

# Public Document Pack

**Peak District National Park Authority**

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Our Ref: A.1142/1687

Date: 30 March 2017



## NOTICE OF MEETING



Meeting: **National Park Authority**

Date: **Friday 7 April 2017**

Time: **9.30 am**

Venue: **The Board Room, Aldern House, Baslow Road, Bakewell**

SARAH FOWLER  
CHIEF EXECUTIVE

### AGENDA

- 1. Apologies for Absence**
- 2. Chair's Announcements**
- 3. Urgent Business**
- 4. Public Participation**  
To note any questions or to receive any statements, representations, deputations and petitions which relate to the published reports on Part A of the Agenda.
- 5. Members Declarations of Interest**  
Members are asked to declare any disclosable pecuniary, personal or prejudicial interests they may have in relation to items on the agenda for this meeting.
- 6. Trans-Pennine Upgrade Programme Non Statutory Public Consultation - Peak District National Park Authority Response (TN/BJT) (Pages 5 - 16)**  
Appendix 1

## **Duration of Meeting**

In the event of not completing its business within 3 hours of the start of the meeting, in accordance with the Authority's Standing Orders, the Authority will decide whether or not to continue the meeting. If the Authority decides not to continue the meeting it will be adjourned and the remaining business considered at the next scheduled meeting.

If the Authority has not completed its business by 1.00pm and decides to continue the meeting the Chair will exercise discretion to adjourn the meeting at a suitable point for a 30 minute lunch break after which the committee will re-convene.

## **ACCESS TO INFORMATION - LOCAL GOVERNMENT ACT 1972 (as amended)**

### **Agendas and reports**

Copies of the Agenda and Part A reports are available for members of the public before and during the meeting. These are also available on the website [www.peakdistrict.gov.uk](http://www.peakdistrict.gov.uk) .

### **Background Papers**

The Local Government Act 1972 requires that the Authority shall list any unpublished Background Papers necessarily used in the preparation of the Reports. The Background Papers referred to in each report, PART A, excluding those papers that contain Exempt or Confidential Information, PART B, can be inspected by appointment at the National Park Office, Bakewell. Contact Democratic Services on 01629 816200, ext 362/382. E-mail address: [democraticservices@peakdistrict.gov.uk](mailto:democraticservices@peakdistrict.gov.uk).

### **Public Participation and Other Representations from third parties**

Anyone wishing to participate at the meeting under the Authority's Public Participation Scheme is required to give notice to the Director of Corporate Strategy and Development to be received not later than 12.00 noon on the Wednesday preceding the Friday meeting. The Scheme is available on the website [www.peakdistrict.gov.uk](http://www.peakdistrict.gov.uk) or on request from Democratic Services 01629 816362, email address: [democraticservices@peakdistrict.gov.uk](mailto:democraticservices@peakdistrict.gov.uk).

### **Written Representations**

Other written representations on items on the agenda, except those from formal consultees, will not be reported to the meeting if received after 12noon on the Wednesday preceding the Friday meeting.

### **Recording of Meetings**

In accordance with the Local Audit and Accountability Act 2014 members of the public may record and report on our open meetings using sound, video, film, photograph or any other means this includes blogging or tweeting, posts on social media sites or publishing on video sharing sites. If you intend to record or report on one of our meetings you are asked to contact the Democratic and Legal Support Team in advance of the meeting so we can make sure it will not disrupt the meeting and is carried out in accordance with any published protocols and guidance.

The Authority uses an audio sound system to make it easier to hear public speakers and discussions during the meeting and to make a digital sound recording available after the meeting. From 3 February 2017 the recordings will be retained for three years after the date of the meeting.

### **General Information for Members of the Public Attending Meetings**

Aldern House is situated on the A619 Bakewell to Baslow Road, the entrance to the drive is opposite the Ambulance Station. Car parking is available. Local Bus Services from Bakewell centre and from Chesterfield and Sheffield pick up and set down near Aldern House. Further information on Public transport from surrounding areas can be obtained from Traveline on 0871 200 2233 or on the Traveline website at [www.travelineeastmidlands.co.uk](http://www.travelineeastmidlands.co.uk).

