

Date: 26 May 2023
Our ref: 15928
Your ref: TR010062.



A66dualling@planninginspectorate.gov.uk

BY EMAIL ONLY

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Dear Mr. Allen,

APPLICATION BY NATIONAL HIGHWAYS FOR AN ORDER GRANTING CONSENT FOR THE A66 TRANS-PENNINE DUALLING PROJECT – DEADLINE 9

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.

The Examining Authority has requested that Natural England respond to the Rule 17 letter, which outlines the need for a joint position statement between the Application and Natural England. We have submitted the agreed position statement alongside this letter.

Natural England were sent the HRA supplementary note on Tuesday 23rd May 2023 and are still in the process of assessing the new evidence that has been provided. The North Pennine Moors SAC is designated for thirteen priority species and irreplaceable habitats, as the survey maps have shown the area potentially impacted by air quality from the A66 project is roughly 8 hectares of Blanket Bog and mosaic habitat. Natural England will continue to assess the HRA and provide the ExA with our updated response in due course.

The North Pennine Moors hold the major area of blanket bog in England. A significant proportion remains active with accumulating peat, although these areas are often bounded by sizeable zones of currently non-active bog, albeit on deep peat. Blanket bog supports distinctive habitats which are important for a range of plants and animals; including SPA birds.

Peatlands in the UK contain over 3000 million tonnes of carbon. Peat is essentially dead plant matter and in waterlogged conditions plant remains do not break down and their carbon remains locked up in the ground. If the peat ecosystem is damaged the peat may be exposed to the air and it decays so that the stored carbon in it is released to the atmosphere. Healthy bogs not only continue to store carbon, but may also continue to form more peat, adding to the carbon that they store. Degraded peatlands in England produce an estimated 10 million tonnes CO₂e emissions into the atmosphere each year.

This habitat type is considered extremely sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

For any queries relating to specific advice in this letter only, please contact Niamh Keddy at ██████████y@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,
Niamh Keddy
Sustainable Development Senior Advisor