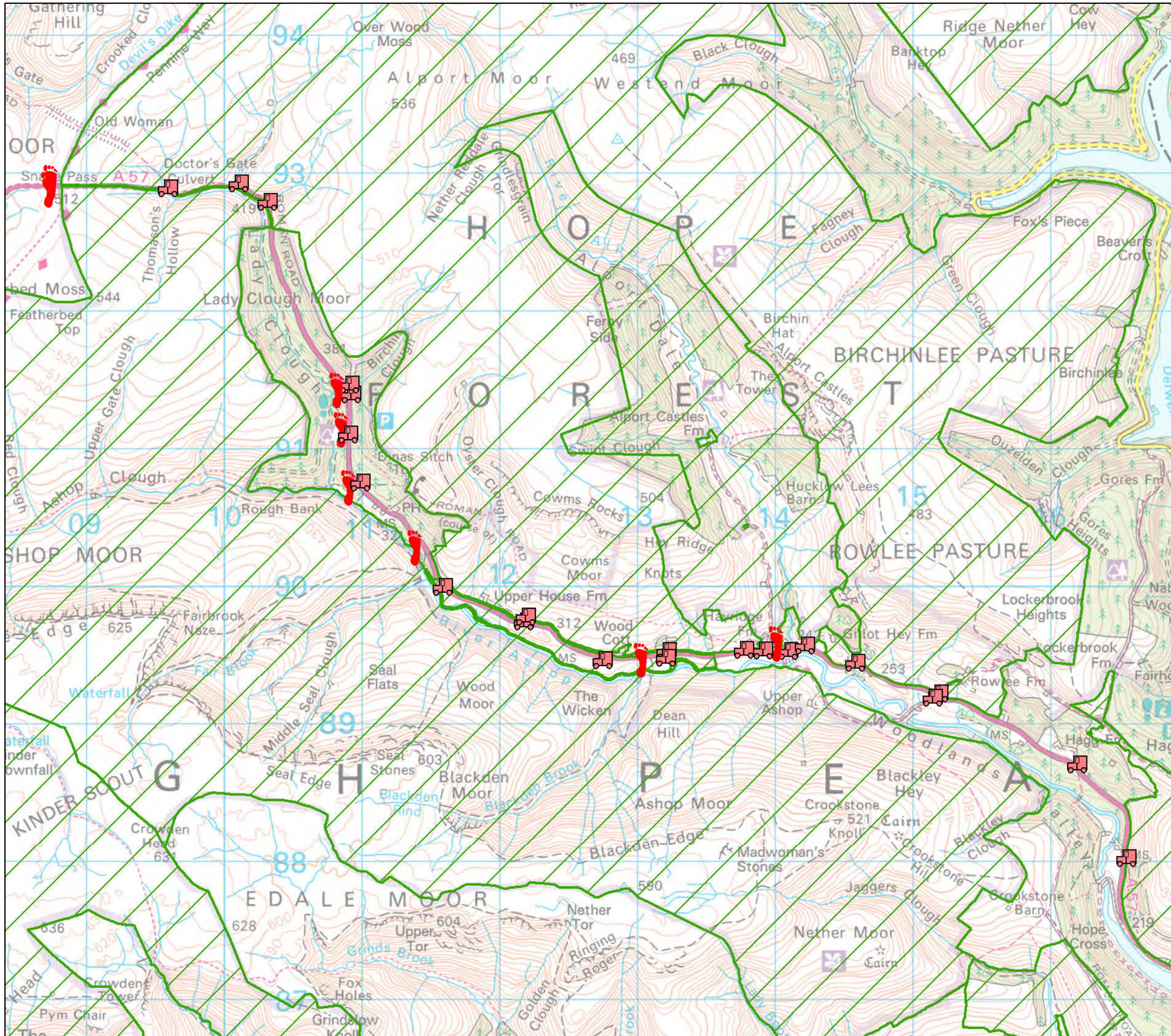
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Kilometers

Appendix 3




Access locations adjacent to A57 (vehicle and pedestrian)



High Peak Estate
 Edale End
 Hope
 Derbyshire S33 6RF

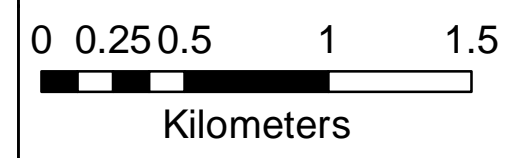
Access Locations adjacent to A57 (Vehicle and Pedestrian)