Please note that there is no catering provision for members of the public during meal breaks. However, there are cafes, pubs and shops in Bakewell town centre, approximately 15 minutes walk away.

To: National Park Authority Members  
Constituent Authorities  
Secretary of State for the Environment  
Natural England

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## **6. TRANS-PENNINE UPGRADE PROGRAMME NON STATUTORY PUBLIC CONSULTATION – PEAK DISTRICT NATIONAL PARK AUTHORITY RESPONSE (TN/BJT)**

### **Consultation**

Highways England is holding a non-statutory public consultation into the Trans-Pennine Upgrade Programme. The consultation is in relation to a series of measures that have been included within the Roads Investment Strategy 1 (RIS1) and focusing on the Southern Trans-Pennine road link between the M1 and the M67, and including the A628 Trunk Road across the National Park.

At this stage the proposals are yet to be finalised, and are at a high level and thus do not carry the level of detail that would be forthcoming at the later design stages. There are a number of elements to the package of proposals, and these include the following: -

- i. Mottram Moor Link Road and the A57(T) to A57 Link Road (2 options)
- ii. A61 Dualling (2 options)
- iii. A628 Climbing Lanes (2 locations)
- iv. Safety improvements
- v. Technology improvements

All of the proposals are likely to result in either direct or indirect impacts on the National Park, and therefore the proposed response covers all these elements.

The consultation is based upon an eight page questionnaire; however, in order to ensure that the Authority is able to provide a detailed and holistic response to the proposals, we are choosing to respond via a letter.

The Public Consultation is open for four weeks, closing on 10<sup>th</sup> April 2017.

### **Site and Surroundings and Proposals**

The proposals have both direct and indirect effects on land within the National Park. The most significant impacts will be from the proposed A628 Climbing Lanes, both of which fall within the National Park boundary.

The locations of sites and their surroundings are provided below: -

#### **i) Mottram Moor Link Road and the A57(T) to A57 Link Road**

There are two possible options for the delivery of this element of the proposal, with the intention of relieving two traffic bottlenecks at Mottram and Woolley Moor, and improving conditions for residents at Mottram and Woolley Moor.

Both of the potential options for this element of the upgrade lie outside the National Park boundary.

#### **ii) A61 Dualling**

There are two possible options for the delivery of this element of the proposal, with the intention of improving traffic flow and journey times between the A616 and the M1

Both of the potential options for this element of the upgrade lie outside the National Park boundary.

### iii) A628 Climbing Lanes

The delivery of these climbing lanes will involve widening the current carriageway at two separate locations. The two locations are: -

- a) Location 1 – This climbing lane would start on the eastern end of Woodhead Reservoir, south of Pikenaze Moor and would extend for a length of approximately 800 metres towards Cadding Wood. In addition to the climbing lane there would be a need for a ~ 250 metre entry / exit way at either end of the climbing lane. It is anticipated that the widening necessary would take the road width from approximately 6 metres at present to approximately 17.5 metres along the length of the climbing lane.

The land that would be used to create the climbing lane at location 1 falls within the Dark Peak, *Reservoir valleys with woodland* and *Moorland slopes and cloughs* landscape character types.

- b) Location 2 – This climbing lane is located to the east of Location 1 and would start roughly adjacent to the Hawthorn Clough Culvert, extending for a length of approximately 1,100 metres towards Longside End. In addition to the climbing lane there would be a need for a ~ 250 metre entry / exit way at either end of the climbing lane. It is anticipated that the widening necessary would take the road width from approximately 6 metres at present to approximately 17.5 metres along the length of the climbing lane.

The land that would be used to create the climbing lane at Location 2 falls within the Dark Peak, *Moorland slopes and cloughs* and *Open Moors* landscape character types. The land at this location is also covered by the Dark Peak SSSI, the South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protected Area.

