

## Deadline 9

### National Trust's comments on the Report on Implications for European Sites (RIES)

#### Question:

*2.2.9 The ExA requests the NT to confirm that any outstanding concerns it has about screening out of likely significant effects to South Pennine Moors SAC that only relate to the operational phase of the Proposed Development or, if not, to provide an explanation of the basis for any concerns about the construction phase.*

#### Response:

National Trust does not have outstanding concerns about impacts on the South Pennine Moors SAC in relation to the construction phase.

#### Question:

*Table 3.3, p21-23*

*Site: South Pennine Moors SAC*

*Issue: Habitat degradation through adverse changes in air quality along the ARN – blanket bog and upland heath qualifying features*

*NT is requested to confirm if it is satisfied by the Applicant's explanation for the decision not to undertake further air quality assessment of the A628 in terms of HRA. If not, please explain what further information it considers is required.*

#### Response:

National Trust notes that according to the RIES, PDNP has raised concerns about confidence limits in traffic data used to screen out effects on the A628 and that CPRE supports this view. In our Written Representation [REP2-079] National Trust discussed issues of landslip and road safety on the A57 Snake Pass which have resulted in road closures in the past. We highlighted potential for more frequent road closures in future as a result of increased traffic on the road. During the course of the Examination, the closure of the A57 Snake Pass for a temporary period following bad weather and landslip has further shown that the ability of this road to accommodate traffic is unreliable. While the road has now reopened, it is currently subject to a 7.5 tonne weight restriction and traffic lighted sections with reduced speed limits (see for Example BBC News online 'A57 Snake Pass: Road to reopen with weight limit'). The future repair programme is at present uncertain.

While National Trust is not in a position to comment on the detailed traffic modelling submitted by the Applicant or other Interested Parties, we consider that unless the reliability of the A57 Snake Pass (a

known issue) has been accounted for in the traffic modelling, then a prudent approach would be to include the A628 in the HRA Screening Assessment. This is because in situations where the ability of the A57 Snake Pass to carry traffic (including HGVs) is reduced, some or all of this traffic may be displaced to alternative routes including the A628. It would also therefore be helpful to know the modelled levels of traffic (and associated air quality impacts) on the A628 in the event that the A57 was closed for a prolonged period, or permanently closed to HGVs, and whether this may result in likely significant effects on European sites around the A628.

A second area of uncertainty that has emerged during the Examination relates to the probable need for traffic restraint measures on the A57 Snake Pass to address road safety issues. The impact that this will have on traffic levels on the A57 and A628 is not known.

Finally, we note that in the RIES there are outstanding questions about possible additional source impact pathways for SAC qualifying features referred to at paragraphs 2.2.11 and 2.2.12, which should be factored into the HRA assessment if necessary.

**Question:**

*3.3.3 The ExA also understands that NT does not dispute the Applicant's conclusions that there would be no likely significant effects to the qualifying features of the European sites from the Proposed Development either alone or in combination. The ExA seeks confirmation from NT that this assumption is correct for the operational phase of the Proposed Development alone in the following instances (as outlined in Table 3.3):*

- *Upland heath and blanket bog qualifying features of the South Pennine Moors SAC from habitat degradation through adverse changes in air quality along the ARN.*

**Response:**

As a result of the issues and uncertainties referred to above that have been raised during the course of this Examination, National Trust lacks confidence in the outcomes of the HRA. Specifically, the National Trust is not able to accept the Applicant's conclusions that there would be no likely significant effects to the qualifying features of the South Pennine Moors SAC from habitat degradation through adverse changes in air quality along the ARN during operation (or from those matters raised at 2.2.11 and 2.2.12 of the RIES), because we consider that additional information is required to support this conclusion.

**Question:**

*3.3.7 The Applicant, CPRE, NE, NT and PDNPA are invited to comment on the ExA's understanding as set out in Tables 3.4 and 3.5, and to identify and explain any discrepancies where relevant.*

**Response:**

National Trust has no comments to make in relation to Table 3.4.

In relation to Table 3.5 on page 30 of the RIES, National Trust offers the following corrections which reflect our response above:

	Screening result: LSE?	Agreed with NT?	Assessment of effects on integrity required?	Agreed with NT?
European dry heaths (4030) Habitat degradation through adverse changes in air quality along the ARN	No	Not agreed with NT – insufficient information	No	Not agreed with NT – insufficient information
Blanket bogs (7130) Habitat degradation through adverse changes in air quality along the ARN	No	Not agreed with NT – insufficient information	No	Not agreed with NT – insufficient information