Legend

- Access_type**
-  Footpath
 -  Vehicle
 -  NT ownership

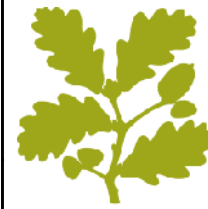
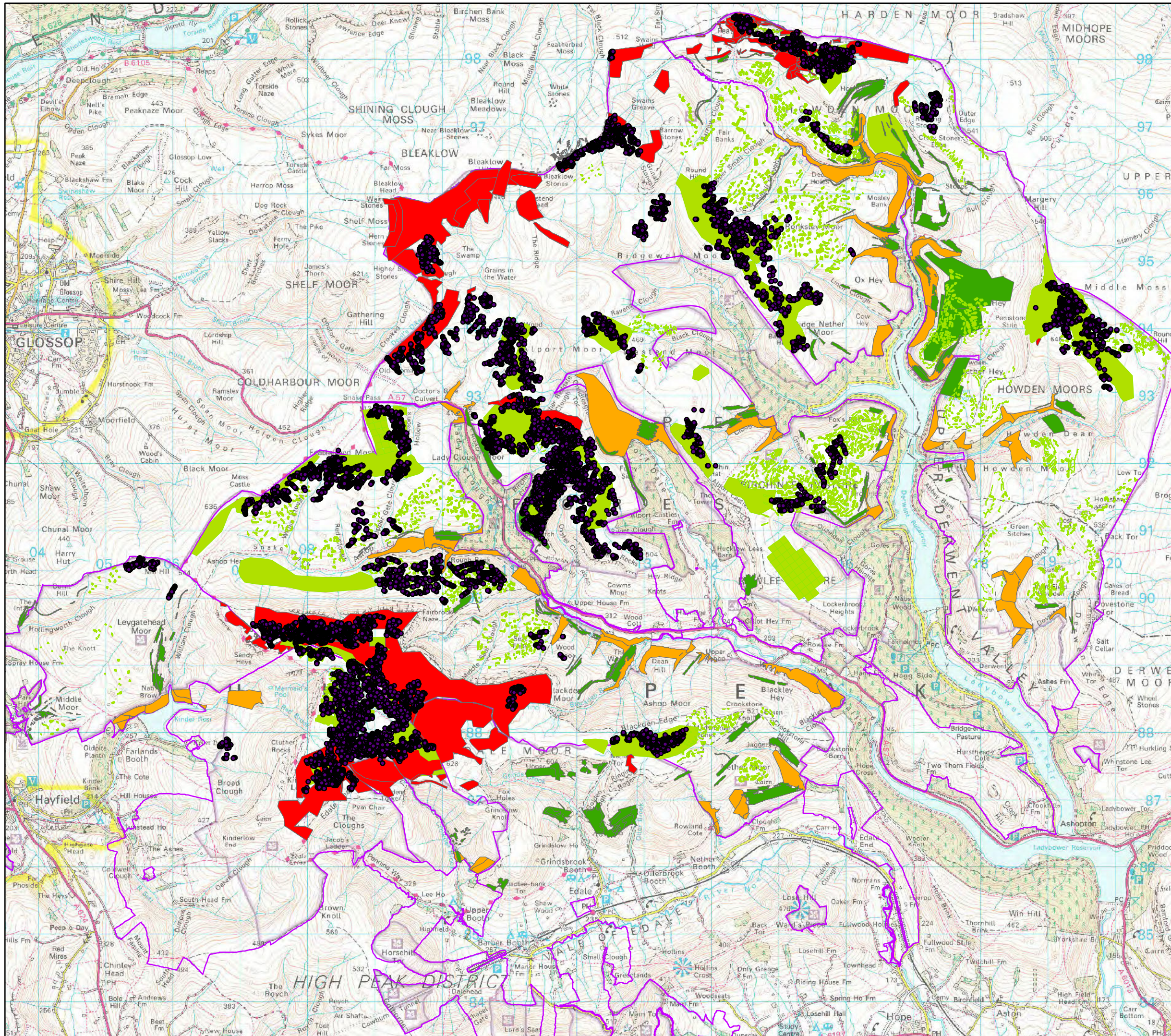
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Appendix 4

National Trust Habitat Restoration High Peak Moors



National Trust

High Peak Estate
Edale End
Hope
Derbyshire S33 6RF

National Trust Habitat Restoration High Peak Moors

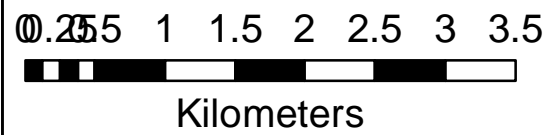
Legend

- Gully Blocking
- Sphagnum
- Bare Peat Restoration
- Invasive Species Control
- Woodland Creation
- NT ownership