In both locations, the climbing lanes would be delivered through the use of cuttings on the northern edge of the carriageway. In both locations, the stabilisation of slopes above the cuttings may require additional earthworks, dependent on the local geology and geomorphology.

### iv) Safety improvements

These are a range of measures across the whole of the route from the M67 to the A1. Of those that may be included within the National Park boundary, the following are worth noting: -

- a) Changing speed limits (usually reducing them) – this is proposed for the majority of the A628 corridor within the National Park.
- b) Average speed cameras – this has been suggested for the whole of the route, including within the National Park.
- c) Erecting vehicle actuated signs (VAS) – it is likely that this would be used to address specific hazards, and it should be assumed that this would include locations on the route within the National Park.

### v) Technology improvements

There are two measures proposed, both of which are on land either within or in close proximity to the National Park: -

- a) Automated snow gates – these would replace the existing snow gates, but would be

raised vertically when closed.

- b) Vehicle Messaging Signs (VMS) – these would new and or replacement signs to warn of road closures etc. These would be clustered around either end of the A628 (T) cross-Park Route.

### **RECOMMENDATION:**

- 1. That the Authority supports the response to the Trans-Pennine Upgrade Programme Non Statutory Public Consultation**
- 2. That the Authority recognises the timescales for the Trans-Pennine Upgrade proposals moving forward.**

### **History**

There has been a long history of a desire to provide a bypass of the villages of Mottram, Hollingworth and Tintwistle, which culminated in the Highways Agency proposed A57/A628/A616 Mottram, Hollingworth and Tintwistle Bypass and Route Restraint Measures scheme of 2007. This proposal included the local A57(T) to A57 Link Road (then known as the Glossop Spur).

The National Park Authority formally objected to the proposed scheme on the basis of the extremely high levels of predicted traffic growth resulting from the scheme, and the impact of road building with the National Park.

The Public Inquiry into the scheme commenced in June 2007, but was adjourned following the discovery of an error in the Highways Agency's traffic modelling figures. Delays in addressing the issue and increased costs as a result led to the Highways Agency withdrawing from the Public Inquiry in March 2009.

Tameside Metropolitan Borough Counsel then devised a strategy to deliver a bypass of Mottram and the Glossop Spur; this was known as the Longdendale Integrated Transport Strategy (LITS).

Measures to deliver the elements of LITS as part of a Trans-Pennine Upgrade Programme were announced in December 2014, and these proposals form part of the RIS1 Programme for delivery during the period from 2015-2020.

### **Main Policies**

Relevant Core Strategy policies:

#### **GSP1: Securing national park purposes and sustainable development**

Part A states that all policies must be read in combination.

Part B states that all development shall be consistent with the National Park's legal purposes and duty.

Part E states that in securing national park purposes major development should not take place within the Peak District National Park other than in exceptional circumstances. Major development will only be permitted following rigorous consideration of the criteria in national policy.

Part F states that where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area's valued characteristics would be expected to be secured.

### **T1: Reducing the general need to travel and encouraging sustainable transport**

Part B of the Policy states that “*Cross-Park Traffic will be deterred*”, it is likely that the delivery of the upgrade programme will encourage Cross-Park Traffic.

Part C states that “*Impacts of traffic within environmentally sensitive locations will be minimised*”, the introduction of a climbing lane that directly impacts on the Dark Peak SSSI, the South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protected Area would appear to be contrary to this Policy

Part A states that “*Conserving and enhancing the National Park’s valued characteristics will be the primary criterion in the planning and design of transport and its management*”, this provides a steer towards the high design standards required as part of any scheme within the National Park.

### **T2: Reducing and directing traffic**

Part C of the Policy states that “*No new road schemes will be permitted unless they provide access to new businesses or housing development or there are exceptional circumstances. Those road schemes (including improvements) that fall outside of the Planning Authority’s direct jurisdiction will be strongly resisted except in exceptional circumstances*”.

However Part B provides scope for potential exceptions stating “*In exceptional circumstances, transport developments (including expansion of capacity, widening or a new route) that increase the amount of cross-Park traffic may be accepted where: there is a demonstrable long term net environmental benefit within the National Park*”.

