



Date: 15/02/2022
Your Ref: A57 Link Roads
Interested Party Ref: 20029663
National Trust (Kim Miller – Planning Adviser)

Deadline 4

Response submitted in lieu of attendance at Issue Specific Hearings on 09/02/2022 and 10/02/2022

Item 5: Biodiversity, Ecological and Geological Conservation

This section of the Hearing Agenda included the following:

Increases in Traffic Volume within the Peak District National Park and Habitat Regulations Assessment

f) In considering potential effects to the SPA qualifying bird features (i.e. ground breeding birds) from increased traffic leading to collision of vehicles and birds, the Applicant concluded in their Habitats Regulations Assessment Screening Report [REP2-004] that the potential for likely significant effects could be excluded as suitable breeding habitats would be located away from the affected road network and that species would be habituated to existing roads. Would the **Peak District National Park Authority** and the **National Trust** comment on their concerns in the light of Natural England's representation?

National Trust response:

National Trust raised a general concern at paragraph 2.5 of our Written Representation that additional traffic may make road crossing more difficult for both pedestrians and wildlife, potentially increasing collision risk. While this may include an increase in collisions involving birds that are Qualifying Features of the SPA, this has not been quantified as part of the Habitats Regulations Assessment and we note that neither the Applicant nor Natural England considers that there will be likely significant effects. National Trust does not dispute the finding of no likely significant effects in relation to collision risk and SPA qualifying bird species.

Item 8: Other Specific Issues

This section of the Hearing Agenda includes the following:

Land use, social and economic, human health

Local social and economic impacts

Concerns have been raised regarding the effect of increased traffic volumes on Snake Pass affecting land stability on the route, and that this could lead to disruption of the business of the National Trust and its tenants.

Similarly, concerns have been raised of the potential for increased traffic volumes on Snake Pass to increase the risk of wildfires. The Applicant has sought to address these concerns in their response at Deadline 3.

g) Would the **National Trust, High Peak National Park Authority and Derbyshire County Council** submit any comments that they wish to make in the light of the Applicant's response for Deadline 4, on Wednesday 23 February 2022*?

*Nb: by subsequent email we were asked to provide this response by Weds 16 Feb 2022

National Trust response:

National Trust's Tenants use access points on the Snake Pass on a regular basis, including for movement of agricultural vehicles and livestock. The safety and reliability of the road is therefore of considerable interest to the Trust. In response to the Written Representation of the National Trust, National Highways states that it will 'collaborate with Derbyshire County Council to identify potential measures to improve road safety on the A57 Snake Road/Pass'. The response goes on to state that 'If a suitable scheme to address the current issues being encountered along the A57 Snake Road/Pass can be identified, then National Highways will look to support DCC throughout the Designated Funds allocation process'. It goes on to state that 'All applications will need to demonstrate compliance with the required assessment criteria'. It appears that there is some uncertainty around whether a suitable scheme can be identified and subsequently delivered through Designated Funds. The feasibility of addressing road safety issues in this way ought to be established as soon as possible. We believe that improvements/traffic restraint on the A57 should be delivered at the same time as the scheme in order to effectively mitigate its impacts.

Should the measures to improve road safety include average speed cameras (or other physical infrastructure) as has been suggested by Derbyshire County Council¹ then these are likely to impact on the landscape and views within the National Park. The impact of such infrastructure

¹ Deadline 2 DCC responses to ExA's First Written Questions, 3.25, [TR010034-000809-Derbyshire County Council - responses to the ExA's First Written Questions.pdf](https://www.planninginspectorate.gov.uk/tr010034-000809-Derbyshire-County-Council-responses-to-the-ExA's-First-Written-Questions.pdf) ([planninginspectorate.gov.uk](https://www.planninginspectorate.gov.uk))

may also benefit from landscape mitigation to ameliorate landscape/visual impacts. It would therefore be helpful to know whether the Designated Funds landscape theme criteria would allow for associated applications for landscape/visual mitigation associated with the scheme, and whether National Highways will also provide support to any landowner seeking to utilise this fund for landscape/visual mitigation. If any sites being considered for physical infrastructure are located on or adjacent to National Trust land then we would also wish to be involved in these discussions.

Specifically in relation to paragraph 3.2 (impact of land slip and road maintenance/closures on National Trust tenants), National Highways states that 'National Highways considers that this is a matter between Derbyshire County Council and the National Trust'. While we accept that land slip issues are not a result of the A57 DCO scheme, we are nevertheless keen to ensure that the Examining Authority is aware of this ongoing issue which may affect the future operation of the A57 Snake Pass, along which the scheme is modelled to direct more traffic.

For completeness, we also wish to respond here to National Highways response to paragraphs 6.1-6.3 of National Trust's Written Representation (Opportunity for biodiversity mitigation and enhancement), which is as follows: 'As per National Highways' Relevant Representation response to RR-0620 (REP1-042), the opportunity to discuss off-site enhancement opportunities with the National Trust is welcomed. However, it should be noted that any commitment to these enhancements will sit outside the DCO application'.

We would welcome a conversation with National Highways about habitat restoration work on the High Peak Moors adjacent to the A57. We do, however, wish to note that we do not believe this opportunity could be pursued through the Designated Funds bid process (i.e. it is unlikely to meet criteria) due to the restrictions placed on National Highways to claim biodiversity net gain units on designated sites, such as SSSIs, SPAs and SACs. We request that National Highways makes an approach to the National Trust via its regional Planning Adviser (Kim Miller) and Senior Estate Manager (Matthew Pocock) to discuss options for funding and delivery.