

Date: 14 January 2022
Our ref: 374997
Your ref: TR010034



The Planning Inspectorate
National Infrastructure Planning
Major Applications and Plans
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BY EMAIL ONLY

Dear Sir

NSIP Reference Name / Code: A57 Link Roads
User Code: TR010034

Thank you for your consultation on the above dated 19 November 2021 which was received by Natural England on 19 November 2021.

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.

Written Representation

PART I: Summary of Natural England's advice. We are satisfied that matters have been resolved.
PART II: Annexes including Natural England's answers to the ExA's first written questions

Content

Part 1 – Introduction

Part 2 – Conservation Interests

Annexes – Natural England's answers to the ExA's questions

PART 1 INTRODUCTION

1.1. Purpose and structure of these representations

- 1.1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for the A57 Links Road Scheme ('the Project') submitted by National Highways Limited ('the Applicant') to the Secretary of State.
- 1.1.2. Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on [16 September 2021]. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:
 - a. Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.
 - b. Section 3 comprises Natural England's submissions in respect of the issues that concern it.
 - c. Annex A is a dedicated section answering the Examining Authority's written questions which were asked on [16 December 2021], cross-referenced to the rest of this document.

2. CONSERVATION DESIGNATIONS, FEATURES AND INTERESTS THAT COULD BE AFFECTED BY THE PROPOSED PROJECT

The following is a brief summary of the interest features of the relevant designated areas of concern in this matter.

2.1. International conservation designations

The South Pennine Moors Special Areas of Conservation (SAC) and Peak District Moors Special Protection Areas (SPA).

The South Pennine Moors SAC – Qualifying Features include Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath, European dry heaths, Blanket bogs, transition mires and quaking bogs; Very wet mires often identified by an unstable ‘quaking’ surface. Presence of Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles

Peak District Moors SPA - Qualifying Features include Merlin (Breeding); European golden plover (Breeding) and Short-eared owl (Breeding)

2.2. National conservation designations

The Dark Peak Site of Special Scientific Interest (SSSI) and Huddersfield Narrow Canal SSSI.

Dark Peak SSSI –

Acid grassland (upland)
Aggregations of breeding birds - Curlew, <i>Numenius arquata</i>
Aggregations of breeding birds - Golden plover, <i>Pluvialis apricaria</i>
Aggregations of breeding birds - Merlin, <i>Falco columbarius</i>
Aggregations of breeding birds - Short-eared owl, <i>Asio flammeus</i>
Aggregations of non-breeding birds - Dunlin, <i>Calidris alpina alpina</i>
Assemblages of breeding birds - Upland moorland and grassland with water bodies
Blanket bog and valley bog (upland)
EO - Namurian
EW - Namurian
FB - Quaternary of the Pennines and adjacent areas
IA - Fluvial Geomorphology

IA - Mass Movement
Invert. assemblage F221 montane & upland
IS - Quaternary of the Pennines and adjacent areas
Lowland dry acid grassland (U4/20)
Mire grasslands and rush pastures (upland)
Population of declining plant species and species at the edge of their range - Vaccinium x intermedium, Hybrid Bilberry
Population of dragonfly - Cordulegaster boltonii, Golden-ringed Dragonfly
Short sedge acidic fen (upland)
Subalpine dwarf-shrub heath
Upland oakwood
Wet heath (upland)
Wet woodland

Huddersfield Narrow Canal SSSI -

Canals
Floodplain fen (lowland)
Standing waters
Vascular plant assemblage

2.3. Protected Species

Natural England has no outstanding concerns in relation to impacts on protected species. This is subject to the submission of the relevant European Protected Species Licensing Application for bats and Protected Species Licensing for badgers.

2.4. Landscape designations

Natural England are aware of discussions held between Peak District National Park Authority and National Highways with regards to the Peak District National Park designated landscape and we are satisfied that these discussions have addressed any potential landscape issues. Natural England therefore has no further comments to make with regards to the Peak District National Park.

3. NATURAL ENGLAND'S CONCERNS AND ADVICE

3.1. The principal issue

3.1.1. Natural England identified the following main issues in its Relevant Representations:

- a. Whether the scheme will directly or indirectly lead to increases in traffic on roads within the Peak District National Park and which could lead to associated air quality impacts on habitats for which an increase in traffic that could lead to air quality impacts on habitats for which The South Pennine Moors SAC and Peak District Moors SPA, Dark Peak SSSI and Huddersfield Narrow Canal SSSI could be affected.

These issues will be discussed in corresponding sections below along with any updates on the progress or resolution of issues.

3.1.2. Air Quality

Natural England are satisfied from the submitted 6.3 Environmental Statement, Chapter 5 Air Quality, and evidence as submitted in Appendix 5.3 and Appendix 5.5 Section 1.4 that the proposal will not lead, either directly or indirectly to significant increases in traffic that could lead to associated air quality impacts on habitats for which The South Pennine Moors SAC, Peak District Moors SPA, the Dark Peak SSSI and Huddersfield Narrow Canal SSSI could be affected.

3.2. Conclusions

3.2.1. Natural England are satisfied evidence provided by National Highways demonstrates beyond reasonable scientific doubt that there would be no significant effect on the integrity of the European site.

Natural England advises that, in relation to the issues within our remit, there is no fundamental reason or principle why the project should not be permitted.

3.3. The questions received

3.3.1. In its Rule 8 letter dated 16 December 2021, the Examining Authority asked Natural England a number of questions. These are set out, along with the answers, in the table provided at Annex A. The table cross-refers to passages in these Written Representations and their Annexes.

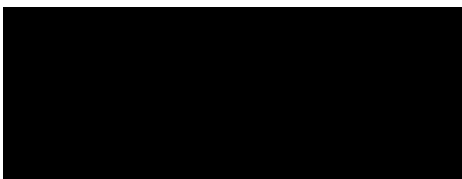
Part II: Annexes

Annex A Schedule of Natural England's responses to Examining Authority's initial questions

If you have any queries relating to the advice in this letter please contact Andy Stubbs at

 [@naturalengland.org.uk](mailto:andy.stubbs@naturalengland.org.uk)

Yours faithfully



Brian Dunning
Team Leader – East Midlands