### **T3: Design of transport infrastructure**

This Policy sets out the standards that would be required from any new transport development including those such as proposed as part of the upgrade programme.

### **T6: Routes for walking, cycling and horse riding, and waterways**

Part A states that “*Where a development proposal affects a Right of Way, every effort will be made to accommodate the definitive route or provide an equally good or better alternative*”.

Relevant Saved Local Plan policies:

### **LT3: Cross-Park traffic: road and rail**

Part A states that “*Cross-Park transport infrastructure projects will be opposed unless there is a net environmental benefit to the National Park and wherever practicable they also provide economic benefits and meet local transport needs*”.

### **Policy LT18: Design criteria for transport infrastructure**

This Policy sets out the standards that would be required from any new transport development including those such as proposed as part of the upgrade programme.

### **Policy LT19: Mitigation of wildlife severance effects**

This policy states that “*Proposals for 'wild bridges' and cut and cover tunnels in Special Protection Areas, Special Areas of Conservation and where major footpaths and bridleways cross roads and railways will be encouraged and supported*”.

### **Policy LT20: Public rights of way**

This Policy protects the line of rights of way but also sets stringent criteria which must be met to remedy the loss of / replacement of an existing right of way.



## National Planning Policy Framework

Paragraphs 115-116 make a presumption against major development in National Parks “*except in exceptional circumstances and where it can be demonstrated they are in the public interest*”. Paragraph 116 then provides a series of tests that should be applied before major development should be considered.

Paragraphs 118-119 make a presumption against development including sustainable development of sites that are designated as SSSI, European Designated Sites (SAC & SPA) and any potential European Sites.

## Wider Policy context (if relevant)

The English National Parks and the Broads UK Government Vision and Circular 2010 states the following at paragraph 85:

*“Improvements of main routes through the Parks are governed largely by considerations outside those relating to the Park area itself. However, there is a strong presumption against any significant road widening or the building of new roads through a Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks.”*

## Key Issues

This Non-Statutory Public Consultation into the Trans-Pennine Upgrade Programme lacks detail and is focussed on obtaining public opinion on the merits of the various elements of the programme.

For this reason the proposed response to the Consultation focuses on clarifying the role of the National Park Authority with regard to the statutory purposes and duty, and Highways England’s duty under Section 62 of the Environment Act.

The proposed response also looks at each element in turn and highlights things that Highways England should take into consideration and areas which will be of potential concern to the Authority. These include the following: -

- i. Direct impacts on the Dark Peak SSSI, the South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protected Area.
- ii. Direct landscape impacts of various elements including the climbing lanes and the average speed cameras.
- iii. Direct and indirect affects related to the growth in traffic along the route.
- iv. Direct and indirect impacts on the quiet enjoyment and tranquillity within the Longdendale Valley.

The proposed response to the proposals largely seeks to raise concerns about the impacts and raises awareness of the requirement of an Environmental Impact Assessment for the upgrade and also the likelihood of the requirement for an Appropriate Assessment under the Habitat Regulations. **However in respect of the proposed climbing lanes officers have proposed to make an objection.** Adopted policies GSP1, T1 and T2 (see below) in combination are clear in that such schemes would comprise major development. Cross-park traffic, and new road building which facilitates such increase will be deterred. Moreover where exceptional circumstances do arise there should be a net environmental benefit to the National Park.

It should be noted that the consultation relates to the schemes detailed within this report. It does not include any potential remediation for Tintwistle or Hollingworth and it does not have any relation to the potential Trans-Pennine Tunnel Study.

It is also worth considering that according to Page 2 of the Consultation Document, there is currently a lack of funds available to complete the full upgrade programme within the RIS1 Time Period (2015-2020). However, Highways England and their agents are looking at ways to deliver the whole programme within budget using a “value engineering” approach. This will almost certainly require a compromise on quality of materials etc. In itself this raises concerns as to the nature of detailed proposals. In accordance with policy GSP1, where major development is considered acceptable the design response ought to be of the highest quality in order to mitigate and compensate for any harm that arises to the valued characteristics of the National Park.