Drawing by: CW

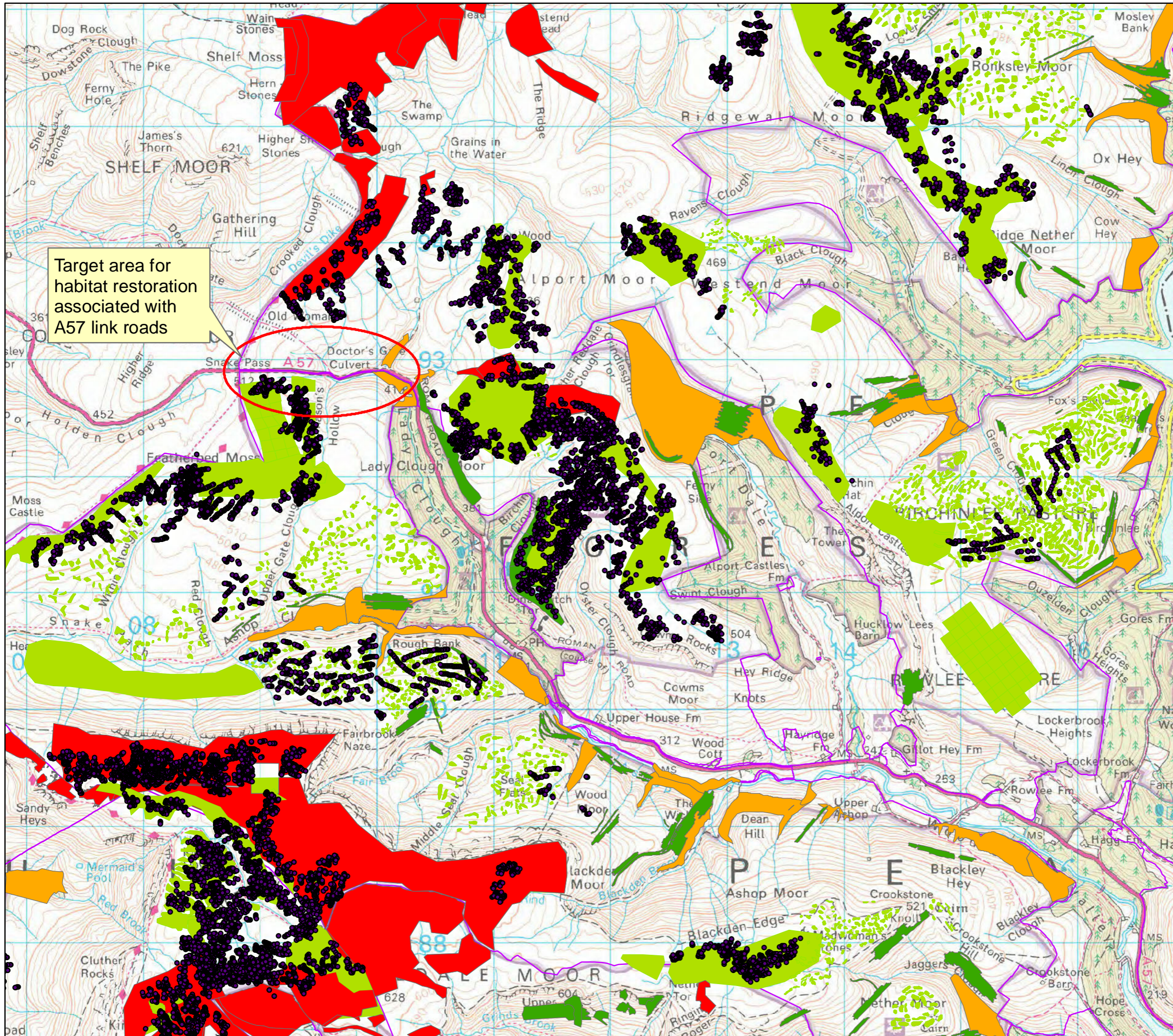
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Appendix 5

National Trust Habitat Restoration Adjacent to A57



Target area for habitat restoration associated with A57 link roads



High Peak Estate
Edale End
Hope
Derbyshire S33 6RF

National Trust

National Trust Habitat Restoration Adjacent to A57

Legend

- Gully Blocking
- Sphagnum
- Bare Peat Restoration
- Invasive Species Control
- Woodland Creation
- NT ownership

Drawing by: CW

Date: 12/01/2022

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Kilometers

Appendix 6

Images of peat erosion and restoration works close to A57



Peat erosion adjacent to Pennine Way



Peat erosion south of A57



Gully blocking south of A57



Peat erosion south of A57



Sphagnum moss plug amongst grasses



Gully blocking south of A57