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Consultation 3

I am an independent scientist and environmental consultant, working at the intersection of science, policy, and law, particularly relating to ecology and climate change. I work as a consultancy called Climate Emergency Policy and Planning (CEPP). I have recently been awarded a Fellowship from the Foundation for Integrated Transport for research and study entitled “Exposing the flaws in carbon assessment and transport modelling for road schemes”.

In so far as the facts in this statement are within my knowledge, they are true. In so far as the facts in this statement are not within my direct knowledge, they are true to the best of my knowledge and belief.

Contents

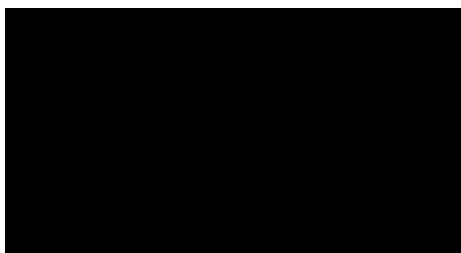
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1 INTRODUCTION

- 1 In a letter on 6th October 2022, the SoS requested comments from Natural England and IPs on the applicant's response of 5th October 2022.

2 COMMENTS FROM CEPP

- 2 My email of September 11th highlighted that the applicant had not addressed the re-alignment of Cantley stream and whether this would need licensing for otters, as addressed by Natural England in the SOCG.
- 3 The applicant's response of 5th October has not addressed the concerns directly.
- 4 The applicant now states, "It is intended that continuity of the river corridor would be maintained during construction ..." and says "as such it is not anticipated that the works would be licensable with regard to otters".
- 5 This contradicts the previous statement in the SOCG that the Cantley stream would be re-aligned.
- 6 National Highways indicate that a sensitive working method statement is being developed in consultation with Natural England. However, Natural England have not confirmed yet that the statement is fit-for-purpose, nor that no impediment remains to a mitigation licence should one be required.
- 7 **For the Secretary of State to reach a reasoned conclusion on the significant effects of the proposed development on the environment under Regulation 21 of the 2017 Regulations (the EIA Regulations), she must be clear that a fit-for-purpose "working method statement" has been prepared, and that there remains no impediment to a mitigation licence should one be required.**



Dr Andrew Boswell,
Climate Emergency Policy and Planning, October 11th, 2022