### **Conclusion**

At this stage, it is difficult to be clear on any potential benefits and impacts of the proposed Trans-Pennine Upgrade Programme, as the designs are yet to be finalised and the detailed assessments and modelling have yet to be undertaken.

Therefore it is important and appropriate at this stage to formally raise any potential concerns about the proposals as well as offering guidance to Highways England as to the processes that they will need to go through to meet Environmental Impact Regulations; their responsibilities with regard to the Dark Peak SSSI, the South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protected Area, and how the Section 62 Duty applies to them.

### **Human Rights**

Any human rights issues have been considered and addressed in the preparation of this report.

### **List of Background Papers** (not previously published)

Annex 1 – [Public Consultation Document \(weblink\)](#)

Annex 2 – [Draft Map of the A628 Climbing lanes Location \(weblink\)](#)

### **Appendices**

Appendix 1 – proposed National Park Authority response to consultation

#### **Report Author, Job Title and Publication Date**

Brian Taylor, Head of Policy & Communities and Tim Nicholson, Transport & Climate Change Policy Officer  
30 March 2017

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**PEAK  
DISTRICT  
NATIONAL  
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Irene Ofei  
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Trans-Pennine Upgrade Programme  
Highways England  
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Piccadilly Gate  
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Your ref:

Our ref: TN/A810

Date: 7 April 2017

Dear Ms Ofei

**Re: Trans-Pennine Upgrade Programme Non Statutory Public Consultation**

Thank you for providing the Peak District National Park Authority with the opportunity to respond to the Trans-Pennine Upgrade Programme Non Statutory Public Consultation. Whilst we appreciate that your preference is for responses to be within the format of your consultation questionnaire, it was felt that in order to provide both clarity and a holistic response, that a response in the form of a letter is most appropriate in this case.

As the schemes described within the Consultation are likely to have both direct and indirect impacts on the National Park, it is worth explaining the Statutory Purposes incumbent on National Park Authorities and the Duty that applies to bodies undertaking work within or impacting on National Parks. The Statutory Purposes of National Parks as set out in the 1949 National Parks and Access to the Countryside Act and restated in Section 61 of the Environment Act (1995)<sup>1</sup> are: -

1. *Conserving and enhancing the natural beauty, wildlife and cultural heritage of the [National Park]; and*
2. *Promoting opportunities for the understanding and enjoyment of the special qualities of [the National Park] by the public.*

Whilst the two purposes carry equal weight, if there is a conflict of purposes, the Sandford principle<sup>2</sup> places priority on the first purpose.

<sup>1</sup> <http://www.legislation.gov.uk/ukpga/1995/25/section/61>

<sup>2</sup> <http://www.nationalparks.gov.uk/students/whatisanationalpark/aimsandpurposeofnationalparks/sandfordprinciple>



Section 62 of the Environment Act places a Duty on the National Park Authority that in pursuit of its purposes it should;

*“Seek to foster the economic and social well-being of local communities within the National Park”<sup>3</sup>*

The same section also places a Duty on certain bodies undertaking work within or affecting land within a National Park. This Duty is: -

*“In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to [National Park Purposes] and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.”*

With regard to the Trans-Pennine Upgrade Programme, this Duty applies to both Highways England and any agents undertaking work on their behalf.

At the current time, whilst the information provided within the Consultation Document indicates locations for the proposed upgrade programme, the details of the proposals and any detailed analysis of their impacts both within and outside the National Park Boundary is not yet available. It is also apparent from Page 2 of the Consultation Document that the costs of the proposals outweigh the budget available. Therefore, this response is provided at a broad level, and is made without prejudice to any future formal and detailed consultations on these proposals.

### **Detailed Comments**

#### **Mottram Moor Link Road and A57(T) to A57 Link Road**

Two options are provided within the Consultation Document (Options A and B). As both options are located beyond the National Park Boundary, it would be inappropriate to comment on a preference between the two options.

The delivery of either of the two options is likely to have an indirect impact on the National park and in particular on roads within the National Park: -

##### **i. Mottram Moor Link Road**

The National Park Authority is aware of the severe impacts of traffic along the existing A57 (T) through the village of Mottram with respect to air quality, noise and vibration and severance, and is supportive of the desire to address this situation. However, the provision of the Mottram Moor Link Road, whilst removing a bottleneck on the route and removing through traffic from the centre of Mottram is likely to result in an increase in traffic as a whole. This additional traffic will in all probability result in a worsening of the impacts of traffic within the villages of Hollingworth and Tintwistle, worsening conditions for residents of these communities, with regard to air quality, noise and vibration and severance.

Any increase in traffic along the wider Trans-Pennine corridor is also likely to bring impacts on the quiet enjoyment of the National park by its visitors, particularly on the Pennine Way, Trans-Pennine and Longdendale Trails as well as increasing severance at crossing points of the A628.

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<sup>3</sup> <http://www.legislation.gov.uk/ukpga/1995/25/section/62>

ii. A57(T) to A57 Link Road

As with the Mottram Moor Link Road, the removal of this bottleneck may well act to increase traffic along the route; with potential growth along both the A57 Snake Pass and the A624 Hayfield road. Both of these routes are subject to fairly steep ascents and descents, a number of sharp corners and already carry a mix of traffic. Any large increase in traffic will again affect the quiet enjoyment and tranquillity of the surrounding landscape. It should be noted that the Pennine Way also crosses the A57 Snake Pass at its summit.

In both cases, without the availability of detailed modelling, it is difficult to judge how severe any impacts might be. However, the land adjacent to potentially affected roads is highly designated in relation to their habitats and therefore consideration will also be required in relation to any potential impacts on these sites. Early consultation with Natural England would be recommended in order to ascertain what such impacts might be.

A61 Dualling

Two options are provided within the Consultation Document (Options 1 and 2). As both options are located beyond the National Park Boundary, it would be inappropriate to comment on a preference between the two options.

However, the delivery of either of the two options is likely to have an indirect impact on land within the National Park by increasing increase traffic levels across the whole Trans-Pennine route. This will potentially impact on tranquillity and the quiet enjoyment of the National Park, in particular on the Pennine Way, Trans-Pennine and Longdendale Trails, with associated difficulties with making crossings of the A628. Without the provision of detailed modelling, it is difficult to judge the severity of any impacts.

As described above, land adjacent to the A628 within the National Park is highly designated in relation to their habitats and therefore consideration will also be required in relation to any potential impacts on these sites.

A628 Climbing Lanes

As proposed the National Park Authority **objects** to the inclusion of climbing lanes as part of this scheme. The proposed scheme would have a considerable direct impact on land within the National Park. Because of the sensitive nature of the location of both of the proposed climbing lanes, there would be a requirement for Highways England to produce an Environmental Impact Assessment. The Environmental Impact Assessment Regulations specify sensitive areas where road schemes will be required to be accompanied by Environmental Impact Assessments, irrespective of scale. These sensitive locations include: -

- i. Sites of Special Scientific interest,
- ii. European Sites (including Special Protected Areas and Special Areas of Conservation),
- iii. National Parks

In the case of the two proposed climbing lane locations, both fall under at least one of these categories. As a result of this, it is almost certain that these proposals would require an Appropriate Assessment under the Habitat Regulations.

### Location 1

This location falls within the National Park, but is located outside of the SSSI, Special Protected Areas and Special Area of Conservation designations. The delivery of a climbing lane at this location would affect land outside the highway boundary along a length of up-to 1.3 kilometres. This would also have a landscape impact, particularly in relation to views from the south of the valley, including along the Longdendale Trail.

The potential increase in traffic and in particular accelerating traffic would be likely to impact on the quiet enjoyment and tranquillity of the area. There is also the likelihood that without any remedial measures the proposed scheme would increase severance at the Ironbower Moss crossing of the Trans-Pennine Trail, with freed-up vehicles travelling at a higher average speed than currently is the case.

### Location 2

This location also falls within the National Park, with the proposed works impacting on land designated at the highest levels in relation to their habitats and value to wildlife. The combination of the climbing lane and tie-ins would result in damage to this highly designated landscape along a length of up to 1.6 kilometres.

In addition to the loss of highly designated land, the scheme would have a landscape impact, especially on views from the south of the valley, and in particular from the slopes leading to the high ground of Far Small Clough Head, Middle Small Clough Head, Near Small Clough Head and Round Hill.

The potential increase in traffic and in particular accelerating traffic would be likely to impact on the quiet enjoyment and tranquillity of the area. There is also the likelihood that without any remedial measures the proposed scheme would increase severance at the Longside End crossing of the Trans-Pennine Trail, with freed-up vehicles travelling at a higher average speed than currently is the case.

### Safety Improvements

The National Park Authority is generally supportive of measures that improve safety on roads across the National Park. However, we prefer such measures to be delivered in a way appropriate with the scale of road, speed limit and the surrounding landscape. Therefore we would wish to see measures that were to a minimum size commensurate with their purpose and the ability to undertake enforcement.

Whilst we are generally supportive of safety improvements, we are concerned about the impact of some of the proposals being brought forward:

- i. Changing speed limits – whilst we may welcome a reduction in the speed limit on the A628 across the National Park, we have some concerns about this approach in respect of the introduction of the climbing lanes which are likely to increase average speeds across the route. Without detailed modelling it is difficult to assess what the impact on average speed the proposals will have. However, if the current average speed is close to the desired average speed to be reflected within the new speed limit, it is unclear where the overall benefit of climbing lanes will be felt. There is also the question of how the speed limit can be effectively enforced without further landscape impact.

It should be noted that at the current time, speeding is not seen as a significant contributor to road traffic collisions on the A628 across the National Park<sup>4</sup>.

- ii. Average Speed Cameras – the introduction of average speed cameras along the route would have a significant landscape impact along the A628 within the National Park. As noted above, speeding is not currently seen as a significant contributor to road traffic collisions on the A628 across the National Park. The requirement for average speed camera enforcement would appear to be a reaction to the speeding up of traffic through the delivery of climbing lanes.
- iii. Installing LED road studs – the Longdendale valley is one of the few locations within the National Park where uninterrupted views of Dark Skies are relatively unaffected by surrounding urban areas. The introduction of light emitting road studs will compromise this ability and further urbanise one of the less populated parts of the Peak District.
- iv. Introducing Vehicle Actuated Signs – the use of vehicle actuated signs (VAS) on this route would be a further urbanising impact, with the accompanying visual intrusion. Because of the remoteness of the location, it is likely that any such signs will require solar panels and / or wind mills to power them. This increase the visual intrusion that they pose from surrounding areas. Because of this remote location and the severity of the weather, the lifetime of such signs may well be limited. There are a number of inoperative VAS located around the National Park which have been left in place because of the costs of removal. In the case of any such signs being introduced along the A628, we would wish to see their effectiveness monitored, and their removal in the event of their ineffectiveness or obsolescence.

### Technology Improvements

Automation of Snow Gates – whilst we are aware of the issues related to closing the road in the event of bad weather, the anecdotal evidence is unclear as to how successful such a system has proved on the A66. We would wish to be satisfied as to the effectiveness of such a system prior to its installation, in light of the significant visual impact that this approach would have.

It is unclear from the Consultation Document whether it is intended to group the various elements of the upgrade together as one package, and if not what timescales apply to which measures. It would appear that a sensible approach would be to avoid implementing any short term measures that would be affected by the delivery of any of the road building elements of the proposals.

I hope that this response is useful to you in moving forward with the proposals, however, if you have any questions about any of the points raised please contact me.

Yours sincerely

John Scott  
Director of Conservation and Planning

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<sup>4</sup> Feedback from police representatives at the December 2016 Trans-Pennine Upgrade Technology Proposals Workshop.

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